



**THE DOWNS**  
PREPARATORY SCHOOL  
BRISTOL

**Bertie's**  
NURSERY SCHOOL  
Wraxall

## 5.1

# Child Protection Policy and Safeguarding Policy and Procedures

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**The Downs Preparatory School & Bertie's Nursery**

|    |   |    |
|----|---|----|
| 1  | Key School Contacts   | 3  |
| 2  | Key External Contacts   | 4  |
| 3  | <u>Aims</u>   | 5  |
| 4  | <u>Scope &amp; Application</u>  | 5  |
| 5  | <u>Regulatory Framework</u>   | 6  |
| 6  | <u>Publication &amp; Availability</u>   | 7  |
| 7  | <u>Definitions</u>  | 8  |
| 8  | <u>Responsibility Statement &amp; Allocation of Tasks</u>                         | 8  |
| 9  | <u>Specific Duties in Relation to Children</u>                                    | 10 |
| 10 | <u>Responsibilities of Staff in Relation to Safeguarding</u>                      | 11 |
| 11 | <u>What to Do if Staff Have a Concern About a Pupil (Action by the DSL)</u>       | 11 |
| 12 | <u>Managing Support for Pupils Internally</u>                                     | 12 |
| 13 | <u>Multi-Agency Working</u>   | 13 |
| 14 | <u>Early Help</u>   | 14 |
| 15 | <u>Making a Referral</u>  | 15 |
| 16 | <u>Allegations Against Pupils – Child-on-Child Abuse</u>                          | 16 |
| 17 | <u>What to Do if Staff Have a Concern About Someone Else’s Welfare</u>            | 17 |
| 18 | <u>Allegations Against Staff</u>  | 17 |
| 19 | <u>Children Missing in Education</u>  | 17 |
| 20 | <u>Informing Parents</u>  | 17 |
| 21 | <u>Additional Reporting</u>   | 18 |
| 22 | <u>Safer Recruitment &amp; Supervision of Staff</u>                               | 18 |
| 23 | <u>E-Safety &amp; Use of Mobile Technology</u>                                    | 19 |
| 24 | <u>Safeguard Training</u>   | 19 |
| 25 | <u>Risk Assessment</u>  | 21 |
| 26 | <u>Monitoring &amp; Review</u>  | 22 |
| 27 | <u>Record Keeping</u>   | 22 |
| 28 | <b>Annex 1 - Indicators of Abuse</b>  | 24 |
| 29 | <b>Annex 2 - Concerns about a child – guidance for staff</b>                      | 38 |
| 30 | <b>Annex 3 - Dealing with allegations against staff</b>                           | 40 |
| 31 | <b>Annex 4 - Low Level Concerns</b>   | 43 |
| 32 | <b>Annex 5 - Responsibilities of the DSL</b>                                      | 45 |
| 33 | <b>Annex 6 - Role of Governing Body</b>   | 48 |
| 34 | <b>Annex 7 - KCSIE flow chart – actions when there are concerns about a child</b> | 49 |

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### Key School Contacts

Designated Safeguarding Lead

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Designated Safeguarding Lead for  
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SLT

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Nominated Safeguarding Governor for  
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Nominated Safeguarding Governor for  
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**Nick Pursall**

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If your concern is about a member of staff, then you must report it to the Head.

If your concern is about the Head then you must report it to the Chair of  
Governors: [chair@thedowns.avon.sch.uk](mailto:chair@thedowns.avon.sch.uk)

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| <b>Key External Contacts</b>  |  |
|---|--|
| North Somerset Children’s Services – Front Door (Care Connect)  | 01275 888690   |
| <u>LADO</u><br>0800-1800  | <u>07795092692</u><br><u><a href="mailto:lado@n-somerset.gov.uk">lado@n-somerset.gov.uk</a></u>  |
| Out of Hours Service (1800-0600)  | 01454 615165   |
| SPA Email address   | <a href="mailto:duty.intake@nsomerset.gov.uk">duty.intake@nsomerset.gov.uk</a>   |
| Local Safeguarding Children’s Board website where all information is available                                    | nsscp.co.uk  |
| <b>The local police non-emergency</b> contact number is 101   |  |
| <b>Prevent Partners and Advice about Extremism</b>  |  |
| Designated Officer for Allegations (DOFA)   | Julie Bishop <b>01275 888211</b>   |
| North Somerset Safeguarding Children’s Partnership  | Paul Cox - <b>07824 123627</b><br><a href="mailto:paul.cox@n-somerset.gov.uk">paul.cox@n-somerset.gov.uk</a>   |
| Channel Police Practitioner & Non-emergency DfE advice  | 01934 426880 or 020 7340 7264<br><a href="mailto:counter-extremism@education.gsi.gov.uk">counter-extremism@education.gsi.gov.uk</a>  |
| <b>Help Lines</b>   |  |
| UK Safer Internet Centre  | 0344 800 2382<br><a href="mailto:helpline@saferinternet.org.uk">helpline@saferinternet.org.uk</a><br><a href="https://swgfl.org.uk/services/professionals-online-safety-helpline">https://swgfl.org.uk/services/professionals-online-safety-helpline</a> |
| Ofsted  | 0300131231   |
| ISI   |  |
| NSPCC whistleblowing helpline   | 0808 800 5000<br><a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>  |
| Health and Safety Executive – Reporting (RIDDOR) <a href="http://www.hse.gov.uk/riddor">www.hse.gov.uk/riddor</a> |  |
| <b>Contact for Children</b>   |  |
| Childline   | 0800 1111  |
| NSPCC   | 0808 800 5000  |

### 3. Aims

This is the safeguarding and child protection policy and procedures of the Downs Preparatory School and Bertie's Nursery (referred to collectively as the "School").

The aims of this policy are as follows:

to actively promote and safeguard the welfare of children, staff and others who come into contact with the School;

to have clear procedures in place for dealing with and referring concerns about the welfare of any individual and/or allegations of abuse;

to raise the awareness of all staff of their safeguarding responsibilities and how to report concerns;

to ensure staff are familiar with the reporting procedure for low level concerns as set out in Appendix 4

to ensure staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children and others and feel supported in this role;

to ensure consistent good safeguarding practice throughout the whole school .

to ensure that child protection is at the forefront of all relevant aspects of process and policy and operate with the best interests of a child at heart.

### 4. Scope and Application

This policy applies to the whole School including the Early Years Foundation Stage (**EYFS**) and runs alongside the [North Somerset Threshold Document](#)

This policy applies at all times including where pupils or staff are away from the School.

This policy applies to core School activities and to out of hours and commercial activities.

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;

the specific obligations on the School to safeguard and promote the welfare of children, as defined below.

## 5. Regulatory Framework

This policy has been prepared to meet the School's responsibilities under:

Education (Independent School Standards) Regulations 2018;

*Statutory framework for the Early Years Foundation Stage* (DfE, March 2017);

Education and Skills Act 2008;

Children Act 1989;

Childcare Act 2006;

Children and Social Work Act 2017;

Data Protection Act 2018 and General Data Protection Regulation (GDPR);

Equality Act 2010 and;

Charities Act 2011.

This policy has regard to the following guidance and advice:

[Keeping Children Safe In Education \(DfE, September 2024\)](#) (**KCSIE**);

[Working together to safeguard children \(HM Government, updated Dec 2023\)](#) (**WTSC**);

Every Child Matters 2003

Statutory Framework for the Early Years Foundation Stage DfE 2017

[Disqualification under the Childcare Act 2006 \(DfE, 31 August 2018\)](#);

[Revised Prevent duty guidance for England and Wales \(HM Government, 2023\)](#);

[Channel duty guidance: protecting vulnerable people from being drawn into terrorism \(HM Government\)](#);

[Multi-agency statutory guidance on female genital mutilation \(HM Government, July 2020\)](#);

[What to do if you're worried a child is being abused: advice for practitioners \(HM Government, March 2015\)](#);

[Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers](#) (HM Government, July 2018);

[Sexting in schools and colleges: responding to incidents and safeguarding young people \(UK Council for Child Internet Safety \(UKCCIS\), March 2024\)](#);

[Children missing education \(DfE, August 2024\)](#);

[Child sexual exploitation: definition and a guide for practitioners local leaders and decision makers working to protect children from child sexual exploitation \(DfE, February 2017\)](#);

[Searching, screening and confiscation: advice for schools \(DfE, July 2022\)](#);

[Safeguarding children \(links to government guidance and resources\)](#)

[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 \(Charity Commission, June 2019\);](#)

North Somerset Safeguarding Children Partnership referral / threshold procedures / guidance.

