



DEAN CLOSE
**KINGHAM HILL
SCHOOL**
OXFORDSHIRE

POLICY DOCUMENTS

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School contacts

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Each School and area within The Dean Close Foundation has a designated member of the Board of Trustees with responsibility for oversight of Safeguarding matters. Debra Ritsperis is the designated member for DCKHS. The group of Nominated Safeguarding Trustees meets at least termly under the chairmanship of the Trustee nominated with responsibility for DCF Safeguarding Oversight, Mr Stephen Holliday. Marie Widdowson is the DSL for lets and commercial.	Email: d.ritsperis@kinghamhill.org Telephone number: 07740 702337

Contacts

Designated Officer of the Local Authority/Educational Safeguarding Advisory Service (ESAT)	Jo Lloyd, Donna Crozier, Sandra Barratt, Lorna Todd, Sophie Kendall, Becky Langstone (ESAT)
Telephone number	01865 810603
Email	Team email: lado.safeguardingchildren@oxfordshire.gov.uk
Locality and Community Support Service (LCSS – north)	
Telephone number	0345 050 7666
Multi Agency Safeguarding Hub (MASH)	
Telephone number	0345 050 7666 Out of hours 08450 507666
The local police non-emergency contact number for Female Genital Mutilation (FGM) reporting is 101.	
To report about child sexual exploitation (CSE) – Kingfisher Team 01865 309196	
The telephone numbers of relevant Prevent partners are as follows:	
Channel referrals	0345 050 7666 preventreferrals@thamesvalley.pnn.police.uk
Non-emergency DfE advice	020 7340 7264 counter.extremism@education.gov.uk
The National Society for the Prevention of Cruelty to Children (NSPCC) whistleblowing helpline can be contacted on:	
NSPCC Weston House 42 Curtain Road London EC2A 3NH	
Telephone number	0800 028 0285



Safeguarding and Child Protection Policy and Procedures

1. Introduction and Policy statement

- **Scope.** Kingham Hill School fully recognises its moral and statutory responsibility to safeguard and promote the welfare of children. This policy sets out how the School, through its staff, discharges its statutory responsibilities relating to safeguarding and promoting the welfare of children, staff and others who come into contact with the School.
- **Interpretation.** The “Head” includes deputies. “Staff” refers to all those working for or on behalf of the School (including staff working on behalf of third party contractors, such as catering staff), full or part-time permanent or temporary, in either a paid or a voluntary capacity (this includes Governors). “Parent/s” includes one or both of the parents, legal guardians or education guardians.
- Every pupil should feel safe and protected from any form of abuse and neglect. The School is committed to safeguarding and promoting the welfare of children and young people and requires everyone who comes into contact with children and their families to share this commitment. Children includes everyone under the age of 18.
- Keeping children safe in education (KCSIE) defines safeguarding and promoting the welfare of children as protecting children from maltreatment; preventing impairment of children’s health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes. All staff at Kingham Hill School are required to read at least Part One of KCSIE. The Safeguarding team are available to assist staff to both understand and discharge their role and responsibilities.
- When this document refers to the term victim, the School recognises that not everyone who has been subjected to abuse considers themselves a victim or would want to be described in this way. The School is conscious of this when managing any incident and will be prepared to use any term with which the individual pupil is most comfortable.
- When this document refers to the term perpetrator(s), the School will use this term sensitively, especially when speaking in front of pupils, not least because in some cases the abusive behaviour will have been harmful to the perpetrator as well.

2. Scope and application

- This policy applies to the whole School.
- This policy applies at all times including where pupils or staff are away from School.
- This policy applies to core School activities and to out of hours and commercial activities.

- For the purposes of this policy, safeguarding and promoting the welfare of children is defined as:
 - Protecting children from maltreatment
 - Preventing impairment of children's mental and physical health or development
 - Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
 - Taking action to enable all children to have the best outcomes
 - Children are defined as everyone under the age of 18.

- This policy is designed to address the School's charity law safeguarding duty to:
 - Provide a safe and trusted environment which safeguards anyone who comes into contact with it, including beneficiaries, staff and volunteers
 - Set an organisational culture that prioritises safeguarding, so that it is safe for those affected to report incidents and concerns with the assurance they will be handled sensitively and properly
 - Have adequate safeguarding policies, procedures and measures to protect people
 - Provide clarity as to how incidents and allegations will be handled should they arise, including reporting to the relevant authorities, such as the Charity Commission.

- This policy is designed to address the specific obligations on the School to safeguard and promote the welfare of children, as defined below.

3. Regulatory Framework

- This policy has been prepared to meet the School's responsibilities under:
 - Education (Independent School Standards) Regulations 2014
 - Boarding schools: national minimum standards (Department for Education (DfE) April 2022)
 - Education and Skills Act 2008
 - Children Act 1989
 - Children and Social Work Act 2017
 - Data Protection Act 2018 and General Data Protection Regulation (GDPR)
 - Equality Act 2010
 - Charities Act 2011
 - Use of social media for online radicalisation 2015.

- The School's Child Protection and Safeguarding Policy and Procedures (Policy) has regard to the following guidance and advice:
 - Keeping children safe in education (KCSIE 2025)
 - Sharing nudes and semi-nudes: advice for education setting working with children and young people (UKCIS, 2020)

- Promoting and supporting mental health and wellbeing in schools and colleges (June 2021)
- Working together to safeguard children (July 2022 update) (WTSC)
- Prevent duty guidance for England and Wales (Sept 2023)
- Channel duty guidance: protecting vulnerable people from being drawn into terrorism (2015)
- The use of social media for on-line radicalisation
- Multi-agency statutory guidance on Female Genital Mutilation (FGM) (2016)
- What to do if you're worried a child is being abused: advice to practitioners (2015)
- Information share: advice for practitioners providing safeguarding services to children, young people, parents and carers (2018)
- Disqualification under the Childcare Act (2006)
- RSHE (2020)
- Sexting in schools and colleges: responding to incidents and safeguarding young people (2016) (UKCCIS). Information from Oxfordshire Safeguarding Board oscb.org.uk.
- Children missing education (DfE September 2016)
- Child sexual exploitation: definition and a guide for practitioners local leaders and decision makers working to protect children from child sexual exploitation (DfE February 2017)
- Harmful online challenges and online hoaxes (Feb 2021)
- Safeguarding and remote education (March 21)
- Searching, screening and confiscation: advice for schools (DfE January 2018)
- Listening to and involving children and young people (DfE January 2014)
- NSPCC's 'What you can do to report abuse advice line' <https://www.nspcc.org.uk/what-you-can-do/report-abuse/dedicated-helplines/whistleblowing-advice-line/>
- Preventing Youth violence and gang involvement <https://www.gov.uk/government/publications/advice-to-schools-and-colleges-on-gangs-and-youth-violence>
- Criminal exploitation of children and vulnerable adults: county lines guidance <https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines>
- Strategy for dealing with safeguarding issues in charities (Charity Commission December 2017)
- Regulatory alert to charities – safeguarding (Charity Commission December 2017)
- How to report a serious incident in your charity (Charity Commission September 2020)
- Preventing and tackling bullying (July 2017)
- Mental Health and Behaviour in Schools (November 2018)
- Promoting children and young people's emotional health and wellbeing (March 2015)
- NPCC – when to call the police.

- The School will:

- Follow the local inter-agency procedures of the Oxfordshire Safeguarding Children Partnership (OSCP) in particular the Oxfordshire Safeguarding Children Board Threshold of Needs, Multi-agency procedures and documents
- Work together with Local Safeguarding Partners (LSPs) and retain a good working knowledge of all local arrangements including LADO, MASH, Locality and Community Support Services (LCSS) and the numerous systems available within 'early help' The Safeguarding Team (DSL and Deputy DSLs) are the main point of contact with all LSPs and other appropriate agencies. For more information on the structure of the Local Safeguarding Partners and Oxfordshire Safeguarding Board, please refer to <https://www.oscb.org.uk/about-us/>.
- The DSL will ensure that staff have sufficient information of LSP arrangements and training opportunities
- Ensure that we practise safer recruitment in checking the suitability of staff, Governors and volunteers (including staff employed by another organisation) to work with children and young people which is in line with Part 3 of KSCIE. See the Foundation's separate Recruitment and Selection Policy, and Recruitment of Proprietors, Governors and Trustees Policy
- Take all reasonable steps to ensure that its pupils and others who come into contact with the School do not, as a result, come to harm or are exposed to abuse
- Listen to pupils if and when they express concerns about their own well-being or that of others, and acting on this information appropriately and in line with this policy
- Deal appropriately with every suspicion or complaint of abuse and to support children who have been abused in accordance with his/her agreed child protection plan
- Design and operate procedures which, so far as possible, ensure that teachers and others who are innocent are not prejudiced by false allegations
- Be alert to the needs of children with physical and mental health conditions
- Operate robust and sensible health and safety procedures and operate clear and supportive policies on drugs, alcohol and substance misuse
- Assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology, based on an understanding of the potential risk in the local area
- Identify children who may be vulnerable to radicalisation, and know what to do when they are identified
- Respond to children who are absent or go missing from education
- Take all reasonable action to limit pupils' exposure to the risks from the school's IT system and ensure that the school has appropriate filters and monitoring systems in place, regularly reviewing their effectiveness in line with national expectations
- Ensure that external contractors and providers (lettings) are aware of the school's safeguarding policy and procedures and that this will be referred to and followed if an allegation is made regarding a member of their agency. The school will require that employees and volunteers provided by these organisations use the school's procedures to report concerns
- Consider and develop procedures to deal with any other safeguarding issues which may be specific to individual children in the School or in the local area.

- **Contextual safeguarding**

- Safeguarding incidents and/or behaviours can be associated with factors outside the School and/or can occur between children outside the School
- All staff, including the DSL, should consider the context within which such incidents and/or behaviours occur, for example where environmental factors are present in a child's life that may be a threat to their safety and/or welfare
- All staff (particularly the Safeguarding Team) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation and serious youth violence
- Children's services should be informed of all such information to allow any assessment process to consider all available evidence and the full context of any abuse
- Staff may follow the Foundation's Whistleblowing Policy to raise concerns about poor or unsafe safeguarding practices at the School or potential failures by the School or its staff to properly fulfil its safeguarding responsibilities. Such concerns will be taken seriously. The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns about child protection failures internally (see the front of this policy for the relevant contact details).

- **Application and accessibility**

- This Policy is a whole-school policy and applies wherever staff, Governors and volunteers are working with pupils even where this is away from the School, for example an educational visit
- This Policy is published on the School website and is available in hard copy on request. It can be made available in large print or other accessible format if required.

- **Related policies**

- The following policies, procedures and resource materials are also relevant to the School's safeguarding practices:
 - Foundation Staff Handbook and Code of Conduct
 - Foundation Whistleblowing Policy
 - Trust Recruitment and Selection Policy
 - e-Safety Policy
 - ETF/PSHEE scheme of work
 - Acceptable Use of Network Agreements
 - Foundation Anti-bullying Policy
 - Behaviour Policy
 - Security and Access Policy
 - Risk Assessment Policy
 - Missing (Absent) Pupil Policy
 - Special Educational Needs and Learning Disabilities Policy

- First Aid Policy (incorporating the administration of medicines and supporting pupils with medical conditions)
 - Terms of reference for the Safeguarding Governor - TBC
 - Control and Restraint of Pupils Policy
 - Visiting Speakers Policy
 - Visitors to Staff Accommodation Policy
 - Data Protection Policy.
- These policies, procedures and resource materials are available to staff on the Google Team Drive and hard copies are available on request.

