



## Cothill House Policy Documents

### **ISSR 7 & 8                      Safeguarding Policy**

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## **Commitment to acting in the best interests of the child**

Children need to be safe and to feel safe in school and they have the right to be protected from harm or maltreatment. Safeguarding and promoting the welfare of children prevents impairment of their mental and physical health or development. It ensures that children grow up in circumstances consistent with the provision of safe and effective care, enabling all children to have the best outcomes. Children need support that matches their individual needs, including those who are at risk or may have experienced abuse.

## **All children at Cothill House**

- Have the right to speak freely and voice their values and beliefs.
- Are encouraged to respect each other's values and support each other.
- Have the right to be supported to meet their emotional and social needs as well as their educational needs – a happy, healthy, sociable child will achieve better educationally.

Schools can and do contribute to the prevention of abuse, victimisation, bullying, exploitation, extreme behaviours, discriminatory views and risk taking behaviours.

## **All school staff and visitors**

- All school staff and visitors have an important role to play in safeguarding children and protecting them from abuse.
- All school staff should maintain an attitude of 'it could happen here' where safeguarding is concerned, and staff must always seek to act in the best interests of the child.
- All school staff should be prepared to identify children who may benefit from early help (Chapter 1 '[Working Together to Safeguard Children](#)'). 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. In the first instance, staff should discuss early help requirements with the DSL. Staff may be required to support other agencies and professionals in an early help assessment.

Any staff member who has a concern about a child's welfare should follow the referral process set out below. Staff may be required to support social workers and other agencies following any referral.

## **Procedures for dealing with and referring concerns about children in need and/or at risk in accordance with locally agreed inter-agency procedures put in place by the safeguarding partners.**

## **Statutory guidance**

The school's policy and procedures has due regard to the following statutory guidance as required by DfE:

- [Keeping Children Safe in Education \(KCSIE\) \(Sept 2023\)](#)
- [Relationships and Sex Education and Health Education \(Sept 2022\)](#)
- KCSIE incorporates the additional statutory guidance, [Disqualification under the Childcare Act 2006 \(September 2018\)](#)

- KCSIE also refers to the non-statutory advice for practitioners: [What to do if you're worried a child is being abused \(March 2015\)](#)
- KCSIE refers also to [When to call the police](#), non-statutory guidance from the National Police Chiefs' Council
- [Working Together to Safeguard Children](#) (September 2018 – updated in 2019 but without changing the date on the published version) (WT)
- WT refers to the non-statutory but important advice: [Information sharing \(2018\)](#)
- [The Prevent duty: Departmental advice for schools and childminders \(June 2015\)](#)
- [The use of social media for on-line radicalisation \(July 2015\)](#)
- [Sexual Violence and Sexual Harrassment between Children in Schools and Colleges \(September 2021\)](#)

## Details of the Local Safeguarding Children Partnership

The school is situated in the area of the Oxfordshire Safeguarding Children Board and operates their inter-agency procedures.

Role	Name	Contact
Local Authority Designated Officer (LADO)	Jo Lloyd	01865 810 603 jo.lloyd@oxfordshire.co.uk
Multi-Agency Safeguarding Hub (MASH) Emergency Duty Team		03450 507 666 0800 833 408
Locality Community Support Service (LCSS Central)		03452 412 705 LCSS.Central@oxfordshire.gov.uk

Our school takes pupils from outside of our own area and where necessary we work with other local authorities. The equivalent contact details are usually available on the website of the local authority.

This policy is written to reflect both the whole-school approach to safeguarding children, child-on-child abuse ([see below](#)) and the local protocol for assessments.

## Prep Schools Trust and Cothill House Contact Details

Role	Name	Contact
Designated Safeguarding Lead (DSL)	Miss Ruth Hogg Head of House	07472 950 189 rhogg@cothillpst.org
Deputy Designated Safeguarding Lead (DDSL)	Mr Adam Pearson Deputy Head (Pastoral)	apearson@cothillpst.org
Level 3 DSL Trained Staff	Miss April Bailey School Nurse	abailey@cothillpst.org

Head	Mr George May	gmay@cothillpst.org
Chair of Board of Trustees	Mrs Emma McKendrick	Ask Trust Office for contact details
Designated Safeguarding Trustee	Mrs Emma McKendrick	Ask Trust Office for contact details
School Designated Trustee	The Countess of Darnley Lady Peta Darnley	pdarnley@prepschoolstrust.org
Prep Schools Trust CEO	Mr Tom Beardmore-Gray	01865 390 720 tbeardmoregray@prepschoolstrust.org
Head of Boarding	Mr Adam Pearson	apearson@cothillpst.org
Head Matron (Boarding)	Miss Ruth Hogg	rhogg@cothillpst.org
School Nurse	Miss April Bailey	abailey@cothillpst.org nurse@cothillpst.org
Independent Listener	Mrs Kate Carling	01865 391 271

## Guidance on what to do if you are worried a child is being abused or become aware of a potential safeguarding issue

### General

- Discuss your concerns with the DSL, or if not available, with the DDSL. If requested to do so, put your concerns in writing, with dates and details of these suspicions and pass to the DSL.
- Anyone can make a referral to social care. It is normal for concerns to be raised with and managed by the DSL, however, if you remain concerned, you can refer your concerns directly to the Local Authority (Contact above).
- If staff members have concerns about a child (as opposed to a child being in immediate danger) they will need to act immediately. Where possible, there should be a conversation with the DSL to agree a course of action, although any staff member can make a referral to children's social care. Pastoral support will be given to the child and other options could include referral to specialist services or early help services and should be made in accordance with the referral threshold set by the LCSP. The school will operate safeguarding procedures in line with locally agreed inter-agency procedures and contact details are found above.
- If after a referral, the child's situation does not appear to be improving then the DSL should press for reconsideration.
- If early help is appropriate, the DSL should support the member of staff in liaising with other agencies and setting up inter-agency assessment as appropriate.
- If early help is appropriate, the case should be kept under constant review and consideration given to a referral if the child's situation doesn't improve. For more

information on early help, please refer to 'Working Together to Safeguard Children'. The flowchart below can be found on p. 22 of KCSIE Part 1 (Sept 2023):



## On a disclosure regarding a child/pupil in need or at risk

- 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. It is also important that staff determine how best to build trusted relationships with children which facilitate communication.
- It takes a lot of courage for a child to disclose that they are being abused. They may feel ashamed, particularly if the abuse is sexual, his or her abuser may have threatened them, they may have lost all trust in adults, (or other children in cases of child-on-child abuse) they may believe, or have been told, that the abuse is his or her own fault.
- If a child talks to you about any risks to their safety or wellbeing you will need to let them know that you may pass the information on – you are not allowed to keep secrets. Confidentiality cannot be promised to a child who is making a disclosure. The point at which you say this is a matter for professional judgement.