Children Missing in Education (2016)

The following School policies and procedures are relevant to this policy:

Code of Professional Conduct at the Downs Preparatory School and Bertie's Nursery School 3.1 and Staff Code of Conduct including contact with children 3.2.

E-safety and Acceptable Use of ICT 3.16

Supporting Pupils with Mental Health Issues 5.4

Whistle Blowing Policy 5.1 App 2

Staff Selection Process 2.7

Behaviour Management Policy 6.1

Anti-bullying Policy 5.6

Security, Lone Working and Access Control Policy 7.9

Risk Assessment Policy 8.8

Missing Pupil Policy 5.1 App 3&4

Learning Support Policy 4.8

Accessibility Policy 8.6

Health and Safety Policy 8.1

Medical Treatment and First Aid Policy 5.9

Staff Selection process 2.7 (inc. Safer Recruiting Handbook)

## **6. Publication and Availability**

This policy is published on the School website.

This policy is available in hard copy on request and also available in the Staff Resource Area in The Downs Prep.

A copy of the policy is available for inspection from the Head's PA during the school day.

This policy can be made available in large print or other accessible format if required.

This policy and all policies referred to in it are also available to staff on the School's intranet, S:.

## 7. Definitions

Where the following words or phrases are used in this policy:

References to the **Proprietor** are references to the Board of Governors;

References to **working days** mean Monday to Saturday, when the School is open during term time. The dates of terms are published on the School's website. If referrals to an external agency are required outside term time, references to **working days** are to the days on which the relevant external agency is working;

**Safeguarding** is promoting physical and mental well-being and welfare by protecting the rights of adults to live in safety, free from abuse and neglect and safeguarding and promoting the welfare of children (as defined below).

**Safeguarding and promoting the welfare of children** is defined in KCSIE 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; and

taking action to enable all children to have the best outcomes.

**DSL** means the School's Designated Safeguarding Lead. References to the DSL include the Deputy DSL (**DDSL**) where the DSL is unavailable.

Reference to **staff** includes all those who work for or on behalf of the School, regardless of their employment status, including contractors, supply teachers and volunteers and Governors unless otherwise indicated.

## 8. Responsibility Statement and Allocation of Tasks

The Proprietor has overall responsibility for all matters which are the subject of this policy and has specific responsibilities as described in Part 2 of KCSIE.

The Proprietor has nominated senior board level members to take leadership responsibility for the School's and for the Nursery's safeguarding arrangements. Contact details are set out in the School contacts list at the front of this policy.

To ensure the efficient discharge of its responsibilities under this policy, the Proprietor has allocated the following tasks:



| <b>Task</b>   | <b>Allocated to</b>          | <b>When / frequency of review</b>  |
|---|------------------------------|------------------------------------|
| Keeping the policy up to date and compliant with the law and best practice  | Senior Leadership Team (SLT) | As required, and at least annually |
| Monitoring the implementation of the policy, relevant risk assessments and any action taken in response and evaluating effectiveness      | SLT                          | As required, and at least termly   |
| Maintaining up to date records of all information created in relation to the policy and its implementation as required by the GDPR        | SLT                          | As required, and at least termly   |
| Seeking input from interested groups (such as pupils, staff, parents) to consider improvements to the School's processes under the policy | SLT                          | As required, and at least annually |
| Formal annual review  | Proprietor                   | At least annually                  |

### **Designated Safeguarding Lead**

The Proprietor has appointed a senior member of staff of the school's leadership team to the role of the DSL. The current DSL is Deputy Head - Prep School. The DSL has the necessary status and authority to take lead responsibility for all aspects of safeguarding and child protection (including online safety) throughout the school.

The DSL also acts as the Prevent Lead for the school.

The DSL has the time, funding, training, resources and support to enable them to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings (and / or to support other staff to do so) and to contribute to the assessment of children. 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 Annex 5 of this document.

If the DSL is unavailable the activities of the DSL will be carried out by the Deputy DSL (DDSL). The DDSL's details are also set out in the school contacts list at the front of this policy.

The DDSL EYFS resumes responsibility for e-safety.

## Safeguarding Principles

The School will take 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.

Abuse is a form of maltreatment. Somebody may abuse or neglect a person by inflicting harm, or by failing to act to prevent harm. Abuse can take place wholly online, or technology may be used to facilitate offline abuse.

Any safeguarding concern raised by any person will be taken seriously and action taken in accordance with the relevant School policies and procedures.

### 9. Specific Duties in Relation to Children

Safeguarding and promoting the welfare of children is **everyone's responsibility**.

Every pupil should feel safe and protected from any form of abuse and neglect. The indicators of abuse and neglect and examples of specific safeguarding issues are set out in Annex 1.

The school is committed to acting in the best interests of the child so as to safeguard and promote the welfare of children and young people. The school requires everyone who comes into contact with children and their families to share this commitment.

The school will:

follow the local inter-agency procedures of the North Somerset Safeguarding Children Partnership;

Safeguard and be alert to signs of abuse both in the school and from outside and take steps to protect individuals from any form of abuse, whether from an adult or another child; deal appropriately with every suspicion or complaint of abuse and 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 staff and others who are innocent are not prejudiced by malicious, false, unsubstantiated or unfounded allegations; prepare staff to identify children who may benefit from early help;

be alert to the needs of pupils with physical or mental health conditions, special educational needs or disabilities, where additional barriers can exist when detecting abuse or neglect;

encourage a culture of listening to pupils and taking account of their wishes and feelings in any measure put in place by the school to protect them;

ensure that pupils are aware of the systems in place in the school for them to express their concerns, for instance via the tutor system, the pastoral care staff and the School's counselling service;

operate robust and sensible health and safety procedures and operate clear and supportive policies on drugs, alcohol and substance misuse;

assess the risk of pupils 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 pupils who may be vulnerable to radicalisation, and know what to do when they are identified; and

consider and develop procedures to deal with any other safeguarding issues which may be specific to individual pupils 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 wider environmental factors are present in a child's life that may be a threat to their safety and / or welfare.

Children's social care 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 School'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).

### 10. Responsibilities of Staff in Relation to Safeguarding

Staff members should maintain an attitude of "**it could happen here**" where safeguarding is concerned. When concerned about the welfare of a pupil, staff members should always act in the **best** interests of the pupil.

All staff have a duty to:

Record and report any concerns they may have about the safety and/or wellbeing of pupils;

Record and report any concerns they may have about the safety and/or wellbeing of other persons associated with the School;

Record and report any safeguarding concerns about staff or anyone else associated with the School;

Report any concerns of criminal offence being committed to the police.

The procedures for doing so are set out below. If staff are unsure about the process, they should not hesitate to speak to the DSL, senior leadership team or directly to children's social care or police in their absence for guidance.

### 11. What to Do if Staff Have a Concern About a Pupil

If staff have **any concern** about a pupil's welfare, action should be taken **immediately**.

A concern about a child is not defined and should be interpreted broadly. It may relate to a recognition that a child would benefit from extra support, to an emerging problem or to a potentially unmet need or may reflect a concern that a child may be deemed to be "in need" or at "immediate risk of harm" as defined by the Children Act 1989.

The member of staff must report the concern to the **DSL** or the **DDSL** in the DSL's absence, if neither are available then report the concern to a member of the SLT, or report directly to the local children's safeguarding social care team.

The contact details of the DSL and DDSL are set out in the contacts list at the front of this policy.

See Annex 2&3 for guidance about what to do when receiving a disclosure and recording a concern.

A written report should be collated during a disclosure or as soon as practically possible after the disclosure. Staff should record the date, time and sign the document and pass to DSL or DDSL immediately or record on CPOMS.

Teachers or staff must report known cases of female genital mutilation (FGM) to the police. See Annex 1 for further information about FGM and this reporting duty. All other staff should refer FGM concerns to the DSL.