4. Leadership and Management

- We recognise that staff anxiety around child protection can compromise good practice and so have established a clear line of accountability, training and advice to support the process and individual staff.
- The DSL is a senior member of staff of the School's leadership team with the necessary status and authority to take lead responsibility for safeguarding and child protection.
- The DSL shall be given the time, funding, training, resources and support to enable him/her to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and interagency meetings – and/or to support other staff to do so – and to contribute to the assessment of children.
- In this School, any individual can contact the Designated Safeguarding Lead (DSL) or the Deputy (DDSL) if they have concerns about a young person. The DSL and the Deputy DSLs may be contacted on their mobile telephone in relation to any safeguarding concerns out of School hours.
- The name and contact details of the DSL are set out in the School contacts list at the front of this Policy. The main responsibilities of the DSL are set out in Appendix 1.
- If the DSL is unavailable the activities of the DSL will be carried out by the Deputy DSL. The Deputy DSL's details are also set out in the School contacts list at the front of this Policy. In this Policy, reference to the DSL includes the Deputy DSLs where the DSL is unavailable.
- Since May 2017, the School records all safeguarding and pastoral concerns on CPOMS. Elevated access users are able to control the security of all files. These users are the DSL, the Deputy DSLs and the Head, whilst the Houseparents have access to pastoral reports (but not safeguarding files) for everyone in their house.
- The Safeguarding Team are the main point of contact with LSPs and related agencies and are responsible for providing sufficient information to the staff.

5. Duty of staff, Trustees and volunteers

- All staff, including Supply Staff, Trustees and volunteers of the School are under a general legal duty:
 - To safeguard and promote the welfare of children as defined above
 - There is a whole School approach to Safeguarding which is taken seriously
 - Where there is a safeguarding concern, all the Governing Body and School Management should ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems are in place for pupils to confidently report abuse, knowing their concerns will be treated seriously and knowing they can safely express their views and give feedback.
 - To be aware of the terms and procedures in this Policy and to follow them
 - To know how to access and implement the procedures in this Policy, independently if necessary
 - An awareness of local early help and their role within it
 - The process for making referrals to Children Action 1989 (Sections 17 and 47) which may follow a referral, along with the role they might be expected to play in such assessment and knowing what to do if a pupil informs him/her that s/he is being abused.
 - A knowledge of how to maintain an appropriate level of confidentiality.
 - To keep a sufficient record of any concerns, discussions and decisions in accordance with this Policy
 - All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment nor should a victim ever be made to feel ashamed for making a report
 - To report any matters of concern in accordance with this Policy
 - To work with and support social workers following a referral of a pupil to local authority children's social care.

- The Board of Trustees ensures that:
 - The Safeguarding and Child Protection policy is reviewed and approved annually in September and ratified by the Board of Trustees
 - Other Safeguarding policies (such as Safer Recruitment, Staff Code of Conduct and Anti-Bullying) are in place and reviewed regularly
 - Safeguarding and Child Protection is included as an agenda item at every Board of Trustees meeting. Minutes of Trustee meetings are kept
 - A Nominated Safeguarding Trustee (NST) with specific responsibility for Safeguarding and Child Protection is appointed for each school within the Foundation as well as DCSL and DCNL. A Trustee is appointed to oversee safeguarding work throughout the Foundation
 - An annual safeguarding review is presented to the Trustee body. This will include a report from each school and DCSL. DCNL will produce its own annual safeguarding review

- A DSL is appointed from the Senior Leadership Team (SLT) of each school within the Foundation and that there is a Deputy DSL in each school and that they all receive training every two years
 - DCSL and DCNL will appoint DSLs and DDSLs as appropriate
 - The Trustees with particular responsibility for Safeguarding and Child Protection meet with the appropriate DSL at least termly and will report to the Trustee Board and raise any Safeguarding or Child Protection concerns or issues. The designated Trustees will receive training at least every three years
 - All other staff are trained regularly in accordance with advice from OSCP, at least every three years
 - Pupils have opportunities to learn about safeguarding as part of the curriculum at an age-appropriate level
 - The 'voice of the child' is heard, and that the Foundation has an 'it can happen here' attitude
 - Appropriate IT filters and monitoring for harmful searches are in place that block websites in an age-appropriate way and do not restrict teaching and learning
 - All Trustees comply with their duties under legislation
 - Trustees are aware of their obligations under the Human Rights Act 1998 and the Equality Act 2010
 - Procedures are in place to handle allegations against members of staff and that any such allegations are referred to the LADO and DBS as necessary
 - The appropriate authority, time, funding, training, resources, and support is given to the DSLs to take part in Safeguarding and Child Protection procedures including strategy discussions and inter-agency meetings
 - The Foundation schools have an appropriate Child Missing from Education policy in place.
- The role of the Chair of Trustees:
 - To inform and liaise with relevant external agencies if there is an allegation against a Head or Warden
 - To ensure that the designated Nominated Safeguarding Trustees are appointed and meet with the appropriate DSL
 - To ensure that all Trustees receive appropriate and regular Safeguarding and Child Protection (including online) training which equips them with the knowledge to provide strategic challenge to test and assure themselves that effective policies and procedures are in place
 - To read and ratify the Safeguarding and Child Protection policy annually and following any significant revisions.
 - The role of the Head of each school:
 - To ensure that the Board of Trustees' ratified Safeguarding and Child Protection policy is followed by all staff
 - To appoint and support a DSL and Deputy DSL(s) in each school
 - To ensure that appropriate checks are carried out for all persons over 16 (not on the roll of the school) who live on the same premises as boarders but are not employed by the school, and an enhanced certificate with a barred list information is obtained from the Disclosure and Barring Service (DBS)

- To ensure that there is a written agreement between the school and any person over 16 not employed by the school but living in the same premises as children. This specifies the terms of their accommodation, guidance on contact with pupils, their responsibilities to supervise their visitors, and notice that accommodation may cease to be provided if there is evidence that they are unsuitable to have regular contact with pupils. They are required to notify a member of SLT or the Bursar if they are charged with, or convicted of, any offence.
- The role of the Warden (CEO):
 - To ensure that the Head in each school monitors the DSL and deputy DSL and that the correct safeguarding procedures are known and understood
 - To ensure that the Human Resources department carries out appropriate checks on all staff and that a single central record of identity, qualification and DBS checks is kept
 - To keep the Board of Trustees informed of changing safeguarding requirements. This duty will normally be designated to the relevant DSL
 - To monitor the progress of any major safeguarding concerns or investigation of Foundation procedures by an outside agency
 - To meet regularly with the Foundation DSL with particular reference to strategy and Foundation issues.

6. Training

- All training will be carried out in accordance with OSCP procedures.
- **Induction**
 - All staff, including temporary staff and volunteers, will be provided with induction training that includes:
 - This Policy
 - The Foundation Handbook containing the Code of Conduct, the Whistleblowing Policy, the Behaviour Policy, e-Safety Policy and IT Acceptable Use Policy (Staff)
 - The role of the DSL, his identity and contact details together with that of his Deputies.
 - Child protection training in accordance with OSCB procedures, including Prevent Training and guidance on managing a report of child-on-child harmful sexual behaviour
 - The safeguarding response to children who go missing from education
 - Online safety training; reporting on CPOMS (video)
 - A copy of Part 1 and, where appropriate, Annex B of KCSIE.
- **Child protection training**

- All staff, including the Head, will receive a copy of this Policy and Part 1 and, where appropriate, Annex B of KCSIE, and will be required to confirm that they have read and understand these
- The Head and all staff members will undertake appropriate child protection training which will be updated every three years and following consultation with the OSCP.

In addition, all staff members will receive safeguarding and child protection updates via email, e-bulletins and staff meetings on a regular basis and at least annually, in line with the School Safeguarding Training Schedule

- Staff development training will also include training on online safety and Prevent training assessed as appropriate for them by the School via Parago
- All staff are trained on how to manage a report of a child protection incident or situation, including reporting on child-on-child sexual violence and sexual harassment
- Members of staff should have an understanding of the factors that make people vulnerable to being drawn into terrorism and to challenge extremist ideas which are used by terrorist groups to encourage and legitimise terrorist activity. Staff should have sufficient training to be able to recognise this vulnerability, to understand that it could happen here and to be aware of what action to take in response. This will include how to make a referral, using CPOMS (Safeguarding & Child Protection Software for Schools) or directly to the DSL, and where to get additional advice and support
- Additionally, the School will make an assessment of the appropriate level and focus for staff training and responsiveness to specific safeguarding concerns such as radicalisation, child sexual exploitation, female genital mutilation, cyberbullying and mental health and to ensure that staff have the skills, knowledge and understanding to keep looked after children safe
- The School has mechanisms in place to assist staff to understand and discharge their role and responsibilities and to ensure that they have the relevant skills and knowledge to safeguard children effectively, including online training, inset and bespoke training. This includes information on how staff can report concerns occurring out of hours/out of term time and should where appropriate refer to the School's risk assessment for out of hours/out of term safeguarding arrangements.

- **Designated Safeguarding Lead**

- The DSL and Deputy DSLs will undertake training to provide them with the knowledge and skills required to carry out the role which includes inter agency working in line with the OSCP and regular updates. This training also includes Prevent awareness training and will be updated at least every two years. In addition, their knowledge and skills will be refreshed at regular intervals, at least annually, to allow them to understand and keep up with any developments relevant to their role. For further details about the training of the DSL, see Appendix 1
- Prevent duty training will be consistent with Home Office Workshop to Raise Awareness of Prevent (WRAP).

- **Teaching pupils about safeguarding**

- The School teaches pupils about safeguarding through the curriculum and ETF (Equipped to Flourish)/Personal, Social, Health and Economic Education (PSHE), themed Chapels, including guidance on adjusting behaviour to reduce risks, particularly online, building resilience to protect themselves and their peers, fostering healthy and respectful relationships with others and providing information about who they should turn to for help
- Pupils are taught about harmful sexual behaviours, including sexual violence and sexual harassment, through ETF/PSHEE education appropriate to their age and stage of development. This might take place through topics such as 'Relationships and Sex Education' which will have regard to the statutory guidance such as RSE (Sept 2021)
- The School has a critical role in preventative education through a whole-school approach that prepares pupils for modern living whilst creating a zero tolerance for sexism, misogyny/misandry, homophobia and sexual violence/harassment. Kingham Hill's approach to these values and standards are upheld and demonstrated in all facets of school life which is supported by the Behaviour Policy and our pastoral support system as well as fully inclusive and age-appropriate ETF/PSHEE sessions
- The ETF/PSHEE scheme of work will include subjects such as
 - Healthy and respectful relationships
 - Boundaries and consent
 - Stereotyping, prejudice and equality
 - Body confidence and self-esteem
 - How to recognise an abusive relationship, including coercive and controlling behaviour
 - The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so call honour-based violence such as forced marriage and FGM and how to access support
 - What constitutes sexual harassment and sexual violence and why these are always unacceptable.
- Pupils are given the opportunity to talk about safeguarding issues within the classroom environment and are made aware of the processes for reporting a concern about a friend or peer, and how any report will be handled. The School's concerns and complaints procedure for pupils sets out in writing what pupils should do if they have a worry or complaint
- During the academic year, pupils are taught on how to stay safe online (not only at school but also beyond). This takes place in a number of different ways:
 - Annual tutorial by the Well-being team to all year groups
 - As part of the PSHEE programme
 - Chapels and tutor periods.
- An internet filter and management system has been installed on the school's network which produces daily reports of concerning use. The Headmaster, DSL and IT and Network Lead meet regularly to discuss network use

- Staff receive training from an external company whilst we also offer a training session for parents on safe internet use at home
- In recent years, concerns have been raised nationally about the increase of 'harmful online challenges and online hoaxes. The school will follow the advice of the Government guidance "Harmful online challenges and online hoaxes" (Feb 2021)
- The School has made provision for keeping children safe online when accessing remote learning and follows the 'Safeguarding and remote education' government guidance (March 2021)
- The Foundation's e-Safety policy contains further details.

