

## Brighton Waldorf School

# Child Protection and Safeguarding Policy and Procedure

This policy was adopted on **1<sup>st</sup> September 2020**

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### **Key Contacts**

<b>Role</b>	<b>Name</b>	<b>Contact details</b>
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Deputy Designated Safeguarding Lead	Jacqui Firth	<a href="mailto:jacqui.firth@brightonwaldorfschool.org">jacqui.firth@brightonwaldorfschool.org</a> 01273 386300
Nominated Trustee for safeguarding and child protection	Thais Bishop	<a href="mailto:thais.bishop@brightonwaldorfschool.org">thais.bishop@brightonwaldorfschool.org</a>
Chair of Trustees	Thais Bishop	<a href="mailto:thais.bishop@brightonwaldorfschool.org">thais.bishop@brightonwaldorfschool.org</a>
Local Authority Designated	Darrell Clews	<a href="mailto:darrell.clews@brighton-hove.gcsx.gov.uk">darrell.clews@brighton-hove.gcsx.gov.uk</a>

Officer (LADO)		01273 295643
Brighton and Hove Multi Agency Safeguarding Hub (MASH) now known as <a href="#">Front Door For Families (FDFE)</a>	Front Door for Families	<a href="mailto:frontdoorforfamilies@brighton-hove.gcsx.gov.uk">frontdoorforfamilies@brighton-hove.gcsx.gov.uk</a> 01273 290400  Gill Hibbert <a href="mailto:Gill.Hibbert@brighton-hove.gov.uk">Gill.Hibbert@brighton-hove.gov.uk</a> 01273 294081
Emergency Duty Service (after hours, weekends and public holidays) Emergencies	Social Workers	01273 335905 or 01273 335906 <a href="mailto:frontdoorforfamilies@brightonhove.gcsx.gov.uk">frontdoorforfamilies@brightonhove.gcsx.gov.uk</a> (t) 999
<a href="#">Brighton &amp; Hove Safeguarding Children Partnership (BHSCP)</a>		01273 292379
OFSTED		0300 123 1231
LA Prevent Lead	Nahida Shaikh	01273 290584 <a href="mailto:nahida.shaikh@brightonhove.gcsx.gov.uk">nahida.shaikh@brightonhove.gcsx.gov.uk</a>
<a href="#">Partnership Community Safety Team</a>		<a href="mailto:nahida.shaikh@brightonhove.gcsx.gov.uk">nahida.shaikh@brightonhove.gcsx.gov.uk</a>
DfE (non-emergency prevent advice):		020 7340 7264 <a href="mailto:counter-extremism@education.gsi.gov.uk">counter-extremism@education.gsi.gov.uk</a>
FGM reporting - non-emergency police contact number		101
NSPCC whistleblowing helpline		0800 028 0285 <a href="https://www.nspcc.org.uk/what-you-can-do/report-abuse/dedicated-helplines/whistleblowing-advice-line/">https://www.nspcc.org.uk/what-you-can-do/report-abuse/dedicated-helplines/whistleblowing-advice-line/</a>
<a href="#">UK Safer Internet Centre</a>		0344 381 4772 <a href="mailto:helpline@saferinternet.org.uk">helpline@saferinternet.org.uk</a>
Charity Commission		<a href="mailto:whistleblowing@charitycommission.gsi.gov.uk">whistleblowing@charitycommission.gsi.gov.uk</a>

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## Safeguarding Policy

### 1. Aims

- 1.1. Brighton Waldorf School ('the School') aims to be a community where the safety and welfare of children, staff and others who come into contact with the School are safeguarded and promoted, and where a child in need or at risk of harm is identified and receives appropriate support.
- 1.2. The School recognises its responsibility to safeguard and promote the welfare of the children in its care and its duty to respond immediately to any concern relating to a pupil's welfare both within the School environment and outside it. The School aims to actively promote the well being of pupils and to create a culture of safety, equality and protection.
- 1.3. The School recognises its responsibility to ensure that all professionals understand that safeguarding is everyone's responsibility and that everyone who comes into contact with children has a role to play in safeguarding.
- 1.4. The School recognises that to fulfil its responsibility to safeguard children effectively, every professional must ensure their approach is child-centred and that consideration at all times will be with regard to the best interests of the child. The School is committed to raising staff awareness about the School's safeguarding expectations and to ensuring that staffs are both competent to carry out their safeguarding responsibilities and feel supported in this role.
- 1.5. At the heart of the School's wider aims are the values to which all members of the School community aspire: fairness, honesty, respect, tolerance, compassion and forgiveness. These underpin the School's work, help to protect everyone associated with the School from harm and help to foster an environment where people are working together to safeguard children.
- 1.6. This policy sets out the procedures in place for dealing with and referring concerns about the welfare of any individual and allegations of abuse. The School is committed to ensuring consistent good safeguarding practice throughout the School.
- 1.7. In drawing up and effectively implementing this Policy, the School has considered and taken account of:
  - 1.7.1. the requirements for pupils aged 3.5 to 16 years who are from a wide range of ethnic backgrounds and cultures;
  - 1.7.2. the particular location and features of the school site; and
  - 1.7.3. the requirements of a registered charity.
- 1.8. This policy is designed to address:
  - 1.8.1. the specific statutory obligations on the School to safeguard and promote the welfare of children, as defined below.
  - 1.8.2. the School's charity law safeguarding duty to:
    - 1.8.2.1. provide a safe and trusted environment which safeguards anyone who comes into contact with it, including pupils, staff/volunteers and visitors;
    - 1.8.2.2. set an organisational culture that prioritises safeguarding, so that it is safe for those affected to report incidents and concerns with the assurance they will be handled sensitively and properly;
    - 1.8.2.3. have adequate safeguarding policies, procedures and measures to protect people;
    - 1.8.2.4. provide clarity as to how incidents and allegations will be handled should they arise, including reporting to the relevant authorities, such as the police, local

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authority and Charity Commission which is covered in more detail at Appendix 3.

## 2. Interpretation

- 2.1. **Safeguarding** is the protection of people from harm.
- 2.2. **Safeguarding and promoting the welfare of children** is defined in WTSC and KCSIE as:
  - 2.2.1. protecting children from maltreatment;
  - 2.2.2. preventing impairment of children's mental and physical health or development;
  - 2.2.3. ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
  - 2.2.4. taking action to enable all children to have the best outcomes.
- 2.3. **DSL** means the School's Designated Safeguarding Lead. References to the DSL include the Deputy DSL where the DSL is unavailable.
- 2.4. **LADO** means the designated officer at a local authority. The designated officer(s) has overall responsibility for oversight of the procedures for dealing with allegations, for resolving any inter-agency issues, and for liaison with the three safeguarding partners.
- 2.5. Reference to **staff** includes all those who work for or on behalf of the School, regardless of their employment status; including contractors, supply staff, volunteers and Council members unless otherwise indicated.
- 2.6. The term 'children' refers to everyone under the age of 18.
- 2.7. 'Must' is used when a person is legally required to do something.
- 2.8. 'Should' is used when the advice should be followed unless there is a good reason not to

## 3. Introduction

- 3.1. This policy is written in accordance with the Children Act 1989; the Education and Skills Act 2008; the Education (Independent School Standards) Regulations 2014, the National Minimum Standards for Boarding Schools (Department for Education (**DFE**), April 2015); the Children and Social Work Act 2017; the Children Act 2004; the Safeguarding and Vulnerable Groups Act 2006; the Data Protection Act 2018 and General Data Protection Regulation (GDPR); the Equality Act 2010 and the Charities Act 2011.
- 3.2. This policy has regard to the following guidance and advice:
  - 3.2.1. *Keeping children safe in education*, September 2020 (KCSIE)
  - 3.2.2. *Working Together to Safeguard Children*, July 2018 (WTSC)
  - 3.2.3. *Prevent Duty Guidance* (April 2019)
  - 3.2.4. Channel duty guidance: protecting vulnerable people from being drawn into terrorism (April 2015)
  - 3.2.5. Educate Against hate (<https://educateagainsthate.com/>) (2018)
  - 3.2.6. Multi-agency statutory guidance on female genital mutilation (July 2020)
  - 3.2.7. What to do if you're worried a child is being abused: advice for practitioners (March 2015)
  - 3.2.8. Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers (July 2018)
  - 3.2.9. Sexting in schools and colleges: responding to incidents and safeguarding young people (August 2016)
  - 3.2.10. Children missing education (September 2016)
  - 3.2.11. Child sexual exploitation: definition and a guide for practitioners local leaders and decision makers working to protect children from child sexual exploitation (February

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2017)

- 3.2.12. Sexual violence and sexual harassment between children in schools and colleges (May 2018)
  - 3.2.13. Searching, screening and confiscation: advice for schools (January 2018)
  - 3.2.14. Strategy for dealing with safeguarding issues in charities (December 2017)
  - 3.2.15. Regulatory alert to charities - safeguarding (December 2017)
  - 3.2.16. How to report a serious incident in your charity (June 2019)
  - 3.2.17. Reporting a serious incident in your charity when it involves a partner (December 2019)
  - 3.2.18. Report serious wrongdoing at a charity as a worker or volunteer (June 2019)
  - 3.2.19. Guidance on handling safeguarding allegations in a charity (January 2019)
  - 3.2.20. Relationships education, relationships and sex education and health education guidance (July 2020) and
  - 3.2.21. The local inter-agency guidance and procedures of Brighton and Hove Safeguarding Children Partnership ('BHSCP') (<http://sussexchildprotection.procedures.org.uk/>).
- 3.3. The School contributes to interagency working in line with Working Together to Safeguard Children guidance through effective implementation of the School's safeguarding arrangements and ensuring effective communication with local agencies (see also 24 below). This policy also takes account of the School's equality obligations.

Copies of Part 1 of KCSIE DfE guidance - including Annex A - are available on the School intranet and on request from the Designated Safeguarding Lead, and given to all staff at Induction and to all staff who work directly with children and leaders at the school – this is in line with the Staff Code of Conduct (see section 10 below).