### **What if the DSL is Unavailable?**

The DSL or the DDSL should always be available to discuss safeguarding concerns and may be contacted on their mobile phones in relation to any safeguarding concerns out of School hours.

If in exceptional circumstances the DSL and DDSL are unavailable, which may occur outside term time or school hours, staff must not delay taking action. Staff should speak to a member of SLT, or if they are not available, their line and / or advice should be taken from children's social care. The contact details are set out at the front of this policy.

Where a child is suffering, or is likely to suffer from harm, a referral to children's social care should be made immediately. Staff should be aware of the process for making referrals direct to children's social care and / or the police in these circumstances. See section 15 below for details on making a referral.

Any action should be shared with the DSL or DDSL, or a member of the SLT, as soon as is practically possible.

### **Action by the DSL**

On receipt of a report of a concern, the DSL will consider the appropriate course of action in accordance with the North Somerset Safeguarding Children Partnership procedures and referral threshold document. Such action may include:

managing any support for the pupil internally via the School's own pastoral support processes, seeking advice from children's social care where required (see Annex 3);

an early help assessment (see Annex 3); or

a referral for statutory services (see Annex 3).

The views of the child will be taken into account when considering the appropriate course of action but will not be determinative.

If it is decided that a referral is not required, the DSL will keep the matter under review and give ongoing consideration to a referral if the pupil's situation does not appear to be improving.

## **12. Managing Support for Pupils Internally**

The School has a framework for the identification, assessment, management and review of risk to pupil welfare so that appropriate action can be taken to reduce the risks identified. See the School's risk assessment policy (8.8) for pupil welfare.

The School Pastoral Care Policies and support processes are implemented by the School to support pupil welfare.

All staff should 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.

All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/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 child.

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

The Downs Prep is a relevant agency in the North Somerset Safeguarding Children Partnership and will work with appropriate agencies to safeguard and promote the welfare of children to identify and respond to their needs. This is in compliance with statutory guidance Working Together to Safeguard Children 2018.

Occasions that warrant a statutory assessment under the Children Act 1989:

- If the child is in need under s.17 of the Children Act 1989 (including when a child is a young carer and or subject to a private fostering arrangement).
- Or if the child needs protection under s.47 of the Children Act 1989 where they are experiencing significant harm, or likely to experience significant harm.

Referrals in these cases should be made by the DSL (or Deputy DSL) to Children's Social Care in the Local Authority in which that child resides.

Where the child already has a social worker, the request for service should go immediately to the social worker involved or, in their absence, to their team manager. If the child is a child in care, notification should also be made to the Virtual School.

The Downs Prep will co-operate with any statutory safeguarding assessments conducted by children's social care: this includes ensuring representation at appropriate inter-agency meetings such as Multi-Agency Safeguarding Hub (MASH), Family Meetings, initial and review child protection conferences and core group meetings.

#### **Additional Considerations**

- Where a learner and/or their family is subject to a child protection plan or a Multi-Agency Risk Assessment Conference (MARAC) meeting, the setting will contribute to the preparation, implementation, and review of the plan as appropriate.
- In situations where a child in care may be put on to part time timetable, the school will consult with the Virtual School following local procedures.
- **If there is a risk of harm, the police should be called via 999. For other concerns of criminality, Avon and Somerset Police have produced a helpful guide When to Contact the Police or schools may wish to contact their local School Liaison Officer (SLO)**
- **In the rare event that a child death occurs, or a child is seriously harmed, The Downs Prep will notify the North Somerset Safeguarding Children Partnership as soon as is reasonably possible.**

## 14. Early Help

Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years. The school understands that providing early help is more effective in promoting the welfare of children than reacting later.

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 and reporting 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;
- 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 displaying poor mental health
- is at risk of modern slavery, trafficking or exploitation;
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult 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.
- is sharing Consensual and non-consensual nude and semi-nude images and or videos

A member of staff 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 [North Somerset Safeguarding Children Partnership referral threshold document](#) and will support staff in liaising with other agencies and setting up an inter-agency assessment as appropriate.

If early help is appropriate, staff may be required to support other agencies and professionals in an early help assessment and will be supported by the DSL and carrying out this role. In some cases staff may be required to take a lead role.

The matter will be kept under review and consideration given to a referral to children's social care for assessment for statutory services if the pupil's situation appears to be getting worse, or does not appear to be improving.

## 15. Making a Referral

**Where a child is suffering, or is likely to suffer from harm, a referral to children's social care (and if appropriate the police) should be made immediately.** The referral can be made by any member of staff. The contact details for children's social care are set out at the front of this policy.

### Statutory Assessments

Children's social care may undertake a statutory assessment under the Children Act 1989 into the needs of the child. **Parental consent is not required to make a statutory referral.** It is likely that the person making the referral will be asked to contribute to this process. Statutory assessments include:

**Children in need:** A child in need is 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. Children in need may be assessed under section 17 of the Children Act 1989.

**Children suffering or likely to suffer significant harm:** Local authorities have a duty to make enquiries under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm.

Staff required to make a direct referral may find helpful the flowchart set out on page 24 of KCSIE 2024 and set out in p.57 of WTSC 2023 for information about the likely actions and decisions 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.

If the referral is made by telephone, this should be followed up in writing.

If the referral is made by someone other than the DSL, the DSL should be informed of the referral as soon as possible.

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 children's social care again.

Following a referral, if the child's situation does not appear to be improving, the local escalation procedures should be followed to ensure that the concerns have been addressed and that the child's situation improves.

## **16. Allegations against Pupils - Child on Child Abuse**

Allegations against pupils should be reported in accordance with the procedures set out in this policy (Annex 2). If harmful sexual violence and sexual harassment behaviour is alleged to have occurred (including online), the DSL will have regard to Part 5 KCSIE and take into account the local response of the police and children's social care to these issues. The views of the alleged victim will be taken into account but will not be determinative.

The Downs takes a zero-tolerance approach to abuse, and will never pass abuse off as "banter", "just having a laugh", "part of growing up" or "boys being boys" as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.

Even with a zero-tolerance approach, we take steps to educate and take action to mitigate the risk of contributing to a culture of unacceptable behaviours or a culture that normalises abuse

It is understood that child-on-child harm may reflect equality issues, those who may be targeted are more likely to have protected characteristics such as race, religion, gender, gender identity, SEND needs or sexuality.

All child-on-child abuse is unacceptable, irrespective of it being between boys-girls, girls-girls or boys-boys and will be taken seriously and dealt with on a case-by-case basis, without prejudices.

The Downs recognises that child-on-child abuse can include, but not be limited to: bullying (including cyberbullying, prejudice-based and discriminatory bullying); abuse in intimate personal relationships between children (also known as teenage relationship abuse); physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexual violence and sexual harassment. Staff training will be used to increase staff awareness of such types of abuse.

A pupil against whom an allegation of abuse has been made may be suspended from the School as a neutral measure during the investigation and the School's policy on behaviour, discipline and sanctions will apply. The School will take advice from children's social care and / or the police, as appropriate, on when and how to inform the pupil and his / her parents about the allegations and how investigation of such allegations will be conducted. The School will offer support via early help and multiagency to prevent escalation of potentially harmful behaviours. The school will carry out risk assessments and take all appropriate action to ensure the safety and welfare and continued education of all pupils 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 relevant agencies, 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.

All those involved in such allegations will be treated as being at risk and in need of support and the safeguarding procedures in accordance with this policy will be followed. Appropriate support will be provided to all pupils involved, including support from external services as necessary.

The means to protect the victim and preserve their anonymity of the victim must also be discussed and agreed with the police and other authorities involved.



## **17. What to Do if Staff Have a Concern About Someone Else's Welfare**

Staff who have concerns about the welfare of others or any other safeguarding issue not expressly covered by this policy, should report them in accordance to guidance in section 9.

In the absence of an express procedure about reporting, they should report such concerns to their line manager in the first instance.

## **18. Allegations against Staff**

The School has procedures for dealing with safeguarding concerns and allegations against staff, supply staff, contractors and volunteers:

The procedures in this policy apply to staff who pose a risk of harm to children and aim to strike a balance between the need to protect children from abuse and the need to protect staff from malicious, false, unsubstantiated or unfounded allegations. Staff should follow Part 4 of KCSIE and reference the low-level concerns procedure set out in Appendix 4.