## **During your conversation with the child:**

- Allow a child to speak freely and lead the discussion; never stop a child who is freely recalling significant events and do not press for details by asking questions, e.g. "What did they do next?". Avoid asking leading questions.
- Remain calm and do not over react as a child may stop talking if they feel they are upsetting you.
- Listen and be supportive - give reassuring nods or words of comfort.
- Accept what the child says without challenge, and reassure them that they are safe, that they are doing the right thing and that you recognise how hard it is for them.
- Do not promise complete confidentiality, although you can explain that they have done the right thing and tell them that you will only be passing this information on to the appropriate person within school in order to keep them and other children safe.
- Do not admonish the child for not disclosing earlier. Saying 'I do wish you had told me about this when it started' or 'I can't believe what I'm hearing' may be your way of being supportive, but a child may interpret it that they have done something wrong.
- Do not be afraid of silences, remember how hard this must be for a child.
- When asking questions, always ask open questions using the TED principle of 'Tell' me, 'Explain' to me, 'Describe' to me.
- Make careful and detailed legible notes as they may be needed later. Record the date, event, observation, disclosure and action taken using the school's reporting system. Name anyone else present, sign it and hand it to the DSL as soon as possible.
- Don't investigate, although you may use questions such as, 'Is there anything else you'd like to tell me?'
- Do not offer any physical touch as comfort, it may be anything but comforting to a child who has been abused.
- Do not lay blame or criticise either the child or the perpetrator.
- Tell a child what will happen next and he may agree to go with you to see the DSL.
- Do not discuss the matter with anyone else.
- Report the information immediately to the DSL (or the DDSL if the DSL is away). The DSL will then make any appropriate contact with LSCP immediately (or certainly within one working day) for advice, or to make a referral. Parental consent is not required before any contact with, or referral to the LSCP.
- If a child is at risk, the DSL will make a referral to the LCSP immediately.
- The report may be made direct to the LCSP.
- If a crime may have been committed or there is a suspected case of FGM (see below), the DSL (or the DDSL) must report the matter to the police immediately.
- It is not the responsibility of the school to investigate suspected cases of abuse. It is, however, our responsibility to follow local safeguarding procedures and to recognise that a child telling you that he or she has been abused may be the beginning of a legal process, as well as of a process of recovery for the child. Legal action against the perpetrator can be seriously damaged by any suggestion that the child's account has in any way been influenced by the person he or she has told.
- The school will not undertake their investigations of any disclosure of allegation without prior consultation with, and advice from MASH (or the LADO).
- Please seek support if you feel distressed, and follow up with the DSL if you remain concerned.

## **Additional advice to staff about dealing and working appropriately with pupils**

Staff should be fully aware of Safeguarding (Child Protection) issues. Staff should avoid putting themselves (or indeed children) in a vulnerable position. For example:

- Staff should avoid a situation when they are 1:1 with a child in an enclosed environment.
- When coaching games, staff should avoid close personal contact when demonstrating techniques relating to the sport.
- Staff should not communicate with children on social media or personal emails.
- Staff should not divulge personal details (such as personal phone numbers, email addresses) to children.
- Staff should avoid any contact with children, outside of the school, which is not school related.
- Staff should avoid creating personal friendships with children, and should aim to keep relationships with children on a professional level.
- Staff teaching individual peripatetic lessons should be particularly aware and not place themselves or children in a vulnerable position.
- Please also refer to the Staff Code of Conduct and Staff Handbook policy for further information.

## **Arrangements for dealing with allegations of child-on-child abuse and how victims and perpetrators will be supported**

### **Context**

- We must understand that child-on-child abuse **may be happening** in our school.
- There is **zero tolerance** for any form of child-on-child abuse.
- Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their education attainment as well as their emotional well-being. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and offline (both physically and verbally) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support.
- We believe that all children have a right to attend school and learn in a safe environment.
- Children should be free from harm by adults and other children in school. We recognise that children are capable of abusing other children and their peers and this will be dealt with under our child protection policy and in line with KCSiE (Sept 2023)
- Sexual violence and sexual harassment are not acceptable, will never be tolerated, and are not an inevitable part of growing up. It can occur between children of any age. It is recognised that girls are more likely to be victims and boys perpetrators, and that those with learning difficulties and those who identify as part of the LGBT community may be particularly vulnerable.

- As a boarding school, particular consideration will be paid to the fact that victims of child-on-child abuse within the school are unable to escape from the perpetrator.

## **The school will minimise the risk of child-on-child abuse by:**

### **Prevention**

- Taking a whole school approach to safeguarding & child protection.
- Providing training to staff.
- Providing a clear set of values and standards underpinned by the school's Behaviour Policy.
- Teaching children how to keep themselves and others safe particularly through the PSHE and RSE curriculum.

### **Supporting the Victim and the Alleged Perpetrator**

- The needs and wishes of the victim are paramount and, wherever possible, they should be able to continue their normal routine. Support is tailored on a case-by-case basis and may include CAMHS referrals or support from Children and Young People's Independent Sexual Advisors.
- An alleged perpetrator may potentially have unmet needs and may pose a risk of harm to other children. Advice will be taken from Local Agencies including the police. If the alleged perpetrator transfers to another school, the DSL takes responsibility for transferring the child protection file and makes the new school aware of any ongoing support needs.

### **Responding to reports of sexual violence and sexual harassment**

- The Voyeurism (Offences) Act came into force on 12th April 2019. 'Upskirting' is where a person takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim.
- Children making a report of sexual violence or sexual harassment of any kind will be taken seriously, kept safe and be well supported.
- Where there is any report which makes reference to matters which have occurred online, staff must have due regard to Searching, Screening and Confiscation: advice for schools (DfE 2022) guidance. Staff taking the report will inform the DSL or the DDSL immediately and will never promise confidentiality.

### **Risk Assessment**

Following a report/disclosure, the DSL will make an immediate risk and needs assessment on a case-by-case basis. The risk assessment will consider; the victim, especially their protection and support; the alleged perpetrator, their support needs and any discipline action; all other children at the school; the victim and the alleged perpetrator sharing classes and space at school. The alleged perpetrator(s) should be removed from any classes they share with the victim and alternative accommodation must be found if the perpetrator and victim share a dorm so that they can be separated from each other. The school will **carefully**

consider how best to keep the victim and alleged perpetrator(s) a reasonable distance apart on school premises (including during any before or after school-based activities) and on transport to and from the school, where appropriate. These actions are in the best interests of all children involved and should not be perceived to be a judgement on the guilt of the alleged perpetrator(s). The risk assessment will be recorded and kept under review by the DSL in accordance with relevant partner agencies. Any disciplinary action which may occur at the same time as support will be in line with the school's Behaviour Policy.

## **Physical Abuse**

Physical assaults from pupils to pupils can also be abusive. The principles from the Anti-Bullying Policy will be applied in these cases alongside locally agreed referral thresholds for child-on-child abuse.

## **Harmful Sexual Behaviour**

For further clarification on Harmful Sexual Behaviours, the [The Brook Traffic Light Tool](#) uses a traffic light system to categorise age-appropriate sexual behaviours and is designed to help those working with children make informed decisions about safeguarding regardless of culture, faith and personal beliefs.

## **Arrangements for handling allegations of abuse against members of staff, supply staff, volunteers, contractors, and the Head.**

- Allegations against any member of staff, DSL or volunteers must be reported straight away to the Head (who may also seek support from the DSL) or, in their absence, the CEO of the Trust.
- In the case of any allegation relating to a member of supply or agency staff, the agency will be fully involved and included with any proceedings.
- The Head (and DSL) will seek advice immediately from, or make a referral to, the LADO. The LADO will then advise the school and preside over the investigation of any such allegation or suspicion of abuse, which will include reporting to the DBS/TRA. Guidance from Part Four of KCSIE (September 2023) will be followed, including whether the harm threshold is met or not met. Parental consent is not required before any contact with, or referral to, the LADO.
- If a child is at immediate risk the DSL will make a referral to the LSCP immediately.
- If a crime may have been committed, the DSL and/or Head (or the DDSL) must report the matter to the police immediately.
- If you suspect or become aware of an allegation of child abuse made against the Head, then the Chairman of the Prep Schools Trust must immediately be informed (without informing the Head). The Chairman of the Prep Schools Trust will liaise with the LADO without informing the Head.
- Where there is a conflict of interest in reporting the concern to the Head, the report must be made to the LADO direct.
- Staff who are concerned about the conduct of a colleague towards a child are undoubtedly placed in a very difficult situation. The welfare of the child is however paramount. The School Whistleblowing Policy enables staff to raise concerns or allegations in confidence and for a sensitive enquiry to take place. Should staff not

feel able to raise concerns, they can call the NSPCC's "What you can do to report abuse" dedicated helpline on 08088 005 000.