It is also available:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/912593/Keeping\\_children\\_safe\\_in\\_education\\_part\\_1\\_Sep\\_2020.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/912593/Keeping_children_safe_in_education_part_1_Sep_2020.pdf)

- 3.4. The School will take reasonable steps to ensure that its pupils and others who come into contact with the School do not, as a result, come to harm or are exposed to abuse. Any safeguarding concern raised by any person will be taken seriously and any action taken will be in accordance with the relevant School policies and procedures.
- 3.5. Every pupil should feel safe and protected from any form of abuse and neglect. The indicators of abuse and neglect and examples of specific safeguarding issues are set out in Appendix 1. The School is committed to acting in the best interests of each child so as to safeguard and promote the welfare of children and young people and requires all staff (including temporary staff), Council members and volunteers who come into contact with children and their families to share this commitment. The School will:
  - 3.5.1. Understand its role in the three safeguarding partner arrangements and make itself aware of and follow the local inter-agency procedures of the Brighton & Hove Safeguarding Partners;
  - 3.5.2. Practise safer recruitment in checking the suitability of all staff members and volunteers (including supply staff and staff of contractors) who work with children and young people and ensure that other organisations who provide staff to the School operate appropriate safeguarding checks and procedures. The School's Recruitment and Selection Policy can be found on the School intranet and a copy

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- can be provided on written request from the Director of Finance and Administration;
- 3.5.3. Carry out all necessary checks on the suitability of any person serving on the School Council (Board of Trustee Governors);
  - 3.5.4. When pupils attend off site activities, ensure that where staff from another organisation are working with our pupils, the School has received assurances and verified that appropriate child protection checks and procedures apply to those staff;
  - 3.5.5. Raise awareness of child protection issues and equip pupils with the skills needed to keep themselves safe;
  - 3.5.6. Encourage a culture of listening to pupils and taking account of their wishes and feelings in any measure put in place by the School to protect them;
  - 3.5.7. Prepare staff to identify children who may benefit from early help and encourage them to be particularly alert to the potential need for early help for children with the indicators listed in KCSIE or WTSC;
  - 3.5.8. Support those pupils who have been abused or are in need (including in accordance with any Child Protection Plan) and deal appropriately with every suspicion or complaint of abuse in accordance with the procedures set out in this Policy and Brighton and Hove Safeguarding Children Partnership arrangements;
  - 3.5.9. Ensure that any 'looked after' children receive appropriate support from staff who have the skills, knowledge and understanding to help keep them safe;
  - 3.5.10. Be alert to the individual needs of children with physical or mental health conditions, learning needs and/or disabilities), which could be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation and where additional barriers can exist when detecting abuse or neglect;
  - 3.5.11. Be alert to signs of abuse whether in school, within the child's family or outside, and take steps to protect individuals from any form of abuse, whether from an adult or another child;
  - 3.5.12. Identify those who may be at risk from radicalisation or cultural and illegal practices at odds with British values, such as forced marriage and female genital mutilation, and know what to do when they are identified;
  - 3.5.13. Assess the risk of pupils being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology, based on an understanding of the potential risk in the local area;
  - 3.5.14. Be alert to children who are at potentially greater risk of harm including children who need a social worker and children requiring mental health support;
  - 3.5.15. Design and operate procedures which, so far as possible, ensure people against whom allegations are made are treated fairly and protected from malicious allegations;
  - 3.5.16. Establish and maintain a safe environment in which pupils can learn and develop, are encouraged to talk and are listened to;
  - 3.5.17. Take all practicable steps to ensure that School premises are as secure as circumstances permit;
  - 3.5.18. Ensure the safe use of IT equipment and access to the internet and to promote the safeguarding and welfare of pupils. In order to achieve this, all computers in the School used to gain access to the School network, internet and social media are protected by a rigorous firewall and filtering system, as per the Data Protection and ICT Acceptable Use Policy, and all security updates and patches are applied;
  - 3.5.19. Provide a support network for pupils so that they know there are adults in the
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School whom they can approach if they are worried by establishing arrangements for listening to children including as set out in the School's Counselling and Independent Listener Policy;

- 3.5.20. Provide opportunities in the PSHE Curriculum and Citizenship Programme for pupils to develop the skills they need to recognise and stay safe from abuse: physical, sexual, emotional and/or neglect (including abuse that may arise from the use of the Internet);
- 3.5.21. Operate a robust and sensible health and safety procedures to help protect the welfare of all pupils;
- 3.5.22. Consider and develop procedures to deal with any other safeguarding issues which may be specific to the local area;
- 3.5.23. Ensure that all staff and volunteers are appropriately trained at Induction and receive updated safeguarding training, including awareness of the early help process and their role, as well as regular updates (at least annually) throughout their employment with the School and ensure that any volunteers and temporary staff are also made aware of the School's safeguarding and safe working practices; and
- 3.5.24. Ensure staff understand and comply with relevant policies including the School's Promoting Good Behaviour Policy, Use of Reasonable Force Policy, Staff Code of Conduct and safe working practices, such as the potential risks of working alone.

### 3.6. Contextual safeguarding

- 3.6.1. Safeguarding incidents and/or behaviours can be associated with factors outside the School and/or can occur between children outside the School.
- 3.6.2. All staff, including the DSL, should consider the context within which such incidents and/or behaviours occur, for example where wider environmental factors are present in a child's life that may be a threat to their safety and/or welfare.
- 3.6.3. Children's social care should be informed of all such information to allow any assessment process to consider all available evidence and the full context of any abuse.
- 3.6.4. Extra-familial harm: all staff, but especially the DSL (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

## 4. Pupil Support and Education

- 4.1. The School recognises that pupils who are in need, abused or witness violence may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation or some sense of blame. The School may be the only stable, safe and predictable element in their life. When at school their behaviour may be challenging and defiant or they may appear withdrawn.
- 4.2. The School will endeavour to support pupils through:
  - 4.2.1. The content of the curriculum.
  - 4.2.2. Its aims and ethos promoting a positive, secure environment and giving the pupils a sense of being valued.
  - 4.2.3. Ensuring that pupils know that some behaviour is unacceptable and what to do if they have concerns about the behaviour of someone else (be this, for example, another pupil, family member or member of staff).
  - 4.2.4. Inter-agency liaison with, for example, Brighton and Hove BHSCP, the police and

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Children's Social Services where appropriate.

- 4.2.5. Information sharing, insofar as, if a pupil suffering abuse leaves, their information is transferred to the new school immediately (but separately from the main pupil file) and keyworkers are informed where appropriate.
- 4.3. The School teaches pupils about safeguarding through the curriculum and PSHE/Citizenship Program. This includes guidance on adjusting behaviour to reduce risks, particularly online, building resilience to protect themselves and their peers, fostering healthy and respectful relationships with others and providing information about who they should turn to for help.
- 4.4. Relevant issues will be covered through Relationships and Education and Relationships and Sex Education as part of the PSHE/Citizenship Program programme.
- 4.5. Pupils are taught about harmful sexual behaviours, including sexual violence and sexual harassment, through relationships and sex education and PSHE/Citizenship Program education appropriate to their age and stage of development.
- 4.6. Pupils are given the opportunity to talk about safeguarding issues within the classroom environment and are made aware of the processes by which any concerns they have can be raised, including the processes for reporting a concern about a friend or peer, and how any report will be handled. The School's concerns and complaints procedure for pupils' sets out in writing what pupils should do if they have a worry or complaint.
- 4.7. The safe use of technology is a focus in all areas of the curriculum and key ICT safety messages are reinforced as part of assemblies and tutorial/pastoral activities. The School has appropriate filters and monitoring systems in place (see the online safety policy) and is mindful that this should not lead to unnecessary restrictions on learning.

## **5. Wider Awareness of the Policy**

- 5.1. This policy is addressed to all members of staff (including volunteers and temporary/supply staff) and the Council (Board of Trustee Governors.) It applies at all times including during core School activities, out of hours activities and where staff or pupils are away from the School on School business.
- 5.2. The Safeguarding Policy is available on the School website. Printed copies are available from the School Office. In addition, we recognise, understand and implement the obligations placed on the School in terms of safeguarding and child protection, which is promoted in the School prospectus, the Parent Contract and the Student Handbook.
- 5.3. This policy recognises that the School and its staff form part of the wider safeguarding system for children and that the safeguarding and promotion of the welfare of children is everyone's responsibility.

## **6. Use of Mobile Technology**

- 6.1. The School's policy on the use of mobile technology, including phones and cameras, in the School, is as follows:
- 6.2. The School's acceptable use policy for pupils which sets out the expectations on pupils from Class 6 to Class 10; in particular Filtering software is used to filter out inappropriate sites and images but be aware that there is no perfect system for doing this. Mobile phones and other mobile electronic devices must be switched off (and not just on silent mode) and kept in bags during School hours, including at break times and between lessons. Use of such devices is only permitted during School hours with the express permission of a member of staff.

The use of cellular data (e.g. GPRS, 3G, 4G, etc) to access the internet while pupils are on School premises or otherwise in the care of the School is discouraged, as pupils are unable to benefit

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from the School's filtering and anti-virus software. Pupils accessing the internet outside the School's network whilst on School premises or otherwise in the care of the School do so at their own risk and must comply with all the provisions of the ICT Acceptable Use Policy for Pupils regarding acceptable behaviour.

- 6.3. All staff should use mobile devices and cameras in accordance with the guidance set out in the staff code of conduct;
- 6.4. Parents of all pupils may bring mobile devices onto the premises but may only take photographs during events such as plays, concerts or sporting events for personal use. Parents should be reminded that the publication of such images (including on personal social networking sites even where access to the image may be limited) may be unlawful.
- 6.5. The School allows access to the internet on site. Appropriate internet safety measures are taken to manage associated risks, including use of filters and monitoring of usage.
- 6.6. The School's approach to online safety is set out in the School's ICT Acceptable Use Policy for Pupils.

## 7. Designated safeguarding lead and other staff

- 7.1. **The Designated Safeguarding Lead (DSL) for the School is Hannah Joel (Inclusion lead and SENCO)** [Hannah.joel@brightonwaldorfschool.org](mailto:Hannah.joel@brightonwaldorfschool.org) / 01273 386300. The identity will be explained to all staff as part of their induction. The DSL takes lead responsibility for all aspects of safeguarding and child protection (including online safety) throughout the School.
- 7.2. The Deputy DSLs – to whom safeguarding activities may be delegated – are Damian Mooncie, School Director ([damian.mooncie@brightonwaldorfschool.org](mailto:damian.mooncie@brightonwaldorfschool.org) / 01273 386300) and Carrie Rawle, Chair of College ([carrie.rawle@brightonwaldorfschool.org](mailto:carrie.rawle@brightonwaldorfschool.org) / 01273 386300) and Jacqui Firth, Senior Leadership Team ([Jacqui.firth@brightonwaldorfschool.org](mailto:Jacqui.firth@brightonwaldorfschool.org) / 01273 386300) The identity of the Deputy DSLs will be explained to all staff as part of their induction. Deputy DSLs are trained to the same standards as the DSL.
- 7.3. The DSL and Deputy DSLs have the necessary training, status and authority to be responsible for matters relating to safeguarding, child protection and pupil welfare. They are the most appropriate individuals to advise on any safeguarding concerns.
- 7.4. Mrs Thais Bishop is the member of Council (Board of Trustee Governors) who takes leadership responsibility for the School's safeguarding arrangement and has also completed Level three Safeguarding training and who meets with the DSL each term to review this Policy and to give guidance and support on safeguarding and safer recruitment practices within the School.
- 7.5. The primary responsibilities of the DSL are set out in Annex B of KCSIE. Responsibilities include:
  - 7.5.1. To take lead responsibility for safeguarding and child protection (including online safety).
  - 7.5.2. To provide support, advice and expertise to staff members to carry out their safeguarding duties, including when making referrals to the local authority's children's social care and the Channel programme as required.
  - 7.5.3. To maintain an overview of safeguarding within the School.
  - 7.5.4. To be the first point of contact for parents, pupils, teaching and non-teaching staff and external agencies in all matters of child protection (except where an allegation of abuse involves a member of staff in which case the procedure contained in section 19 must be followed).
  - 7.5.5. To be a central point of safeguarding information within the School so that all people involved in a pupil's life can liaise directly with the DSL in order that the DSL can have an understanding of all aspects of a pupil's experience and from that assess patterns of behaviour and/or concerns.