The School will follow its employment procedures for dealing with any other concern raised about staff, involving external agencies as appropriate.

Detailed guidance is provided to staff to ensure that all staff are clear on the rules of conduct and the expectations of the School in relation to contact with pupils, parents, colleagues and any other person who comes into contact with the School. This guidance is contained in the Staff Employment Handbook and Code of Professional Conduct including contact with children (3.2) and includes details of additional safeguarding arrangements where staff engage in one-to-one teaching and meetings with pupils.

## **19. Children Missing in Education**

**The Downs Prep** will follow the guidance detailed in Children Missing Education (2016) and Children Missing Education North Somerset Policy. The DSL or deputy will inform the local authority where the child lives if:

Any pupil fails to attend school regularly or,

A pupil has been absent without the school's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the school and the local authority.

## **20. Informing Parents**

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), children's social care, the police and / or the pupil before discussing details with parents.

In all cases, the DSL will be guided by the North Somerset Safeguarding Children Partnership referral threshold document.

See also Annex 3 for details about the disclosure of information where an allegation has been made against a member of staff.

## 21. 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 \(Charity Commission, June 2019\)](#).

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 policies **Insurers**.

The School will 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 any be concurrent cover under existing and historic policies.

Care should be taken to ensure this is done before renewal 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.

## 22. Safer Recruitment and Supervision of Staff

The School is committed to practising safer recruitment in checking the suitability of staff (including staff employed by another organisation). See the School's Recruitment, Selection and Disclosure Policy and Procedure.

The School maintains a single central register of appointments for all staff.

Staff connected to the School's early years and later years provisions are under an ongoing duty to inform the School if their circumstances change which would mean they meet any of the criteria for disqualification under the Childcare Act 2006. Staff should refer to the School's Recruitment, Selection and Disclosure Policy and Procedure for further information about this duty and to their contract of employment in respect of their ongoing duty to update the School.

The School's protocol for ensuring that visiting speakers are suitable and appropriately supervised is set out in the School's separate Security, Lone Working and Access Control Policy.

## **23. E-Safety & Use of Mobile Technology**

The School's policy on the use of mobile technology, including phones and cameras, in the School, is as follows:

the School's E-Safety and Acceptable Use of ICT policy for pupils which sets out the expectations on pupils from Reception to Year 8. Pupils are not permitted to bring mobile phones or any mobile device with a camera facility onto the premises and staff secure their mobile phones out of sight in the designated area. Any visitors to Bertie's Nursery leave their mobile phones in the office, before they move into the children's area of the Nursery and collect them as they leave the setting;

all staff (including staff in the EYFS setting) should use mobile devices and cameras in accordance with the guidance set out in the Staff Code of Conduct (3.2);

staff may not take any image of a child on their own mobile device unless approved by a member of SLT.

staff may not take any image on any device to record a child's injuries;

parents of all pupils (including parents of pupils in the EYFS classes at the Downs Preparatory School) may bring mobile devices 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.

The School's approach to online safety is set out in the School's E-safety and Acceptable Use of ICT (3.16, R: Policies).

## **24. Safeguard Training**

The School ensures that regular guidance and training is arranged on induction and at regular intervals thereafter so that staff understand what is expected of them by this policy and have the necessary knowledge and skills to carry out their roles.

The level and frequency of training depends on role of the Individual member of staff.

The School maintains written records of all staff training.

All training will be carried out in accordance with North Somerset Safeguarding Children Partnership procedures where possible.

The School draws upon the training and expertise of its staff experienced in safeguarding practices to contribute to and shape its safeguarding arrangements and this Policy.

The Downs Prep makes provision for teaching children about online safety through PSHE, IT curriculum and supported through assemblies.

## **Induction**

Please read in conjunction with Induction and Mentoring of New Colleagues 3.5. All staff, including temporary staff and volunteers, will be provided with induction training that includes awareness of:

this policy;

the role, identity and contact details of the DSL and the DDSL;

the Behaviour Management Policies for pupils (6.1);

the Staff Code of Conduct (3.2) including the whistleblowing policy (5.1 App 2), E-safety and Acceptable Use of ICT (3.16);

the safeguarding response to children who go missing from education;

the School's approach to online safety and use of personal mobile devices;

safeguarding training in accordance with North Somerset Safeguarding Children Partnership procedures including guidance on managing and reporting concerns over child welfare or concerns over potentially harmful actions of an adult towards a child.

Training on of Part 1 or Annex A of KCSIE 2024 (dependent on whether the role is child facing) and Annex B.

The level of safeguarding information shared with volunteers is assessed on risk and is proportionate to the volunteers' involvement with the pupils.

### **Safeguard Training**

All staff including the Head will receive a copy of this policy. Staff who work closely with children will be required KCSIE Part 1 and Annex B. Staff who do not work closely with children should read Annex A. Staff will be required to complete the relevant online training module to confirm that they have read and understand these. Additional training is provided when the KCSIE and/or policy are updated.

The Head and all staff members will undertake appropriate safeguarding training following consultation with the North Somerset Safeguarding Children Partnership. In addition, all staff members will receive safeguarding and child protection updates via email, and staff meetings on a regular basis and at least annually.

Staff development training will also include training on online safety, searching pupils for prohibited and banned items, and Prevent duty training assessed as appropriate for them by the School.

Additionally, the School will make an assessment of the appropriate level and focus for staff training and responsiveness to specific safeguarding concerns set out in Annex B ensure that staff have the skills, knowledge and understanding to keep looked after children safe.

All Governors receive safeguarding training on induction. The Nominated Safeguarding Governor and the Chair of Governors will receive additional appropriate training to enable them to fulfil their safeguarding responsibilities. Governors will complete KCSIE Part 2 on an annual basis. Governors will be equipped with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in the school are effective and support the whole school approach to safeguarding.

Governors shall be made aware of their obligations under the Human Rights Act 1998, the Equality Act 2010 and their local multi-agency safeguarding arrangements.

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 knowledge, skills and experience to safeguard children effectively, including staff meetings, termly safeguarding newsletter and professional development reviews. 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 (DSL)**

The DSL and Deputy DSL will undertake biennial interagency training to provide them with the knowledge and skills required to carry out the role. This training 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 Annex 5.

Prevent duty training will be consistent with Home Office Workshop to Raise Awareness of Prevent (**WRAP**) training if available.

## **Teaching Pupils About Safeguarding**

The School teaches pupils about safeguarding through the curriculum and PSHE / RSE. This includes guidance on adjusting behaviour to reduce risks, particularly, building resilience to protect themselves and each other, 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 RSE education appropriate to their age and stage of development.

Pupils are given the opportunity to talk about safeguarding issues within the classroom environment and are made aware of the processes by which any concerns they have can be raised, including the processes for reporting a concern about a friend or fellow pupil, and how any report will be handled. Pupils know their class teachers well and displays around the school offer guidance of who else they can speak to if they have any concerns. Pupils know that their concerns will be listened to and taken seriously via follow up from staff involved.

The safe use of technology is a focus in all areas of the curriculum and key ICT safety messages are reinforced as part of assemblies and tutorial / pastoral activities. Pupils are taught to adjust their behaviours in order to reduce risks. The School has appropriate filters and monitoring systems in place (see the E-safety and Acceptable Use of ICT (3.16) and is mindful that this should not lead to unnecessary restrictions on learning.

## **25. 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 will be tasked with, carrying out the particular assessment.

## **26. 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 Proprietor as necessary and seeking contributions from staff. The DSL will update the Senior Leadership Team regularly on the operation of the School's safeguarding arrangements.

Any safeguarding incidents at the School will be followed by a review of these procedures by the DSL and a report made to the Proprietor. 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 safeguarding arrangements at any time will be remedied without delay.

The Proprietor 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 inter-agency working through an annual safeguarding audit.

The DSL will work with the Nominated Safeguarding Governor, preparing a written report commissioned by the Proprietor. 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 Proprietor should also consider independent corroboration, such as:

- inspection of records or feedback from external agencies including the Designated Officer(s);

- reports of ISI / Ofsted inspections;

- the outcome of any relevant parental complaints; and

- press reports.