- If the concerns prove to be unfounded, staff should not reproach themselves for having raised the issue. In cases of this nature it is always better to be safe than sorry.
- For registered EYFS settings, the school will inform OFSTED as soon as is practicable and within 14 days at the latest, of allegations of serious harm or abuse by any person living, working or looking after the children at the premises and the action taken in respect of such allegations.

## Low-Level Concerns

- Low-level concerns about colleagues or other adults **must** be shared and recorded responsibly. Always report them to the Head (or the DSL or Chairman of the Trust in their absence). Examples may be where you feel that someone is being over-friendly with children, has favourites, takes images of children on their own device without permission or meets children one-to-one in secluded areas, to name a few.
- The Head should collect as much evidence as possible by speaking to the person who raised the concern (unless it was reported anonymously), to the individual involved and any witnesses.
- The information collected will be used to categorise the type of behaviour and determine what further action may need to be taken. All of this needs to be recorded along with the rationale for their decisions and action taken.
- The Head should liaise with the LADO if there are any doubts as to whether a concern may be low-level or not.

## Recruitment Procedures

- All staff who work in the school, including teaching and non-teaching, governors, temporary staff and volunteers, will be checked through the Disclosure and Barring Service (DBS) for an Enhanced Disclosure and a Barred List check, and have all other required regulatory checks completed, including appropriate identity checks, before they start work at the school (according to the school's Safer Recruitment policy).
- KCSIE 2023 makes it clear that a curriculum vitae (CV) should only be accepted alongside a full application form. It is a long-standing PST policy that CVs are not accepted except as stated.
- The school will also carry out online searches as part of its due diligence checks on shortlisted candidates.
- A staff member can only start work at the school when all of these regulatory checks have been appropriately completed. However, in specific (and rare) circumstances, a staff member may start work at the school pending the return of their enhanced disclosure, provided all other checks are complete, a separate 'Barred list' check has been undertaken and that the staff member has understood and signed a controlled access agreement.
- All staff will undertake a probationary period, during which time they will receive instruction in the implementation of this Safeguarding (Child Protection) policy.

## Management of Safeguarding

### The Role of the Designated Safeguarding Lead (DSL)

- The role of the DSL is in accordance with Annex C of KCSIE (September 2023).
- The DSL takes lead responsibility for safeguarding and child protection, including online safety and understanding the filtering and monitoring systems and processes in place.
- The DSL will be available for staff in the school for support and to discuss safeguarding concerns.
- The DSL will undertake Safeguarding (Child Protection) and Interagency training in locally agreed procedures, at least every two years
- Staff Induction Safeguarding (Child Protection) Training is the responsibility of the DSL and is conducted for all staff and those who join the school. New staff will receive copies of the school's policies, to include Safeguarding, Staff Code of Conduct and Part One and Annex B or Annex A of KCSIE (September 2023). Names of staff who attend such induction training must be noted by the DSL, and any non-attendance must be followed up immediately.
- KCSIE Part One (Sept 2023) must be read and understood by all staff working directly with children. All staff not working directly with children must also read and understand either KCSIE Part One or Annex A at the school's discretion.
- The DSL will ensure each member of staff has access to and understands the school's Safeguarding (Child Protection) Policy and has read and understood KCSIE (Part One and Annex B or Annex A) (Sept 2023).
- The DSL is responsible for ensuring that staff (including temporary, and volunteer staff) at the school receive regular update training (annually). This should include Prevent and online safety. Names of staff who attend such INSET sessions must be noted by the DSL, and any non-attendance must be followed up immediately. Additionally, staff will receive informal updates through e-mail, e-bulletins and staff meetings.
- The DSL will be familiar with the statutory guidance provided in PACE Code C (2019) – The Role of the Appropriate Adult. In summary, this is to safeguard the interests, rights, entitlements and welfare of children who are suspected of a criminal offence, by ensuring that they are treated in a fair and just manner and are able to participate effectively. The appropriate adult will support, advise and assist the young person (YP) and observe whether the police are acting properly and fairly to respect the YP's rights and entitlements and inform an officer of the rank of inspector or above if they consider that they are not.
- The DSL provides at least an annual update to the Board of Trustees on Safeguarding (Child Protection) matters including the efficacy of filtering and monitoring in school and assists the whole Board of Trustees in their annual review of Safeguarding (Child Protection).
- The DSL will keep informed of any new regulations, and child protection procedures, and ensure that staff receive updated training, when any new regulations are introduced.
- The DSL will collect and retain all the staff declarations on this task (see below), ensuring that any 'non-returns' are followed up immediately.

- The DSL will lead regular case monitoring reviews of vulnerable children. These reviews must be evidenced in files. All decisions and actions must be reviewed along with the rationale for making them.
- Safeguarding (Child Protection) information will be dealt with in a confidential manner. Staff will be informed of relevant details only when the DSL feels their having knowledge of a situation will improve their ability to deal with an individual child and/or family. A written record will be made of what information has been shared with whom, and when.
- Safeguarding (Child Protection) records will be stored securely. Individual files will be kept for each child: the school will not keep files on the child's family. Files will be kept for at least the period during which the child is attending the school, and beyond that in line with current data legislation and guidance.
- Access to these records by staff other than by the DSL will be restricted, and a written record will be kept of who has had access to them and when.
- The DSL will support staff who make referrals to external agencies
- Communication with parents will be in line with guidance given by the LADO, and appropriate to each individual case.
- The DSL will not disclose to a parent any information held on a child if this would put the child at risk of significant harm.
- Where children leave the school the DSL should ensure their child protection file is transferred to the new school as soon as possible and within 5 days for an in-year transfer or with the first 5 days of the start of a new term to allow the new school or college to have support in place for when the child arrives.
- The DSL will contact a child's former school to ascertain whether there are any safeguarding concerns. Direct contact may be necessary between the schools/providers.
- The DSL must ensure that this school Safeguarding (Child Protection) policy is made available to parents and prospective parents on the school website.
- The DSL has overall responsibility for online safety within the school.
- The DSL will immediately contact the Police regarding any criminal matters, such as a child being at immediate risk or of being harmed.
- With regard to a concern regarding FGM, the Police must be informed immediately (Phone 101).
- With regard to a concern regarding radicalisation and/or extremism the police must be informed immediately (Phone 101).
- On receipt of a Safeguarding (Child Protection) related allegation against a member of staff, or any employee of the school, or any volunteer, the DSL will consult the LADO immediately or certainly within one working day. The LADO will then advise the school and preside over the investigation of any such allegation or suspicion of abuse. (There is no requirement for the parent to be informed first or permission to be sought before contacting the LADO).
- Where the school has 'low level' concerns that do not amount to allegations or suspicions of specific abuse, but which may indicate the possibility of abuse occurring, the DSL will discuss these concerns with the LADO, which may firstly be an enquiry with 'no names'.
- The DSL will immediately contact the police regarding any criminal matters, including in the case of any serious harm occurring or if there is a child at risk of immediate harm.

- The school (Head / DSL) must report to the Disclosure and Barring Service any person (whether employed, contracted or volunteer) whose services are no longer used because s/he is considered unsuitable to work with children, within one month of leaving the school.
- The school (Head / DSL) must consider making a referral to the Teaching Regulation Agency (TRA) where a teacher has been dismissed or resigned before s/he would have been dismissed. In circumstances where unacceptable professional conduct, conduct that may bring the profession into disrepute or if there is a conviction for a relevant offence, a referral must be made.