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- 7.5.6. To liaise with staff (especially pastoral support staff, school, IT and SENCOs/named person with oversight for SEN) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies.
  - 7.5.7. To act as a point of contact with the three safeguarding partners.
  - 7.5.8. Link with the Local Safeguarding Partners to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.
  - 7.5.9. To refer cases of suspected abuse to the relevant external agencies including the relevant local authority's children's social care, in accordance with this policy and to liaise closely with external agencies who are concerned with a pupil's safeguarding.
  - 7.5.10. To refer cases to the Channel programme where there is a radicalisation concern as required;
  - 7.5.11. To refer cases where a person is dismissed or has left due to risk/harm to a child to the Disclosure and Barring Service (**DBS**) as required.
  - 7.5.12. To monitor the keeping, confidentiality and storage of records in relation to child protection.
  - 7.5.13. To refer cases where a crime may have been committed to the police as required.
  - 7.5.14. To raise awareness within the whole School community of the importance of safeguarding and ensure the School's child protection and safeguarding policies and processes are known, understood and used appropriately.
  - 7.5.15. To ensure mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in part one of the KCSIE – including Annex A.
  - 7.5.16. To ensure that all staff (including temporary) are regularly trained in safeguarding policies and procedures throughout their employment in accordance with this Policy.
  - 7.5.17. To ensure that all staff (including temporary) receive a Safeguarding Induction at whatever stage they join the School community during the academic year.
  - 7.5.18. To work closely with the School Director and Finance Officer and Administration to ensure that safer recruitment procedures are carried out comprehensively.
  - 7.5.19. To ensure that the School follows procedures for dealing with allegations of abuse in accordance with BHSCP guidelines, KCSIE and this policy.
  - 7.5.20. To keep parents informed of action(s) to be taken under these procedures in relation to their child, as appropriate.
  - 7.5.21. To liaise with the School Director to inform them of any issuing, especially ongoing child protection enquiries under section 47 of the *Children Act 1989* and police investigations.
  - 7.5.22. To as required, liaise with the case manager and the designated officer(s) at the local authority for child protection concerns in cases which concern a staff member.
  - 7.5.23. To monitor records of pupils in the School who are subject to a child protection plan to ensure that this is maintained and updated as notifications are received.
  - 7.5.24. To inform Children's Social Care Department in writing when a child who is subject to a Child Protection Plan moves to another school; and inform the new school of the child protection plan as advised by the Children's Social Care Department.
  - 7.5.25. To ensure the School's safeguarding policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and remedy any deficiencies or weaknesses without delay.
  - 7.5.26. To ensure this policy is available publicly and parents are aware that referrals about suspected abuse or neglect may be made and the role of the School in this.
  - 7.5.27. To help promote educational outcomes by sharing information about the welfare,

safeguarding and child protection issues that children, including children with a social worker, are experiencing or have experienced with teachers and school leadership staff.

- 7.5.28. To ensure that appropriate child protection checks and procedures apply to any staff employed by another organisation and working with the School's pupils on another site (for example in a separate institution). This includes any taxi company used by the School
  - 7.5.29. For any 'looked after' child, to ensure there is a designated member of staff with responsibility for their welfare and progress.
  - 7.5.30. To ensure, together with the Head and Council members, that all staff receive appropriate training to help them understand the risk of radicalisation and what to do if they have any concerns that a child may be at risk of being drawn into terrorism, radicalisation and/or extremism.
  - 7.5.31. To ensure that, where a pupil leaves the School (including for in-year transfers, the child protection file is transferred to any new school or college as soon as possible but transferred separately from the main pupil file, ensuring secure transit and obtaining confirmation of receipt. The DSL will also consider if it is appropriate to share any information with the new school or college in advance of a child leaving.
  - 7.5.32. On receiving a child protection file, the DSL will ensure that key staff are aware as required, including the SENCO/named person with oversight for SEN.
- 7.6. The School's DSL, Hannah Joel, and Deputy DSLs, are Damian Mooncie, Carrie Rawle and Jacqui Firth who also have responsibility for the welfare and progress of any 'looked after' children in the School. This includes ensuring the School 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.
- 7.7. If the DSL is unavailable, all their duties will be carried out by the Deputy DSLs.
- 7.8. The DSL and Deputy DSLs undertake training to provide them with the knowledge and skills required to carry out the role and the processes and procedures and responsibilities of other agencies, particularly children's social care. This includes appropriate multi-agency child protection training and training in inter-agency working (including training in Brighton and Hove BHSCP's approach to Prevent, participation in Child Protection case conferences, supporting Children in Need, identifying children at risk of radicalisation, record keeping and promoting a culture of listening to children). Such training is updated at least every two years.
- 7.9. In addition, their knowledge and skills will be refreshed at regular intervals, at least annually, to allow them to understand and keep up with any developments relevant to their role so they:
- 7.9.1. understand the statutory and local processes for identifying those who may benefit from additional support, the support which may be available and the processes by which this can be accessed;
  - 7.9.2. understand the statutory and local processes for referral and how they will be actioned so that they can be managed and overseen effectively
  - 7.9.3. can ensure that appropriate training is provided to all who need it and that it is fit for purpose;
  - 7.9.4. can ensure that appropriate records are maintained and kept securely

## **8. Records and Procedures**

- 8.1. Where a member of staff hears a complaint of abuse and/or neglect (or has concerns that a pupil may be subject to abuse and/or neglect), they should act immediately by speaking with the DSL and must follow the procedures set out at sections 13 and 14 below.
- 8.2. Where an allegation is made against a member of staff, the procedures in section 19 must be

followed.

- 8.3. All pupils in respect of whom there is a safeguarding concern have a separate file in addition to their main school file. These are kept securely by the DSL. The main school file is given a red dot indicating that there are ongoing safeguarding concerns. The DSL must be consulted before issuing any information from the School Office.
- 8.4. The School's Safeguarding Policy and procedures are regularly monitored. The safeguarding team (DSL – Hannah Joel, Deputies – Damian Mooncie, Carrie Rawle and Jacqui firth and Safeguarding Council (Board of Trustee Governors) member – Thais Bishop) will also regularly keep this policy under review and following any safeguarding incident to assess the policy's effectiveness, and to determine whether any amendments are necessary.

## **9. Safer Recruitment**

- 9.1. The School is committed to practising safer recruitment in checking the suitability of staff. See the School's Recruitment and Selection Policy.
- 9.2. Records of all staff appointments are held on a Single Central Register.
- 9.3. The School's protocol for ensuring that visiting speakers are suitable and appropriately supervised is set out in the School's separate Visitors and Security Policy

## **10. Induction and Training**

- 10.1. The School ensures that regular guidance and training is arranged on induction and at regular intervals thereafter so that staff understands what is expected of them by this policy and have the necessary knowledge and skills to carry out their roles. The level and frequency of training depends on role of the individual member of staff. The School maintains written records of all staff training.
- 10.2. All new staff, including the Head and part-time, temporary, trainee and voluntary staff, complete a safeguarding induction. Induction training includes training on (and where relevant includes the provision of copies of):
  - 10.2.1. the School's Safeguarding Policy
  - 10.2.2. the role, identity and contact details of the DSL and Deputy DSLs
  - 10.2.3. the Promoting Good Behaviour Policy
  - 10.2.4. the Code of Conduct for teaching and support staff including the Whistleblowing Policy, Staff Social Media Policy and IT Acceptable Use Policy
  - 10.2.5. the School's approach to online safety
  - 10.2.6. the School's safeguarding response to children who go missing from education
  - 10.2.7. safeguarding training in accordance with Brighton and Hove BHSCP advice including guidance on managing a report of peer-on-peer harmful sexual behaviour.
  - 10.2.8. a copy of Part 1 and, where appropriate, Annex A of KCSIE
  - 10.2.9. Appropriate Prevent duty training.
- 10.3. The School has mechanisms in place to assist staff to understand and discharge their role and responsibilities and to ensure that they have the relevant knowledge, skills and experience to safeguard children effectively, including questionnaires, staff meetings, and professional development reviews. This includes information on how staff can report concerns occurring out of hours/out of term time.
- 10.4. All staff including volunteers and the School Director will also receive regular safeguarding training, updates and refreshers in line with Brighton and Hove BHSCP advice. In agreement with the BHSCP, such training is updated every three years. In addition, all staff members will receive safeguarding and child protection updates via email, e-bulletins and staff meetings on a regular basis and at least annually.
- 10.5. The induction and In Service programmes ensure that all staff members understand their

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- responsibilities in being alert to the signs of abuse, their responsibility for referring any concerns to the DSL, and the continuing requirement for safe working practice and appropriate behaviour from all staff. They are also kept informed of any changes to guidelines and/or systems within the School.
- 10.6. All new and existing staff will also be required, as part of their induction and/or as part of refresher training, to read a copy of the most up to date Part 1 of Keeping Children Safe in Education (including Annex A, where appropriate) and confirm that they have read and understand it.
- 10.7. Upon completion of safeguarding induction, each staff member is asked to complete a safeguarding induction form to acknowledge that he/she:
- 10.7.1. is aware of the identity of the DSL;
  - 10.7.2. knows what to do in the event of hearing a child protection disclosure or allegation, or observing anything which might lead them to suspect that a child is in need or at risk of harm;
  - 10.7.3. understands the School's expectations with regard to appropriate relationships between staff and pupils and to confidentiality, as set out in the School's Staff Code of Conduct;
  - 10.7.4. has received, read and understood the School's Safeguarding policy; and
  - 10.7.5. has received, read and understood the guidance in Part 1 of *Keeping children safe in education* (including Annex A, where appropriate).
  - 10.7.6. The completed form is placed on the staff member's personal file in the Admin office.
- These records are kept securely by the HR Officer and reviewed regularly.
- 10.8. The School will also ensure that all staff (including new staff as part of their induction) receive appropriate training on online safety, searching pupils for prohibited and banned items and preventing people from becoming drawn into terrorism and extremist views, so as to provide staff with the knowledge and confidence to identify children at risk and to challenge ideas which can be used to legitimise terrorism. Such training will be included as part of all new staff's induction and will be updated as appropriate in line with any BHSCP advice
- 10.9. Additionally, the School will make an assessment of the appropriate level and focus for staff training and responsiveness to specific safeguarding concerns such as radicalisation, harmful sexual behaviour, child sexual exploitation, female genital mutilation, cyberbullying, prejudice based bullying and mental health and to ensure that staff have the skills, knowledge and understanding to keep 'looked after' children safe.
- 10.10. All Council (Board of Trustee Governors) members receive safeguarding training on induction. The Council member responsible for safeguarding and the Chair of Council will receive additional appropriate training to enable them to fulfil their safeguarding responsibilities regularly and at least annually.

## **11. Types of Abuse and Neglect**

- 11.1. All members of staff should be aware of the signs of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection. Knowing what to look for is vital to the early identification of abuse and neglect. If staff members are unsure they should always speak to the DSL or Deputy DSLs or directly to Brighton and Hove Children's Social Care. More information on the types of abuse can be found on the NSPCC website and also the Government website:

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[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/419604/What\\_to\\_do\\_if\\_you\\_re\\_worried\\_a\\_child\\_is\\_being\\_abused.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf)

- 11.2. Please see Appendix 1 for information about the indicators of abuse and neglect and examples of specific safeguarding issues in relation to children.
- 11.3. When concerned about the welfare of a child, staff members should always act in the interests of the child.
- 11.4. It is important that all staff maintain an attitude that it could happen here and that they should always act in the best interests of the child.
- 11.5. Child protection is part of safeguarding and promoting welfare. Child protection is the activity undertaken to protect specific children who are suffering, or are likely to suffer, significant harm. The School Director will also consider whether action should also be taken to promote the welfare of a pupil in need of additional support, even if they are not suffering harm or are at immediate risk.