The Proprietor will review the safeguarding audit, 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 Proprietor will be made.

## **27. Record Keeping**

All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

The records created in accordance with this policy may contain personal data. The School has a number of privacy notices which explain how the School will use personal data for the benefit of pupils and parents. The privacy notices are published on the School's website. In addition, staff must ensure that they follow the School's data protection policies and procedures when handling personal data created in connection with this policy. This includes the School's Data Protection Policy and Information Security Policy.

All records created in accordance with this policy are managed in accordance with the School's policies that apply to the retention and destruction of records.

Insofar as pupil records are concerned:

- Staff must record all concerns about a pupil on the School's record tracking system.

The DSL will open a child protection file following a report to him / her of a child protection concern about a pupil. The DSL will record all discussions with both colleagues and external agencies, decisions made and the reasons for them and detail of the action taken.

### **Information Sharing and Multi-Agency Working**

The School will treat all safeguarding information with an appropriate level of confidentiality, only involving others where appropriate. The School will always act in order to safeguard and promote the welfare of others.

The School understands that information sharing is essential for effective safeguarding and promoting the welfare of children and young people. Fears about sharing information will not stand in the way of the need to promote the welfare, and protect the safety, of pupils, which is always the School's paramount concern. The School understands that the GDPR and Data Protection Act 2018 provide a framework to ensure that personal information is shared appropriately.

The School will co-operate with children's social care, and where appropriate the police, to ensure that all relevant information is shared for the purposes of early help assessments, and assessments and child protection investigations under 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 children's social care to agree the information that should be disclosed and to whom.

While the School will share information with those involved where and when it is appropriate to do so, they may be unable to for reasons of data protection and confidentiality, for example because to do so may pose a risk of harm to others or because it has been prohibited by external agencies.

## 28. Annex 1 Indicators of Abuse

### Types of Abuse

Part 1 of KCSIE defines the following indicators of abuse and neglect, 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.

**Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children.

**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 from 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, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers);



or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

## **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 well-being;

the pupil appears neglected, e.g. dirty, hungry, inadequately clothed;

the pupil is reluctant to go home, or has been openly rejected by his / her parents or carers; and

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.

A pupil displaying poor mental health can be a sign or indicator of abuse, neglect or exploitation.

The North Somerset Safeguarding Children Partnership can provide advice on the signs of abuse and the DfE advice [What to do if you're worried a child is being abused \(March 2015\)](#) provides advice in identifying child abuse. The [NSPCC website](#) is also a good source of information and advice.

## **Specific Safeguarding Issues**

Statutory guidance acknowledges the following as specific safeguarding issues:

child Abduction and community safety incidents

children and the court system;

children missing in education

children with family members in prison;

child sexual exploitation child criminal exploitation: county lines;

modern slavery and the National Referral Mechanism

cybercrime;

homelessness;

online safety; mental health and wellbeing;

so-called 'honour-based' violence;

Female Genital Mutilation (FGM);

Forced Marriage;

preventing radicalisation and the Prevent Duty;

child on child abuse;

sexual violence and sexual harassment between children in schools and colleges;

Sexting;

Up-skirting;

Serious youth violence;

Domestic Abuse;

Further advice and links to guidance on these specific safeguarding issues can be found in Annex B of KCSIE 2024. Staff should be particularly aware of the safeguarding issues set out below.

### **Child Abduction and Community Safety Incidents**

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers. Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

### **Children and the Court System**

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age-appropriate guides to support children 5-11-year olds and 12-17 year olds. The guides explain each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained. Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

### **Children Missing Education**

Children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. 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.

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.

This will assist the local authority to:

fulfil its duty to identify children of compulsory school age who are missing from education; and

Follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect or radicalisation. The School shall inform the local authority of any pupil who:

fails to attend School regularly; or

has been absent without the School's permission for a continuous period of 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).

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

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders, NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

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

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

**Child Criminal Exploitation (CCE).** Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others. Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to. It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

**Child Sexual Exploitation (CSE).** CSE is a form of child sexual abuse. That may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet. CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media. CSE can affect any child, who has been coerced into engaging in sexual activities. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

**County lines** is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of “deal line”. This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children’s homes and care homes. Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. A number of the indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

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

## **Modern Slavery and the National Referral Mechanism**

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the [Modern Slavery Statutory Guidance](#). **Cybercrime**

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

Cyber-dependent crimes include;

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

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

## **Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm. The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the new duties: Homeless Reduction Act Factsheets. The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

## **Online Safety**

This should be read in conjunction with policy 3.16 E-Safety and Acceptable Use online.

Online Safety is an integrated and interwoven theme with other safeguarding considerations. It is essential that the DSL takes a lead on ensuring that interventions are effective. This means coordinating support and engaging with other colleagues in the setting who may have more technological expertise such as the Head of ICT and Network Services Manager.

The School is committed to addressing online safety issues around content, contact, conduct and commerce. This includes: Ensuring that online safety is concerned in relevant policies and procedures.

Online safety is interwoven in safeguarding training for staff and safeguarding on the curriculum for pupils.

Acknowledging that child on child abuse can happen via mobile and smart technology between individuals and groups. This should be approached in the same process outlined in section 3.14 Responding to incidents of child on child harm.

Provision of education via remote learning will comply with **governmental advice Safeguarding and remote education**

The effectiveness of the setting's ability to safeguarding learners in respect to filtering and monitoring, information security and access management alongside the above will be reviewed annually.

## **Mental Health and Wellbeing**

This section should be read in conjunction with policy 5.4 Supporting Pupils with Mental Health issues.

The Downs School has an important role to play in supporting the mental health and wellbeing of its pupils. Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

The school will commit to undertake the following:

Ensuring that there is a Mental Health and Wellbeing Coordinator within the school and that key teaching and pastoral staff have received training from Mental Health First Aid England in Youth Mental Health First Aid.

Early identification of vulnerability to mental health problems by reviewing attendance, behaviour, attainment and safeguarding records at least on a termly basis.

Ensuring that pupils can report and share concerns

Staff will follow a safeguarding process in terms of reporting concerns outlined in Appendix 2 so the DSL and DDSLs can assess whether there are any other vulnerabilities can be identified.

Staff will ensure the immediate health and safety of a pupil who is displaying acute mental health distress. This may require support from emergency services via 999 if the learner is at risk of immediate harm.

DSLs/DDSLs will consider whether a case can be managed internally, through early help, or should involve other agencies as required.

The school will communicate and work with parents to ensure that interventions are in the best interests of the child.

DSLs will liaise with staff to ensure reasonable adjustments are made and develop ways to support achieving positive educational outcomes.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem – DSLs and the senior leadership team should be able to access specialist advice through targeted services or through their locality Primary Mental Health Specialists from Child and Family Consultation Services.

The school will also ensure that: Preventative measures in terms of providing safeguarding on the curriculum will provide opportunities for pupils to identify when they may need help, and also to develop resilience.

We adopt a 'whole school approach' to deliver high quality teaching around mental health and wellbeing with involvement of pupils and parents.

a culture and environment that promotes mental health and wellbeing is adopted

pupils and staff are aware of and able to access a range of mental health services

it actively supports staff wellbeing

## **Honour-Based Violence**

All forms of so-called honour-based violence are abuse (regardless of motivation) and should be handled and escalated as such. 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 social care

## **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. Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 38-41 of the [Multi-agency statutory guidance on FGM \(HM Government, April 2016\)](#) (pages 59-61 focus on the role of schools).

All staff must be aware of the requirement for teachers 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 \(December 2016\)](#) for further details about the duty.

Guidance published by the [Department for 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. Forced Marriages now include anything done to make someone before they turn 18, even if there is no pressure or abuse.

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 \(HM Government, June 2014\)](#)

Staff should speak to the DSL if they have any concerns. Pages 32-36 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 [fm@fco.gov.uk](mailto:fm@fco.gov.uk) for advice and information.

## **Preventing Radicalisation and the Prevent Duty (Including Additional Support)**

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 extremist ideologies associated with terrorist groups."*

There is no single way of identifying an individual who is likely to be susceptible an extremist 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. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the DSL making a referral to the Channel programme, having consulted [Channel duty guidance: protecting vulnerable people from being drawn into terrorism \(HM Government, April 2015\)](#).

