

# Safeguarding Policy

## 1. Child Protection Policy Statement

- 1.1. The School is committed to safeguarding and promoting the welfare of children<sup>1</sup> and young people, physically, mentally and emotionally, both within the school environment and outside. It implements a whole school preventative approach to managing safeguarding concerns and ensures that the wellbeing of students is at the forefront of everything it does.<sup>2</sup>
- 1.2. The Aims of the School quite clearly state that children come first and this child centred approach follows through into all aspects of School life, including safeguarding, so at all times we must consider what is in the best interest of the child. Because of our day-to-day contact with our students, staff are particularly well placed to observe outward signs of abuse, changes in students' behaviour or their failure to develop. We all need therefore to:
  - Be alert to the possibility of abuse occurring;
  - Be aware of the procedures to be followed if staff have suspicions, and
  - Have the confidence to follow those procedures.

Safeguarding and promoting the welfare of children is everyone's responsibility and therefore, in this school community, this Policy applies to all staff, governors, volunteers and any others working for or in the School<sup>3</sup>.

- 1.3. The School recognises its legal duties to safeguard and promote the welfare of children who are students at the school,<sup>4</sup> to protect them from "significant harm"<sup>5</sup> and to work with other Authorities and agencies in doing so. These duties are defined and guided by:
  - The Education Act 2002
  - Working Together to Safeguard Children (July 2018)
  - Keeping Children Safe in Education (KCSIE) (September 2023)
  - What to do if you are worried a child is being abused – advice for practitioners (March 2015)
  - Dudley Safeguarding People Partnership Board (DSPPB) - Safeguarding Children Procedures <http://safeguarding.dudley.gov.uk>
- 1.4. The School is aware of its responsibilities under the Counter-Terrorism and Security Act 2015. Preventing students from being influenced or affected by extremism and radicalisation is integral to the whole school approach to safeguarding and promoting the welfare of children and young people.
- 1.5. The School has adopted the Boarding Schools Association (BSA) Commitment to Care Charter, which is attached as Appendix I to this Policy.

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<sup>1</sup> Children includes everyone under the age of 18.

<sup>2</sup> The School recognises that The Human Rights Act 1998 compels them to respect and protect an individual's human rights when they make individuals decisions about them and that being subject to harassment, violence or abuse may be in breach of these rights. The Schools commitment to safeguarding is designed to protect children and therefore preserve these rights.

<sup>3</sup> Throughout this Policy 'staff' refers to all staff (including teaching staff, boarding staff, and all support staff), governors and volunteers and includes temporary and supply staff.

<sup>4</sup> Safeguarding and promoting the welfare of children is defined in Working Together to Safeguard Children (July 2018), updated by Keeping Children Safe in Education as protecting children from maltreatment, preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes

<sup>5</sup> Harm is defined in the Children Act 1989, as amended by the Adoption and Children Act 2002 as the ill-treatment or the impairment of health or development, including for example impairment suffered from seeing or hearing the ill-treatment of another. In this context 'development' means physical, intellectual, social or behavioural development; Health means physical or mental health and ill-treatment includes sexual abuse and forms of ill-treatment that are not physical.

## 2. Policy Aims

- 2.1. The aim of this Policy is to provide information for all staff to carry out our duty of care responsibly, effectively and in a timely and and we will do this by:
- Placing emphasis on the importance of children's welfare and promoting a child centred approach to everything that we do.
  - Creating a culture of safer recruitment by adopting procedures that help deter, reject or identify people who might pose a risk and checking the suitability of staff and volunteers to work with children.
  - Raising awareness of child protection issues, the need to safeguard children and staff responsibilities in identifying and reporting possible cases of abuse.
  - Developing and implementing procedures for identifying and reporting cases, or suspected cases, of abuse.
  - Ensuring that staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children.
  - Ensuring that everyone in the school community understands their responsibilities under safeguarding legislation and statutory guidance, is alert to the signs of child abuse and knows how to refer concerns appropriately.
  - Creating an environment where staff feel able to raise concerns and feel supported in their safeguarding role.
  - Teaching students how to keep safe and recognise behaviour that is unacceptable, how they can report it and encouraging them to be confident to do this;
  - Supporting students who have been identified as in need of early help or at risk of harm or who have been harmed.
  - Establishing a safe environment in which students can learn and develop.
  - Ensuring that there is a whole school approach to safeguarding and links with the School's other policies and procedures including, but not limited to, anti-bullying, behaviour, attendance and children absent and missing education, medical conditions, educational visits, online safety, sexual violence and harassment, sexting, drugs, disability, homophobic/biphobic/transphobic abuse, racism, radicalisation and extremism.
- 2.2. We recognise that because of the day-to-day contact we have with our students, our staff are well placed to observe the outward signs of abuse, changes in students' behaviour or their failure to develop. The School will therefore:
- Establish and maintain an environment and a culture in which students feel secure, valued and respected and where they are encouraged to talk and are listened to.
  - Ensure students know that there are adults in the School whom they can approach if they are worried and they feel confident in doing so in the knowledge that they will be listened to and, as far as possible, their wishes and feelings taken into account.
  - Include opportunities in the curriculum for students to develop and be equipped with the skills they need to recognise danger and potential for harm and with practical advice to keep them safe.
  - Consider the needs of each student and how these can be met, making use of resources within or beyond the school as necessary.
  - Provide the means to monitor students known or thought to be at risk of harm and contribute to assessments of need and support packages for them.
  - Develop and promote effective working relationships with relevant external agencies.
- 2.3. We understand that there is an inextricable link between good behaviour and safeguarding and the importance of actively managing behaviour to fulfil our commitment to keeping children safe and

promoting their welfare as well as ensuring community standards, cohesion and order. The School's Behaviour Policy lays down rules and sets boundaries and it establishes our expectations for student conduct. It is a whole school policy, complementary to this Safeguarding Policy, and through proactive behaviour management we aim to ensure these expectations are met, that patterns of behaviours are monitored and managed, and that poor behaviour does not become normalised and by doing this, make a significant contribution to the safeguarding and welfare of children.