## **12. How to Respond to Concerns – General**

- 12.1. All staff have a duty to:
  - 12.1.1. report any concerns they may have about the safety and/or wellbeing of pupils;
  - 12.1.2. report any concerns they may have about the safety and/or wellbeing of other persons associated with the School;
  - 12.1.3. report any safeguarding concerns about staff or anyone else associated with the School; and
  - 12.1.4. follow up on any such reports to ensure that appropriate action is or has been taken; and the School encourages anyone else with these concerns to report them in accordance with this Policy.
  - 12.1.5. The procedures for doing so are set out in the sections below. If staff are unsure about the process, they should not hesitate to speak to the DSL, a member of the school leadership team or directly to children's social care or police for guidance.
  - 12.1.6. Every situation will be slightly different but the following guidelines should always be followed to ensure that concerns are identified, information shared and prompt action is taken:

## **13. Responding to a Safeguarding Disclosure**

- 13.1. A member of staff suspecting or hearing a complaint of abuse must:
  - 13.1.1. Take what is said seriously and maintain an appropriate level of confidentiality
  - 13.1.2. Listen carefully and do not interrupt. Staff must not take a decision as to whether or not the abuse has taken place
  - 13.1.3. Remain calm
  - 13.1.4. Reassure the person
  - 13.1.5. Let the person know you will help them
  - 13.1.6. Write up your notes as soon as possible. These should include the pupil's details (name; date of birth; address and family details); the date, time and place of the event/concern/conversation; the essence of what was said; the action taken and by whom; and the name and position of the person making

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the record. The record should be factual and signed and dated by the person making it and should use names, clearly printed, not initials. All other evidence, for example, scribbled notes, mobile phones containing text messages, clothing, computers must be kept securely with the written record and passed on when reporting the matter in accordance with this policy.

13.1.7. Talk to the DSL or Deputy about any support for yourself.

13.2. Do not:

13.2.1. Agree to keep the information secret. (All staff must be mindful that the overriding consideration must be the interests of the child. For this reason, absolute confidentiality cannot and should not be promised to anyone.) The member of staff should explain the need to pass on the information in accordance with this policy so that the correct action can be taken;

13.2.2. Ask leading questions, that is, a question which suggests its own answer

13.2.3. Promise anything

13.2.4. Investigate

13.2.5. Allow shock or distaste to show

13.2.6. Make negative comments

13.2.7. Express disbelief

13.2.8. Speculate

13.2.9. Think 'someone else will report this'

13.2.10. Delay help

13.3. When responding to a child, staff must take account of language or communication difficulties the child has.

13.4. All evidence (for example, scribbled notes, and mobile phones containing text messages, clothing, and computers), must be safeguarded and preserved.

13.5. Even if a member of staff is not sure that the issue they have encountered is serious, they should inform the DSL. The DSL will decide the best course of action. What is important is that the pupil receives the right help at the right time to prevent any issues escalating; as such, all staff are encouraged to act on any concerns they may have.

13.6. **Receiving a report of Harmful Sexual Behaviour**

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

13.6.2. Only record the facts as the child presents them.

13.6.3. Where the report includes an online element, do not view or forward illegal images of a child. See the guidance about sexting in Appendix 1 of this policy and the UK Council for Child Internet Safety's advice note [Sexting in schools and colleges: responding to incidents and safeguarding young people \(August 2016\)](#) for advice about what to do when viewing an image is unavoidable.

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

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

13.7. **Use of Reasonable Force**

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

13.7.2. Staff should refer to the School's Use of Reasonable Force Policy for more detailed guidance about the use of reasonable force.

## 14. Raising Concerns about a Child

- 14.1. If staff have **any concern** about a pupil's welfare, action should be taken **immediately**.
- 14.2. Any member of staff who has concerns about a child's welfare should raise these with the DSL (or the DDSL in the DSL's absence), or if the complaint involves the DSL, to the School Director immediately. Details of procedures for reporting allegations against members of staff are given in section 19.
- 14.3. A concern about a child is not defined and should be interpreted broadly. It may relate to a recognition that a child would benefit from extra support, to an emerging problem or to a potentially unmet need or may reflect a concern that a child may be deemed to be "in need" or at "immediate risk of harm" as defined by the Children Act 1989.
- 14.4. **Staff must also report to the police any known cases of FGM.** In such cases, a referral should be made immediately. See Appendix 1 for further information about FGM and this reporting duty. All other staff should refer FGM concerns to the DSL.
- 14.5. If the concern involves an **allegation against a member of staff**, supply staff or volunteers this must be reported in accordance with the procedures set out in section 19 below and part 4 of KCSIE.
- 14.6. **What if the DSL is unavailable?**
  - 14.6.1. The DSL or the DDSL should always be available to discuss safeguarding concerns and may be contacted on their mobile phones in relation to any safeguarding concerns out of School hours.
  - 14.6.2. If in exceptional circumstances the DSL and DDSL are unavailable, which may occur outside term time or school hours, staff must not delay taking action. Staff should speak to their line manager or a member of the senior leadership team and/or advice should be taken from children's social care.
  - 14.6.3. Where a child is suffering, or is likely to suffer from harm, a referral to children's social care and/or police should be made immediately. Staff should be aware of the process for making referrals direct to children's social care and/or the police in these circumstances. See section 17 below for details on making a referral.
  - 14.6.4. Any action should be shared with the DSL or DDSL, or a member of the school leadership team, as soon as is practically possible.
- 14.7. Where the suspicion or complaint is in relation to terrorism or extremist ideas involving a pupil, staff must firstly raise this with the School Director Damian Mooncie or DSL, Hannah Joel without delay. The School Director or DSL will consult with external agencies, as appropriate. Where the level of risk is such that there is an immediate risk of harm or staff have a genuine concern that there is an immediate risk of harm, any member of staff may make a referral directly to Children's Social Care or the police.
- 14.8. Parents who have concerns about suspected abuse or neglect may also approach the DSL, or Class Teacher who will ensure such concerns are dealt with in accordance with this policy. Parents may make a referral directly to Children's Social Care where they have concerns that there is a risk of immediate serious harm.
- 14.9. All concerns, discussions and decisions made, and the reasons for those decisions, should be made in writing.
- 14.10. **Action by the DSL**
  - 14.10.1. On receipt of a report of a concern, the DSL will consider the appropriate course of action in accordance with the Brighton and Hove BHSCP procedures and referral threshold document. Such action may include:
    - 14.10.1.1. managing any support for the pupil internally via the School's own pastoral support processes, seeking advice from children's social care where required

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- (see 16 below);
  - 14.10.1.2. an early help assessment (see 17 below);
  - 14.10.1.3. a referral for statutory services (see 18 below).
  - 14.10.1.4. Parental or pupil consent is **not** required for a referral to a statutory agency where there are concerns about a pupil's safety. The view of the child will be taken into account when considering the appropriate course of action but will not be determinative.
- 14.11. Where the concern relates to the welfare of a pupil who is aged 18 or over, the DSL will consider whether it is necessary to refer such concerns to the Safeguarding Adults Board rather than, or in addition to, children's social care.
- 14.12. If it is decided that a referral is not required, the DSL will keep the matter under review and give ongoing consideration to a referral if the pupil's situation does not appear to be improving.

## 15. Making a Referral

- 15.1. **Where a child is suffering, or is likely to suffer from harm, a referral to children's social care (and if appropriate the police) should be made immediately.** Referrals should generally be made to the child's home police/local authority in accordance with local procedures, but otherwise should be made to the School's local police force/authority in accordance with the details in section 23.

### 15.2. Statutory assessments

- 15.2.1. Children's social care may undertake a statutory assessment under the Children Act 1989 into the needs of the child. It is likely that the person making the referral will be asked to contribute to this process. Statutory assessments include:
- 15.2.1.1. **Children in Need:** A child in need is a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Children in Need may be assessed under section 16 of the Children Act 1989.
  - 15.2.1.2. **Children suffering or likely to suffer significant harm:** Local authorities have a duty to make enquiries under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm.
- 15.3. Staff will need to have access to certain information about the child and the safeguarding concern in order to make the referral. In general terms, this information will comprise:
- 15.3.1. personal details of the child including the child's developmental needs;
  - 15.3.2. detailed information about the concern;
  - 15.3.3. information about the child's family and siblings including the capacity of the child's parents or carers to meet the child's developmental needs and any external factors that may be undermining their capacity to parent.
- 15.4. Staff required to make a direct referral may find helpful the flowchart set out on page 17 of KCSIE and the flowcharts set out in Chapter 1 of WTSC for information about the likely actions and decisions required.
- 15.5. If the initial referral is made by telephone, this should be followed up in writing. If the referral is made by someone other than the DSL, the DSL should be informed of the referral as soon as possible.

- 15.6. Confirmation of the referral and details of the decision as to what course of action will be taken should be received from the local authority within one working day. If this is not received, the DSL (or the person that made the referral) should contact children's social care again.
- 15.7. Any member of staff who has concerns that a child's situation does not appear to be improving following a referral should follow the local escalation procedures, to ensure that their concerns have been addressed and that the child's situation improves.
- 15.8. The School will not do anything that may jeopardise any external investigation. Once the matter has been referred, all further responsibility for gathering information and deciding what happens next will rest with Social Services and the police.

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

- 16.1. The School has a framework for the identification, assessment, management and review of risk to pupil welfare so that appropriate action can be taken to reduce the risks identified. See section 23 and the School's Risk Assessment Policy for Pupil Welfare.
- 16.2. Where a pupil requires additional welfare support the relevant member of the pastoral team will gather information through meetings with the pupil, parent/guardian and academic staff and produce a clear Pastoral Support Plan. The plan will be periodically reviewed and updated.
- 16.3. All staff also needs to be alert to the specific needs of those pupils who have special educational needs and/or disabilities, including young carers.

## **17. Indicators and Early Intervention**

- 17.1. The School recognises that there may be children who, whilst not suffering harm or at immediate risk, require additional support from external agencies. Where appropriate, the School may consult with the child concerned and their parents regarding a referral to external agencies (such as children's social care). This may lead to a written plan to support a child in need being drawn up or an early help assessment, such as the Common Assessment Framework, being carried out. In either case, the School will liaise and take advice from external agencies as appropriate.
- 17.2. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years. The School understands that providing early help is more effective in promoting the welfare of children than reacting later.
- 17.3. The School's safeguarding training includes guidance about the early help process and prepares all staff to identify children who may benefit from early help. Staff are mindful of specific safeguarding issues and those pupils who may face additional safeguarding challenges. Staff should be particularly alert to the potential need for early help for a child who:
  - 17.3.1. Is disabled and has specific needs.
  - 17.3.2. Has special educational needs (whether or not they have a statutory Education, Health and Care Plan).
  - 17.3.3. Is a young carer.
  - 17.3.4. Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups.
  - 17.3.5. Is frequently missing/goes missing from care or from home.