7. Risk assessment

- Where a concern about a pupil's welfare is identified, the risks to that pupil's welfare will be assessed and appropriate action will be taken to reduce the risks identified.
- The format of risk assessment may vary and may be included as part of the School's overall response to a welfare issue, including the use of individual pupil welfare plans (such as behaviour, healthcare and education plans, as appropriate). Regardless of the form used, the School's approach to promoting pupil welfare will be systematic and pupil focused.
- The Head has overall responsibility for ensuring that matters which affect pupil welfare are adequately risk assessed and for ensuring that the relevant findings are implemented, monitored and evaluated.
- Day to day responsibility to carry out risk assessments under this policy will be delegated to the DSL who has been properly trained in, and tasked with, carrying out the particular assessment.

8. Procedures

- The child protection training provided to staff considers the types and signs of abuse and neglect staff must be aware of. The types of abuse and neglect and examples of specific safeguarding issues are set out in Appendix 2.
- Each of our pupils have a number of members of staff whom they can approach with any concerns they have about their well-being or that of others. This is likely to be the houseparent, the tutor, a member of the Safeguarding Team, the School Councillor, a Sixth Form Hub mentor or another trusted member of staff. In each case, the pupil will be listened to and the staff member/mentor will respond appropriately to the information. Staff should refer to the guidance in Appendix 3 in the event of receiving a disclosure from a child and for guidance about recording concerns. A mentor should inform the DSL (or DDSL) as soon as possible.
- All staff should be aware that pupils may not feel ready or know how to tell someone that they are being abused, exploited or neglected and they may not recognise their experiences as harmful.

- Pupils may feel embarrassed, humiliated or are being threatened which could be due to their vulnerability, disability or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a pupil. It is also important that staff determine how best to build trusted relationships with pupils which facilitate communication
- Staff members working with children should maintain an attitude of “**it could happen here**” where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the **best** interests of the child.
- Staff should also be aware of the risks of child-on-child abuse and refer to KCSIE
- Staff, particularly the Safeguarding Team, should refer to the NPCC document – When to contact the police, when considering calling the police
<https://www.npcc.police.uk/SysSiteAssets/media/downloads/publications/publications-log/2020/when-to-call-the-police--guidance-for-schools-and-colleges.pdf>
- **If staff are ever unsure, they must always speak to the DSL.**
- **Early help**
 - The School understands that providing early help is more effective in promoting the welfare of children than reacting later. Early help means providing support as soon as a problem emerges at any point in a child’s life, from the foundation years to the teenage years
 - Children who are in need of early help can be drawn into anti-social or criminal behaviour; frequently missing school or from home, at risk of modern slavery, trafficking or exploitation, show early signs of abuse, at risk of radicalisation or are privately fostered
 - The School’s safeguarding training includes guidance about the early help process and prepares all staff to identify children who may benefit from early help. Staff are mindful of specific safeguarding issues and those pupils who may face additional safeguarding challenges. Staff should be particularly alert to the potential need for early help for a child who:
 - Is disabled and has specific additional needs
 - Has special educational needs (whether or not they have a statutory education, health and care plan)
 - Is a young carer
 - Has certain health conditions (in addition to those who are disabled or have specific additional needs)
 - Has mental health needs
 - Is Showing signs of being drawn into county lines
 - Is at risk of sexual or criminal exploitation
 - Is with a family member in prison or is affected by parental offending
 - Is at risk of honour-based abuse (eg. FGM or forced marriage)
 - Is persistently absent from education, including for part of the school day

- Is showing signs of being drawn in to anti-social or criminal behaviour including gang involvement and association with organised crime groups
 - Is frequently missing/goes missing from care or from home
 - Is misusing drugs or alcohol themselves
 - Is at risk of modern slavery, trafficking or exploitation
 - Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse
 - Is looked after or has returned home to their family from care
 - Is showing early signs of abuse and/or neglect
 - Is at risk of being radicalised or exploited
 - Is a privately fostered child.
- A member of staff or volunteer who considers that a pupil may benefit from early help should in the first instance discuss this with the DSL. The DSL will consider the appropriate action to take in accordance with the OSCB referral threshold document and will support staff in liaising with other agencies and setting up an interagency assessment as appropriate
 - The Safeguarding team are familiar with the processes involved with Early Help under OSCP. However, as a boarding school, early help centres around the local authority of the pupil's home address is frequently located in other local authorities. When the safeguarding team engage with a local authority other than OSCP, they will do everything they can to familiarise themselves with these different processes. If early help is appropriate, the matter will be kept under review and consideration given to a referral to local authority children's social care if the pupil's situation does not appear to be improving.

- **Concerns about a pupil's welfare**

- KCSIE identifies four types of abuse which include physical abuse, emotional abuse, sexual abuse and neglect. Further information on this can be found via the DSL or the OSCP website <https://www.oscp.org.uk/practitioners/>
- Where a child is suffering, or is likely to suffer from harm, it is important that a referral to local authority children's social care (and if appropriate the police) is made immediately. If a member of staff is concerned about a pupil's welfare, the matter should be reported to the DSL as soon as possible. See paragraph **Dealing with allegations against teachers, the Head, Governors, volunteers and other staff** on Page 19 and Appendix 4 for the procedures for dealing with allegations against staff and volunteers. Under the Children Act 1989, a 'child in Need' is defined as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services, or a child who is disabled. (Section 17) Local authorities are required to provide support and services to all children in such circumstances.
- On being notified of a concern the DSL will consider the appropriate course of action in accordance with the OSCP referral threshold document. If any emerging concerns do not require an immediate safeguarding response, the DSL will make contact with LCSS (Locality & Community Support Service) for advice. If it is decided that a referral is not required, the DSL will keep the matter under review

and consideration given to a referral to children's services if the pupil's situation does not appear to be improving

- Staff are reminded that normal referral processes must be used when there are concerns about children who may be at risk of being drawn into terrorism
- In accordance with these procedures, if a member of staff has a concern about a child, there should be a conversation with the DSL to agree a course of action where possible. However, any member of staff can make a referral to children's services. If a referral is made by someone other than the DSL, the DSL should be informed of the referral as soon as possible
- Staff should be aware that the General Data Protection Regulation (GDPR) is not a barrier to justified information sharing in relation to safeguarding concerns and must not stand in the way of the need to promote the welfare or safety of our pupils. Staff should refer to the seven golden rules for sharing information contained in 'Information Sharing' (May 2024) which can be found at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/721581/Information_sharing_advice_practitioners_safeguarding_services.pdf.

- **If a child is in immediate danger or at risk of harm**

- If a pupil is suffering or likely to suffer significant harm (Section 47), local authorities are required to make enquiries in order to decide whether any action is required to safeguard the pupil. If a pupil is in **immediate** danger or is at risk of harm, a referral should be made to MASH and/or the police immediately
- Anybody can make a referral in these circumstances. See paragraph **Making a referral** on Page 19 for making a referral
- If a referral is made by someone other than the DSL, the DSL should be informed of the referral as soon as possible. If the DSL is not available, then the member of staff should notify the Deputy DSL with their concerns. If no member of the safeguarding team is available, the member of staff should notify the Head.

- **Mental Health**

- As a school, we have an important role to play in supporting the mental health and wellbeing of our pupils. Such problems can, in some cases, be an indicator that a pupil has suffered or is at risk of suffering abuse, neglect, or exploitation. Staff should refer to the Mental Health Policy for systems and processes for identifying possible health problems. Staff should be aware that there could be a link between a safeguarding concern and the mental health of a pupil.
- As of Sept 2022, the School has appointed a Head of Wellbeing in order to promote positive health, wellbeing and resilience amongst pupils.

- **Making a referral**

- Staff required to make a direct referral may find helpful the flowchart set out on Page 22 of KCSIE and the flowcharts set out in Chapter 1 of WTSC for information about the likely actions and decision required

- Staff will need to have access to certain information about the child and the safeguarding concern in order to make the referral. In general terms, this information will comprise:
 - Personal details of the child including the child's developmental needs
 - Detailed information about the concern
 - Information about the child's family and siblings including the capacity of the child's parents or carers to meet the child's developmental needs and any external factors that may be undermining their capacity to parent.
 - The relevant contact information is set out at the front of this Policy. If the referral is made by telephone, this should be followed up in writing
 - Confirmation of the referral and details of the decision as to what course of action will be taken should be received from the local authority within one working day. If this is not received, the DSL (or the person that made the referral) should contact local authority children's social care again. For further information on the referral process, see KCSIE
 - If after a referral the pupil's situation does not appear to be improving, the DSL (or the person that made the referral) should follow the local escalation procedures to ensure their concerns are addressed and that the pupil's situation improves.
 - Where relevant, the School will co-operate with the Channel panel and the police in providing any relevant information so that each can effectively carry out its functions to determine whether an individual is vulnerable to being drawn into terrorism. The School will respond to requests for information from the police promptly and in any event within five to ten working days.
- **Dealing with allegations against teachers, the Head, Governors, volunteers and other staff**
 - If a member of staff (including supply staff, volunteers and contractors) has a safeguarding concern, or an allegation is made about a member of staff (including volunteers) posing a risk of harm to children, then this should be referred immediately to the Head. In the event that there are concerns about the Head, then the matter should be referred to the Warden of the Foundation. Detailed processes of dealing with allegations against a person of trust are laid out in Appendix 4 and Part 4 of KCSIE, which also distinguishes between an allegation/concern and 'low level concern'
 - The School has procedures that aim to strike a balance between the need to protect children from abuse and the need to protect staff and volunteers from false or unfounded allegations
 - The local authority has designated a particular officer, or team of officers, to be involved in the management and oversight of allegations against people that work with children (Designated Officer(s)). The Designated Officer(s) will be informed immediately and in any event within one working day of all such allegations that come to the School's attention and appear to meet the criteria set out in paragraph 1 of Appendix 4

- Detailed guidance is given to staff, Governors and volunteers to ensure that their behaviour and actions do not place pupils or themselves at risk of harm or of allegations of harm to a pupil. The guidance is contained in the School Staff Handbook which is available on the Google Team Drive or from the Bursar or HR Manager, and includes details of additional safeguarding arrangements where staff engage in one-to-one teaching and meetings with pupils
- Staff and volunteers should also feel able to follow the School's separate Whistleblowing Policy to raise concerns about poor or unsafe safeguarding practices at the School or potential failures by the School or its staff to properly safeguard the welfare of pupils, and that such concerns will be taken seriously. The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns about child protection failures internally (Contact details are available at the front of this policy).
- The School will preserve records which contain information of allegations of sexual abuse for IICSA for the term of any inquiry. All other records about allegations against staff will be retained until the accused has reached pensionable age, or a period of 10 years from the date of the allegation if that is longer.

- **Information Sharing**

- Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including their educational outcomes. The School has the power to share, hold and use information for these purposes
- Parents will normally be kept informed as appropriate of any action to be taken under these procedures. However, there may be circumstances when the DSL will need to consult the Head, the Designated Officer(s), MASH and/or the police before discussing details with parents. In all cases, the DSL will be guided by the OSCP referral threshold document. Parental consent is not required in order for anyone to make a referral to the statutory agencies.
- In relation to Channel referrals, the DSL will consider seeking the consent of the pupil (or their parent/guardian) when determining what information can be shared. Whether or not consent is sought will be dependent on the circumstances of the case but may relate to issues such as the health of the individual, law enforcement or protection of the public
- When there is a safeguarding concern, the School will ensure that the child's wishes and feelings are taken into account as to what actions are taken, what services are provided and with whom information is shared. Ultimately, the process will operate in the best interests of the child
- See also section 3 of Appendix 4 for details about the disclosure of information where an allegation has been made against a member of staff, volunteer or the Head of the School.