## **The Role of the Deputy Designated Safeguarding Lead (DDSL)**

In addition to the role and responsibilities of all staff the Deputy DSL will:

- Be trained to the same standard as the Designated Safeguarding and Child Protection Lead and the role is explicit in their job description.
- Provide support and capacity to the DSL in carrying out delegated activities of the DSL; however, the lead responsibility of the DSL cannot be delegated.
- In the absence of the DSL, carry out the activities necessary to ensure the ongoing safety and protection of children. In the event of the long-term absence of the DSL, the DDSL will assume all of the functions above.
- The DSL lead and any deputies will liaise with the three safeguarding partners and work with other agencies in line with Working Together to Safeguard Children. The document “NSPCC- When to call the police” should help designated safeguarding leads understand when they should consider calling the police and what to expect when they do.

## **Training of the DSL, staff, volunteers and the Head**

The DSL and DDSL undertake external Safeguarding (Child Protection) and Interagency training at least every two years in order to:

- Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments (including ‘Common Assessment Frameworks (CAF)’ and ‘Team Around the Child (TAC)’).
- 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 Safeguarding (Child protection) policy and procedures, especially new and part time staff.
- Be alert to the specific needs of children in need, those with special educational needs and young carers.
- Be able to keep detailed, accurate, secure written records of concerns and referrals.
- Obtain access to resources and attend any relevant or refresher training courses.
- Encourage a culture of listening to pupils and taking account of their wishes and feelings, among all staff, and promote measures the school may put in place to protect the pupils.

The DSL will also undertake online 'Prevent Duty' training in order to inform the staff regarding 'Prevent Duty' during INSET sessions.

## **Training for all staff**

- All staff (including full time, part time, temporary and peripatetic teachers, maintenance, support, administration, catering and cleaning staff) will have Safeguarding (Child Protection) training in line with locally agreed inter-agency procedures including the Prevent Duty and online safety, which is regularly updated (usually at least annually).
- Regular update training may be cascaded by the DSL or external trainers, as well as the school's online account with Educare.
- Any volunteers working in the school will be made aware of Safeguarding (Child Protection) policy and arrangements for reporting by the DSL.
- All staff will be made aware of the local early help process and understand their role in it.
- All staff will be made aware of the process for making referrals to children's social care.
- All staff will be made aware of the risk-factors and signs of Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE).
- Staff will understand that no victim should ever be ashamed of making a report, that there is zero tolerance for any form of abuse and that abuse which takes place outside school or online is equally serious.
- All staff who work directly with children are required to read and understand KCSIE (September 2023) Part One. Staff who do not work directly with children are required to read and understand either Part One and Annex B or Annex A. All staff are required to sign a declaration to say that they have done so (see below).
- All staff are trained to manage a report of child-on-child sexual violence and sexual harassment.
- Staff will be trained to reassure victims that they are being taken seriously, that they will be supported and kept safe so that no victim will be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment and that no victim will ever be made to feel ashamed for making a report.
- Staff will be reminded of the arrangements for IT filtering and monitoring in school and roles and responsibilities in that connection.
- Staff may be selected at random by either the DSL or DDSL to complete a questionnaire on the implementation of this policy. Any follow up points are addressed with the member of staff.
- A record is kept of staff attending this training. This training is repeated for any staff who cannot attend.
- In addition to annual INSET training and regular updates, safeguarding training for all staff is provided by the OSCB every three years. A record is kept of staff attending this training.

## **Induction training for new staff**

This training is given by the DSL/DDSL and all new staff are given copies of the Safeguarding Policy, E-safety Policy, [KCSIE Part 1 or Annex A \(Sept 2023\) plus Annex B](#),

Code of Professional Conduct Policy, Bullying Policy, Behaviour Policy and Whistleblowing Policy.

## **Summary of Induction Training**

- Staff understand the difference between a safeguarding concern and a child in immediate danger or at risk of significant harm.
- Staff are advised to maintain an attitude of **'it may be happening here'** where safeguarding is concerned.
- When concerned about the welfare of a child, staff should always act in the best interests of the child.
- Staff understand that children's poor behaviour may be a sign that they are suffering harm or that they have been traumatised by abuse.
- If staff are unsure, they should always speak to the DSL or deputy DSL.
- If staff have any concerns about a child's welfare, they should act on them immediately.
- Staff should not assume a colleague or another professional will take action.
- Our safeguarding arrangements to respond to children who are absent from education, particularly on repeat occasions and/or for prolonged periods.
- All new staff in the categories mentioned above will have induction Safeguarding (Child Protection) training in line with locally agreed interagency procedures. In addition all staff members will receive safeguarding and child protection updates (for example via e-mail, e-bulletins, daily staff meetings etc.) as required, but at least annually to provide relevant skills and knowledge to safeguard children effectively.
- A record is kept of staff attending this training. This training is repeated for any staff who cannot attend, or who join at other times during the year.

## **Other related training**

- The Head (and others in the Senior management) will undertake training in Safeguarding (Child Protection), Safer Recruitment and Interagency work.
- The Board of Trustees have an annual update in Safeguarding (Child Protection) with additional training when required.

## **Induction training for older pupils with responsibilities**

- Pupils who may have defined areas of responsibility, are given simple basic training in Safeguarding (Child Protection) for instance, to report concerns, to listen and to recognise aspects of pupil behaviour which might cause such concern. However, no pupils are placed in a position of responsibility or authority over others.

## **Oversight of Safeguarding from the Board of Trustees**

The Board of Trustees of the Prep Schools Trust will carry out the following duties in relation to their oversight of safeguarding within the school:

- Receive appropriate safeguarding and child protection (including online) training at induction. Training will be updated every two years. Trustees are also required to receive training updates at regular intervals. This training will provide them with the

knowledge to ensure that the school's safeguarding policies and procedures are effective.

- Ensure there is/are member(s) of the board of Trustees with designated Safeguarding (Child Protection) role(s).
- The Chair of The Prep Schools Trust (or the Trust's CEO in their absence) will contact the LADO immediately, or within one working day, if there is a Safeguarding (Child Protection) allegation against the Head.
- Undertake an annual review by the whole Board of Trustees of the Trust's Safeguarding (Child Protection) policy, to ensure the safety and well-being of the pupils, as well as regulatory compliance.
- Undertake an annual review, by the whole Board of Trustees, of each Trust schools' implementation of the Safeguarding (Child Protection) policy, to ensure the safety and well-being of the pupils and regulatory compliance.
- Each school's designated Trustee will visit the school at least termly and check compliant implementation of this policy as well as chairing the termly LAG meeting.