2.4. As a boarding school we must meet the National Minimum Boarding Standards which are additional but complementary to KCSIE. Both acknowledge that there are extra factors to consider in respect of safeguarding in a boarding setting, including:

- The need to be alert to inappropriate relationships between children and the importance of boarders understanding this;
- Our approach to child on child abuse reflecting the unique nature of boarding accommodation and the risks associated with children sharing overnight accommodation as well as the likelihood of boarders not being able to escape their bullies for long periods of time as they are not going home as often.
- Recognising the extra vulnerabilities of SEND children;
- Protecting children where there is a significant gender imbalance, and
- Harmful online content and how boarders' devices are managed in terms of bringing a device into the school, the risk that harmful content that may already be downloaded on to it and the opportunity to download harmful content via 3,4 and 5G that will bypass the School's filtering and monitoring systems.

Staff involved in boarding are aware of, and vigilant for, this extended range of possible safeguarding matters. Adopting the BSA Commitment to Care Charter is an acknowledgement of our special responsibilities and a sign of our commitment to following them through.

### **3. Role and Responsibility of the Governing Body**

3.1. It is the responsibility of the Governing Body to ensure that they comply with their duties under child protection and safeguarding legislation. They must have regard to regulation, to guidance issued under it by the Secretary of State, by the Local Authority (LA) and other safeguarding partners and to locally agreed multi-agency safeguarding arrangements ensuring that the policies, procedures and training in their school are effective and compliant.

3.2. Governing Bodies have a strategic leadership responsibility for the School's safeguarding arrangements and they must ensure that:

- All Governors understand that safeguarding is their strategic responsibility.
- They nominate a Governor to take leadership responsibility for the School's safeguarding arrangements.
- A Designated Safeguarding Lead (DSL) is appointed and that that person is an appropriate senior member of staff, sits on the school leadership team (SLT) and is adequately resourced and supported.
- There are policies and procedures in place, together with a staff Code of Conduct and safeguarding responses to children who are absent or go missing from education, so that appropriate action is taken in a timely manner to safeguard and promote children's welfare.
- The School contributes to multi-agency working.
- Safeguarding arrangements take into account government guidance and locally agreed multi-agency safeguarding arrangements set up by the Dudley Safeguarding People Partnership Board (DSPPB).
- There is an appropriate and effective programme of safeguarding and child protection training, and updates for all staff, including online training which gives an understanding of the

expectations, applicable roles and responsibilities in relation to filtering and monitoring.

- Appropriate filters and monitoring systems are in place on the School's computer systems to protect students from potentially harmful and inappropriate online material, that their effectiveness is regularly reviewed and that SLT and relevant staff have an awareness and understanding of the provisions in place, manage them effectively and know how to escalate concerns when identified.
- Reviewing the DfE's filtering and monitoring standards, and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards
- Students are taught about safeguarding, including online safety and risks both in school time and at home, through teaching and learning opportunities, as part of providing a broad and balanced curriculum.
- Appropriate procedures and checks are in place to prevent people who pose a risk of harm from working with students.
- There are procedures in place to manage safeguarding concerns or allegations about staff, including supply staff, volunteers and contractors, that might indicate that they would pose a risk of harm to students<sup>6</sup>. The Chair of Governors will act as case manager in the event an allegation of abuse is made against the Headmaster.
- There are procedures in place to minimise the risk of child on child abuse and for how concerns/allegation will be managed, and students supported, throughout the process<sup>7</sup>.
- Students' wishes and feelings are taken into account, as far as possible, when determining what action to take and what services to provide to protect individuals.
- The School knows which of its students are vulnerable and what is needed to help keep them safe and to thrive.
- A Designated Teacher for looked after and previously looked after children is appointed and that staff have the skills, knowledge and understanding to keep these students safe.
- The School sets relevant data protection principles which allow them to share, or where appropriate withhold, personal information.

3.3. This Policy sets out how this will be done in this School.

## **4. Role and Responsibility of the Headmaster**

4.1. The Headmaster is responsible for the implementation of this Policy and that the adopted policies and procedures adopted are followed by all staff.

4.2. He must ensure that:

- The DSL has the appropriate time, funding, training and resources to carry out the role effectively and that there are sufficient trained persons to act as deputy DSL (DDSL) or to support the DSL where appropriate.
- A Designated Teacher for looked after and previously looked after children is appointed and has the appropriate time, funding, training and resources to carry out the role effectively.
- Appropriate filters and monitoring systems are in place on the School's computer systems, that their effectiveness is regularly reviewed and that SLT and relevant staff have an awareness and understanding of the provisions in place, manage them effectively and know how to escalate concerns when identified.
- All staff receive safeguarding and child protection training including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring.

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<sup>6</sup> See Appendix E

<sup>7</sup> See Appendix E

- Staff authorised to search students are appropriately trained and aware of their responsibility to consider whether the student may be a child at risk, or potentially at risk, of harm.
- 4.3. Any decision to involve the police to undertake a strip search will be taken by the Headmaster after considering the mental and physical well-being of the child, their needs and vulnerabilities and how they should be supported after the event.
- 4.4. The Headmaster will act as case manager in the event an allegation of abuse is made against the DSL and, where the DSL is also the Designated Teacher for looked after and previously looked after children, also for the Designated Teacher.

## 5. Implementation

5.1. The School will ensure that all staff follow the procedures set out by the DSPPB and will take account of guidance issued by the Department of Education (DfE).

5.2. There is a DSL for child protection who has appropriate training and support for this role.

**The DSL is Clive Kay, Deputy Headmaster.**

In the DSL's absence, the Deputy DSL's (DDSL) trained to undertake the role are:

**Paul Kilbride, Jon Adey, Laura Hunt & Zoe Mullen**

The DSL will work closely with those nominated to act with him so that they can assist him and provide effective cover when required.