9. Safeguarding Issues

- All staff should be aware of the various safeguarding issues which can put our pupils at risk of harm. Behaviours linked to issues such as drug taking and/or alcohol misuse,

deliberately missing education and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk.

- UKCIS document 'Sharing nudes and semi-nudes: advice for education settings working with children and young people' should be referred to as consensual image sharing, especially between older pupils of the same age, may require a different response. It might not be abusive but pupils still need to know it is illegal – whilst non-consensual is illegal and abusive.

- **Female Genital Mutilation (FGM)**

- Teachers must report to the police known cases of FGM in under 18s. Although all members of staff should speak to the DSL about concerns regarding FGM, there is a special legal duty on teachers to report concerns about any acts of FGM on a girl under the age of 18 to the police. See Appendix 2 for further information about FGM and this reporting duty.

- **Allegations against pupils – child-on-child abuse**

This should be read in conjunction with Appendix 2.

- **Kingham Hill School has a whole School approach and zero tolerance approach to child-on-child abuse**
- All staff should be aware that children can abuse other children (peer-on-peer abuse), and have an important role to play in preventing it and responding where they believe a pupil may be at risk from it. All staff should challenge, and report any suspected incidents of child-on-child abuse to the DSL (or DDSL) immediately, either directly or via CPOMS. Child-on-child abuse can take place inside or outside school or online.
- It is crucial that staff challenge any physical behaviour (which is potentially criminal in nature) such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts as dismissing or tolerating such behaviours risks normalising them
- Any pupil can report abuse to any member of staff or prefect safe in the knowledge that their concern will be treated seriously
- The School recognises that even if there are no reported cases of child-on-child, such abuse may still be taking place and is simply not reported
- Although it is more likely that girls will be victims and boys perpetrators, all child-on-child abuse is unacceptable and will be taken seriously
- The conduct of pupils towards each other will, in most instances, be covered by the School's behaviour and discipline policies. However, some behaviour by a pupil towards another may be of such a nature that safeguarding concerns are raised. Pupils with SEN/D are particularly vulnerable to child-on-child abuse. Examples of behaviour by a pupil which may raise safeguarding concerns may include:

- Violence, including gender-based violence

- Physical abuse such as hitting kicking, shaking, biting, hair pulling or otherwise causing physical harm
 - Threatening or intimidating behaviour
 - Blackmail
 - Sexual violence (such as rape, assault by penetration and sexual assault) and sexual harassment (such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse)
 - Sexting also known as youth produced sexual imagery (see the School's Behaviour Policy for the School's approach to sexting)
 - Any form of inappropriate behaviour by an older pupil towards a younger or more vulnerable pupil, particularly when the older pupil has reached the age of 18
 - Abuse in intimate personal relationships between peers
 - Consensual and non-consensual sharing of nude and semi-nude images and/or videos
 - Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
 - Initiation/hazing type of violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)
 - Bullying, including cyberbullying, prejudice based and discriminatory bullying
 - Upskirting, is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and/or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Anyone of any gender can be victim and it is now a criminal offence under the Voyeurism (Offences) Act.
- The School takes steps to minimise the risk of child-on-child abuse. The School has robust anti-bullying procedures in place (see the School's Anti-bullying Policy) and pupils are taught at all stages of the School about acceptable behaviour and how to keep themselves safe. Risk assessments are carried out and appropriate action taken to protect pupils identified as being at risk including risks arising from behaviour in boarding houses (see the School's Risk Assessment Policy and Guidance and Boarding Handbook)
 - Abusive behaviour by pupils (including sexual violence and sexual harassment) must be taken seriously and the School has a zero-tolerance approach in order to prevent a culture which normalises abuse and thus pupils not coming forward to report it. Behaviour should not be dismissed as being normal between young people, as "banter" or simply "part of growing up". Behaviour such as initiation violence or any form of sexual harassment is not acceptable
 - Bullying can take place wholly online or technology can be used to facilitate offline bullying. When a report of abuse is made, the incident(s) will be fully investigated by the Second Deputy which will be conducted in a sensitive way in

order to provide support for the victim and recorded through the appropriate process (CPOMS, Serious Sanctions Log, Anti-bullying log)

- A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment nor should a victim ever be made to feel ashamed for making a report
- If a crime has been committed against a pupil by another pupil (which can include sexting), if criminal activity against another pupil has been alleged or if there is a reasonable cause to suspect that a pupil is suffering or in immediate danger of significant harm, then the school will follow safeguarding procedures including referrals to the Police, MASH or the Designated Officers (see also 'Anti-bullying Policy', Early help, Concerns about a pupil's welfare, and if a child is in immediate danger or at risk of harm). Both the perpetrator and the victim are treated as 'at risk' in sexting cases
- A pupil against whom an allegation of abuse has been made may be suspended from the School during the investigation and the School's policy on behaviour, discipline and sanctions will apply. The School will take advice from children's services on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the pupil or pupils accused of abuse
- If it is necessary for a pupil to be interviewed by the police in relation to allegations of abuse, the School will ensure that, subject to the advice of local authority children's social care, the pupil's parents are informed as soon as possible and that the pupil is supported during the interview by an appropriate adult. In the case of pupils whose parents are abroad, the pupil's Education Guardian will be requested to provide support to the pupil and to accommodate him/her if it is necessary to suspend him/her during the investigation
- Where an allegation is made against a pupil, both the victim and the perpetrator will be treated as being at risk and safeguarding procedures in accordance with this Policy will be followed. This might involve a risk assessment written if both pupils remain in school at the same time. Appropriate support will be provided to all pupils involved, including support from external services as necessary. This will be organised by the DSL in conjunction with the houseparent and the tutor.

- **Serious Violence**

- All staff (teaching and support) should be aware of the indicators which are potential markers that pupils are either at risk or are involved with serious violent crime. Examples of these indicators are:
 - Increased absence from School
 - Change in friendships or relationships with older individuals or groups
 - A significant decline in performance
 - Signs of self-harm or a significant change in wellbeing
 - Signs of assault or unexplained injuries
 - Unexplained gifts or new possessions (which may indicate associations with criminal networks or gangs).

- All such concerns should be raised with the DSL, as soon as possible. All staff should be aware of the associated risks and understand the measures in place to manage these
- Advice for schools and colleges is provided in the Home Office's Preventing youth violence and gang involvement
 - <https://www.gov.uk/government/publications/advice-to-schools-and-colleges-on-gangs-and-youth-violence> and its Criminal exploitation of children and vulnerable adults: county lines guidance
 - <https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines>

- **Inclusion**

- Any reports of abuse involving pupils with SEND will require close liaison between the Safeguarding Team and the Head of Greens (all of whom are part of the Welfare Group)
- Although a pupil who is LGBT is not an inherent risk factor for harm, these pupils could be a target for abuse by other pupils. In some cases, a pupil who is perceived by other pupils to be LGBT (whether they are or not) can be as vulnerable as pupils who do identify as LGBT
- Since January 2022, the School has put a number of factors in place in order for pupils who are LGBT to confidently speak out and share concerns with a trusted adult. These include
 - The formation of an Inclusion group which meet regularly within a safe space
 - The marking of LGBT events
 - The appointment of a Head of Wellbeing.

- **Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)**

- All staff should be aware that CSE and CCE are forms of abuse and can occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceived a child into sexual or criminal activity. The power imbalance can include a range of factors including:
 - Age
 - Gender
 - Sexual identity
 - Cognitive ability
 - Physical strength
 - Status
 - Access to economic or other resources.
- In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage of the perpetrator or facilitator
- The abuse can be perpetrated by individuals or groups, males or females, and children or adults

- The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.
 - It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence
 - Victims can be exploited even when activity appears consensual and it should be noted that exploitation as well as being physical can be facilitated and/or take place online.
- **Child Criminal Exploitation (CCE)**
 - Forms of CCE can involve the forcing or manipulation of children into activities such as the transportation of drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. These children can also be forced into committing vehicle crime or the use of threatening or serious violence to others
 - Children can become trapped by these activities as perpetrators can threaten the individuals or their families. They may be coerced into carrying knives
 - The experience of girls who are criminally exploited can be very different to boys and it is important to note that both boys and girls may be a higher risk of sexual exploitation if they are being criminally exploited.
 - Link to OSCB guidance on child criminal exploitation <https://www.oscp.org.uk/practitioners/multi-agency-procedures-and-resources/child-exploitation/>
- **Child Sexual Exploitation (CSE)**
 - CSE is a form of child sexual abuse which may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts (such as masturbation, kissing, rubbing and touching outside clothing). It may include non-contact activities such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually.
- **Mental Health**
 - Within the School, we aim to promote positive mental health and wellbeing for our whole community (pupils, staff, parents and carers), and recognise how important mental health and emotional wellbeing is to our lives, in just the same way as physical health. We recognise that children and young people's mental health is a crucial factor in their overall wellbeing and can affect their learning and achievement. All children and young people will have varying mental health during their school career. However, some face significant life events which can seriously impact their emotional wellbeing and can include mental illness
 - The Department for Education (DfE) recognises that: "Schools have a role to play in supporting the mental health and wellbeing of children" (Mental Health and Behaviour in School, 2018). Schools can be a place for all pupils to experience a nurturing and supportive environment that has the potential to develop self-

esteem and give positive experiences for overcoming adversity and building resilience

- The School can also be a place of respite from difficult home lives, and offers positive role models and relationships, which are critical in promoting the wellbeing of all young people
- The role of school is to ensure that pupils can manage times of change and stress, and that they are supported to reach their potential or access help when they need it. The School also has a role to ensure that pupils learn about what they can do to maintain positive mental health, what affects their mental health, how they can help reduce the stigma surrounding mental health issues, and where they can go if they need help and support
- All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation and staff should take immediate action in order to report the concern to the Safeguarding Team and follow all of the above procedures
- Staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. However, only appropriately trained professionals should attempt to make a diagnosis of this problem. Staff should refer these concerns to the Safeguarding Team who can make referrals to a GP, CAMHS or other external agencies as appropriate
- Where a child has suffered abuse and neglect, or other potentially traumatic adverse childhood experiences (ACE), this can have a lasting impact throughout childhood, adolescence and into adulthood and thus it is crucial that staff are aware. It is key that staff are aware of how these pupils' experiences can impact on their mental health, behaviour and education.
- The School has access to a counsellor as well as other outside agencies such as CAMHS. More information is available on the Dept of Education's 'Mental Health and Behaviour in Schools' (Nov 2018) and the School's 'Mental Health guidance'.

- **Other Forms of Abuse**

- A full list of definitions and signs of other forms of abuse can be found in Appendix 2 and include:
 - Mental Health
 - Pupils missing education
 - Domestic Abuse
 - FGM
 - CSE and CCE
 - Radicalisation
 - Honour-based abuse
 - Forced Marriage.

- **Social workers**

- Where a social care assessment is taking place, the School will co-operate fully with children's services in order to provide as much information as possible as

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

- Some pupils will require a social worker in order to assist with safeguarding concerns and welfare needs. In some cases, pupils will be placed on a 'Child in Need' or Child Protection' plan. In these cases, the DSL will work closely with the social worker and attend all appropriate meetings.