- 17.3.6. Is at risk of modern slavery, trafficking or exploitation.
  - 17.3.7. Is at risk of being radicalised or exploited.
  - 17.3.8. Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse.
  - 17.3.9. Is misusing drugs or alcohol themselves.
  - 17.3.10. Is looked after or has returned home to their family from care.
  - 17.3.11. Is a privately fostered child.
- 17.4. When assessing children, staff should consider the wider environmental factors affecting the child's life that may pose a threat to their safety and/or welfare. Staff are encouraged to provide as much contextual information as possible as part of the referral process.
- 17.5. A member of staff who considers that a pupil may benefit from early help should in the first instance discuss this with the DSL. The DSL will consider the appropriate action to take in accordance with the Brighton and Hove BHSCP referral threshold document and will support staff in liaising with other agencies and setting up an inter-agency assessment as appropriate.
- 17.6. If early help is appropriate, staff may be required to support other agencies and professionals in an early help assessment and will be supported by the DSL and carrying out this role. In some cases staff may be required to take a lead role.
- 17.7. The matter will be kept under review and consideration given to a referral to children's social care for assessment for statutory services if the pupil's situation appears to be getting worse, or does not appear to be improving.
- 17.8. With regards to the Prevent Duty, the School will co-operate with Channel panels and the police when assessments are being undertaken.

### **18. What to do if Staff have a Concern about Someone else's Welfare**

- 18.1. Staff who have concerns about the welfare of others, or any other safeguarding issue not expressly covered by this policy, should report them.
- 18.2. In the absence of an express procedure about reporting, they should report such concerns to their line manager in the first instance.

### **19. Allegations of abuse made against Staff, the School Director or Volunteers**

- 19.1. Every staff member has a responsibility to ensure safe working practices and that their behaviour and actions do not place pupils or staff at risk of harm or of allegations of harm to a pupil (see the Staff Code of Conduct for further information). The School's procedures for dealing with allegations against staff (including supply teachers and volunteers who work with children) in this policy apply to staff who pose a risk of harm to children or may behave in a way that indicates that they may be unsuitable to work with children and aim to strike a balance between the need to protect children from abuse and the need to protect staff and volunteers from malicious, false, unsubstantiated or unfounded allegations.
- 19.2. The School's procedures for managing allegations against staff (including the Head) and supply teachers and volunteers follows Part 4 of KCSIE and Brighton and Hove BHSCP arrangements and apply when staff, including volunteers, have (or alleged to have):
  - 19.2.1. Behaved in a way that has harmed a child, or may have harmed a child;
  - 19.2.2. Possibly committed a criminal offence against or related to a child;
  - 19.2.3. Behaved towards a child in a way that indicates that they may pose a risk of harm if they were to work regularly or closely with children; or
  - 19.2.4. Behaved or may have behaved in a way that indicates they may not be suitable to

work with children.

- 19.3. Any allegations not meeting these criteria will be dealt with in accordance with the Brighton & Hove Safeguarding Partners' procedures. Advice from the LADO will be sought in borderline cases.
- 19.4. All such allegations must be dealt with as a priority without delay.
- 19.5. The School will follow its employment procedures for dealing with any other concern raised about staff, involving external agencies as appropriate.
- 19.6. Detailed guidance is provided to staff to ensure that all staff are clear on the rules of conduct and the expectations of the School in relation to contact with pupils, parents, colleagues and any other person who comes into contact with the School. This guidance is contained in the Staff Code of Conduct and includes details of additional safeguarding arrangements where staff engages in one-to-one teaching and meetings with pupils.
- 19.7. The School Director will act as the case manager for any allegation made against a member of staff or volunteer that meets the criteria set out in 19.2 above. An allegation against any member of staff, including the DSL, should be immediately reported to the Head. In the absence of the School Director the allegation should be passed to the Chair of Council who will assume the role of case manager. If it is not possible to report to the Head or the Chair of Council or the Council member responsible for safeguarding, a report should be made immediately to the DSL. The DSL will take action in accordance with these procedures and will as soon as possible inform the School Director or, where appropriate, the Chair of Council will consult the Council member responsible for safeguarding.
- 19.8. If the allegation concerns the School Director, the person receiving the allegation should immediately inform the Chair of Council or the Council member with responsibility for safeguarding without notifying the School Director first. All concerns or allegations about a member of the Council should be directed to the Chair of Council or the Council member responsible for safeguarding. If either the Chair of Council or the Council member responsible for safeguarding is the subject of an allegation, the matter should be reported to the other. The DSL will be informed of any allegation made against an employee of the School (except where they are the subject of the allegation) and, where appropriate, the Chair of Council will consult the Council member responsible for safeguarding, and vice versa.
- 19.9. The relevant case manager will then immediately, and in any event within one working day, inform the LADO (Local Area Designated Officer) of all allegations which appear to meet the above criteria or that are made directly to the police before further action is taken. If, at any point, there is a risk of immediate serious harm, immediate intervention by social services and/or the police will be required. The case manager will discuss the matter with the LADO and where necessary, the LADO will obtain further details of the allegations and the circumstances in which the allegation was made. The School will act in accordance with advice given by the LADO and will not investigate allegations or inform any individuals without the LADO's consent. The case manager will keep a written record of discussions with the LADO.
- 19.10. In case of serious harm or where a crime has been committed, the case manager should inform the police from the outset.
- 19.11. Allegations against a member of staff who is no longer at the School (including historical allegations) should be referred to the police.
- 19.12. The Case Manager will inform the accused person of the allegation as soon as possible after the LADO has been consulted. The parents or carers of the child/children involved will be informed of the allegation as soon as possible if they do not already know of it. They may also be kept informed of the progress of the case, including the outcome of any disciplinary

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- process. The timing and extent of disclosures, and the terms on which they are made, will be dependent upon and subject to the laws on confidence and data protection and the advice of external agencies.
- 19.13. Where the LADO advises that a strategy discussion is needed, or the police or children's social care need to be involved, the Case Manager will not inform the accused or the parents or carers until these agencies have been consulted and it has been agreed what information can be disclosed.
- 19.14. The reporting restrictions preventing the identification of a teacher who is the subject of such an allegation in certain circumstances will be observed.
- 19.15. The School recognises it has a duty of care to staff. The School will ensure support is in place for individuals facing an allegation and a representative will be appointed to keep the individual informed of progress of the case and to consider what other support is available and appropriate for the individual. The School will take action in accordance with Part 4 of KCSIE and the School's employment procedures.
- 19.16. Where the School is not an employer of an individual about whom safeguarding concerns are raised with the School, it will still have responsibility to ensure allegations are dealt with appropriately and will liaise with relevant parties. This includes supply teachers and volunteers. Any action taken will be in accordance with Part 4 of KCSIE.
- 19.17. Where a member of boarding staff is suspended pending an investigation of a child protection nature, arrangements for alternative accommodation away from children will be made for the member of staff.
- 19.18. Where an allegation by a pupil is shown to have been deliberately invented or malicious, the School Director will consider whether to take disciplinary action in accordance with the School's behaviour and disciplinary policy. Where a parent has made a deliberately invented or malicious allegation, the School Director will consider (in accordance with the School's terms and conditions) whether to require that parent to withdraw their child or children from the School on the basis that they have treated the school or a member of staff unreasonably. The School also reserves the right to contact the police to determine whether any action might be appropriate.
- 19.19. Details of allegations that are found to have been malicious will be removed from personnel records. For all other allegations the School will keep clear, comprehensive records on the confidential personnel file of the person accused including details of the action taken and decisions reached. Allegations proven to be false, unsubstantiated or malicious will not be included in employer references. In accordance with KCSIE, a history of repeated concerns or allegations which have all been found to be false, unsubstantiated or malicious will also not be included in any reference. The School will retain all safeguarding records and relevant personnel records for so long as reasonably required.
- 19.20. **Ceasing to Use Staff**
- 19.20.1. If the School ceases to use the services of a member of staff (whether employed, contracted, a volunteer or pupil), a Council member or volunteer for regulated activity and the DBS referral criteria is met (that is, they have caused harm or posed a risk of harm to children) because they are unsuitable to work with children a prompt and detailed report will be made to the DBS. Any such incidents will be followed by a review of the safeguarding procedures within the School, with a report being presented to the Proprietor without delay. The School may also need to consider a referral to the DBS if a member of staff is suspended, or deployed to another area of work that is not regulated activity.
- 19.20.1.1. All reports to the DBS will be followed by an internal review of the School's safeguarding procedures with a report being presented to the School Council.

- 19.20.1.2. Separate consideration will be given as to whether a referral to the Teaching Regulation Agency (**TRA**) should be made where a teacher has been dismissed (or would have been dismissed had they not resigned) and a prohibition order may be appropriate.
- 19.20.2. A prohibition order would be considered for:
  - 19.20.2.1. unacceptable professional conduct;
  - 19.20.2.2. conduct that may bring the profession into disrepute; or
  - 19.20.2.3. a conviction, at any time, for a relevant offence.
- 19.20.3. An interim referral to the TRA may also be considered and made if appropriate.
  - 19.20.3.1. If a member of staff (or Council member or volunteer) tenders his or her resignation, or ceases to provide his or her services at a time when child protection concerns exist in relation to that person, those concerns will still be followed up by the School. Resignation will not prevent a prompt and detailed report being made to the DBS if the criteria for referral are met and/or the TRA in appropriate circumstances.
  - 19.20.3.2. When an allegation is made, an investigation should be carried out to gather enough evidence to establish if it has foundation, and employers should ensure they have sufficient information to meet the referral duty criteria explained in the DBS referral guidance.

### **Whistleblowing**

- 19.21. The School will not tolerate harassment or victimisation and will take all possible measures to protect anyone who raises a concern in good faith. If staff voice suspicion in good faith but it is not confirmed by the investigation, no action will be taken against them (please see the School's *Whistleblowing Policy*). If the investigation concludes that a member of staff has maliciously fabricated the allegations, disciplinary action may follow.
- 19.22. If staff feel unable to raise a concern about a colleague through the School, they may contact the Local Area Designated Officer (LADO), Darrel Clews, or via the appropriate channels as referred to in the School's *Whistleblowing Policy*.
- 19.23. Staff may follow the School's *Whistleblowing Policy* to raise concerns about poor or unsafe safeguarding practices at the School, or potential failures by the School or its staff to properly fulfil its safeguarding responsibilities. Such concerns will be taken seriously by the school leadership team. Should staff feel unable to raise an issue about child protection failures internally or feel that genuine concerns are not being addressed, as well as the School's *Whistleblowing Policy*, staff can contact the NSPCC *Whistleblowing Helpline* on 0800 028 0285 or [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

## **20. Young People who abuse other Young People – Peer on Peer/Child on Child Abuse**

- 20.1. Safeguarding issues can manifest themselves via peer on peer abuse which can include (but is not limited to) bullying (including cyberbullying and prejudice-based bullying), physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm, gender based violence/sexual assaults, sexting, sexual violence and sexual harassment, and initiation/hazing type violence and rituals.
- 20.2. Upskirting typically involves taking a picture under a person's clothing without them knowing and with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause humiliation, distress or harm.
- 20.3. Harmful sexual behaviour is an umbrella term that includes sexual violence and sexual

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- harassment. The School recognises that problematic, abusive and violent sexual behaviours are inappropriate and may cause developmental damage. Harmful sexual behaviour can occur online and offline (both physical and verbal) and the School recognises the gendered nature such behaviour can take. See Appendix 1 for more information about harmful sexual behaviour.
- 20.4. Peer on peer abuse is never acceptable and will always be taken seriously and acted upon in accordance with this policy. Peer on peer abuse will not be dismissed as 'banter', 'having a laugh' or 'part of growing up'.
- 20.5. The school takes steps to minimise the risk of all types of peer-on-peer abuse. The school has robust anti-bullying procedures in place (see the school's preventing bullying policy) and pupils are taught at all stage of the school about acceptable behaviour and how to keep themselves safe. Risk assessments are carried out and kept under review. Appropriate action is taken to protect pupils identified as being at risk including risks and the particular vulnerabilities of those with special educational needs and disabilities.
- 20.6. In order to safeguard children from all members of their community, the School seeks to engender an atmosphere where young people can discuss their concerns with any of the adults around them. The School recognises that situations where one pupil may be endangering another are very sensitive and the needs of all the pupils involved will be taken very seriously under the guidance of the LADO and Brighton and Hove Children's Social Care.
- 20.7. The School has robust anti-bullying procedures in place (see the School's anti-bullying policy) and pupils are taught at all stages of the School about acceptable behaviour and how to keep themselves safe. Risk assessments are carried out and kept under review. Appropriate action is taken to protect pupils identified as being at risk including risks arising from behaviour and the particular vulnerabilities of those with a special educational need or disability (see the School's Risk Assessment Policy for Pupil Welfare).
- 20.8. A bullying incident will be treated as a child protection concern where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm.
- 20.9. Older pupils will not normally supervise younger pupils unless in a structured and managed situation where appropriate training and supervision has been provided.