5.3. Direct contact details for these safeguarding lead trained people are:

Clive Kay	<a href="mailto:ckay@oshsch.com">ckay@oshsch.com</a>	01384 815019	07900 161 569
Paul Kilbride	<a href="mailto:headmaster@oshsch.com">headmaster@oshsch.com</a>	01384 817375	07703 785 721
Jon Adey	<a href="mailto:jadey@oshsch.com">jadey@oshsch.com</a>	}	
Laura Hunt	<a href="mailto:lhunt@oshsch.com">lhunt@oshsch.com</a>	} 01384 817300	07955 838 493
Zoe Mullen	<a href="mailto:zmullen@oshsch.com">zmullen@oshsch.com</a>	}	

5.4. Staff can also alert the DSL to a concern by logging the details on 'MyConcern'<sup>8</sup> using the school desktop icon or at [www.myconcern.education](http://www.myconcern.education)

5.5. Every member of staff, of the governing body and all volunteers know the name of the DSL responsible for child protection and their role.

5.6. There is a nominated governor with leadership responsibility for the School's safeguarding arrangements.

**The Designated Governor for Child Protection is Philip Foley.**

5.7. The School's **Data Protection Officer (DPO) is Paul Kilbride, Headmaster** and his contact details are as above.

5.8. The School's **Designated Teacher for looked after children and previously looked after children is Paul Kilbride, Headmaster.**

5.9. Staff understand their responsibilities in being alert to the signs of abuse and their responsibility for immediately referring any concerns to the DSL, including referring any contextual information.

5.10. Staff are aware of the signs of neglect and abuse<sup>9</sup>, so that they are able to identify students who may need help or protection. They are aware of what to do if there are concerns around a student, of the process for making referrals to local authority children's social care (LA children's social care) and for statutory assessments under the Children Act 1989, especially section 17 (children in

<sup>8</sup> If a concern has been communicated by email or through MyConcern, and it is not immediately acknowledged by the DSL it must be followed up by a telephone call or a face to face conversation. Staff must not assume it has been actioned by anyone else until they receive positive confirmation.

<sup>9</sup> For more information on these categories see Appendix A.

need)<sup>10</sup> and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.

- 5.11. Staff are aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside the school and therefore are aware of the need to recognise that wider environmental factors can be a threat to a child's safety or welfare and that they may be vulnerable to abuse in a range of social contexts.
- 5.12. Appendix B to this Policy refers to what to do if you are concerned. The multi-agency referral form (MARF) that must be completed when making a referral can be accessed from the DSPPB website (<http://safeguarding.dudley.gov.uk>).
- 5.13. All staff are familiar with the 'Prevent' initiative, which is part of the Government's counter-terrorism strategy, and have regard to preventing people being drawn into terrorism. Appendix G to this Policy refers to this in further detail.
- 5.14. Effective links are developed with relevant agencies and there is co-operation regarding child protection matters including attendance at child protection meetings.
- 5.15. Links with other agencies that support students such as the Child and Adult Mental Health Service, Education Investigation and Education Psychology Service are developed.
- 5.16. Parents/carers understand the responsibility placed on the School and staff for child protection. This Policy is brought their attention by reference in the Guide for Parents and Students and it is available on request and also on the School's website.
- 5.17. All concerns, discussion and decisions made and the reasons for these decisions are recorded. Records of concerns about students are kept even where there is no need to refer the matter immediately and these records are kept securely, separate from the main student file, and in locked or secure online storage.
- 5.18. Appropriate training programmes are in place for all staff and are routinely and regularly updated. These programmes include training in online safety and the safe use of technology and in safeguarding children from being drawn into terrorism, extremism and the wider use of violence.

## 6. Abuse, Neglect & Safeguarding Issues

- 6.1. Abuse, neglect and safeguarding issues are rarely stand-alone events that can be covered by one definition or label and they can arise or be associated with factors both inside and outside the school. It is important therefore that all staff, and particularly the DSL, should be considering the context within which safeguarding incidents and behaviours occur and whether children are at risk from a range or combination of these.

### Vulnerable Groups

- 6.2. The Equality Act 2010 requires due regard to the need to eliminate discrimination and promote equality of opportunity so that no child or group of children must be treated any less favourably than others in being able to access effective services which meet their particular needs. However, the Public Sector Equality Duty within the Act permits the School to focus on key issues of concern and how to improve outcomes for children. It allows the School to recognise that some children may be more at risk of harm than others. The School is committed to working in support of safeguarding **all students** but they are particularly vigilant in certain cases because they recognise that some face additional barriers or are liable to have an increased risk of abuse than others and these include, for example, children who:
  - Have already experienced abuse of some kind;
  - Live in families where there is child neglect;

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<sup>10</sup> 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.

- Are disabled or have complex health issues, especially those who have difficulties with speech or language;
  - Have mental health needs;
  - Live in a home environment where there is domestic abuse or substance misuse;
  - Were born prematurely;
  - Are in care;
  - Are seeking asylum, or
  - Have parents with mental health problems that impact negatively on their parenting capacity.
- 6.3. Recognising that some children are potentially at greater risk of harm, both online and offline, the School liaises and works with:
- Virtual School Heads (VSH) in supporting the progress of **looked after children (LAC)** and meeting the needs identified in the student's personal education plan and where appropriate, for children with a social worker.
  - Parents and **previously looked after children (pLAC)**, as these children may retain underlying or more apparent issues related to the reasons for initially being taken into care and during that time.
  - LA Personal Advisors appointed to support **care leavers** and to develop a pathway plan with the young person.
  - LA children's social care teams, and where appropriate the VSH, in supporting those **students who may need a social worker** because of safeguarding or welfare needs and/or adverse experiences which may make them vulnerable to further harm, as well as educationally disadvantaged, and facing barriers to attendance, learning, behaviour and mental health.
  - Students diagnosed as requiring **mental health support**, their parents and counsellors or external agencies, to support and ensure their wellbeing and build and develop their resilience.
  - Other charitable foundations and trusts in supporting the progress of **disadvantaged students** in the School and meeting the needs of those students.
  - Students with **special educational needs and/or disabilities<sup>11</sup> (SEND) or with medical or physical health issues**, their parents and the School's SENCO as these students often face additional safeguarding challenges which can include, but are not limited to:
    - Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the student's disability without further exploration;
    - These children being more prone to peer group isolation or bullying, including prejudice-based or discriminatory bullying, than other children;
    - The potential for students with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs;
    - Communication barriers and difficulties in managing or reporting these challenges, and
    - Cognitive understanding and being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in school or the consequences of doing so.
- 6.4. The School will liaise as appropriate and consider, where it can reasonably do so, whether extra pastoral support and attention for these children is, or could be put, in place.