## **The School's arrangements to fulfil other safeguarding and welfare responsibilities**

### **General**

- The School's role in safeguarding the welfare of children begins in creating an environment where children are safe from harm, in establishing a culture where they can raise any anxieties with confidence and incorporating child protection issues in the classroom.
- The school will not discriminate unlawfully against pupils because of their protected characteristics. We therefore consider how to support children with protected characteristics and will take positive action, where proportionate, to deal with the disadvantages these children face. This includes an understanding that children with protected characteristics may be more at risk of harm.
- Developing an embedded, pro-active culture of safeguarding in our school is paramount.
- All staff should maintain an attitude of '**it may be happening here**' where safeguarding is concerned and staff must always seek to act in the best interests of the child. Staff must endeavour to ensure a culture of vigilance.
- All members of our school community must proactively work to prevent any culture where abuse is normalised. Incidents of abuse must be reviewed to investigate whether they are single episodes (one-offs) or whether they are indicative of wider issues that require addressing within the culture of the school.
- **Corporal punishment of any kind is prohibited in the school.**

### **Educating the pupils how to keep safe**

- The school understand the importance of preventative education as it prepares students for life in 'modern Britain' in which there should be a zero tolerance culture of sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment. The school curriculum will tackle at an age appropriate stages issues such as:

- relationships
- mental health
- sexual activity
- grooming techniques
- online e-safety (including cyber-bullying and sexting, accessing remote learning)
- drug use
- building resilience to the risks of radicalisation and extremism
- body confidence and self-esteem
- boundaries and consent
- stereotyping, prejudice and equality
- There are also many opportunities for pupils to discuss issues and to form and develop their own opinions, in an informal way. This wider education of the pupils is age appropriate and delivered as a planned component of the PSHE/RSE curriculum. The pupils are taught to recognise and understand the risks posed by adults and young people, who use the internet and social media to bully, groom, abuse or radicalise other people, especially children, young people and vulnerable adults.
- The school ensures inclusivity in the safeguarding curriculum, specifically considering LGBT children or those perceived to be.

## **Listening to the pupils and making them aware**

- We are a 'SHARING school' where all pupils are encouraged to share any concerns they may have. Children's viewpoints are listened to and valued.
- Teachers get to know their children well through daily class teaching as well as during form time. All children are encouraged to discuss any concerns they may have with their houseparent, their form tutor or other preferred adult including the Head.
- Staff training (see below) in Safeguarding (Child Protection) includes guidance and advice on listening to children and what to do if a child wishes to disclose to a member of staff.
- There are many opportunities for pupils to work in small group scenarios such as in extra-curricular clubs etc. All these opportunities allow pupils to raise concerns or share views and opinions in a less formal setting.
- In addition to the Houseparent, Form Tutor and other subject teachers, pupils may speak to any member of staff about a concern.
- When sensitive issues are discussed, pupils have the opportunity to voice their thoughts and concerns to their teacher/form tutor/houseparent or other member of staff. Pupils can also express any concerns about themselves or a friend via an online form, which is monitored by the DSL and is available to all pupils on the boys homepage.
- A Pastoral Mentoring Scheme is in place to offer additional support to pupils who have been identified as particularly vulnerable.
- The school has an Independent Listener who is able to see pupils and parents by appointment. Contact details are displayed throughout the school.
- As well as those to whom pupils can turn to for support within school, the school offers details of helplines, counselling or other avenues of external support. We will

liaise and work in partnership with other support services and agencies involved in Early Help and the safeguarding of children.

- We will provide continuing support to a child about whom there have been concerns who leaves the school by ensuring that information is shared under confidential cover to the child's new setting, and ensure the school records are forwarded as a matter of priority and within statutory timescales.
- Pupil surveys are carried out each term asking for their views on a range of issues. Data is gathered, analysed and then actioned depending on the nature of the questionnaire. Pupils also have the opportunity to discuss any issues of concern during their PSHE or RSE lessons and form time, as well as regular School Council (Witan) Meetings.
- Parental contact is encouraged and extensive. This provides an opportunity for parents to raise concerns raised by their children.

## **Welfare, health and safety**

- The school is committed to ensuring the welfare, health and safety of its staff and pupils. The school will, so far as is reasonably practicable, establish procedures and systems necessary to implement this commitment and to comply with its statutory obligations on health and safety.
- While the School will take all reasonable steps to ensure the health and safety of its employees, health and safety at work is a responsibility of all staff themselves. It is the duty of each staff member to take reasonable care of their own and other people's welfare, health and safety and to report any situation which may pose a serious or imminent threat to the well-being of themselves, other staff or the pupils.
- Assurances are obtained by the School that all appropriate child protection procedures apply to staff employed by other organisations who work with our pupils on other sites. (eg residential trips etc.).
- All necessary risk assessments must be undertaken to help ensure that the school environment is a safe environment for both pupils and staff.
- Please see the school's 'Health and Safety policy' for further details.

## **Looked after children**

- The Trustees and the school ensures that staff have the skills, knowledge and understanding necessary to keep safe children who are looked after by a local authority, if there are such children on the school's roll. In such cases, the DSL has responsibility for their welfare and progress and has up-to-date assessment information from the relevant local authority, the most recent care plan and contact arrangements with parents, and delegated authority to carers.
- Where necessary, the school will have due regard to the statutory guidance to local authorities: [Promoting the education of looked after and previously looked after children](#)

## **Visiting speakers**

- Information on the speaker or institution must be provided and known in advance. The member of staff booking the speaker must carry out a risk assessment to be approved by the Head.
- This must align with the ethos of the school and to British values, taking the radicalisation and extremism 'Prevent Duty' into account.
- Whenever possible, a notice period of one month should be given prior to the speaker's visit to school, with the presentation content of the talk being provided in advance.
- A member of the SMT and other staff will be present at any presentation to ensure that a talk/workshop is aligned with the religious ethos of the school, to British values and takes the 'Prevent Duty' into account.
- A log is kept of all visiting speakers and the results of any checks carried out under the PREVENT duty, to ensure their suitability.

## **Pupil absence and missing pupils**

- A pupil going missing from education is a potential indicator of abuse or neglect. If you are concerned that a pupil has been out of school with no reason or communication from home, you must inform the Head and DSL who will inform the local authority.
- Any pupil who fails to attend school regularly, or has been absent without the school's permission for a continuous period of 10 school days or more, is deemed to be at risk.
- Work with staff who monitor attendance to ensure that where there are issues around non-attendance and specifically persistent non attendance, these are flagged with the safeguarding team to consider whether there are safeguarding issues such as risk of criminal exploitation.

## **Measures for internet safety including policy on the use of mobile technology in school**

- There is a school policy for controlled access and appropriate use of the internet. Please refer to the school's E-Safety Policy which includes safer internet strategies. This policy considers: content, contact, conduct and commerce.
- The policy recognises that young people may abuse internet access to sexually harass their peers, share nude or semi-nude images consensually and non-consensually and view and/or share pornography and other harmful content.
- Staff are given regular update training by the DSL on Safer Social Networking as part of INSET.
- The school has internet filtering and protection systems in place, to help prevent inappropriate access and to monitor and take action regarding inappropriate use.
- Internet-capable mobile phones (i.e. with cellular 3G, 4G or 5G internet access) are as a rule not permitted at school. However, we recognise that overseas pupils may require their mobile phone for travel purposes. Please refer to the Specific Items and Searching Policy for further information.

- Chromebooks, laptops or ipads may only be used for educational purposes or in order to communicate with parents when boarding.
- For further information, please refer to Part Two of KCSIE (Sept 2023).
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## **Policy on the use of mobiles and cameras in the EYFS**

Safeguarding (Child Protection) of children within the school is paramount and personal mobile phones and other forms of electronic communication have the potential to be used inappropriately and therefore becoming a safeguarding issue.

Therefore the following guidelines apply:

- Personal mobile phones, cameras and video recorders cannot be used when in the presence of children either on school premises or when on outings. ONLY school equipment should be used. However, when this is not possible, personal mobile phones may be used in the event of an emergency.
- Personal mobile phones must be turned off and left with personal belongings during contact time with children. School devices should be used, when possible, on site.
- Cameras and mobile phones are prohibited in the loos, changing rooms or showers and no parent or volunteer is permitted to use their mobile phone or use its camera facility whilst inside school buildings.
- If a staff member or volunteer must use their mobile phone during working hours (such as in a family emergency) this should be done away from the children, whilst ensuring that staff supervision levels are not compromised.
- The school's digital camera/s or memory cards must not leave the site unless on a school trip. All memory cards should have images removed once the image has been transferred to the school drive.
- Photos are to be printed in the school by staff and images may be stored in the school drives before being removed from the camera's memory. Please note that often such photographs may contain other children in the background.
- Photographs may be taken during indoor and outdoor play / activities and displayed in albums or a child's development records for children and parents to look through. (With appropriate permission from the parent).
- Events such as plays, sports day, outings, Christmas etc. may be recorded by video and photographed by staff and parents, but always in full view of everyone attending. Parents are strongly discouraged from uploading photos or videos which may contain images of children other than their own to social media.