### Procedures

- 20.10. Allegations against pupils should be reported in accordance with the procedures set out in this policy. If harmful sexual behaviour is alleged to have occurred, the DSL will have regard to KCSIE Part 5 and take into account the local response of the police and children's social care to these issues. The views of the alleged victim will be taken into account but will not be determinative.
- 20.11. Where abuse may be peer on peer, a pupil against whom an allegation of abuse has been made may be suspended from the School as a neutral measure during the investigation and the School's policies on behaviour, discipline and sanctions will apply. The School will take advice from Brighton and Hove BHSCP and/or the police, as appropriate, on when and how to inform the pupil and her parents about the allegations and how the investigation of such allegations will be conducted. The School will carry out risk assessments and will take all appropriate action to ensure the safety and welfare and continued education of all pupils including the alleged victim and perpetrator.
- 20.12. If it is necessary for a pupil to be interviewed by the police in relation to allegations of

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abuse, the School will ensure that, subject to the advice of relevant agencies, the pupil's parents are informed as soon as possible and that the pupils involved are supported during the interview by an appropriate adult and until the investigation is completed.

- 20.13. All those involved in such allegations will be treated as being at risk and in need of support and the safeguarding procedures in accordance with this policy will be followed. Appropriate support will be provided to all pupils involved, including support from external services as necessary. Victims of bullying will be supported by their Class Teacher, or other members of the Inclusion Team, through regular 1:1 meetings and will be given the option of meeting with a school counsellor. Following any disciplinary action, perpetrators will be supported through 1:1 meetings with a member of the Inclusion Team to explore the reasons for their behaviour. Where relevant, a Pastoral Support Plan will be put in place and reviewed regularly. Conflict resolution will be considered as an option in all cases.

## **21. Informing Parents/Carers**

- 21.1. Parents will normally be kept informed as appropriate of any action to be taken under these procedures. However, there may be circumstances when the Senior or Deputy Designated Safeguarding Lead will need to consult the School Director, Brighton and Hove BHSCP, children's social care, the police and/or the pupil before discussing details with parents.
- 21.2. In all cases the DSL will be guided by the Brighton and Hove BHSCP referral threshold document.

## **22. Additional Reporting**

- 22.1. In addition to the reporting requirements explained above, the School will consider whether it is required to report safeguarding incidents to any other regulatory body or organisation, including but not limited to the following.
- 22.2. **Health and Safety Executive**
- 22.2.1. The School is legally required under RIDDOR (Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013) to report certain incidents to the Health and Safety Executive. Please see the School's Health and Safety Policy.
- 22.3. **Charity Commission**
- 22.3.1. The School is a registered charity and is required to report all serious incidents to the Charity Commission in accordance with the guidance [How to report a serious incident in your charity](#) [How to report a serious incident in your charity \(Charity Commission, June 2019\)](#).
- 22.3.2. Serious incidents that will be reported to the Charity Commission include suspicions, allegations or incidents of abuse involving pupils. This is likely to involve the following:
- 22.3.2.1. pupils or other beneficiaries have been, or are alleged to have been, abused or mistreated while under the care of the School or by someone connected with the School, for example a Trustee, staff member or volunteer;
- 22.3.2.2. there has been an incident involving the abuse or mistreatment (alleged or actual) of someone who has come into contact with the School through its work, which has resulted in or risks significant harm, and this is connected with the activities of the School or partner organisation;

22.3.2.3. there has been a breach of the School's procedures or policies which has put pupils or others who come into contact with it at risk of significant harm, including failure to carry out checks which would have identified that a person is disqualified in law, under safeguarding legislation, from working with children or otherwise disqualified from holding their position.

22.3.2.4. The School will notify the Charity Commission of other agencies to which the incident has been reported in accordance with this policy.

22.3.2.5. The School will tell the Charity Commission what action it has taken or is planning to take at the time of reporting a serious incident, including the immediate management of the incident and any wider review or lessons learned exercise.

**22.4. Disclosure and Barring Service (DBS)**

22.4.1. A referral to the DBS will be made promptly if the criteria are met. See section 19.20 above for further details.

**22.5. Teaching Regulation Agency (TRA)**

22.5.1. Separate consideration will be given as to whether a referral to the TRA should be made where a teacher has been dismissed, or would have been dismissed if he/she had not resigned. See section 19.20 above for more details.

**22.6. Insurers**

22.6.1. The School will consider whether it is necessary to report a safeguarding incident to the relevant insurers and/or brokers. It may be necessary to report to a number of insurers as there may be concurrent cover under existing and historic policies.

22.6.2. Care should be taken to ensure this is done before renewal to ensure that the School complies with its duties under the Insurance Act 2015. If the School is in any doubt with regard to the correct insurer and/or policy and/or if it is unable to locate the relevant insurer, professional advice should be sought.

**23. What might happen to the Information you provide?**

23.1. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing. Information recorded by the DSL may not seem significant straight away but may become so if further information is received at a later date.

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

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

23.4. The School will keep all child protection records secure with access only given to the safeguarding team, DSL – Hannah Joel, and Deputy DSLs – Damian Mooncie, Carrie Rawle and Jacqui Firth. The School will treat all safeguarding information with an appropriate level of confidentiality, only involving others where appropriate. The School will always act in order to safeguard and promote the welfare of others.

23.5. The School understands that information sharing is essential for effective safeguarding and promoting the welfare of children and young people. Fears about sharing

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information will not stand in the way of the need to promote the welfare, and protect the safety, of pupils, which is always the School's paramount concern. The School understands that the GDPR and Data Protection Act 2018 provide a framework to ensure that personal information is shared appropriately.

- 23.6. When the School receives a request for safeguarding information (e.g. a subject access request from a parent or a request from the police), the School will carefully consider its response to make sure that any disclosure is in accordance with its obligations under the GDPR and Data Protection Act 2018. The School will also have regard to its data protection policies. The School's Data Protection Lead will work with the DSL as appropriate to determine what should be disclosed.
- 23.7. The School will co-operate with Children's Social Care departments and, where appropriate, the police to ensure that all relevant information is shared for the purposes of early help assessments and assessments and child protection investigations under the Children Act 1989 and in accordance with the requirements of *Working Together to Safeguard Children*.
- 23.8. Where allegations have been made against staff, the School will consult with the LADO(s) and, where appropriate, the police and children's social care to agree the information that should be disclosed and to whom.
- 23.9. The DSL will let staff know what will happen to information they provide.
- 23.10. While the School will share information with those involved where and when it is appropriate to do so, they may be unable to for reasons of data protection and confidentiality, for example because to do so may pose a risk of harm to others or because it has been prohibited by external agencies.
- 23.11. Should a child leave the school to transfer to another, the DSL should consider whether it is appropriate to share any information with the new school in advance of the pupil leaving, in addition to the child protection file in order to allow the new school to continue supporting a victim of abuse and have the appropriate support in place for the pupil's arrival.

**24. Contact details**

- 24.1. Contact details and useful resources:

**Concerns about a child:** You can also use the [Online Referral Form](#) to make a Child Protection Referral to the Front Door for Families, Brighton and Hove Children's Services.

**Emergency/Out of Hours:** To contact Children's Services outside normal working hours, call 01273 335905. If a child is in immediate danger or left alone, you should contact the police or call an Ambulance (Call 999).

**Designated Professionals Brighton & Hove** - Designated Doctor Safeguarding Children: 01273 238703; Designated Nurse Safeguarding Children: 01273 01273 238703/07770 381421; and Brighton & Hove Police Child Protection Team: 101 (and ask for Brighton SIU)

**Children & Young People at Risk of CSE** - If you are making a referral for a child or young person who is at risk of Child Sexual Exploitation you may want to provide additional information to assist the assessment using the [Pan Sussex MACSE \(SERAF\) form](#). This is not mandatory so please do not let it delay making a referral.

**On-line safety advice (for teachers, parents and children):**

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[http://www.brightonandhovelscb.org.uk/children/chi\\_esafety/](http://www.brightonandhovelscb.org.uk/children/chi_esafety/)

**25. Risk Assessment**

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

**26. Annual review of Policy and Procedures**

- 26.1. The School Council (Board of Governor Trustees) has overall responsibility for all matters which are the subject of this policy and has specific responsibilities as described in Part 2 of KCSIE.
- 26.2. The School Council has nominated one of its senior board level members to take leadership responsibility for the School's safeguarding arrangements. Contact details are set out in the School contacts list at the front of this policy.
- 26.3. This policy and the implementation of these procedures are reviewed regularly by the School Leadership Team and the policy is approved annually by the School Council (Board of Trustee Governors)
- 26.4. Opportunities will be provided for staffs that have expertise in managing safeguarding concerns to contribute to and shape the safeguarding arrangements and policy.
- 26.5. Any safeguarding incidents at the School will be followed by a review of the safeguarding procedures within the School and a report to the School Council. Where an incident involves a member of staff, the LADO will be asked to assist in this review to determine whether any improvements can be made to the School's procedures or practices to help prevent similar events in the future. Any deficiencies or weaknesses in regard to safeguarding arrangements at any time will be remedied without delay.
- 26.6. The School Council (Board of Trustees Governors) will undertake an annual review of this policy and the School's safeguarding procedures, including an update and review of the effectiveness of procedures and their implementation and the effectiveness of inter-agency working. The DSL will work with the Nominated Safeguarding Governor, preparing a written report commissioned by the Chair of Council. The written report should address how the School ensures that this policy is kept up to date; staff training on safeguarding; referral information; issues and themes which may have emerged in the School and how these have been handled; the contribution the School is making to multi-agency working in individual cases or local discussions on safeguarding matters; security of the school site; the effectiveness of the ICT Acceptable Use Policies and any online safety breaches. The School Council should also consider independent

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corroboration, such as: inspection of records or feedback from external agencies including the Designated Officer(s); reports of Ofsted inspections; the outcome of any relevant parental complaints, claims or related proceedings; and press reports.

- 26.7. The School Council will review the report, this policy and the implementation of its procedures and consider the proposed amendments to the policy before giving the revised policy its final approval. Detailed minutes recording the review by the School Council will be made.