### **Family, Faith, Community and Wider Societal Issues**

- 6.5. The School is aware of and recognises that many other factors can have an influence and impact on a child's life and their safety and welfare and these can affect life outcomes, both school related and externally, whether or not the child is within one of the vulnerable groups above. These can be vulnerabilities arising because:

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<sup>11</sup> Children Act 1989 Section 17(10) a disabled child is a child in need

- Of the child's own circumstances or their families such as drug related issues, alcohol abuse, mental health concerns, one or more of many forms of bullying, exploitation by criminals, domestic abuse, serious violence or LGBTQ+ issues for example;
- Their circumstances have made them homeless;
- They may have a family member in custody or hospitalised, or
- There may be risk of harm from cultural, faith or belief-based influences.

6.6. The School is also aware that:

- Some individuals are more likely to be abused because of wider societal factors such as girls or LGBTQ+ students and others who suffer discrimination, and
- That there are those who are at increased risk of acting as a perpetrator in abusive situations because, for example, they have an abusive home situations or anger management issues.

6.7. These circumstances can manifest themselves in many ways and all staff should be aware of the indicators which may signal that children are at risk and understand the measures in place to manage these:

- They may attract bullying by others or be the cause of behavioural issues;
- The effects may show up emotionally or physically and perhaps with signs of self harm, assault, unexplained injuries or a general significant change in their well-being;
- It may reflect in their schoolwork, their attitudes to learning or their school attendance;
- There may be changes in their friendships or relationships with older individuals or groups;
- They may have unexplained gifts or new possessions, or
- They may simply, and concerningly, remain hidden.

In such instances the School will work to break down barriers and give additional support from an early stage and seek further assistance from appropriate partners where necessary.

6.8. Appendix C briefly describes a number of these issues and provides external links giving additional advice. It is not exhaustive which is why it is important that **every** safeguarding concern is considered in context and why the DSL needs to be made aware of any concerns staff may have, whether suspected or founded, to give best chance for early help.

### **Early Help Assessment**

6.9. The School is committed to the early help process and staff understand the importance of providing support as soon as a problem emerges in a child's life because a child who needs help and protection deserves high quality and effective support as soon as the need is identified. Any student may need and benefit from early help, but staff should be particularly alert to the potential need for early help for one who is:

- Disabled and has specific additional needs or has SEN, whether or not they have an EHCP;
- A young carer;
- Showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- Frequently missing/goes missing from care or from home;
- Misusing drugs or alcohol themselves;
- At risk of modern slavery, trafficking or sexual or criminal exploitation;
- In a family circumstance presenting challenges for the child such as drug and alcohol misuse, adult mental health issues or domestic abuse;
- At risk of being radicalised or exploited;
- At risk of 'honour'-based abuse such as FGM or forced marriage;
- A privately fostered child;
- Persistently absent from education including absences for part of the school day;

or has:

- Returned home to their family from care;
- A mental health need, or
- A family member in prison or is affected by parental offending.

6.10. The DSL will keep cases of early help under constant review and consider a referral to the LA children's social care team if the situation does not seem to be improving.

### **Alternative Provision**

6.11. The School will remain responsible for a student's welfare during their time at an alternative provider and must obtain written confirmation that the provider has conducted relevant safeguarding checks on staff.

### **Private Fostering**

6.12. Where the School becomes aware of a student being privately fostered, they will notify the LA as soon as possible to allow the LA to conduct any necessary checks.

### **Elective Home Education (EHE)**

6.13. The School informs the LA of all deletions from their admission register when a child is taken off role and where this is because of a family's decision to educate a child at home the School liaise with the LA to help them ensure this is in the best interest of the child and to share any relevant information.

### **Mental Health**

6.14. Mental health concerns may create a degree of safeguarding concern in themselves but they may also indicate that a child has suffered or is at risk of suffering abuse, neglect or exploitation. The School recognises that because of the time staff spend with students, both in the school day and boarding time, staff are well placed to observe and to identify behaviours and concerns including those which suggest a student may be experiencing a mental health problem or be at risk of developing one. Where staff find they have a mental health concern about a child they will raise it as a concern with the DSL following the normal reporting procedures in this Policy.

### **Reasonable Force**

6.15. There are circumstances when it is appropriate for school staff to use reasonable force to safeguard children. The term 'reasonable force' covers a broad range of actions used by staff that involve a degree of physical contact to control or restrain children and the interpretation of 'reasonable' in these circumstances means 'using no more force than is needed'. The decision on whether to use reasonable force to control or restrain a child is down to the professional judgement of the staff concerned within the context of the law and should always depend on individual circumstances taking into account risks presented by incidents involving vulnerable children such as children with SEND, mental health concerns or medical conditions.

### **Searching, Screening and Confiscation**

6.16. Appropriate use of searching, screening and confiscation powers can play an important role in establishing a calm and supportive environment which is conducive to learning and maintaining high standards of behaviour and in which student and staff welfare is protected. Suspecting or finding students in possession of prohibited or banned items may indicate that they are involved, or at risk of becoming involved, in antisocial and/or criminal behaviour or child criminal exploitation. A search may play a vital role in identifying students who may benefit from early help or referral to LA children's social care.

6.17. Any decision to involve the police to undertake a strip search will be taken by the Headmaster after considering the mental and physical well-being of the child, their needs and vulnerabilities and how they should be supported after the event.

6.18. All search incidents will be logged on My Concern by the member of staff responsible for the search, with the report specifically highlighting any safeguarding risk identified. The DSL will consider search reports and the circumstances of the individual students against potential wider safeguarding concerns and the need for any support or referral.