The DfE and Home Office's briefing note [The use of social media for online radicalisation \(July 2015\)](#) includes information on how social media is used to radicalise young people and guidance on protecting pupils at risk.

## **Child-on-Child Abuse**

The school adopts a zero-tolerance policy towards Child on child abuse whether inside or outside of school or online. 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 and should be reported directly to the DSL. The DSL will record all instances of Child-on-child abuse, follow up and investigate with the children involved (and parents if necessary) and contact the LADO if a safeguarding issue has arisen.

SLT will seek to identify any vulnerability early by reviewing attendance, behaviour, attainment and safeguarding records at least on a termly basis. Regular pastoral care group meetings are held to discuss such pupils and will review above data weekly.

The school acknowledges that even if there are no (or minimal) cases of child on child abuse reported that abuse may still be present in the school and the school must not therefore become complacent

Safeguarding issues can manifest themselves via child on child abuse. This includes, but is not limited to:

- bullying (including cyber-bullying);
- Prejudice-based and discriminatory bullying
- abuse in intimate relationships between children
- 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);
- up-skirting; and
- Initiation / hazing type violence and rituals.
- sharing Consensual and non-consensual 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.

**Harmful sexual behaviour** is an umbrella term that includes sexual violence and sexual harassment. 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. Staff are made aware that some groups are at greater risk of sexual violence – girls, pupils with special educational needs and LGBT children. LGBT children always have a trusted adult that they can talk to.

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. Staff know to challenge any abusive behaviour between pupils as set out in the school behaviour policy. Risk assessments are carried out and kept under review. Appropriate action is taken to protect pupils identified as being at risk including the particular vulnerabilities of those with a special educational need or disability (see the School's Pupil Welfare Risk Assessment).

The school acknowledges that abusive behaviour by pupils must be taken seriously or it can lead to a culture of unacceptable behaviour and an unsafe environment for children. Behaviour will not be dismissed as being normal between young people, as "banter", "boys being boys", "just having a laugh" or simply "part of growing up". Behaviour such as initiation violence or any form of sexual violence or sexual harassment is not acceptable.

## **Sexual Violence and Sexual Harassment Between Children**

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

Children who are victims of sexual violence and sexual harassment are likely to find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. The School will respond to allegations seriously and all victims will be offered appropriate support.

The School is aware of the importance of:

making it clear to pupils that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;

Ensuring children understand that the law on child on child abuse is there to protect them rather than criminalise them.

not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys"; and is aware that failure to do so can lead to a culture of unacceptable behaviour and an unsafe environment for children.

Challenging behaviours (which are potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

Ensuring that the victim does not feel ashamed, minimised, or that they are creating a problem by reporting sexual violence and harassment.

Its initial response to an incident and how this can affect future victims.

References to **sexual violence** are references to sexual offences under the Sexual Offences Act 2003, specifically rape, assault by penetration and sexual assault.

References to **sexual harassment** mean "unwanted conduct of a sexual nature" that can occur online and offline. In the context of child on child sexual harassment, it is likely to: violate a child's dignity; and / or make them feel intimidated, degraded or humiliated; and / or create a hostile, offensive or sexualised environment.

The school will respond to all allegations of Sexual violence and sexual harassment in accordance with Part 5 of KCSIE. Consideration must be given to:

the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however need to be balanced with the school's or college's duty and responsibilities to protect other children

the nature of the alleged incident(s), including whether a crime may have been committed and/or whether HSB has been displayed

- the ages of the children involved

- the developmental stages of the children involved

- any power imbalance between the children. For example, is/are the alleged perpetrator(s) significantly older, more mature, confident and well known social standing? Does the victim have a disability or learning difficulty? •

- if the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature)

- that sexual violence and sexual harassment can take place within intimate personal relationships between children

- importance of understanding intra familial harms and any necessary support for siblings following incidents

- are there ongoing risks to the victim, other children, adult students or school or college staff.

- other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

The DfE guidance [Sexual violence and sexual harassment between children in schools and colleges](#) provides further detailed advice.

## **Sexting**

"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; or

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 Child Line (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 responding 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.

## **Up-Skirting**

Up-skirting is a criminal offence. It typically involves taking a picture under a person's clothing without their knowledge, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or to cause the victim humiliation, distress or alarm.

## **Serious Youth Violence**

A gang is defined as a group of young people, especially young men, who spend time together, often fighting with other groups and behaving badly. Youth violence refers to harmful behaviours that can start early and continue into young adulthood.

The young person can be a victim, an offender, or a witness to the violence.

Youth violence includes various behaviours including some violent acts such as bullying, slapping or hitting. These behaviours can cause more emotional harm than physical harm. Other behaviours such as robbery and assault (with or without weapons) can lead to serious injury or even death.

Some indicators that a young person may be at risk from or involved with violent crime may include:

- a) Increased absence from school;
- b) a change in friendships with older individuals;
- c) a significant decline in performance;
- d) signs of self-harm or a change in well-being, or signs of assault or unexplained injuries; and
- e) unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with individuals associated with criminal gangs.

## **Domestic Abuse**

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn

## **Special Educational Needs and Disabilities (SEND)**

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 policies on special educational needs and disability.

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 that:

assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the pupil's special educational need or disability without further exploration;

pupils with a special education need or disability can be disproportionately impacted by bullying without outwardly showing any signs; and

pupils with a special educational need or disability can be more prone to group isolation or bullying (including prejudice-based bullying) than any other children.

there may be communication barriers which are difficult to overcome to identify whether action under this policy is required.

## **Looked After Children and Previously Looked After Children**

The Proprietor 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 Designated teacher for looked after children maintains these details, including contact details of the child's social worker and , where appropriate, the child's Virtual school head.

## **Care Leavers**

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.

## **29. Annex 2: Concerns About a Child - Guidance for Staff**

### **Receiving a Disclosure**

Listen carefully and keep an open mind. Do not take a decision as to whether or not the abuse has taken place.

Any pupil making a report must be reassured that they are being taken seriously and that they will be supported and that they must not feel ashamed.

Do not ask leading questions, i.e. a question which suggests its own answer.

Reassure the pupil but not give a guarantee of absolute confidentiality. Explain the need to pass on the information in accordance with this policy so that the correct action can be taken.

Keep a sufficient written record of the conversation (see below). All other evidence, for example, scribbled notes, mobile phones containing text messages, clothing, computers, must be kept securely with the written record.

Pass on the record when reporting the concern in accordance with this policy.

### **Recording a Concern**

Staff must record all concerns in writing.

All records should be factual. If records are not emailed, then records should be signed and dated, with the name of the signatory clearly printed in writing or recorded directly onto CPOMS with the correct safeguarding categories allocated. Records should include:

the pupil's details: name; date of birth; address and family details;

date and time of the event / concern / conversation;

the action taken and by whom;

the name and position of the person making the record.

CPOMS is the preferred method of recording concerns. When this is not possible to access, staff should email the DSL and/or DDSL with a factual record. If emails cannot be accessed a written account should be passed to the eDSL and/or DDSL and will be recorded.

### **Receiving a Report of Harmful Sexual Behaviour**

Additional guidance about how to manage a report of harmful sexual behaviour is provided in Part 5 KCSIE. This includes the following advice:

Only record the facts as the child presents them.

Where the report includes an online element, do not view or forward illegal images of a child. See the UK Council for Child Internet Safety's advice note [Sexting in schools and colleges: responding to incidents and safeguarding young people \(August 2016\)](#) for advice about what to do when viewing an image is unavoidable.

Manage reports with another member of staff present (preferably the DSL or DDSL), if possible.

Inform the DSL as soon as practically possible if the DSL is not involved in the initial report.

In the DSL's absence, if neither are available then report the concern to a member of the SLT, or report directly to the local children's safeguarding social care team.

## **Use of Reasonable Force**

There are circumstances when it would be appropriate for staff to use reasonable force to safeguard pupils. 'Reasonable' in these circumstances means using no more force than is needed.

Staff should refer to Behaviour Management Policy (6.1) and the Staff Code of Conduct including contact with children (3.2) for more detailed guidance about the use of reasonable force.