10. Additional Reporting

- In addition to the reporting requirements explained above, the School will consider whether it is required to report safeguarding incidents to any other regulatory body or organisation including but not limited to:
 - **Health and Safety Executive.** The School is legally required under RIDDOR to report certain incidents to the Health and Safety Executive. Please see the School's Health and Safety Policy
 - **Charity Commission.** The School is a registered charity and is required to report all serious incidents to the Charity Commission in accordance with the guidance How to report a serious incident in your charity (Charity Commission September 2017)
 - Serious incidents that will be reported to the Charity Commission include suspicions, allegations or incidents of abuse involving pupils. This is likely to involve the following:
 - Pupils have been, or are alleged to have been, abused or mistreated while under the care of the School or by someone connected with the School, for example a Governor, staff member or volunteer
 - There has been an incident involving the abuse or mistreatment (alleged or actual) of someone and this is connected with the activities of the School
 - There has been a breach of the School's procedures or policies which has put pupils at risk, including failure to carry out checks which would have identified that a person is disqualified in law, under safeguarding legislation, from working with children.
 - The School will notify the Charity Commission of other agencies to which the incident has been reported in accordance with this policy
 - **Insurers.** The School consider whether it is necessary to report a safeguarding incident to the relevant insurers and/or brokers. It may be necessary to report to a number of insurers as there may be concurrent cover under existing and historic policies
 - Care should be taken to ensure this is done before to ensure that the School complies with its duties under the Insurance Act 2015
If the School is in any doubt with regard to the correct insurer and/or policy and/or if it is unable to locate the relevant insurer, professional advice should be sought

- **Boarding Schools Association (BSA).** The School will report to the BSA all safeguarding cases which have resulted in a referral to an external body and which involve allegations against staff or child-on-child-abuse.

11. Internet Safety, mobile phones and cameras

- It is essential that pupils are safeguarded from potentially harmful and inappropriate online material. An effective whole school approach to online safety empowers the school to both protect and educate pupils and staff in their use of technology and establishes mechanisms to identify, intervene in and escalate any concerns where appropriate
- All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Pupils are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline. Pupils can also abuse other pupils online, this can take the form of abusive, harassing and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.
- The School's policy on online safety can be found in 'e-Safety Policy' and also in Appendix 5. Within this policy there is support for pupils accessing the internet whilst they are at school using data on their phones. This considers that many pupils have unlimited and unrestricted access to the internet via 3G, 4G and 5G networks. This access means some pupils, whilst at school, can sexually harass, bully and control others via their mobile and smart technology, share indecent images consensually and non-consensually and view and share pornography and other harmful content. This has been carefully considered within the policy, including the management of devices, filtering and monitoring and access to smart technology. The policy also reinforces the importance on online safety, including making parents aware of what the school asks pupils to do online (eg. sites they need to visit or who they will be interacting with)
- Pupils are given certain windows during the day to allow them to access their personal devices. The School operates a filter (Smoothwall) in order to prevent pupils from accessing harmful and inappropriate material. In addition, regular checks on VPNs take place in order to safeguard against unfiltered internet access.
- The school's filtering system provides part of the annual Safeguarding report to Governors along with evidence of its effectiveness.
- Pupils are taught how to stay safe online, not only in school, but in the wider world. This includes the dangers of cyber-bullying and sexting.
- Staff need to be aware that pupils will have unlimited and unrestricted access to the internet via 3G/4G/5G networks which some may abuse to sexually harass their peers, share indecent images consensually and non-consensually and view and share pornography and other harmful content. Staff should make an immediate report to the DSL if they suspect or become aware of incidents or concerning behaviour

- During the year, the School will be in contact with parents in order to reinforce the importance of pupils being safe online whilst explaining the School's filtering system. In addition, the School offers a seminar with an expert during the year which parents are invited to attend.
- If a member of staff is expecting a pupil to work online with the member of staff whilst being offsite, the teacher will communicate this to the parent. The School is very strict about online interaction with adults (including staff) and such interaction will only be permitted after authorisation from the DSL.
- The school follows the guidance and expectations outlined in the Government paper 'Generative AI: product safety expectations' (<https://www.gov.uk/government/publications/generative-ai-product-safety-expectations/generative-ai-product-safety-expectations>)
- The School's policy on the use of mobile phones and cameras in the School, is as follows:
 - The School's e-Safety Policy sets out the expectations on pupils in conjunction with the IT Acceptable Use Policy (Pupils, Parents and Visitors)
 - Staff and volunteers should use mobile phones and cameras in accordance with the guidance set out in the e-Safety Policy, School Staff Handbook and Capture and Use of Photographic and Video Images of Pupils Policy
 - Parents may bring mobile phones onto the premises but may only take photographs during events such as plays, concerts or sporting events for personal use. Parents should be reminded that the publication of such images (including on personal social networking sites even where access to the image may be limited) may be unlawful.

12. Record keeping, confidentiality and information sharing

- All concerns, discussions and decisions made and the reasons for those decisions should be recorded on CPOMS.
- Staff must record all concerns about a child on CPOMS. Guidance on record keeping is set out in Appendix 3.
- The safeguarding team will ensure that all concerns, discussions and decisions made, and the reasons for those decisions, are recorded on CPOMS which 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 outcome.
- The School will keep all child protection records confidential, allowing disclosure only to those who need the information in order to safeguard and promote the welfare of children.

- The School will co-operate with police and local authority children's social care to ensure that all relevant information is shared for the purposes of child protection investigations under section 47 of the Children Act 1989.
- Where allegations have been made against staff, the School will consult with the Designated Officer(s) and, where appropriate, the police and local authority children's social care to agree the information that should be disclosed and to whom.
- All staff should adhere to the School's Data Protection Policy and be mindful of GDPR regulations. However, it is understood that 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data. This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner but it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent or if to gain consent would place a child at risk.
- The Governing Body will take a proportionate risk-based approach to the level of information that is provided to temporary staff, volunteers and contractors

13. External Providers

- Any external provider (including all contractors and lettings) must follow the school's Safeguarding policy and procedures. All such providers will receive an initial briefing from a member of the Safeguarding team at the commencement of their contract. They will be expected to read this policy and acknowledge that they have read any updates to the school Safeguarding policy when each update has been published
- As with any safeguarding allegation, the school will follow their safeguarding policies and procedures, as a result of any allegations regarding an external provider

14. Monitoring and review

- The DSL will ensure that the procedures set out in this Policy and the implementation of these procedures are updated and reviewed regularly, working with the Governors as necessary and seeking contributions from staff. The DSL will update the Senior Management Team regularly on the operation of the School's safeguarding arrangements.
- Any child protection incidents at the School will be followed by a review of these procedures by the DSL and a report made to the Governing Body. Where an incident involves a member of staff, the Designated Officer(s) will be asked to assist in this review to determine whether any improvements can be made to the School's procedures. Any deficiencies or weaknesses in regard to child protection arrangements at any time will be remedied without delay.

- The Board of Trustees will undertake an annual review of this Policy and the School's safeguarding procedures, including an update and review of the effectiveness of procedures and their implementation and the effectiveness of interagency working. The DSL will work with the Nominated Safeguarding Trustee, preparing a written report commissioned by the Board of Trustees. The written report should address how the School ensures that this Policy is kept up to date; staff training on safeguarding; referral information; issues and themes which may have emerged in the School and how these have been handled; and the contribution the School is making to multi-agency working in individual cases or local discussions on safeguarding matters.
- The Board of Trustees should also consider independent corroboration, such as inspection of records or feedback from external agencies including the Designated Officer(s). The full Governing Body will review the report, this Policy and the implementation of its procedures and consider the proposed amendments to the Policy before giving the revised Policy its final approval. Detailed minutes recording the review by the Board will be made.

Appendix 1 Designated Safeguarding Lead (DSL)

1. The DSL for the School site is, Rob Jones, Second Deputy, who may be contacted on 01608 658999 and 01608 698964 (out of school hours).
2. The Deputy DSLs are Tim Martin and Esther Blount who may be contacted on 01608 658999. The Heads of Section are also members of the Safeguarding team
3. In accordance with Annex C of KCSIE, the main responsibilities of the DSL are:

- **Managing referrals**

- The DSL is expected to:
 - Refer cases of suspected abuse to LADO, MASH or LCSS as required
 - Support staff who make referrals to LADO, MASH or LCSS as required
 - Refer cases to the Channel programme where there is a radicalisation concern as required
 - Refer any child who is missing education to the Oxfordshire Pupil Tracking Officer in line with statutory guidance
 - Support staff who make referrals to the Channel programme
 - Refer cases where a person is dismissed or has left due to risk/harm to a child to the Disclosure and Barring Service as required
 - Refer cases where crime may have been committed to the Police as required.
 - Organise the transfer of safeguarding files
 - Be the Designated Teacher in the case of 'Looked after Children' and 'previously Looked after Children' and thus be responsible for promoting the educational achievement of these children
 - Be the first point of contact with social workers and work with children's services in Child in Need Plans, Child Protection Plans and attend all core group and case conference meetings
 - Perform the role of e-Safety Co-ordinator.

- **Work with others**

- Liaising with the Head to inform him/her of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations
- As required, liaise with the Case Manager (see Appendix 4 of this policy) and the Designated Officer(s) at the local authority for child protection concerns (all cases which concern a staff member)
- Liaise with staff (especially pastoral support staff, school nurses, IT technicians and SENCOs/named person with oversight of SEN) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies. Act as a source of support, advice and expertise for staff.

- **Raise awareness**

- The DSL should ensure this Policy is known, understood and used appropriately
- Ensure this Policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the Governing Body regarding this
- Ensure this Policy is available publicly
- Ensure that parents are aware that referrals about suspected abuse or neglect may be made to children's social care and the School's role in this
- Maintain links with the OSCP to ensure staff are aware of training opportunities and the local policies on safeguarding.

- **Child protection file**

- Where children leave the School the DSL shall ensure their child protection file is copied for any new school or college as soon as possible. This will be transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt will be obtained
- In addition, the DSL will consider if it is appropriate to share any information with the new school or college in advance of a child leaving
- On receiving a child protection file, the DSL will ensure that key staff are aware as required, including the SENCO/named person with oversight for SEN.

- **Prevent**

- In accordance with the *Prevent duty Guidance for England and Wales and Channel duty guidance: protecting vulnerable people from being drawn into terrorism* (2023/4) the DSL has, in addition, the following responsibilities:
 - Acting as the first point of contact for parents, pupils, teaching and non-teaching staff and external agencies in all matters relating to the Prevent duty
 - Co-ordinating Prevent duty procedures in the School
 - Liaising with local prevent co-ordinators, the police and local authorities and through existing multi-agency forums, including referrals to the Channel Police Practitioner and/or the police where indicated
 - Undergoing WRAP or other appropriate training
 - Maintaining ongoing training programme for all school employees including induction training for all new employees and keeping records of staff training
 - Monitoring the keeping, confidentiality and storage of records in relation to the Prevent duty.

4. The Deputy DSLs will carry out this role where the DSL is unavailable.

5. The DSL and the Deputy DSLs have undertaken training to provide them with the knowledge and skills required to carry out the role which includes inter agency working in line with the OSCB and regular updates.

This training also includes Prevent awareness training and will be updated at least every two years. In addition, their knowledge and skills will be refreshed at regular intervals, at least annually, to allow them to understand and keep up with any developments relevant to their role so they:

- Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments.
- Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.
- Ensure each member of staff has access to and understands the School's child protection policy and procedures, especially new and part time staff.
- Are alert to the specific needs of children in need, those with special educational needs and young carers.
- Are able to keep detailed, accurate, secure written records of concern and referrals.
- Understand and support the School with regard to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation.
- Can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online
- Obtain access to resources and attend any relevant or refresher training courses.
- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the School may put in place to protect them.