### **Use of school premises for non-school activities**

6.19. Where school facilities or premises are let or rented out to other organisations or individuals when this school is not in session, the School will seek assurance that the third-party organisation/individual has appropriate safeguarding and child protection policies and procedures in place to keep children safe. Additional to checking the safeguarding arrangements of the hirer, where the letting/rental is during term time and the School's own students are in attendance/residence the School's own safeguarding arrangements will remain in place for those students. Lettings/rentals in term time or when the School's own students are in attendance/residence will only be permitted following a risk assessment of joint use.

6.20. If we receive an allegation of an incident happening while an individual or organisation was using the school premises to run activities for children, we will follow our safeguarding policies and procedures and inform our LADO.

6.21. When services or activities are provided by the School and are under their direct supervision or management, the School's child protection arrangements will apply. Where services or activities are provided separately by another body the School will undertake the necessary risk assessment, seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place and that there are sufficient and satisfactory liaison arrangements with the School.

## **7. Role and Responsibilities of the Designated Safeguarding Lead (DSL)**

7.1. The DSL has lead responsibility, management oversight and accountability for safeguarding and child protection including online safety and understanding the filtering and monitoring systems and processes in place.

7.2. Whilst the activities of the DSL can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection remains with the DSL and should not be delegated.

7.3. When anyone has concerns about a student the DSL is the person most likely to have a complete safeguarding picture, be the most appropriate person to advise on the response to safeguarding concerns and so will decide what steps should be taken.

7.4. The DSL has a duty to activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison, including referring cases:

- Of suspected abuse and neglect to the LA children's social care and supporting staff who make referrals;
- To the Channel programme where there is a radicalisation concern and supporting staff who make referrals;
- Where a person is dismissed or has left due to risk/harm to a child to the Disclosure and Barring Service, and
- Where a crime may have been committed to the Police.

7.5. The DSL will ensure that:

- Staff are fully aware of the scope and definition of abuse and neglect<sup>12</sup> and of the range of issues falling into the safeguarding net including the specific issues listed in KCSIE<sup>13</sup>.
- There is an appropriate and suitable training programme in place for staff, governors and

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<sup>12</sup> For more information on these categories see Appendix A

<sup>13</sup> KSCIE 2022 Annex B and Appendix C to this Policy

volunteers, which includes refresh and update activities, and its implementation is monitored.

- There is a clear understanding of what to do if there are safeguarding concerns about a student and what to do if a student is in immediate danger or at risk of harm.
- Staff understand the importance of contextual safeguarding and that children can be at risk of abuse or exploitation in situations outside of their family.
- Procedures are in place to trigger early help and that all staff are aware of the process, the importance of providing support as soon as a problem emerges in a student's life and understand their role in it.
- Staff are aware that safeguarding issues can manifest themselves via child on child abuse, are aware of the School's policy on this and how to act in response to concerns<sup>14</sup>.
- Procedures are in place to immediately act upon incidences of students being absent or going missing in education, particularly repeatedly or for long periods, or going missing from boarding and these work in line with the provisions of statutory guidance 'children missing education' to enable the LA to comply with its obligations. Staff are aware of these procedures and know how to respond and to deal with such incidents.
- Where it can, the School holds more than one contact number for the parent of each student.
- There is a process for monitoring and reporting online safety concerns.
- There are clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems.
- Procedures are in place for reporting and recording low level concern, that there is a clear process for responding to these and that the Headmaster is advised of any reports received.
- Staff are aware that the most common reason for children becoming looked after is as a result of abuse and/or neglect and that they have the skills, knowledge and understanding necessary to keep LAC and pLAC safe.
- Staff are aware of the process for making referrals and for statutory assessments under the Children Act 1989 and the role they may be expected to play in assessment.
- Staff are aware of the importance of recording all safeguarding concerns, discussion, decisions made and the reasons for these decisions and of record keeping.
- A culture of safeguarding and listening to children is encouraged amongst all staff.

7.6. The safeguarding process must always be operated with the best interests of the student at heart and where there is a safeguarding concern the DSL will ensure that, as far as possible, the student's wishes and feelings are taken into account when determining what action to take and what services to provide. The DSL will weigh the victim's wishes against their duty to protect the victim and others. If a referral is made against the victim's wishes, it will be done so extremely carefully and the reasons for referral will be explained to the victim. Appropriate specialist support will always be offered.

7.7. The DSL will:

- Be aware of which children in the school may be identified as vulnerable and monitor their well-being according to their situation.
- Be alert to the specific needs of children in need, those with SEND, those with relevant health conditions and young carers.
- Be aware that children must have an 'appropriate adult'.
- Provide advice, support and training to other staff on child welfare, safeguarding and child protection matters and ensure staff are supported during the referrals process.
- Help promote educational outcomes by sharing information about welfare, safeguarding and

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<sup>14</sup> Appendix E

child protection issues with relevant teachers, SLT and support staff so that they can identify the challenges these students might have and assess the additional academic and pastoral measures and adjustments that they could make to best support these children.