## **Definitions of abuse, recognising the particular vulnerabilities of those with SEND including child-on-child abuse**

### **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. Children 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 the child. 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 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 (also known as child-on-child abuse) in education and all staff should be aware of it and of the school's policy and procedures for dealing with it.

## **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.

## Children with SEND

- Children with SEND can face additional safeguarding challenges and staff need to be more vigilant when recognising abuse and neglect with this group of children. KCSIE Sept 2022 advises that evidence shows children with SEND are at greater risk of child-on-child sexual violence and harassment. In addition, there are heightened risks that SEND children face online, for example, from online bullying, grooming and radicalisation.
- This can include assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration.
- SEND pupils are also more prone to peer group isolation or bullying (including prejudice-based bullying) than other children.
- Children with SEND can be disproportionately impacted by behaviours such as bullying (without outwardly showing any signs) and communication barriers and difficulties in managing or reporting these challenges.

## Children in need

- A child in need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. (KCSIE Sept 2023)
- Staff should have an awareness of safeguarding issues some of which are listed below. KCSIE Sept 2023 Part 1 and which is summarised in Annex A contains important additional information about specific forms of abuse and safeguarding issues. All school leaders and those staff who work directly with children should read Part 1 and Annex B. Staff need to be aware that behaviours linked to the likes of drug-taking, alcohol abuse, truanting and sexting put children in danger.
- All staff should be aware that safeguarding issues can manifest themselves via child-on-child abuse. This is most likely to include, but may not be limited to:
  - bullying (including cyberbullying)
  - physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
  - sexual violence and sexual harassment
  - sexting (also known as youth produced sexual imagery)
  - initiation/hazing type violence and rituals
- Staff should also be aware that there are different gender issues that can be prevalent when dealing with child-on-child abuse. This could, for example include girls being sexually touched/assaulted or boys being subject to initiation/hazing type violence (see Part 5 of KCSIE Sept 2023). Please see the *Anti-bullying Policy* and *Behaviour Policy* for further information and how sexting will be dealt with.

## **Physical abuse and indicator signs**

- Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child.
- Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
- Indicators may include:
  - injuries that are not consistent with the explanation offered
  - injuries not consistent with the child's age and development
  - repeated injuries over a period of time
  - runaway attempts and fear of going home
  - stilted conversation, vacant stares or no attempt to seek comfort when hurt
  - describes self as bad and deserving to be punished
  - the child cannot recall how injuries occurred or offers an inconsistent explanation
  - wariness of adults
  - frequent absence from school
  - flinching if touched unexpectedly
  - extremely aggressive or withdrawn
  - displays of indiscriminate affection-seeking behaviour
  - abusive behaviour and language in play
  - over compliance and/or eagerness to please
  - poor sleeping patterns, fear of the dark, frequent nightmares
  - sadness, frequent crying
  - depression
  - poor memory and concentration

## **Emotional abuse and indicator signs**

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

- Fear of failure, over high standards, reluctance to play
- Fears consequences of actions, often leading to lying
- Extreme withdrawal or aggressiveness, mood swings
- Overly compliant, too well-mannered
- Excessive neatness and cleanliness
- Extreme attention-seeking behaviours
- Poor peer relationships
- Severe depression, may be suicidal
- Runaway attempts
- Violence features as a subject for art or writing
- Complains of social isolation

## **Sexual abuse and indicator signs**

- Sexual abuse involves forcing or enticing a child or younger person to take part in sexual activities, not necessarily involving 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 (e.g. 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, or encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). 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 is a specific safeguarding issue in education.
- Indicators may include:
  - contact with other children is forbidden
  - fatigue due to sleep disturbances
  - sudden weight change
  - cuts or sores made by the child on the body (self-harm)
  - recurring physical ailments
  - difficulty in walking or sitting
  - unusual or excessive itching in the genital or anal area due to infection(s)
  - torn, stained or bloody underwear
  - injuries to the mouth, genital or anal areas (eg bruising, swelling, sores, infection)
  - sudden lack of interest in friends or activities
  - hostility toward authority figures
  - the need for constant companionship
  - regressive communication patterns (eg speaking childishly)
  - academic difficulties or performance suddenly deteriorates
  - truancy and/or running away from home
  - wearing layers of clothing to hide bruises

- The following list of indicators is not exhaustive or definitive but it does highlight common signs which can assist professionals in identifying children or young people who may be victims of sexual abuse. Signs include:
  - inappropriate sexual or sexualised behaviour
  - receiving unexplained gifts or gifts from unknown sources
  - having multiple mobile phones and worrying about losing contact via mobile
  - having unaffordable new things (clothes, mobile) or expensive habits (alcohol, drugs)
  - changes in the way the child dresses
  - getting in/out of different cars driven by unknown adults
  - contact with known perpetrators
  - involvement in abusive relationships, intimidated by and fearful of certain people or situations
  - associating with groups of older people, or anti-social groups, or with other vulnerable peers
  - truancy, exclusion, disengagement with school, opting out of education altogether
  - unexplained changes in behaviour or personality (chaotic, aggressive, sexual)
  - mood swings, volatile behaviour, emotional distress
  - self-harming, suicidal thoughts, suicide attempts, overdosing, eating disorders
  - injuries from physical assault, physical restraint, sexual assault

### **Neglect and indicator signs**

- Neglect is 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 caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.
- Depending on the age and capacity of the child, staff should be aware of possible self-neglect where a child may not be following medical guidance or taking medication as prescribed. Where this is the case, this should be raised as a safeguarding concern.
- Indicators may include:
  - unattended medical and dental needs
  - consistent lack of supervision
  - consistent hunger
  - nutritional deficiencies
  - inappropriate dress for weather conditions
  - poor hygiene
  - persistent (untreated) conditions (eg head lice or other skin disorders)
  - development delays (eg language, weight)
  - irregular or non-attendance at school or lateness

- demands for constant attention and affection
- lack of parental participation and interest
- regular displays of fatigue or listlessness, falling asleep in class
- lack of trust in others, unpredictable

### **Children with medical conditions**

- Children with medical conditions will be supported in accordance with Cothill's Medical and First Aid Policy and the statutory guidance Supporting Pupils at School with Medical Conditions 2015.
- The school will ensure that arrangements are in place to support children with medical conditions. These arrangements will be informed through liaison with the parents and medical professionals, where appropriate, and dependent on the age and capacity, the child as well.
- Most ongoing conditions will require an individual healthcare plan, unless it is agreed that this would be inappropriate and disproportionate.
- The healthcare plan will be shared with staff as necessary, to ensure that staff are aware of what arrangements are in place, as well as any emergency procedures.
- Systems are in place to ensure that the Designated Safeguarding Lead is kept informed of arrangements for children with medical conditions and is alerted where a concern arises, such as an error with the administration of medicines or intervention, or repeated medical appointments being missed, or guidance or treatments not being followed by the parents or the child.

## **Specific issues covered in Annex B of KSCIE 2022 extracted here for information.**

### **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.

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff.