Appendix 2 Types and signs of abuse and specific safeguarding issues

1. Types of abuse

- Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children.
- Part 1 of KCSIE defines the following types of abuse, however, staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label and in most cases, multiple issues will overlap with one another.
- **Physical abuse.** A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
- **Emotional abuse.** The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
- **Sexual abuse.** Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.
- **Neglect.** The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development.

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

2. Signs of abuse

- Possible signs of abuse include, but are not limited to:
 - The pupil says he/she has been abused or asks a question or makes a comment which gives rise to that inference
 - There is no reasonable or consistent explanation for a pupil's injury, the injury is unusual in kind or location or there have been a number of injuries and there is a pattern to the injuries
 - The pupil's behaviour stands out from the group as either being extreme model behaviour or extremely challenging behaviour, or there is a sudden or significant change in the pupil's behaviour
 - The pupil asks to drop subjects with a particular teacher and seems reluctant to discuss the reasons
 - The pupil's development is delayed, the pupil loses or gains weight or there is deterioration in the pupil's general wellbeing
 - The pupil appears neglected, eg dirty, hungry, inadequately clothed
 - The pupil is reluctant to go home, or has been openly rejected by his/her parents or carers
 - Inappropriate behaviour displayed by other members of staff or any other person working with children, for example inappropriate sexual comments; excessive one to one attention beyond the requirements of their usual role or responsibilities; or inappropriate sharing of images.
- The OSCB can provide advice on the signs of abuse and the DfE advice **What to do if you're worried a child is being abused** (2015) provides advice in the identifying child abuse. The **NSPCC website** is also a good source of information and advice.

3. Specific safeguarding issues

- Statutory guidance acknowledges the following as specific safeguarding issues, and further details are available in Annex B of KCSE (2023):
 - Children and the court system
 - Children missing education. In particular, there is a further concern if a Student and Child Student Routes pupil goes missing. (See paragraph **Children missing education** below).
 - Children with family members in prison
 - Child sexual exploitation (See paragraph **Child sexual exploitation** on Page 23)
 - Child criminal exploitation: county lines

- Domestic abuse
- Homelessness
- So called “honour-based abuse”
- Preventing radicalisation (See paragraph **Radicalisation and the Prevent duty** on Page 30)
- Child-on-child abuse
- Sexual violence and sexual harassment between children in schools and colleges.
- Child abduction and community safety incident
- Modern slavery and the National Referral Mechanism
- Cybercrime

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

All staff should be aware of the associated risks and understand the measures in place to manage these. Advice for schools and colleges is provided in the Home Office’s Preventing youth violence and gang involvement <https://www.gov.uk/government/publications/advice-to-schools-and-colleges-on-gangs-and-youth-violence> and its Criminal exploitation of children and vulnerable adults: county lines guidance <https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines>

- **Children absent from or missing education**

- Pupils going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM, ‘so called honour-based abuse’ or risk of forced marriage. Local authorities have a duty to establish, as far as it is possible to do so, the identity of children of compulsory school age who are absent for prolonged periods or missing from education in their area
- Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of the pupil going missing in future. The DSL takes the lead on unauthorised absence and pupils missing from education although it is essential that all staff are alert to signs to look for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns
- Where reasonably possible the School will hold more than one emergency contact for each pupil
- The School shall inform the local authority of any pupil who is going to be added to or deleted from the School’s admission register at non-standard transition

points in accordance with the requirements of the Education (Pupil Registration) (England) Regulations 2006 (as amended). The school will also inform the local authority of any pupil who is going to be deleted from the admissions register where they:

- Have been take out of school by their parents and are being educated outside the school system eg. home education, have ceased to attend school and no longer live within reasonable distance of the school at which they are registered
- Have been certified by an appropriate medical practitioner as unlikely to be in a fit state of health to attend school before ceasing to be of compulsory school age and neither s/he nor his/her parent has indicated the intention to continue to attend the school after ceasing to be of compulsory school age
- Are in custody for a period of more than four months due to a final court order with a belief that the pupil will not be returning to the school
- Have been permanently excluded
- The Oxfordshire Admissions team can be contacted on 01865 815175
- This will assist the local authority to:
 - Fulfil its duty to identify children of compulsory school age who are missing from education
 - Follow up any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect or radicalisation.
- The School shall inform the Oxfordshire County Pupil Tracking Officer of any pupil who:
 - Fails to attend School regularly, or
 - Has been absent without the School's permission for a continuous period of ten school days or more, at such intervals as are agreed between the School and the local authority (or in default of such agreement, at intervals determined by the Secretary of State).
- School attendance registers are carefully monitored to identify any trends. Action should be taken in accordance with this Policy if any absence of a pupil from the School gives rise to a concern about his/her welfare
- If a Student and Child Student Routes pupil should go missing, the School will make a relevant report to LCSS in the first instance and also to the police and UKVI if advised by LCSS. The Oxfordshire County Pupil Tracking Officer will always be informed about any missing pupils.

- **Child Criminal Exploitation (CCE)**

- CCE is defined as where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate, or deceive a child into any criminal activity
 - In exchange for something the victim needs or wants
 - For the financial or other advantage of the perpetrator or facilitator

- Through violence or the threat of violence.
- The victim may have been criminally exploited even if the activity appears consensual
- CCE does not always involve physical contact; it can also occur through the use of technology
- CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people
- Some of the following can be indicators of CCE:
 - Pupils 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 period of time or regularly come home late
 - Children who regularly miss school or education or do not take part in education.
- **Child sexual exploitation (CSE)**
 - Child sexual exploitation is a form of sexual abuse. It occurs where an individual or group take advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity:
 - In exchange for something the victim needs or wants
 - 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 and can also occur through the use of technology. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point
 - CSE can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex. It can include both contact and non-contact sexual activity and may occur without the child or young person's immediate knowledge (eg. Through others copying videos or images they have created and posted on social media)
 - The above CCE indicators can also be indicators of CSE, as can:
 - Children who have older boyfriends or girlfriends
 - Children who suffer from sexually transmitted infections or become pregnant.
- **County lines**
 - County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas (within the UK) using dedicated mobile phone lines or other form of 'deal line'

- This is a form of exploitation and staff should be aware that pupils can be targeted and recruited into county lines. One of the ways of identifying potential involvement in county lines are missing episodes (from home and school). If a pupil is suspected to be at risk or involved in county lines, a safeguarding referral should be considered.
- Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. 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.

- **Domestic abuse**

- The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. It covers types of abuse such as psychological, physical, sexual, financial or emotional. Pupils can be victims of domestic abuse. They may see, hear or experience the effects of abuse at home or suffer domestic abuse in their own intimate relationships, all of which can have a detrimental and long-term impact on their health, well-being, development and ability to learn
- The School is registered with Operation Encompass and will respond appropriately to any reports.

- **Mental Health**

- All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation
- Staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. However, only appropriately trained professionals should attempt to make a diagnosis of this problem. Staff should refer these concerns to the Safeguarding Team who can make referrals to a GP, CAMHS or other external agencies as appropriate
- Where a child has suffered abuse and neglect, or other potentially traumatic adverse childhood experiences (ACE), this can have a lasting impact throughout

childhood, adolescence and into adulthood and thus it is crucial that staff are aware.

- **So called honour-based abuse**

- All forms of so called honour-based violence are abuse (regardless of motivation) should be handled and escalated to the DSL. Abuse committed in the context of preserving “honour” often involves additional risk factors such as a wider network of family or community pressure and the possibility of multiple perpetrators which should be taken into account when deciding what safeguarding action to take. Staff should speak to the DSL if they have any doubts
- If appropriate the DSL will activate local safeguarding procedures, using existing national and local protocols for multiagency liaison with police and children’s services.

- **Female genital mutilation (FGM)**

- FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long lasting harmful consequences
- There is a range of potential indicators that a child or young person may be at risk of FGM. Further information on FGM can be found in KCSIE 2023 (Annex B)
- All staff must be aware that it is a mandatory requirement for a teacher to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. The report should be made orally by calling 101, the single non-emergency number. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve children’s social care as appropriate
- If the teacher is unsure whether this reporting duty applies, they must refer the matter to the DSL in accordance with this policy. See the Home Office guidance **Mandatory reporting of female genital mutilation – procedural information** for further details about the duty
- Guidance published by the **Department of Health** also provides useful information and support for health professionals which will be taken into account by the School’s medical staff.

- **Forced marriage**

- Forcing a person into marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage

- Guidance on the warning signs that forced marriage may be about to take place, or may have already taken place, can be found on pages 13-14 of the **Multi-agency guidelines: handling case of forced marriage**
- Staff should speak to the DSL if they have any concerns. Pages 35-56 of the **Multi-agency guidelines: handling case of forced marriage** focus on the role of schools in detecting and reporting forced marriage and the forced marriage unit can be contacted on 020 7008 0151 or **fmu@fco.gov.uk** for advice and information.

- **Radicalisation and the Prevent duty**

- 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 exploit. The School is committed to providing a safe space in which children, young people and staff can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments
- The School has adopted the Government's definitions for the purposes of compliance with the Prevent duty:

Extremism. "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. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas"

Radicalisation. "The process by which a person comes to support terrorism, and forms of extremism leading to terrorism"

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

- There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology. 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)
- It is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Children at

risk of radicalisation may display different signs or seek to hide their views. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately. In particular, outward expressions of faith, in the absence of any other indicator of vulnerability, will not be regarded as a reason to make a referral to Channel

- **Channel duty guidance: protecting vulnerable people from being drawn into terrorism** (2023) notes the following:

“36. There is no single way of identifying who is likely to be vulnerable to being drawn into terrorism. Factors that may have a bearing on someone becoming vulnerable may include: peer pressure, influence from other people or via the internet, bullying, crime against them or their involvement in crime, anti-social behaviour, family tensions, race/hate crime, lack of self-esteem or identity and personal or political grievances

51. Example indicators that an individual is engaged with an extremist group, cause or ideology include:

- Spending increasing time in the company of other suspected extremists
- Changing their style of dress or personal appearance to accord with the group
- Day-to-day behaviour increasingly centred around an extremist ideology, group or cause
- Loss of interest in other friends and activities not associated with the extremist ideology, group or cause
- Possession of material or symbols associated with an extremist cause (eg the swastika for far right groups)
- Attempts to recruit others to the group/cause/ideology
- Communications with others that suggest identification with a group/cause/ideology.

52. Example indicators that an individual has an intention to cause harm, use of violence or other illegal means include:

- Clearly identifying another group as threatening what they stand for and blaming that group for all social or political ills
 - Using insulting or derogatory names or labels for another group
 - Speaking about the imminence of harm from the other group and the importance of action now
 - Expressing attitudes that justify offending on behalf of the group, cause or ideology
 - Condoning or supporting violence or harm towards others
 - Plotting or conspiring with others.”
- Protecting children from the risk of radicalisation is part of the School’s wider safeguarding duties, and is similar in nature to protecting children from other harms (eg drugs, gangs, neglect, sexual exploitation), whether these come from within their family or are the product of outside influences

- The DfE's briefing note **The use of social media for on-line radicalisation** (2015) includes information on how social media is used to radicalise young people and guidance on protecting pupils at risk
- Reference should also be made to 'Additional Support' in Annex B of KCSIE (2022).