## **27. Appendix 1 Indicators of Abuse**

Part 1 of KCSIE defines the following indicators of abuse and neglect, however staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label and in most cases, multiple issues will overlap with one another.

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

### **Physical Abuse**

Physical abuse is 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.

Possible indicators of physical abuse include:

- a) Injuries, especially those which are atypical
- b) Pupils who find it painful to walk, sit down, move their jaws, etc.
- c) Regular occurrence of injuries with no adequate explanation
- d) Reluctance to change for PE
- e) Uncharacteristic behaviour
- f) Compulsive eating or loss of appetite
- g) Pupils who are suddenly uncoordinated
- h) Conflicting explanations of injuries
- i) Reluctance to explain

### **Emotional Abuse**

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

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seeing or hearing the ill treatment of another including domestic violence. It may involve serious bullying (including cyberbullying and prejudiced-based 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.

Possible indicators of emotional abuse include:

- a) Depression
- b) Withdrawal
- c) Introversion
- d) Excessive aggression

### **Sexual abuse**

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

Possible indicators of sexual abuse include:

- a) Physical symptoms in genital areas e.g. itching or bleeding
- b) Sexually transmitted infections
- c) Pregnancy
- d) Nightmares
- e) Bed wetting
- f) Abuse of drugs
- g) Stomach pains when a child is sitting or walking
- h) Running away from home
- i) Apparent fear of an individual
- j) Self-harming
- k) Sudden change in behaviour
- l) Child not allowed to have friends

### **Neglect**

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 care-

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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. The School recognises that neglect may lead to abuse, and vice versa.

Possible indicators of neglect include:

- a) Deterioration in appearance or hygiene
- b) Deterioration in behaviour
- c) Hunger

Many forms of abuse have no physical symptoms. The diagnosis of abuse is difficult, even for experts. To delay reporting the suspicion of abuse could be disastrous. Behaviours linked to drug taking, alcohol abuse, truanting and sexting can put children in danger of abuse.

### Signs of Abuse

Possible signs of abuse include, but are not limited to:

- a) the pupil says she has been abused or asks a question or makes a comment which gives rise to that inference;
- b) there is no reasonable or consistent explanation for a pupil's injury, the injury is unusual in kind or location or there have been a number of injuries and there is a pattern to the injuries;
- c) the pupil's behaviour stands out from the group as either being extreme model behaviour or extremely challenging behaviour, or there is a sudden or significant change in the pupil's behaviour;
- d) the pupil asks to drop subjects with a particular teacher and seems reluctant to discuss the reasons;
- e) the pupil's development is delayed, the pupil loses or gains weight or there is deterioration in the pupil's general well-being;
- f) the pupil appears neglected, e.g. dirty, hungry, inadequately clothed;
- g) the pupil is reluctant to go home, or has been openly rejected by her parents or carers; and
- h) Inappropriate behaviour displayed by other members of staff or any other person working with children, for example inappropriate sexual comments; excessive one-to-one attention beyond the requirements of their usual role or responsibilities; or inappropriate sharing of images.

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

### Specific Safeguarding Issues

Statutory guidance acknowledges the following as specific safeguarding issues:

- a) children and the court system;
- b) children missing from education (see below);
- c) children with family members in prison;
- d) child criminal exploitation (see below);

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- e) child sexual exploitation (see below);
  - f) county lines (see below);
  - g) domestic abuse (see below);
  - h) homelessness;
  - i) so-called 'honour-based' abuse including Female Genital Mutilation and Forced marriage) (see below);
  - j) preventing radicalisation (see below);
  - k) peer on peer/child on child abuse (see below);
  - l) sexual violence and sexual harassment between children in schools and colleges (see below);
  - m) serious violence (see below);
  - n) upskirting.

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

### **Children Missing Education**

A child going missing from an education setting, particularly on repeat occasions, is a potential indicator of abuse and/or neglect (or indeed at risk of radicalisation). School attendance registers are carefully monitored to identify any trends. All staff are informed of the separate procedure to be used for searching for, and if necessary, reporting, any boarder or day pupil missing from school (see the School's *Missing Pupil Policy*). Staff should be aware that some children may be at potential risk of FGM or forced marriage.

The School's *Missing Pupil Policy* is known to staff and used in practice, for searching for and, if necessary, reporting any pupil missing from school. A written record is made of any incident of a pupil missing from school, the action taken (including any reports made to social services and/or the police), and any reasons given by the pupil for being missing.

Where reasonably possible, the School will hold more than one emergency contact for each pupil. The School will inform Brighton and Hove Local Authority of any pupil who is going to be added to or deleted from the School's admission register at non-standard transition points in accordance with the requirements of the Education (Pupil Registration) (England) Regulations 2006 (as amended). This will assist the local authority to fulfil its duty to identify children of compulsory school age who are missing from education and follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect or radicalisation or involvement with serious violent crime.

The School will also inform the Local Authority of any pupil who fails to attend school regularly, or has been absent without the School's permission for a continuous period of 10 days or more, at such intervals as are agreed between the School and the local authority (or in default of such agreement, at intervals determined by the Secretary of State).

### **Domestic Abuse**

The definition of "domestic violence and abuse" was updated by the Home Office in March 2013 to include the reality that many young people are experiencing domestic abuse and violence in relationships at a young age. They may therefore be Children in Need or likely to

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suffer significant harm. The latest definition from the Home Office is as follows:

Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:

- a) Psychological
- b) Physical
- c) Sexual
- d) Financial
- e) Emotional

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. Exposure to 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.

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

Staff should be aware that any disclosures made by children may have a background in domestic abuse and that this abuse may be part of an overall pattern of abuse or violence towards women and girls in the family. That said, domestic abuse can also be experienced by males and assumptions should not be made based on the gender of perpetrators of domestic abuse.

### **Child Criminal Exploitation**

Child criminal exploitation (CCE) is where an individual or group (adult or another child) takes advantage of an imbalance of power to coerce, manipulate or deceive a child into criminal activity

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

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

Child criminal exploitation can include children being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

The following signs can be indicators of child criminal exploitation, including children who:

- appear with unexplained gifts or new possessions;

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- associate with other young people 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; and
  - Regularly miss school or education or do not take part in education.

### Child Sexual Exploitation

Child sexual exploitation (CSE) is a form of sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18, including those aged 16 or 17 who can legally consent to sex, into sexual activity

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

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

Child sexual exploitation can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. Through others copying videos or images they have created and posted on social media).

Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups.

What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim, which increases as the exploitative relationship develops.

Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming.

The above criminal exploitation indicators can also be indicators of child sexual exploitation, as can children who:

- have older boyfriends or girlfriends;
- suffer from sexually transmitted infections or become pregnant;

However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

Inter-agency working and information sharing are particularly vital in identifying and preventing child sexual exploitation.

Any cases of child criminal exploitation will be referred to the National Crime Agency

## County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of “deal line”. They are likely to exploit children and vulnerable adults to move and store the drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons.

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

Additional reporting duties:

- If a child is suspected to be at risk of, or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation;
- Where a pupil may have been trafficked for the purpose of transporting drugs, a referral to the National Referral Mechanism should be considered.

## Homelessness

The DSL will be aware of the contact details and referral routes of the Local Housing Authority to enable them to raise concerns. Referrals to the Local Housing Authority should not replace referrals to Children’s Social Care where a child is being harmed or at risk of harm.

The school recognises that for 16 and 17 year olds homelessness may not be family-based and the DSL will ensure appropriate referrals to children’s services are made where necessary.

## Honour based abuse (including female genital mutilation and forced marriage)

### Honour-Based Violence

All forms of so called honour-based violence are abuse (regardless of motivation) and should be handled and escalated as such. Abuse committed in the context of preserving "honour" often involves additional risk factors such as a wider network of family or community pressure and the possibility of multiple perpetrators which should be taken into account when deciding what safeguarding action to take.

Staff should speak to the DSL if they have any doubts. If appropriate, the DSL will activate local safeguarding procedures, using existing national and local protocols for multiagency liaison with police and children’s social care.

### Female Genital Mutilation

FGM is a form of Honour Based Abuse. It 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.

Professionals in all agencies, and individuals and groups in relevant communities, need to be

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alert to the possibility of a pupil being at risk of FGM, or already having suffered FGM. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person.

Victims of FGM are likely to come from a community that is known to practise FGM. Professionals should note that pupils at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject.

Warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 38-41 of the Multi-Agency Statutory Guidance on FGM. These include:

- a) A pupil may confide that she is to have a 'special procedure' or to attend a special occasion to 'become a woman'.
- b) A pupil may request help from a teacher or another adult if she is aware or suspects that she is at immediate risk.
- c) A pupil may talk about a long holiday to her country of origin or another country where the practice is prevalent.
- d) Parents seeking to withdraw their children from learning about FGM.
- e) Parents stating that they or a relative will take the child out of the country for a prolonged period.
- f) A professional may hear reference to FGM in conversation, for example a pupil may tell other children about it.
- g) It may be possible that families will practise FGM in the UK when a female family elder is around, particularly when she is visiting from a country of origin.

There is a range of potential indicators that a child or young person may be at risk of FGM. Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 38-41 of the Multi-agency statutory guidance on FGM (HM Government, July 2020) (pages 60 - 62 focus on the role of schools).

All staff must be aware of the requirement for teachers to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. The report should be made orally by calling 101, the single non-emergency number. Those failing to report such cases will face disciplinary sanctions.

It will be rare for teachers to see visual evidence, and they should not be examining pupils. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve children's social care as appropriate. If the teacher is unsure whether this reporting duty applies, they must refer the matter to the DSL in accordance with this policy. See the Home Office guidance Mandatory reporting of female genital mutilation - procedural information (January 2020) for further details about the duty.

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Guidance published by the [Department for Health](#) also provides useful information and support for health professionals which will be taken into account by the School's medical staff. The National FGM Centre has also produced FGM guidance to help schools understand their role in safeguarding girls, engaging parents and teaching about FGM.

### **Forced Marriage**

Forced marriage is also form of Honour Based Abuse. Forced marriage is illegal and a form of child abuse. A forced marriage is one entered into without the full and free consent of one or both parties, and where violence, threats (physical, emotional or psychological) or other forms of coercion are used to cause a person to enter into a marriage. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage.

Advice can be found via [www.gov.uk/forced-marriage](http://www.gov.uk/forced-marriage) and the Forced Marriage Unit can be contacted on: 0207 0080151 or ([fmufco.gov.uk](mailto:fmufco.gov.uk)) for advice and information.

Guidance on the warning signs that forced marriage may be about to take place, or may have already taken place, can be found on pages 13-14 of the Multi-agency guidelines: handling case of forced marriage (HM Government, June 2014). Pages 32-36 of the [Multi-agency guidelines: handling case of forced marriage \(HM Government, June 2014\)](#) focus on the role of schools in detecting and reporting forced marriage.

In cases of suspected forced marriage staff should follow normal safeguarding procedures and should speak to the DSL if they have any concerns. The DSL will follow locally agreed procedures using existing national and local protocols for multiagency liaison with police and Children's Social Care.

### **Radicalisation, British Values and Prevent Strategy**

Under the Counter-Terrorism and Security Act 2015, the School has a legal duty to have due regard to the need to prevent people from being drawn into terrorism/radicalisation. The school aims to build pupils' resilience to radicalisation by promoting British values and enabling them to challenge extremist views and giving due regard to exploring this and regular opportunities for discussion through assembly, chapel, tutorial, and Citizenship Program. Being drawn into terrorism includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit.