- Lead the TAPS programme<sup>15</sup> to deliver a co-ordinated approach to pastoral care and safeguarding across school and boarding time, keeping the welfare of each student under review, interpreting and taking action on key metrics and promoting their recovery and well-being.
- The DSL will consider reports following searches, and the circumstances of the of the students involved, against potential wider safeguarding concerns and the need for any support or referral.
- Be the School's liaison with LA children's social care and with outside agencies, acting as the point of contact for the safeguarding partners, taking part in strategy discussions and inter-agency meetings and/or supporting other staff to do so, and contributing to the assessment of children.
- Be the liaison with the School's SENCO, as well as the student's family where appropriate, when managing a safeguarding issue relating to a student with SEND.
- Be the liaison with school staff including, mental health leads, the school medical centre, SENCO, boarding teams and pastoral staff on matters of safety and safeguarding and welfare when deciding whether to make a referral so that children's needs are considered holistically.
- Keep cases of early help under constant review and consider a referral to LA children's social care if the situation does not seem to be improving.
- Make an immediate risk and needs assessment where there is a report of sexual violence.
- Promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.
- Obtain the confirmation required that where a student is placed with an alternative provider, the provider has conducted all relevant safeguarding checks on staff.
- Be aware of contact details and referral routes into the Local Housing Authority so that concerns can be raised/progressed about homelessness at the earliest opportunity. This would not preclude the DSL concurrently making a referral to LA children's social care where a student has been harmed or is at risk of harm.
- Be aware of local procedures for making a Prevent referral.
- Have a good understanding of harmful sexual behaviours.
- Liaise with the LA advisor appointed to guide and support care leavers to ensure they are made aware of any issues of concern affecting a care leaver.
- Notify the LA where the School becomes aware of a student being privately fostered.
- Be alert to reports from other schools, authorities or agencies of issues affecting students in other schools or in the locality and make other staff aware of these reports so that they might better monitor the welfare of the students in this school.

7.8. The DSL will act as case manager in the event a safeguarding concern or an allegation about another member of staff including supply staff, volunteers and contractors.

7.9. The DSL should understand relevant data protection legislation and regulations and the importance of information sharing, both within school and with safeguarding partners, other agencies, organisations and practitioners.

7.10. The DSL will liaise with the Headmaster to inform him of issues and ongoing enquiries and report to the Governing Body on safeguarding matters, including training, at least termly and will liaise on a regular basis throughout each term with the designated Safeguarding Governor.

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<sup>15</sup> Targeted Action Plan and Safeguarding (TAPS)

- 7.11. The DSL is responsible for the on-going audit and assurance of safeguarding procedures in school.
- 7.12. The DSL will be responsible for the School's records relating to safeguarding, including low level concerns, and for child protection information ensuring that:
- Child protection information is dealt with in a confidential manner. Staff will be informed of relevant details only when the DSL feels their having knowledge of a situation will improve their ability to deal with an individual student and/or family. A record will be kept of what information has been shared with whom, and when.
  - Child protection records are stored securely in a central place separate from academic records. Individual files (which may be paper/electronic) will be kept for each student. The School will not keep family files. Files will be kept for at least the period during which the student is attending the School, and beyond that in line with current data legislation and guidance.
  - Access to these records by staff other than the DSL and those nominated to act with him, or in his absence, is restricted.
  - Access to records of low level concerns access are restricted to the DSL and the Headmaster.
  - Where appropriate, parents/carers are made aware of information held on their children and kept up to date regarding any concerns or developments. Information held on a student will not be disclosed to a parent/carer if this would put the student at risk of significant harm.
  - If a student moves from this school their child protection records are forwarded securely to the DSL at the new school, with due regard to their confidential nature and in line with current government guidance on the transfer of such records. Direct contact between the two schools may be necessary especially on transfer from primary to secondary schools. A record will be kept of where, when and to whom these records have been passed.
  - If a student is permanently excluded and moves to a Pupil Referral Unit (PRU) their child protection records will be securely forwarded on to the relevant organisation.
  - Where a vulnerable young person is moving on to further education (FE), consideration should be given to the student's wishes and feelings on their child protection information being passed on in order that the FE establishment can provide appropriate support.
- 7.13. The DSL will work closely with those nominated to act with him so that they can assist him and provide effective cover when required.

## **8. Role and Responsibilities of Staff**

- 8.1. Because of the time staff spend with students, both in the school day and boarding time, they are particularly well placed to observe and to identify concerns early, provide help to students, prevent concerns from escalating where possible and promote children's welfare.
- 8.2. Staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful but this should not prevent staff from having a professional curiosity, picking up on signs and changes in behaviour, assuming it is happening here, understanding that children can be at risk of harm inside and outside of school, their own home or online and speaking to the DSL if they have concerns about a child.
- 8.3. All staff will be aware of:
- The School's policies and systems which support safeguarding, including the staff Code of Conduct, the role of the DSL, the School's Behaviour Policy, Behaviour Management Practice Statement, Online Safety and Computer Usage Policy and the safeguarding response to:
    - Children absent or who go missing from education
    - Child on child abuse
  - The process for making safeguarding referrals (Appendix B to this Policy) and for statutory assessments that may follow a referral, including the role they might be expected to play.

- How to report a concern on MyConcern and know that if a concern has been communicated by email or through MyConcern, and it is not immediately acknowledged by the DSL, it must be followed up by a telephone call or a face to face conversation. They cannot assume it has been actioned by anyone else until they receive positive confirmation.
- How to report a search incident on MyConcern.
- How to report a low level concern.
- The importance of recording all safeguarding concerns, discussion, decisions made and the reasons for these decisions and of record keeping.
- Relevant data protection legislation and regulations, how they relate to safeguarding information and that they do not create barriers to sharing information where failure to do so would result in the student being placed at risk.

#### 8.4. All staff have a responsibility to:

- Maintain an attitude of 'it could happen here' where safeguarding is concerned.
- Safeguard students' wellbeing, establish a safe environment in which students can learn and manage behaviour effectively to maintain this, have a clear understanding of the needs of all students and maintain public trust in the teaching profession as part of their professional duties<sup>16</sup>.
- Challenge inappropriate behaviours.
- Undertake training as directed.
- Understand the importance of contextual safeguarding, the problems that young people are facing both in school and in their local community and that safeguarding incidents and/or behaviours can be associated with factors outside of school and can occur between children outside of school.
- Understand and consider whether children are at risk of abuse or exploitation in situations outside of their family.
- Act in accordance with school procedures with the aim of eliminating unlawful discrimination, harassment and victimisation, including those in relation to child on child abuse.
- Have an awareness of safeguarding issues<sup>17</sup> that can put children at risk of harm and the behaviours linked to issues such as drug taking and/or alcohol misuse, persistently absent or deliberately missing education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos that can be signs that children are at risk.
- Be aware of the signs of abuse and neglect, know what to do if they identify a safeguarding issue or a student tells them they are being abused or neglected and understand the legal reporting requirements for FGM as explained in Appendix B to this Policy.
- Be aware that technology is a significant component in many safeguarding and wellbeing issues and alert to signs which may indicate online safety concerns, including those coming from out of school use. All children can be at risk when using the internet. Social media, chat rooms and web forums are all used by child sex abusers to groom potential victims. In many cases abuse and other risks will take place both online and offline.
- Be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation but that they may also be for other reasons which nevertheless are a cause for concern for the wellbeing of the student and the same safeguarding procedures apply in reporting safeguarding concerns to the DSL.
- Be aware of the risk factors that increase the likelihood of involvement in serious violence and of the indicators which may signal that children are at risk from, or are involved with serious