4. Child-on-child abuse and sexual violence and sexual harassment

- All staff should be aware that incidents of 'child-on-child' abuse and sexual violence and harassment' could happen at Kingham Hill. The School adopts a zero-tolerance approach to such incidents. Reports should be made immediately to the Acting Deputy Head/DSL.
- The School recognises, acknowledges and understands that even if there are no reports it does not mean it is not happening as it may be the case that it is just not being reported.
- The conduct of pupils towards each other will, in most instances, be covered by the School's behaviour and discipline policies. Pupils with SEN/D are particularly vulnerable to child-on-child abuse.
- However, some behaviour by a pupil towards another may be of such a nature that safeguarding concerns are raised.
- Safeguarding issues can manifest themselves via child-on-child abuse. This includes but is not limited to:
 - Bullying (including cyber-bullying)
 - Physical abuse such as hitting, kicking, shaking biting, hair pulling, or otherwise causing physical harm
 - Harmful sexual behaviour
 - Sexting (also known as youth produced sexual imagery)
 - Initiation/hazing type violence and rituals
 - Upskirting, 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, or cause the victim humiliation, distress or alarm. Upskirting is a criminal offence.
- Harmful sexual behaviour is an umbrella term that includes sexual violence and sexual harassment and can occur between two pupils of any age and sex and within intimate personal relationships between peers. A group of pupils can sexually assault or sexually harass a single pupil or group of pupils.
- Sexual behaviour between pupils can be considered harmful if one of the pupils is much older (two year's difference) or if one of the pupils is pre-pubescent and the other is not. However, a younger pupil can abuse an older pupil, particularly if they have power over them, for example, if the older pupil is disabled or smaller in stature.
- It is possible for harmful sexual behaviours to progress on a continuum and it is important that inappropriate behaviour is addressed as it can be an important intervention which

helps prevent problematic, abusive and violent behaviour in the future. Support is always offered to all pupils involved in such cases.

- The School recognises that problematic, abusive and violent sexual behaviours are inappropriate and may cause developmental damage. Harmful sexual behaviour can occur online and offline (both physical and verbal) and the School recognises the gendered nature such behaviour can take. Harmful sexual behaviour, like all child-on-child abuse, is never acceptable and will be taken seriously. Abuse that takes place online and offsite will be treated equally seriously as incident occurring onsite during school time.
- The School takes steps to minimise the risk of all types of child-on-child abuse. The School has robust anti-bullying procedures in place (see the School's Anti-bullying Policy) and pupils are taught at all stages of the School about acceptable behaviour and how to keep themselves safe. Risk assessments are carried out and kept under review. Appropriate action is taken to protect pupils identified as being at risk including [risks arising from behaviour in boarding houses and the particular vulnerabilities of those with a special educational need or disability (see the School's Risk Assessment Policy and Guidance for pupil welfare).
- A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment nor should a victim ever be made to feel ashamed for making a report.
- Behaviour should not be dismissed as being normal between young people, as "banter" or simply "part of growing up". Behaviour such as initiation violence or any form of sexual violence or sexual harassment is not acceptable.
- There is concern nationally relating to a culture of misogyny and sexual harassment in many schools and the DfE and Ofsted have reviewed school procedures. As a result, the Government has published 'Sexual violence and sexual harassment between children in Schools' alongside Part 5 of the statutory guidance in Keeping Children Safe in Education 2021.
- Both documents are read and understood by the School's safeguarding team and referred to as needed, particularly if a report of child-on-child sexual violence or sexual harassment is made.
- If a report is made, it is crucial that there is an immediate response by the School. How the School responds to such a report is critical due to the impact it will have on the confidence of future victims to report or come forward. The DSL will lead how the report is dealt with, given the high-profile nature of the report. This will be in liaison with the Head. Where the DSL is unavailable, a Deputy DSL will lead. On a case-by-case basis, there will be consideration made as to the gender of the DSL or Deputy, so that the victim feels comfortable with how the investigation is managed. It will be explained to the pupil that the law is in place to protect children and young people rather than criminalise them in a way that avoids alarming or distressing them.

- The four considerations on managing a report are:
 - Internal management
 - Early help
 - Referrals to local authority children's services
 - Reports to the police.
- When it comes to action to manage the report, the needs and wishes of the victim will take centre stage in conjunction with the School's duty and responsibility to protect children. Considerations should include how the investigation proceeds and what support the victim requires. Sexual violence and sexual harassment are not acceptable and will not be tolerated. Reports will not be passed off as banter or part of growing up.
- Where a report of rape, assault by penetration or sexual assault is made, local authority children's social care and the police will be informed. Before doing so, this will be discussed with the victim and their parents/carers, explaining why it is important for other agencies to know and how these agencies will be able to support the victim. Other allegations will be managed within the School and/or with support from local authority children's social care providers.
- The guidance and the DfE advice set out the steps the school will take to manage the pupils involved, including risk assessments, separating the pupils in lessons, investigating the report, and supporting the victim and alleged perpetrator.

5. Sexting or the sharing of consensual and non-consensual sharing of nude and semi-nude images and/or videos

- "Sexting" means the taking and sending or posting of images or videos of a sexual or indecent nature, usually through mobile picture messages or webcams over the internet.
- The School treats all incidences of sexting as safeguarding matters to be actioned in accordance with this policy.
- Members of staff should not view sexual imagery which is reported to them, or copy, print or share the images under any circumstances. In referring any incident of sexting, members of staff should describe the content of the images as reported to them.
- The DSL may in exceptional circumstances view images with the prior approval of the Head and only where:
 - It is the only way to make a decision whether to involve other agencies as there is insufficient information available as to its contents
 - It is necessary to report the image to a website or agency to have it taken down
 - A pupil has reported the image directly to a member of staff in circumstances where viewing the image is unavoidable.
- Where viewing an image is unavoidable:
 - Viewing should take place on School premises wherever possible

- The image should be viewed by a person of the same sex as the person alleged to be shown in the image (where this is known)
 - A senior member of staff should be present to monitor and support the person viewing the image. This member of staff should not view the image
 - Full details of the viewing must be recorded in the School's safeguarding records, including who was present, the date and time, the nature of the image and the reasons for viewing it
 - Any member of staff who views an indecent image should be given appropriate support.
- If any devices need to be confiscated (whether in order to view the image(s) or to pass evidence to the appropriate authority), they should be turned off and locked away securely until they are required.
 - If an electronic device that is prohibited by the school rules has been seized and the member of staff has reasonable grounds to suspect that it contains evidence in relation to an offence, or that it contains a pornographic image of a child or an extreme pornographic image, the device will be given to the police.
 - If external agencies do not need to be involved, the School must consider the deletion of any images. Pupils should be asked to delete images themselves and to confirm that this is done. Members of staff should not search devices to delete images.
 - If images have been shared online and cannot now be deleted by the person who shared them, the School should consider reporting the images to the relevant web host or service provider (if an option is provided), or contacting the internet Watch Foundation or ChildLine (if the website does not provide this option).
 - Where a pupil receives unwanted images, the School should advise the pupil and his/her parents of options that may be available to block the sender or to change the pupil's mobile phone number or email address.
 - The UK Council for Child Internet Safety's advice note Sexting in schools and colleges: responding to incidents and safeguarding young people (August 2016) contains details of support agencies and provides further information for schools on how to respond to incidents of sexting.
 - The College of Policing has also produced a briefing note Police action in response to youth produced sexual imagery ("sexting") (November 2016) which provides information on how police forces treat instances of sexting by young persons.

6. Special educational needs and disabilities

- The School welcomes pupils with special educational needs and disabilities and will do all that is reasonable to ensure that the School's curriculum, ethos, culture, policies, procedures and premises are made accessible to everyone. See the School's policy on Special Educational Needs and Disabilities (SEND) Policy.
- Additional barriers can exist when detecting the abuse or neglect of pupils with a special educational need or disability creating additional safeguarding challenges for those

involved in safeguarding and promoting the welfare of this group of children. The School is mindful in particular:

- Of wrongful assumptions that possible indicators such as behaviour, mood and injury are related to the pupil's special educational need or disability
- That pupils with special educational needs or disabilities are more prone to peer group isolation than other children
- Pupils with a special education need or disability can be disproportionately impacted by bullying without outwardly showing any signs
- There may be communication barriers which are difficult to overcome to identify whether action under this policy is required.

7. Looked after children and previously looked after children

- The Governing Body ensures that staff have the skills, knowledge and understanding to keep looked after children safe and the information they need in relation to a child's looked after legal status, for example:
 - Whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order
 - Contact arrangements with birth parents or those with parental responsibility
 - Information about a child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her.
- The DSL maintains details of the local authority personal advisor appointed to guide and support care leavers and liaises with them as necessary regarding any issues of concern.

Appendix 3 Guidance for staff and volunteers on suspecting or hearing a complaint of abuse or neglect

1. Receiving a disclosure

- A member of staff or volunteer suspecting or hearing a complaint of abuse or neglect:
 - Must listen carefully to the child and keep an open mind. The member of staff should not take a decision as to whether or not the abuse has taken place
 - Must not ask leading questions, ie a question which suggests its own answer
 - Must reassure the child but not give a guarantee of absolute confidentiality. The member of staff should explain that they need to pass on the information in accordance with this Policy so that the correct action can be taken
 - Must keep a sufficient record of the conversation. The record should include:
 - The date and time
 - The place of the conversation
 - The essence of what was said and done by whom and in whose presence
 - And must be signed by the person making it, using names and not initials.
 - All other evidence, for example, scribbled notes, mobile phones containing text messages, clothing, computers, must be kept securely with the written record (see below) and passed on when reporting the matter in accordance with this Policy.

2. Recording the concern

- Staff must record all concerns about a child on CPOMS and should include a description of the concern or directly to the Safeguarding team who will subsequently record the concern on CPOMS.
- This information will then be included in the child protection log which is managed and actioned by the DSL and Deputy DSLs.

3. Immediate response to a report – responding to the report

- Local authority children's social care and the police will be important partners where a crime might have been committed. Referrals to the police will often be a natural progression of making a referral to local authority children's social care. The Safeguarding team will lead the School and are aware of the local process for referrals to local authority children's social care and making referrals to the police.
- It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the School should be downplayed and should be treated equally seriously. A pupil should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. It is important to explain that

the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

4. Confidentiality and Anonymity

- Staff taking a report should never promise confidentiality as it is very likely that it will be in the best interest of the victim to seek advice and guidance from others in order to provide support and engage appropriate agencies.
- The school will only engage staff and agencies who are required to support the pupils involved and be involved in any investigation.

5. Internal disciplinary action

- Whilst protecting pupils and/or taking any disciplinary measures against the alleged perpetrator(s), the DSL will work closely with the police (and other relevant agencies), to ensure that any actions taken does not jeopardise the police investigation.
- Disciplinary action can be taken whilst other investigations by the police and/or local authority children's social care are ongoing. The fact another body is investigate or has investigated an incident does not in itself prevent the school from coming to its own conclusion, on the balance of probabilities, about what happened and imposing a penalty accordingly. This should be considered on a case-by-case basis after liaising with all external agencies whilst also considering whether there are circumstances that make it unreasonable or irrational for the school to reach its own view about what happened whilst an independent investigation is considering the same facts.
- Taking disciplinary action and still providing appropriate support are not mutually exclusive actions. They can, and should, occur at the same time if necessary. The school will be very clear as to what its approach is.
- The school will, in most instances, engage with both the victim's and the alleged perpetrator's parents or carers when there has been a report of sexual violence. The exception to the rule is if there is a reason to believe that informing a parent or carer will put a pupil at additional risk and thus all information should be carefully considered. In some cases, local authority children's social care and/or the police will have a very clear view and it will be important for the school to work with relevant agencies to ensure a consistent approach is taken to information sharing.
- It is good practice to:
 - Meet with the victim's parents or carers with the victim present to discuss what arrangements are being put in place to safeguard the victim
 - Meet with the alleged perpetrator's parents or carers to discuss any arrangements that are being put into place that impact an alleged perpetrator
 - Signpost all parties to this safeguarding policy

6. Ongoing response

- Pupils who have experienced sexual violence display a wide range of responses to their experience, including in some cases clear signs of trauma, physical and emotional responses, or no overt signs at all. The school will remain alert to the possible challenges of detecting those signs and show sensitivity to the needs of the pupils irrespective of how overt the pupil's distress is

7. Safeguarding other pupils

- Consideration should be given to supporting pupils who have witnessed sexual violence, especially rape and assault by penetration. Witnessing such an event is likely to be traumatic and support may be required
- The school will do all that it can to ensure both the victim and alleged perpetrator(s), and any witnesses, are not being bullied or harassed
- Social media is very likely to play a central role in the fallout from any incident or alleged incident. There is the potential for contact between victim and alleged perpetrator(s) and a very high likelihood that friends from either side could harass the victim or alleged perpetrator(s) online and/or become victims of harassment themselves.