The School is committed to providing a safe space in which children, young people and staff can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments.

The School has adopted the government's definitions for the purposes of compliance with the Prevent duty:

**Extremism:** *"vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed*

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*forces, whether in this country or overseas"*

**Radicalisation:** *"the process by which a person comes to support terrorism and forms of extremist ideologies associated with terrorist groups"*

**Terrorism:** *"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 made for the purpose of advancing a political, religious or ideological cause."*

Staff should be aware of the early warning signs of radicalism.

There is no single way of identifying an individual who 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. Radicalisation can occur through many different methods (such as social media) and settings (such as the internet).

It is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection.

School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the DSL making a Prevent referral. 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. An individual's engagement with the programme is entirely voluntary at all stages. Guidance is available here: [Channel duty guidance: protecting vulnerable people from being drawn into terrorism \(HM Government, April 2015\)](#).

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

Signs and indicators of a child who is in the process of being radicalised may include:

- a) Self-identification e.g. naming new ideological leaders/role models, lingering concerns with questions of meaning and identity, concentrated self-image
- b) Very strong devotion to a particular cause, newfound patriotism
- c) An 'Us Versus Them' societal view e.g. seeing society as the enemy, verbal expression against the government, expressed feelings of disconnection, change in personal narrative
- d) Social interaction e.g. disconnecting with former community, initiating personal violence, forcing customs on others, untouchable demeanour, dependence on communication technology, persona e.g. change in personality, particular emotional expressions
- e) Association e.g. associating with extremist groups, word choice, change in physical appearance and/or attire, internet identity, training and/or travel for training

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The School recognises that pupils may be at risk of being drawn into terrorism and as such, carries out appropriate risk assessments (following consultation with local partners, such as the police) of the potential risk in the local area. Such risk assessments are discussed with the Trustee responsible for Safeguarding to ensure the School's safeguarding arrangements are sufficiently robust to help prevent and protect children from being drawn into terrorism and that they are regularly revised.

The school recognises the importance of the Channel programme in providing support for individuals most at risk from terrorism.

### **Peer on Peer/Child on Child Abuse**

The conduct of pupils towards each other will, in most instances, be covered by the School's behaviour and discipline policies. However, some behaviour by a pupil towards another may be of such a nature that safeguarding concerns are raised.

Safeguarding issues can manifest themselves via peer on peer abuse. These include, but are not limited to:

- a) abuse within intimate partner relationships
- b) bullying (including cyber-bullying and prejudiced-based bullying);
- c) physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- d) harmful sexual behaviour (see below);
- e) sexting (also known as youth produced sexual imagery);
- f) initiation/hazing type violence and rituals.

Harmful sexual behaviour is an umbrella term that includes sexual violence and sexual harassment.

The School recognises that problematic, abusive and violent sexual behaviours are inappropriate and may cause developmental damage. Harmful sexual behaviour can occur online and offline (both physical and verbal) and the School recognises the gendered nature such behaviour can take. See also 'Sexual violence and sexual harassment between children' below. Harmful sexual behaviour, like all peers on peer abuse, is never acceptable and will be taken seriously.

The School takes steps to minimise the risk of all types of peer on peer abuse. The School has robust anti-bullying procedures in place (see the School's anti-bullying policy) and pupils are taught at all stages of the School about acceptable behaviour and how to keep themselves safe.

Risk assessments are carried out and kept under review. Appropriate action is taken to protect pupils identified as being at risk arising from the particular vulnerabilities of those with a special educational need or disability.

Abusive behaviour by pupils must be taken seriously. Behaviour should not be dismissed as being normal between young people, as "banter" or simply "part of growing up". Behaviour such as hazing/initiation violence or any form of sexual violence or sexual harassment is not acceptable.

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## Sexual Violence and Sexual Harassment between Children

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

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

The School will respond to allegations seriously and all victims will be offered appropriate support.

The School is aware of the importance of:

- a) making it clear to pupils that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- b) not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys"; and
- c) challenging behaviours (which are potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

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

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

The DfE guidance 'Sexual violence and sexual harassment between children in schools and colleges' provides further detailed advice.

### Sexting

"Sexting" means the taking and sending or posting of images or videos of a sexual or indecent nature, usually through mobile picture messages or webcams over the internet.

The School treats all incidents of sexting as safeguarding matters to be actioned in accordance with this policy.

Members of staff should not view sexual imagery which is reported to them, or copy, print or share the images under any circumstances. In referring any incident of sexting, members of staff should describe the content of the images as reported to them.

The DSL may in exceptional circumstances view images with the prior approval of the School Director and only where:

- a) it is the only way to make a decision whether to involve other agencies, as there is insufficient information available as to its contents;

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- b) it is necessary to report the image to a website or agency to have it taken down; or
  - c) a pupil has reported the image directly to a member of staff in circumstances where viewing the image is unavoidable.

Where viewing an image is unavoidable:

- a) viewing should take place on School premises wherever possible;
- b) the image should be viewed by a person of the same sex as the person alleged to be shown in the image (where this is known);
- c) a senior member of staff should be present to monitor and support the person viewing the image. This member of staff should not view the image;
- d) full details of the viewing must be recorded in the School's safeguarding records, including who was present, the date and time, the nature of the image and the reasons for viewing it;
- e) any member of staff who views an indecent image should be given appropriate support.

If any devices need to be confiscated (whether in order to view the image(s) or to pass evidence to the appropriate authority), they should be turned off and locked away securely until they are required.

If an electronic device that is prohibited by the school rules has been seized and the member of staff has reasonable grounds to suspect that it contains evidence in relation to an offence, or that it contains a pornographic image of a child or an extreme pornographic image, the device will be given to the police.

If external agencies do not need to be involved, the School must consider the deletion of any images. Pupils should be asked to delete images themselves and to confirm that this is done. Members of staff should not search devices to delete images.

If images have been shared online and cannot now be deleted by the person who shared them, the School should consider reporting the images to the relevant web host or service provider (if an option is provided), or contacting the Internet Watch Foundation or ChildLine (if the website does not provide this option).

Where a pupil receives unwanted images, the School should advise the pupil and parents of options that may be available to block the sender or to change the pupil's mobile phone number or email address.

The UK Council for Child Internet Safety's advice note Sexting in schools and colleges: responding to incidents and safeguarding young people (August 2016) contains details of support agencies and provides further information for schools on how to responding to incidents of sexting.

The College of Policing has also produced a briefing note police action in response to youth produced sexual imagery ("sexting") (November 2016) which provides information on how police forces treat instances of sexting by young persons.

The Home Office has published Indecent images of children: guidance for young people

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(November 2019) to help young people understand the law on indecent images of children and how to navigate the internet confidently and safely within legal boundaries.

### **Upskirting**

'Upskirting' typically involves taking a picture under a person's clothing without their permission or knowledge, with the intention of viewing parts of their body or clothing, not otherwise visible, to obtain sexual gratification, or cause the victim humiliation, distress or alarm.

It is now a criminal offence. Attempting to commit an act of upskirting may also be a criminal offence e.g. if actions are taken to do something that is more than merely preparatory to committing the offence such as attempting to take a photograph on a telephone or camera but failing to do so because of lack of storage space or battery.

The School will treat incidences of upskirting as a breach of discipline and also as a safeguarding matter under the School's child protection procedures.

All matters relating to upskirting images and devices which may have been used in connection with an allegation of upskirting will be dealt with in a similar manner to sexting.

### **Serious Violence**

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

All staff should be aware of the associated risks and understand the measures in place to manage these. Advice for schools and colleges is provided in the Home Office's 'Preventing youth violence and gang involvement and its Criminal exploitation of children and vulnerable adults: county lines guidance'.

### **Special Educational Needs and Disabilities**

The School welcomes pupils with special educational needs and disabilities and will do all that is reasonable to ensure that the School's curriculum, ethos, culture, policies, procedures and premises are made accessible to everyone. See the School's policy on special educational needs and learning difficulties and disability policy.

Additional barriers can exist when detecting the abuse or neglect of pupils with a special educational need or disability creating additional safeguarding challenges for those involved in safeguarding and promoting the welfare of this group of children. The School is mindful in particular that:

- a) assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the pupil's special educational need or disability without further exploration;
- b) pupils with a special education need or disability can be disproportionately impacted by bullying without outwardly showing any signs; and

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

### **Looked after Children and previously 'looked after' children**

The School Director ensures that staff have the skills, knowledge and understanding to keep looked after children safe and the information they need in relation to a child's looked after legal status, for example:

- a) whether they are 'looked after' under voluntary arrangements with consent of parents or on an interim or full care order;
- b) contact arrangements with birth parents or those with parental responsibility;
- c) Information about a child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her.

The DSL maintains these details including contact details of the child social worker

### **Care Leavers**

The DSL maintains details of the local authority personal advisor appointed to guide and support care leavers and liaises with them as necessary regarding any issues of concern.

## **Appendix 2 Charity Safeguarding Procedures**

### **Charity Safeguarding Duties**

As part of a wider charity, the School recognises it has additional safeguarding duties which require it to take reasonable steps to protect from harm people who come into contact with it.

This includes protecting people who come into contact with its work as a charity from abuse or mistreatment of any kind.

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

Any safeguarding allegation or concern raised by any person, including those involved or participating in a commercial activity, relating to the charity's and/or partner organisation's activities) will be taken seriously and action will be taken in accordance with the relevant School policies and procedures.

### **Safeguarding Measures**

The School will:

- a) arrange appropriate induction and refresher training on safeguarding for all staff at a level commensurate with their role;
- b) consult with staff about safeguarding issues and encourage a culture which promotes positive behaviour and the reporting of any safeguarding concerns;
- c) have appropriate safeguarding policies and procedures, which are fit for purpose, reviewed at least annually and published on its website as appropriate;
- d) check staff are suitable to act in their roles by:

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- a. sharing this policy with applicants at the recruitment stage;
  - b. undertaking appropriate checks on all staff to ensure an individual's suitability for their role;
  - e) be mindful of the different risks for staff and beneficiaries who are overseas and have suitable reporting and monitoring processes in place for any work overseas;
  - f) undertake appropriate due diligence checks of third parties (whether those who provide services to the Charity or directly to its beneficiaries (including pupils)) and enter into appropriate agreements with them covering the relationship, their respective roles and monitoring and reporting requirements;
  - g) review its premises, security arrangements and arrangements for third party use to minimise safeguarding risks;
  - h) ensure a sufficient level of oversight of the operations of partner organisations, so that any incidents which materially affect the school's operations, finances, people, reputation of the school (or charity as a whole) can be managed appropriately;
  - i) actively promote and encourage the reporting of safeguarding concerns, train staff to identify them and to refer or report them (and have a clear system for doing so);
  - j) be quick to respond to concerns and carry out appropriate investigations;
  - k) manage conflicts of interest and/or loyalty;
  - l) encourage effective working relationships with third party agencies which manage safeguarding concerns. This includes being aware of, and complying with, the published arrangements set out by the local safeguarding partners;
  - m) set out risks and how it will manage them in a risk register;
  - n) allocate sufficient funds for the effective management of safeguarding;
  - o) arrange appropriate insurance cover for staff and volunteers and the activities involved.

## Appendix C

### Managing Allegations Flowchart