It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: [www.actionagainstabduction.org](http://www.actionagainstabduction.org) and [www.clevernevergoes.org](http://www.clevernevergoes.org).

### **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 who are absent from education**

All staff should be aware that children who are absent or going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, 'honour'-based abuse or risk of forced marriage. Early intervention is necessary to identify the existence of any

underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff should be aware of their school's or college's unauthorised absence and children who are absent from education procedures.

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

We know that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation.

In some cases the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator.

Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim.

Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources.

Some of the following can be indicators of both child criminal and sexual exploitation where children:

- appear with unexplained gifts, money or new possessions;
- associate with other children involved in exploitation;
- suffer from changes in emotional well-being;
- misuse drugs and alcohol;
- go missing for periods of time or regularly come home late;
- regularly miss school or education or do not take part in education.

Children who have been exploited will need additional support to help maintain them in education.

CSE can be a one-off occurrence or a series of incidents over time and range from

opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

Some additional specific indicators that may be present in CSE are children who:

- have older boyfriends or girlfriends;
- suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

Further information on signs of a child's involvement in sexual exploitation is available in Home Office guidance: [Child sexual exploitation: guide for practitioners](#)

### **County lines**

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.

Further information on the signs of a child's involvement in county lines is available in guidance published by the [Home Office](#).

## **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. Modern slavery: how to identify and support victims - GOV.UK ([www.gov.uk](http://www.gov.uk))

## **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; and,
- 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.

If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the **Cyber Choices** programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

Note that **Cyber Choices** does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Additional advice can be found at: [Cyber Choices](#), ['NPCC- When to call the Police'](#) and [National Cyber Security Centre - NCSC.GOV.UK](http://NationalCyberSecurityCentre.gov.uk)

## **Domestic abuse**

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, sexual, financial or emotional abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be “personally connected” (as defined in section 2 of the 2021 Act).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Seeing, hearing or experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as ‘teenage relationship abuse’. Depending on the age of the young people, this may not be recognised in law under the statutory definition of ‘domestic abuse’ (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support. The Act’s provisions, including the new definition, will be commenced over the coming months.

## **Operation Encompass**

[Operation Encompass](#) operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually

the designated safeguarding lead) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs. Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or schools should make a referral to children's social care if they are concerned about a child's welfare.

More information about the scheme and how schools can become involved is available on the Operation Encompass website.

### **National Domestic Abuse Helpline**

Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked. Additional advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

- [NSPCC- UK domestic-abuse Signs Symptoms Effects](#)
- [Refuge what is domestic violence/effects of domestic violence on children](#)
- [Safelives: young people and domestic abuse.](#)
- [Domestic abuse: specialist sources of support - GOV.UK \(www.gov.uk\)](#) (includes information for adult victims, young people facing abuse in their own relationships and parents experiencing child to parent violence/abuse)
- [Home : Operation Encompass](#) (includes information for schools on the impact of domestic abuse on children)

### **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.

In most cases school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised that in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's social care will be the lead agency for these children and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. The Department and the Ministry of Housing, Communities and Local Government have published joint statutory guidance on the provision of accommodation for 16 and 17 year olds who may be homeless and/or require accommodation: [here](#).

### **So-called 'honour'-based abuse (including Female Genital Mutilation and Forced Marriage)**

So-called 'honour'-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

### **Actions**

If staff have a concern regarding a child who might be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding lead (or deputy). As appropriate, the designated safeguarding lead (or deputy) will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on **teachers** that requires a different approach (see following section).

### **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.

## **FGM mandatory reporting duty for teachers**

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon **teachers**, along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases may face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should **not** be examining pupils or students, but the same definition of what is meant by “to discover that an act of FGM appears to have been carried out” is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at: [Mandatory reporting of female genital mutilation procedural information](#).

Teachers **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has good reason not to, they should still consider and discuss any such case with the school’s or college’s designated safeguarding lead (or deputy) and involve children’s social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures. The following is a useful summary of the FGM mandatory reporting duty: [FGM Fact Sheet](#).

Further information can be found in the [Multi-agency statutory guidance on female genital mutilation](#) and the [FGM resource pack](#) particularly section 13.

## **Forced marriage**

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

The Forced Marriage Unit (FMU) has created: Multi-agency practice guidelines: handling cases of forced marriage (pages 32-36 of which focus on

the role of schools and colleges) and, Multi-agency statutory guidance for dealing with forced marriage, which can both be found at <https://www.gov.uk/guidance/forced-marriage>. School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email [fm@fcdo.gov.uk](mailto:fm@fcdo.gov.uk).

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

### **Preventing radicalisation**

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools' or colleges' safeguarding approach.

- **Extremism** is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- **Terrorism** is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat **must** be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a Prevent referral.

The school's or college's designated safeguarding lead (and any deputies) should be aware of local procedures for making a Prevent referral.

## **The Prevent duty**

All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have “due regard to the need to prevent people from being drawn into terrorism”. This duty is known as the Prevent duty.

The Prevent duty should be seen as part of schools’ and colleges’ wider safeguarding obligations. Designated safeguarding leads and other senior leaders in schools should familiarise themselves with the revised [Prevent duty guidance: for England and Wales](#), especially paragraphs 57-76, which are specifically concerned with schools (and also covers childcare). Designated safeguarding leads and other senior leaders in colleges should familiarise themselves with the [Prevent duty guidance: for further education institutions in England and Wales](#). The guidance is set out in terms of four general themes: risk assessment, working in partnership, staff training, and IT policies.

## **Channel**

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual’s engagement with the programme is entirely voluntary at all stages.

The designated safeguarding lead should consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse or those who are currently receiving support through the ‘Channel’ programme, and have that support in place for when the child arrives.

Statutory guidance on Channel is available at: [Channel guidance](#).

## **Additional support**

The Department has published further advice for schools on the [Prevent duty](#). The advice is intended to complement the Prevent guidance and signposts to other sources of advice and support.

The Home Office has developed three e-learning modules:

- [Prevent awareness e-learning](#) offers an introduction to the Prevent duty.
- [Prevent referrals e-learning](#) supports staff to make Prevent referrals that are **robust, informed** and with **good intention**.

[Channel awareness e-learning](#) is aimed at staff who may be asked to contribute to or sit on a multi-agency Channel panel.

[Educate Against Hate](#), is a government website designed to support school teachers and leaders to help them safeguard their students from radicalisation and extremism. The platform provides free information and resources to help school staff identify and address the risks, as well as build resilience to radicalisation.

### **Child-on-child abuse**

Children can abuse other children (often referred to as child-on-child abuse) and it can take many forms. It **can** happen both inside and outside of school/college and online. It is important that all staff recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports. This **can** include (but is not limited to): bullying (including cyberbullying, prejudice-based and discriminatory bullying); abuse within intimate partner relationships; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexual violence and sexual harassment; consensual and non-consensual sharing of nude and semi-nude images and/or videos; causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party; upskirting and initiation/hazing type violence and rituals. Addressing inappropriate behaviour (even if it appears to be relatively innocuous) **can** be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

It is important to understand that children:

- may not be able to identify that their experiences are harmful
- they may not know how to tell someone that they are being abused

It should therefore be explained to children that the law is in place to protect them, rather than criminalise them.

It is vital that all staff and adults who have contact with children are aware of the signs and symptoms of potential abuse and that they take action and inform the DSL immediately if they have even the smallest suspicion that abuse may be happening.

### **Sexual violence and sexual harassment between children in schools and colleges**

#### **Context**

Sexual violence and sexual harassment can occur between two children of any age and sex from primary to secondary stage and into colleges. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood,

adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physically and verbally) and are never acceptable.