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<sup>16</sup> Teachers Standards 2012

<sup>17</sup> See Appendix C for further information

violent crime.<sup>18</sup>

- Be aware of, and follow, the guidance on using reasonable force.<sup>19</sup>
- Be aware of, and follow, the guidance on searching, screening and confiscation<sup>20</sup> and be mindful of the possibility that suspecting or finding prohibited or banned items in a child's possession may indicate that they are at risk, or potentially at risk, of involvement in antisocial and/or criminal activity or exploitation.
- Be aware of the early help process and understand their role in it.
- Be aware of, and understand, the process for making referrals as well as for making statutory assessments under the Children Act 1989 and their role in these assessments.
- Make a referral in accordance with Appendix B to this Policy if at any point there is a risk of immediate serious harm to a student.
- With the DSL, support social workers in making decisions about individual children.
- Maintain appropriate levels of confidentiality when dealing with individual cases, and always act in the best interest of the student.
- Understand and follow the School's procedure for, and approach to, dealing with incidences of students persistently absent or missing in either education or boarding as referred to in Appendix D to this Policy.
- Understand and follow the School's procedure for managing allegations of abuse against other children as referred to in Appendix E to this Policy and the School's zero tolerance approach to any form of child on child abuse.
- Understand and follow the School's procedure for managing allegations against staff as referred to in Appendix E to this Policy.
- Understand and follow the School's procedure for, and approach to, preventing radicalisation as referred to in Appendix G to this Policy.
- Adopt safe working practices in accordance with Guidance for safer working practices for those working with children and young people in educational settings including in boarding and, where teaching online, pay particular attention to safe protocols and guidance.<sup>21</sup>

## **9. Safeguarding Partners and Multi-Agency Working**

- 9.1. There is a shared responsibility between organisations and agencies to safeguard and promote the welfare of all children in a local area. This school works within the framework established by the DSPPB and contributes to multi-agency working as part of its statutory duty.
- 9.2. The School recognises the importance of drawing on external support and on information sharing between professionals and local agencies in order to effectively meet children's needs.
- 9.3. Schools are considered 'relevant agencies' in determining working relationships with safeguarding partners and the School will fully co-operate, engage and work with these partners to improve the wellbeing of children.
- 9.4. When dealing with LAC and pLAC, it is important that all agencies work together and prompt action is taken when necessary to safeguard these children, who are a particularly vulnerable group.

## **10. Safer Recruitment and Employment Practices**

- 10.1. The School is responsible for creating a culture of safe recruitment and adopting safe recruitment practices that help deter, reject or identify people who might abuse children. This is a key part of our whole school approach to safeguarding and promoting the welfare of children and in

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<sup>18</sup> Appendix C

<sup>19</sup> Use of reasonable force, Advice for headteachers, staff and governing bodies, July 2013

<sup>20</sup> Searching, Screening and Confiscation, Advice for schools, July 2022

<sup>21</sup> Guidance for Safer Working Practice for those Working with Children and Young People in Educational Settings (February 2022)

formulating our policy we have due regard to DSPPB procedures for safer recruitment and DBS workforce guides.

- 10.2. Recruitment policy relates to everyone applying to work at the School. These are not only people who regularly come into contact with students, or who will be responsible for students, because of their work. They are also people who work in the school when students are present, who may not come into direct contact with them as a result of their job, especially those who may be seen as safe and trustworthy because of their regular presence in the setting. This includes workers not on the payroll such as supply staff, self-employed staff, staff employed by contractors and volunteers. Adults<sup>22</sup> living in school accommodation within or attached to boarding accommodation or on the school site are also vetted in accordance with Governors' policies.
- 10.3. The School's safer recruitment practices are explained in Appendix F.

## **11. Managing Safeguarding Concerns or Allegations Made About Staff<sup>23</sup>**

- 11.1. The School aims to promote an open and transparent culture, in which all concerns, whether they meet the harm threshold or not, about all adults working in or on behalf of the school are shared responsibly and with the right person, recorded and dealt with promptly and appropriately. In this way we can identify inappropriate, problematic or concerning behaviour early, minimise the risk of abuse, and ensure that adults working in or on behalf of the school are clear about professional boundaries and act within these boundaries, and in accordance with our ethos and values.
- 11.2. Staff should have regard to Appendix B of this Policy (What to do if..) and report their concerns to the DSL. Whatever these allegations may be, the School will be responsive and consider the concern and the context of the behaviour, proportionally, sensitively and without delay.
- 11.3. The School's procedures managing allegations, both those that meet the harm threshold and those that are low level concerns, are set out in Appendix E to this Policy ensuring they form part of our whole school approach to safeguarding and promoting the welfare of children.

## **12. Managing Allegations of Abuse Against Other Children**

- 12.1. We recognise that children are capable of abusing other children and have a zero-tolerance approach to any form it may take, ensuring that all members of the school community, staff and students alike, are clear that this is our approach.
- 12.2. The School's policy and procedures both for guarding against child on child abuse happening, and our procedures for managing allegations if it does, are set out in Appendix E to this Policy ensuring they form part of our whole school approach to safeguarding and promoting the welfare of children.