## **30. Annex 3 Dealing with Allegations Against Staff**

### **The School's Procedures**

The School's procedures for dealing with allegations made against staff (including supply staff and volunteers) will be used where the member of staff or volunteer 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; or

behaved towards a child or children in a way that indicates he or she would pose a risk of harm if he or she work regularly or closely with children.

Any allegations not meeting this criteria will be dealt with in accordance with the school's Low Level Concerns Procedure as set out in Appendix 4 below.

All such allegations must be dealt with as a priority without delay.

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 allegations that come to the School's attention and appear to meet the criteria in paragraph 0 above.

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

Allegations regarding a member of supply staff, will be handled in conjunction with the employment agency.

### **Reporting an Allegation**

Where an allegation or complaint is made against any member of staff (other than the Head), including the DSL, supply staff, contractors and volunteers the matter should be reported immediately to the Head. The allegation will be discussed immediately with the Designated Officer(s) before further action is taken. Where appropriate, the Head will consult with the DSL.

Where an allegation or complaint is made against the Head, the matter should be reported immediately to the Chair 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. The Chair 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 Chair of Governors or the Nominated Safeguarding Governor. If either the Chair of Governors or the Nominated Safeguarding Governor are the subject of an allegation, the matter should be reported to the other. The allegation will be discussed immediately with the Designated Officer(s) before further action is taken. Where appropriate, the Chair of Governors will consult the Nominated Safeguarding Governor, and vice versa.

Where a conflict of interest may arise in reporting the matter to the head, the matter should be referred directly to the Designated Officer(s).

If it is not possible to report to the Head or Chair 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 Chair of Governors and the Nominated Safeguarding Governor.



The person taking action in accordance with the procedures in this Appendix is known as the **Case Manager**.

### **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 allegation 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. Parents will be made aware of this legal requirement to maintain confidentiality and a teacher's right to anonymity.

### **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.

### **Early Years Foundation Stage (EYFS)**

The School will inform Ofsted of any allegations of serious harm or abuse by any person living, working or looking after children on the premises of the EYFS provision (whether that allegation relates to harm or abuse committed on the premises or elsewhere), and will provide details of the action taken in respect of those allegations.

These notifications will be made as soon as reasonably practicable, but in any event within 14 days of the allegations being made.

### **Ceasing to Use Staff**

If the School ceases to use the services of a member of staff because they are unsuitable to work with children, a settlement 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 Governing Body without delay. The School may also need to consider a referral to the DBS if a member of staff is suspended, or deployed to another area of work that is not regulated activity.

If a member of staff tenders his or her resignation, or ceases to provide his or her services at a time when child protection concerns exist in relation to that person, those concerns will still be followed up by the School in accordance with this policy and a referral to the DBS will be made promptly if the criteria for referral are met.

Separate consideration will be given as to whether a referral to the Teaching Regulation Authority (**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. An interim referral to the TRA may also be considered and made if appropriate.

## **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.

## **Record Keeping**

Details of allegations found to be malicious will be removed from personnel records.

For all other allegations, full details will be recorded on the confidential personnel file of the person accused. A clear and comprehensive summary of the allegation, details of how it was followed up and resolved is held and a copy provided to the person concerned.

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 been 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.

At the conclusion of a case where the allegation is substantiated, the School will review all circumstances of the case to determine whether there are improvements to be made to the School's procedures or practice to prevent similar events in the future.

The school will keep a record of all low-level concerns and review half termly. Records will be kept separately of any e-safety, bullying, extremist behaviour or sexual harassment logs.

## **31. Annex 4 Low Level Concerns**

The aim of the School's low-level concern procedure is to facilitate a culture in which the clear values and expected behaviours which are set out in our Code of Conduct are lived, constantly monitored, and reinforced by all staff. This is consistent with 'Working Together to Safeguard Children' which states "Children are best protected when professionals are clear about what is required of them individually and how they need to work together".

In particular, the intention of this policy is to:

- maintain a culture of openness, trust and transparency in which staff are confident and clear about expected behaviours of themselves and their colleagues, the delineation of boundaries and reporting lines;
- ensure staff feel empowered to raise any low-level concern, whether about their own or a colleague's behaviour, where that behaviour might be construed as falling short of the standards set out in our Code of Conduct; and
- provide for responsive, sensitive and proportionate handling of such concerns when they are raised – maintaining on the one hand confidence that concerns when raised will be handled promptly and effectively whilst on the other hand protecting staff from false allegations or misunderstandings.

### **What is a low-level concern:**

A low-level concern for this purpose is any concern, no matter how small and even if no more than a 'nagging doubt', that an adult may have acted in a manner inconsistent with the School's Code of Conduct or simply – even if not linked to a particular act or omission – a sense of unease as to the adult's behaviour particularly towards or around children. KCSIE 2024 gives examples such as (but not limited to):

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone or using their mobile phones around children in school;
- engaging with a child on a one-to-one basis in a secluded area.

### **Low-level concerns about self (Self-reporting/referral):**

From time to time an individual may find him/herself in a situation which might appear compromising to others or which could be misconstrued. Equally, an individual may for whatever reason have behaved in a manner which on reflection he/she considers falls below the standard set out in the Code of Conduct. Self-reporting in these circumstances is encouraged as it demonstrates both awareness of the expected behavioural standards and self-awareness as to the individual's own actions or how they could be perceived. As such, the School sees self-reporting/referral of low-level concerns as an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

Staff should report any self-referral concerns to a member of SLT who will record it accordingly on low-level concerns log.

### **Low-Level Concerns about another adult**

From time to time an individual may notice behaviour or actions in others which leave them concerned. These are behaviour or actions which fall short of a formal allegation of abuse. These tend to be behaviours which indicate that our Code of Conduct has not been met. Any such

concerns can be dealt with as a Low-Level Concern and should be reported as such to a member of SLT.

**What should I do if I have one:**

Where a low-level concern exists it should be reported to the Headteacher or DSL in writing as soon as reasonably possible and in any event within 24 hours of becoming aware of it (where the concern relates to a particular incident).

**How will my low-level concern be handled:**

The Headteacher or DSL will in the first instance satisfy themselves that it is a low-level concern and should not be reclassified as an allegation and dealt with under the appropriate procedure set out above. The circumstances in which a low-level concern might be reclassified are where:

- (a) the threshold is met for an allegation
- (b) there is a pattern of low-level concerns which collectively amount to an allegation or
- (c) there is other information which when taken into account leads to an allegation.
- (d) where the Headteacher or DSL is in any doubt whatsoever, advice will be sought from the LADO, if necessary, on a no-names basis.

Should it be considered that the actions of a member of staff have, or could possibly lead to, a detrimental impact to the mental or physical health of a pupil the LADO will be informed.

Having if it is established that the concern is low-level, the DSL or Headteacher as appropriate will discuss it with the individual who has raised it and will take any other steps to investigate it as necessary. Most low-level concerns by their very nature are likely to be minor and will be dealt with by means of management guidance, training etc.

If a low-level concern is received about a member of staff that is either supply or contracted the procedure above will be followed and in addition their employer will be notified.

**What records will be kept:**

Where a low-level concern has been communicated, a confidential record will be kept in a central file which logs all low-level concerns. This is necessary to enable any patterns to be identified. However, no record will be made of the concern on the individual's personnel file (and no mention made in job references) unless either:

- a) the concern (or group of concerns) has been reclassified as an allegation as above; or
- (b) the concern (or group of concerns) is sufficiently serious to result in formal action under the school's grievance, capability or disciplinary procedure.

## 32. Annex 5

### Responsibilities of the Designated Safeguarding Lead (DSL)

The name and contact details of the DSL and Deputy DSL are set out in the contacts list at the front of this policy.