Appendix 4 Dealing with allegations against teachers, the Head, Governors, volunteers and contractors

1. The School's procedures

Please refer to Part 4 of KCSIE (2023)

- The School's procedures for dealing with allegations made against staff will be used where the teacher, the Head, Governor, volunteer or other member of staff 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 he or she would pose a risk of harm if he or she works regularly or closely with children.
 - Behaved or may have behaved in a way that indicates they may not be suitable to work with children.
- Any allegations not meeting this criteria will be dealt with in accordance with the OSCB procedures. Advice from the Designated Officer will be sought in borderline cases.
- All such allegations must be dealt with as a priority without delay. The Designated Officer (s) will be informed immediately and in any event within one working day of all allegations that come to the School's attention and appear to meet the criteria above (under first bullet point). The School will contact MASH and/or the police if a pupil has been harmed, there is an immediate risk of harm to a pupil or if the situation is an emergency. The School will look after the welfare of the pupil as a matter of priority.
- Allegations against a teacher who is no longer teaching and historical allegations will be referred to the police.
- Kingham Hill rarely employs supply teachers but, in the case of an allegation against supply staff, the School should refer to Para 356-359 of KCSIE (2023).

2. Reporting an allegation

- The reporting requirements for allegations against a teacher, the Head, Governor, volunteer or other member of staff are set out below.
- Where an allegation or complaint is made against any member of staff (other than the Head), the DSL, a volunteer or contractor, the matter should be reported immediately to the Head. The allegation will be discussed immediately with the Designated Officer(s) as soon as basic enquiries have been conducted by the School in line with local procedures in order to establish facts to help determine whether there is any foundation to the allegations and to collate the initial information that LADO will require. The School will be careful not to jeopardise any future police investigation
- Where an allegation or complaint is made against the Head, the matter should be reported immediately to the Chairman of Governors or the Nominated Safeguarding Governor, without first notifying the Head. The allegation will be discussed immediately

with the Designated Officer(s) before further action is taken and the matter will not be investigated before the referral.

- The Chairman of Governors will consult the Nominated Safeguarding Governor, and vice versa.
- Where an allegation is made against any Governor, the matter should be reported immediately to the Chairman of Governors or the Nominated Safeguarding Governor. If either the Chairman of Governors or the Nominated Safeguarding Governor are the subject of an allegation, the matters should be reported to the other. The allegation will be discussed immediately with the Designated Officer(s) before further action is taken and the matter will not be investigated before the referral. Where appropriate, the Chairman of Governors will consult the Nominated Safeguarding Governor and vice versa.
- If it is not possible to report to the Head or Chairman of Governors or Nominated Safeguarding Governor in the circumstances set out above, a report should be made immediately to the DSL. The DSL will take action in accordance with these procedures and will as soon as possible inform the Head or, where appropriate, the Chairman of Governors and the Nominated Safeguarding Governor.
- If there is a conflict of interest in reporting the matter to the Head, a member of staff can report the matter directly to LADO.
- The person taking action in accordance with the procedures in this Appendix is known as the “Case Manager”.

3. Disclosure of information

- The Case Manager will inform the accused person of the allegation as soon as possible after the Designated Officer(s) has been consulted.
- The Parents or carers of the child/children involved will be informed of the allegations as soon as possible if they do not already know of it. They may also be kept informed of the progress of the case, including the outcome of any disciplinary process. The timing and extent of disclosures, and the terms on which they are made, will be dependent upon and subject to the laws on confidence and data protection and the advice of external agencies.
- Where the Designated Officer(s) advises that a strategy discussion is needed, or the police or children’s social care need to be involved, the case manager will not inform the accused or the parents or carers until these agencies have been consulted and it has been agreed what information can be disclosed.
- The reporting restrictions preventing the identification of a teacher who is the subject of such an allegation in certain circumstances will be observed.

4. Further action to be taken by the School

- A school has a duty of care towards its employees and as such, it must ensure that effective support is provided for anyone facing an allegation. The School will take action in accordance with Part 4 of KCSIE and the School's employment procedures.
- Where a member of boarding staff is suspended pending an investigation of a child protection nature, arrangements for alternative accommodation away from children will be made for the member of staff.

5. Ceasing to use staff

- If the School ceases to use the services of a member of staff or volunteer because they are unsuitable to work with children, a settlement agreement (formerly known as a compromise agreement) will not be used and a referral to the Disclosure and Barring Service (DBS) will be made promptly if the criteria for a referral are met. Any such incidents will be followed by a review of the safeguarding procedures within the School, with a report being presented to the Governors without delay.
- If a member of staff or volunteer tenders his or her resignation, or ceases to provide his or her services, any child protection allegations will still be followed up by the School in accordance with this policy and a referral to the Disclosure and Barring Service will be made promptly if the criteria for referral are met.
- A referral to the Teaching Regulation Agency (TRA) should be made where a teacher has been dismissed, or would have been dismissed had he/she not resigned, because of unacceptable professional conduct, conduct that may bring the profession into disrepute, or a conviction at any time for a relevant offence.

6. Malicious allegations

- Where an allegation by a pupil is shown to have been deliberately invented or malicious, the Head will consider whether to take disciplinary action in accordance with the School's behaviour and discipline policy.
- Where a parent has made a deliberately invented or malicious allegation the Head will consider whether to require that parent to withdraw their child or children from the School on the basis that they have treated the School or a member of staff unreasonably.
- Whether or not the person making the allegation is a pupil or a parent (or other member of the public), the School reserves the right to contact the police to determine whether any action might be appropriate.

7. Low Level Concerns

- A low-level concern is a concern which does not meet the threshold at the beginning of this Appendix; however, it does not mean that it is insignificant. In KCSIE, it is defined as "any concern – no matter how small, and even if no more than causing a sense of unease

or a 'nagging doubt' – that an adult working in or on behalf of the School...may have acted in a way that”:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO
- Examples of such behaviour could include, but are not limited to:
 - Being over friendly with children
 - Having favourites
 - Taking photographs of children on their mobile phone
 - Engaging with a child on a one-to-one basis in a secluded areas or behind a closed door
 - Humiliating pupils
- The purpose of the School's safeguarding procedures is to create a culture of openness where any low level concern is noted and dealt with as appropriate. All staff understand their safeguarding obligations and the need to discuss any concerns with the Head.
- Low-level concerns may arise in several ways and from a number of different sources such as a suspicion, complaint or disclosure made by a pupil, parent or another adult either within or external to the school. It can also be as a result of vetting checks.
- Low-level concerns should be reported to the same persons as set out above for reporting allegations which meet the harms threshold ie. to the Headmaster for a member of staff, or the Chair of Governors for low-level concerns about the Head
- Reports about supply staff and contractors should be notified to their employers so any potential patterns of inappropriate behaviour can be identified.
- If a low-level concern has been raised by a third party, the Head will need to gather as much evidence as possible by speaking where possible with the person who raised the concern, to the individual involved and to any witnesses.
- Reports of low-level concerns should be recorded in writing, with details of the concern, the context in which it arose and action taken.
- The name of the person reporting should be noted, respecting wishes to remain anonymous as far as possible.
- Where a pattern of behaviour is identified, the School will decide on a course of action which might involve internal disciplinary procedures, or referral to LADO if the harms threshold is met.
- The School will consider if any wider cultural issues in school enabled the behaviour to occur and, if appropriate, policies should be revised or extra training delivered to minimise the risk of recurrence.

- All decisions, actions and rationales will be recorded in personnel files and reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and responded to.

8. Record keeping

- Details of allegations found to be malicious will be removed from personnel records.
- For other allegations, full details will be recorded on the confidential personnel file of the person accused including notes of actions, decisions and outcomes. Substantiated allegations will be included in references, provided that the information is factual and does not include opinion.
- Records are reviewed by the HR manager and the Headmaster so that potential patterns of concerning, inappropriate, problematic or concerning behaviour can be identified
- An allegation proven to be false, unsubstantiated or malicious will not be referred to in employer references. In accordance with KCSIE, a history of repeated concerns or allegations which have all be found to be false, unsubstantiated or malicious will also not be included in any reference.
- The School will retain all safeguarding records and relevant personnel records for so long as reasonably required.

Appendix 5 – Online safety

- It is recognised that the use of technology presents challenges and risks to children and adults both inside and outside of the School.
- The DSL has overall responsibility for online safeguarding within the School.
- Issues can be broadly categorised into four areas of risk:
 - **Content:** being exposed to illegal, inappropriate or harmful content, for example, pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (include fake news) and conspiracy theories
 - **Contact:** being subjected to harmful online interaction with other users; for example, peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
 - **Conduct:** online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying
 - **Commerce:** risks such as online gambling, inappropriate advertising, phishing and/or financial scams (Anti-phishing working group – apwg.org)
- The DSL and leadership team have read Annex B regarding Online Safety within 'Keeping Children Safe in Education'
- The School recognises the specific risks that can be posed by mobile phones and cameras and in accordance with KCSIE and has appropriate policies in place that are shared and understood by all members of the School community. Further information about specific approaches relating to this can be found in the 'e-safety Policy' which can be found via the School Google Drive
- As schools and colleges increasingly work online, it is essential that children are safeguarded from potentially harmful and inappropriate online material. The School has Smoothwall network filter and monitoring system in place. In addition to preventing access to harmful online material, it produces a daily report of any concerning activity to the DSL.
- The IT and Network Lead is responsible for the operation of the school's IT and filter system whilst the DSL and the Head are responsible for how this is implemented across the school. The management of the filter system considers the school's responsibility to safeguard and promote the welfare of pupils, providing them with a safe environment in which to learn. The school must also consider the age range of the pupils, those who are potentially at greater risk of harm and how often they access the IT system along with the proportionality of costs verses safeguarding risks

- The School acknowledges that whilst filtering and monitoring is an important part of School's online safety responsibilities, it is only one part of the approach to online safety. Pupils and adults may have access to systems external to the School control such as mobile phones and other internet enabled devices and technology and where concerns are identified appropriate action will be taken.
- The School acknowledge where children are being asked to learn online at home the department has provided advice to support schools and colleges do so safely.
- The school follows the guidance and expectations outlined in the Government paper 'Generative AI: product safety expectations' (<https://www.gov.uk/government/publications/generative-ai-product-safety-expectations/generative-ai-product-safety-expectations>)

The School will ensure that comprehensive information is relayed in order to enable all pupils to learn about and manage online risks effectively and will support parents and the wider school community (including all members of staff) to become aware and alert to the need to keep children safe online.

This policy was ratified on

and will be reviewed September 2026

Signed by the Board of Trustees

Reviewed and updated by Rob Jones (September 2025)