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

Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with special educational needs and disabilities (SEND) and LGBT children are at greater risk.

Staff should be aware of the importance of:

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

### **What is sexual violence and sexual harassment?**

#### **Sexual violence**

It is important that school and college staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way and that it can happen both inside and outside of school/college. When referring to sexual violence we are referring to sexual violence offences under the Sexual Offences Act 2003<sup>135</sup> as described below:

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

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

**Sexual Assault:** A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not

consent to the touching and A does not reasonably believe that B consents. (Schools should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent, or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.)

**Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

### **What is consent?**

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.<sup>137</sup> Further information about consent can be found here: [Rape Crisis England & Wales - Sexual consent](#)

- A child under the age of 13 can never consent to any sexual activity;
- The age of consent is 16;<sup>138</sup>
- Sexual intercourse without consent is rape.

### **Sexual harassment**

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school/college. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- Sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- Sexual "jokes" or taunting;
- Physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- Online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.<sup>139</sup> It may include consensual and

non-consensual sharing of nude and semi-nude images and/or videos.<sup>140</sup> As set out in [UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) (which provides detailed advice for schools and colleges) taking and sharing nude photographs of U18s is a criminal offence;

- o sharing of unwanted explicit content;
- o upskirting is a criminal offence;
- o sexualised online bullying;
- o unwanted sexual comments and messages, including, on social media;
- o sexual exploitation; coercion and threats.

### **Upskirting**

The Voyeurism (Offences) Act 2019, which is commonly known as the Upskirting Act, came into force on 12 April 2019. ‘Upskirting’ is where someone takes a picture under a person’s clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any sex, can be a victim.

### **The response to a report of sexual violence or sexual harassment**

The initial response to a report from a child is incredibly important. How the school or college responds to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward. Schools and colleges not recognising, acknowledging or understanding the scale of harassment and abuse and/or downplaying of some behaviours can actually lead to a culture of unacceptable behaviour. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

If staff have a concern about a child or a child makes a report to them, they should follow the referral process as set out from paragraph 55 in Part One of the KCSIE 2023. As is always the case, if staff are in any doubt as to what to do they should speak to the designated safeguarding lead (or a deputy).

### **Early Help**

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

- is disabled or has certain health conditions and has specific additional needs;
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan);
- has a mental health need;
- 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 or county lines;
- is frequently missing/goes missing from care or from home;
- is at risk of modern slavery, trafficking, sexual or criminal exploitation;
- is at risk of being radicalised or exploited;
- has a family member in prison, or is affected by parental offending;
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- is misusing drugs or alcohol themselves;
- has returned home to their family from care;
- is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage;
- is a privately fostered child; and
- is persistently absent from education, including persistent absences for part of the school day.

### **Concerns that do not meet the harm threshold**

Governing bodies and proprietors should have policies and processes to deal with concerns (including allegations) which do not meet the harm threshold set out above. Concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken. It is important that schools and colleges have appropriate policies and processes in place to manage and record any such concerns and take appropriate action to safeguard children.

### **Low level concerns**

As part of their whole school approach to safeguarding, schools and colleges should ensure that they promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school or college (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

#### **What is a low level concern?**

It is vital that all staff are fully committed to ensuring that the school continually strives to create and embed a culture of openness and trust and transparency in which the school's values and expected behaviour which are set out in this staff code of conduct are constantly lived, monitored and reinforced by all staff is fostered within the organisation. It is therefore important for staff to share any concerns about the conduct of colleagues and be assured that these will be received in a sensitive manner. Any concern should be reported directly to the Head or to the Trust CEO or the Chair of Trustees in the event that the Head is absent, or if a staff member feels that it is not possible to report their concerns to the Head for any reason.

A low-level concern is any concern about an adult's behaviour towards a child that does not meet the allegation threshold set out above or is not otherwise serious enough to consider a referral to the LADO. A low-level concern 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 which is not consistent with the school's Staff Code of Conduct, and/or relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children.

Staff do not need to be able to determine in each case whether their concern is a low-level concern, or if it is in fact serious enough to consider a referral to the LADO or meets the threshold of an allegation. Once staff share what they believe to be a low-level concern, that determination should be made by the Head, who can make this decision in consultation with the DSL and/or LADO where appropriate.

The school ensures that a culture of openness and trust is fostered within the organisation in which staff can share any concerns about the conduct of colleagues and be assured that these will be received in a sensitive manner.

Reports about supply staff and contractors should be notified to their employers so any potential patterns of inappropriate behaviour can be identified.

### **Procedures for responding to low-level concerns**

If the concern is raised by a third party, the Head should collect as much evidence as possible by speaking where possible with the person who raised the concern, to the individual involved and to any witnesses.

Recording of all low-level concerns is imperative and will be recorded in writing, with details of the concern, the context in which it arose and action taken; the name of the person reporting should be noted, respecting wishes to remain anonymous as far as reasonably possible.

As with all school logs, records of low-level behaviour should be reviewed regularly so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and responded to. If a pattern of behaviour is identified, the school will decide on a course of action. This might be internal disciplinary procedures, or referral to the LADO if the harms threshold is met.

There is a duty upon the school and therefore it must consider if any wider cultural issues in school that enabled the behaviour to occur and if appropriate policies could be revised or extra training delivered to minimise the risk of recurrence.

The rationale for all decisions and actions taken must be recorded.

### **Mental Health**

**All** staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or

exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour, and education.

Schools and colleges can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies. More information can be found in the [mental health and behaviour in schools guidance](#), colleges may also wish to follow this guidance as best practice. Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among children. See [Rise Above](#) for links to all materials and lesson plans.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy, and speaking to the designated safeguarding lead or a deputy.

**STAFF DECLARATION**  
**(Confirming that this Safeguarding (Child Protection) Policy and**  
**Keeping Children Safe in Education 2023 Part 1 and Annex B or**  
**Annex A have been read and understood)**

**To be completed by all members of staff**

(Including all employees of the school  
including volunteers and temporary staff)

I have read and I understand this Safeguarding (Child Protection) Policy. I agree to abide by the guidance and enforce the rules set out within it.

\*I have also read and I understand the contents of Keeping Children Safe in Education KCSIE (Sept 2023) Part 1 and Annex B/ \*I have also read and I understand the contents of Keeping Children Safe in Education KCSIE (Sept 2023) Annex A (*\*delete as necessary*) and that induction has been completed.

Signed: .....

Print Name: .....

Date: .....

*KCSIE Part 1 (Sept 2023) must be read and understood by all staff working directly with children. All staff not working directly with children must also read and understand either KCSIE Part 1 or Annex A at the school's discretion.*



# **SAFEGUARDING**

## **All pupils at Cothill House ...**

- have the right to speak freely and voice their values and beliefs.
- are encouraged to respect each other's values and support each other.
- have the right to be supported in all their needs.

**We want you to feel happy, healthy & safe.**

## **Need to talk? We are here to listen.**



**Our Designated Safeguarding Lead (DSL) is Miss Hogg.**

**Please talk to her if you have any worries or concerns.**



**The Deputy Designated Safeguarding Lead (DDSL) is Mr Pearson.**

***You can speak to any member of staff and ask for help.***

*If you would like to speak to someone off site, there are three useful phone numbers you can call. These numbers are also by the phones:*

Our **independent listener** is Kate Carling  
**Childline**  
**Help at Hand** The Children's Commissioner

**01865 391271**  
**0800 1111**  
**0800 528 0731**

### **Important Contacts for Staff:**

**Local Authority Designated Officer (Jo Lloyd)**  
**Multi-Agency Safeguarding Hub**

**01865 810603**  
**0345 050 7666 / 0800 833 40**