In accordance with KCSIE, the main responsibilities of the DSL are:

#### Managing Referrals

The DSL is expected to:

- (a) refer cases of suspected abuse to the local authority children's social care as required;
- (b) support staff who make referrals to the local authority children's social care;
- (c) refer cases to the Channel programme where there is a radicalisation concern as required;
- (d) support staff who make referrals to the Channel programme;
- (e) refer cases where a person is dismissed or has left due to risk / harm to a child to the Disclosure and Barring Service (**DBS**) as required;
- (f) refer cases where a crime may have been committed to the police as required; and
- (g) make an immediate risk and needs assessment where a report of sexual violence has been made, and consider the need for risk and needs assessment where sexual harassment has been reported.
- (h) Act as the schools' Prevent Lead

#### Work with Others

The DSL is expected to:

- (i) liaise with the Head to inform him / her of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- (j) as required, liaise with the Case Manager and the designated officer(s) at the local authority for child protection concerns in cases which concern a staff member;
- (k) liaise with staff (especially pastoral support staff, school nurses, IT technicians and SENCOs/named person with oversight for 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;
- (l) act as a source of support, advice and expertise for staff

- (m) ensure that all visitors to the School are made aware of the identity of the DSL and how to contact him/her in the case of a concern.

## **Raise Awareness**

The DSL should:

- (n) ensure the School's child protection and safeguarding policies and processes are known, understood and used appropriately;
- (o) ensure this policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the Proprietor regarding this;
- (p) ensure this policy is available publicly and parents are aware that referrals about suspected abuse or neglect may be made and the role of the School in this;
- (q) link with the Local Safeguarding Children Partnership to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.

## **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* (HM Government, July 2015) 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; and

monitoring the keeping, confidentiality and storage of records in relation to the Prevent duty.

## **Training**

The DSL and the Deputy DSL have undertaken biennial interagency training to provide them with the knowledge and skills required to carry out the role. This training includes Prevent duty 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 statutory intervention, including local criteria for action and local authority children's social care referral arrangements;

have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;

ensure each member of staff has access to and understands the School's child protection and safeguarding policy and procedures, especially new and part-time staff;

are alert to the specific needs of children in need, those with special educational needs and young carers;

are able to keep detailed, accurate, secure written records of concerns and referrals;

understand and support the School with 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;

are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at School;

can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, child on child abuse, 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.

### 33. Annex 6

#### Role of Governing Body

Duties are further outlined in Keeping Children Safe in Education (2024, Part 2)

There is a senior board level lead who takes responsibility for the setting's safeguarding responsibility to ensure that safeguarding and child protection practice, process, and policy (including online safety) is effective and is compliant with legislation, statutory guidance, and Local Safeguarding Partnership arrangements.

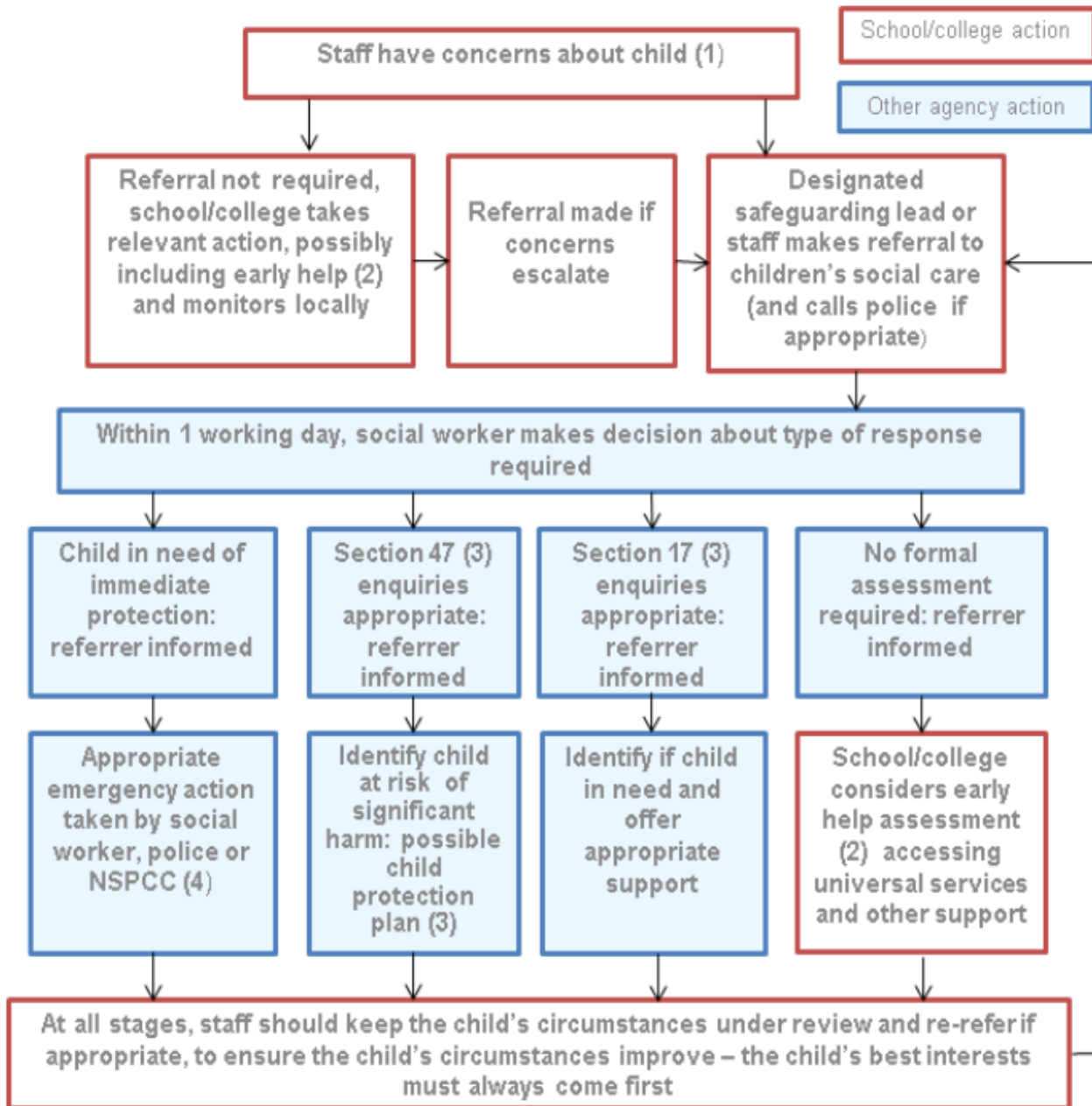
- The appointed Safeguarding Governor will liaise with the Head Teacher/Principal and the DSL to produce an annual report for governors and complete the S.175 (annual safeguarding) audit
- Ensure that the school remedies any deficiencies or weaknesses brought to its attention without delay
- Ensure that this document is updated annually (or when there are significant updates)
- Ensure that the DSL is an appropriate senior member of setting's senior leadership team and ensure that they have adequate time, funding, training, resources, and support to carry out their role effectively
- Ensure that the training and learning for the school community is robust and effective
- Ensure that learners are taught about safeguarding on the curriculum including online safety and Relationships and Sex Education in compliance with statutory guidance
- To ensure that teachers, including supply teachers, other staff, volunteers, and contractors have appropriate checks carried out in line with statutory guidance Keeping Children Safe in Education (2022, Part 3)
- Ensure that there are procedures in place to manage safeguarding concerns or allegations against teachers, including supply teachers, other staff, volunteers, and contractors who may not be suitable to work with or pose a risk to learners, this includes having a process to manage low level concerns
- Ensure that systems are in place for learners to effectively share a concern about a safeguarding issue they are experiencing, express their views and give feedback
- Ensure that the setting has systems in place to prevent, identify and respond to child-on-child harm (including sexual abuse and sexual harassment) and mental health concerns, and review the effectiveness of the setting's online safety practices
- Appoint a designated teacher to promote the educational achievement for children in care and other care arrangements



34. Annex 7

KCSIE flow chart - Actions where there are concerns about a child

### Actions where there are concerns about a child



| <b>This Policy (or Handbook) was updated on</b> | <b>Signed on behalf of the School/Nursery</b> | <b>Date for next review</b> |
|---|---|-----------------------------|
| <i>27/01/25</i>                                 | <i>O Elliott</i>                              | <i>01/09/2025</i>           |

| <b>Overview required by R&amp;R Committee - date</b> |  | <b>Policy uploaded to website(s) - date</b> |
|--|--|---|
| <i>20/11/24</i>                                      |  | <i>28/01/25</i>                             |