## **13. Staff Support**

- 13.1. We recognise the stressful and traumatic nature of child protection work and will support staff by providing opportunities to talk through their anxieties with the DSL and to seek further support as appropriate.
- 13.2. Equally we will encourage our DSL to seek support from the designated Safeguarding Governor, the Headmaster and the LA safeguarding team.
- 13.3. In the event that a member of staff feels unable to raise an issue within school or feels that their genuine concerns are not being addressed they may use the whistleblowing channels in the Whistleblowing Policy or follow the links to do so on the [NSPCC website](#).

## **14. Confidentiality, Information Sharing and Record Keeping**

### **Confidentiality**

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<sup>22</sup> Being those aged 16 and above

<sup>23</sup> Staff includes supply staff, volunteers and contractors.

- 14.1. Confidentiality is an issue which needs to be discussed and fully understood by all those working with children particularly in the context of child protection. Every effort should be made to ensure that confidentiality is maintained for all concerned but staff members must not promise a student confidentiality as it is very likely that it will be in the best interest of the child to seek advice and guidance from others in order to provide support and engage with appropriate agencies. Staff must ensure that the student is aware of what information will be shared, with whom and why.
- 14.2. However:
- Where there is an allegation or incident of sexual violence or sexual harassment, the victim is entitled to anonymity by law and the School will do all they reasonably can to protect the anonymity of any children involved.
  - The victim may ask that no-one is told about the sexual violence or sexual harassment but even where a victim does not give consent to share information, staff may still lawfully share it, if there is another legal basis that applies under UK GDPR. Advice should be sought from the DSL in these cases.
  - The School will carefully consider and agree, based on the nature of the report, what information will be disclosed to which staff and others, in particular the alleged perpetrator and their parents. Where a report of sexual violence or sexual harassment is progressing through the criminal justice system, the School will do all it can to protect the anonymity of the students involved and be aware of the need for witness support, and the criminal process in general.
  - Where an allegation is made against a member of teaching staff there are legally imposed reporting restrictions<sup>24</sup> preventing the publication of any material that may lead to the identification of a teacher in a school who has been accused by, or on behalf of, a student from the same school. This restriction applies to anyone, including parents.
- 14.3. Safeguarding information should be handled and disseminated on a need to know basis only and should confidentiality or anonymity be breached, the School will implement appropriate disciplinary procedures, seek to minimise any damage and consider how future breaches could be prevented.

### **Information sharing**

- 14.4. Information sharing is essential for effective safeguarding and promoting the welfare of children. It is vital in identifying and tackling all forms of abuse and neglect and neither data protection regulation or human rights law prevents or limits the sharing of information when it is shared for the purposes of keeping children safe but they do provide a framework to ensure that personal information about living individuals is shared appropriately.
- 14.5. As with all data sharing, appropriate organisational and technical safeguards should still be in place and the general principles of data sharing apply such that shared information should be necessary and proportionate, relevant, adequate, accurate, timely and shared in a secure way.
- 14.6. It is important to be open and honest with the individual and/or their family where appropriate about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so. In a safeguarding context the sharing of information can be lawfully done without consent if to gain consent would place a child at risk from neglect or physical, emotional or mental harm or if it is protecting their physical, mental or emotional wellbeing.
- 14.7. In most cases the DSL will be the person in School with whom information is shared and it will be for him to determine the extent of sharing outside of the School. They will have the experience to

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<sup>24</sup> Education Act 2002

The reporting restrictions apply until the point that the accused person is charged with an offence, or until the Secretary of State publishes information about an investigation or decision in a disciplinary case arising from the allegation. The reporting restrictions are disapplied if the individual to whom the restrictions apply effectively waives their right to anonymity by going public themselves or by giving their written consent for another to do so or if a judge lifts restrictions in response to a request to do so.

exercise judgement in cases for example where indicators of abuse are more subtle and have a more in depth understanding of the services which might be accessed to ensure that students receive the right services at the right time to prevent a need from becoming more acute. However, if it is a member of staff making the referral they may seek guidance from the DSL or the DPO but it must be within a time frame which is not detrimental to the student's interests. The most important consideration for anyone who makes a referral is whether sharing information is likely to safeguard and protect that student and this is the overriding consideration when making decisions on sharing.

- 14.8. In making a referral to LA children's social care as much contextual information as possible should be shared to enable their assessment to encompass the wider picture.
- 14.9. Where a student is leaving the School, the DSL will consider whether it is appropriate to share any information with the student's new provider, in addition to the child protection file, that will allow the new provider to continue supporting victims of abuse or those who are currently receiving support through the 'Channel' programme.
- 14.10. Appropriate staff, including the DSL and any Deputy DSL, will have:
- The information they need in relation to a student's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order) and contact arrangements with students' birth parents or those with parental responsibility, social workers and the VSH in the authority that looks after any LAC and for any pLAC.
  - Information about the student's care arrangements and the levels of authority delegated to the carer by the authority/parent/guardian looking after him/her.
- 14.11. It may be appropriate to withhold information and in such instances the reason for doing so will be recorded.
- 14.12. Information must be shared where there is a statutory duty or Court Order to do so.
- 14.13. Appendix H sets out a helpful flowchart of how and when information ought to be shared.

### **Record Keeping**

- 14.14. We will keep a clear and comprehensive record of all concerns, discussion, decisions made and the reasons for these decisions, including low level concerns. If there is any doubt about the recording requirement staff will refer to the DSL.
- 14.15. We will keep a record of what information has been shared, with whom and why. It should make clear to the recipient what is fact and what is an opinion and where information is shared without consent the recipient should be made aware of this. Where possible, the individual(s) concerned should be informed about the information to be shared, the reasons and to whom it is disclosed.
- 14.16. It may be necessary to liaise and, where necessary, challenge other agencies involved in order to obtain relevant information to support a student appropriately. If a student resides in another borough but attends this school, the DSL will liaise with the LA in which the student resides.
- 14.17. If a student who is subject to a child protection plan leaves this school, their information should be securely transferred to the new school as soon as possible and within the 5-day period for an in-year transfer or the start of a new term, with a confirmatory receipt, and the child's social worker informed. If appropriate the DSL may authorise the sharing of information with the destination establishment in advance of the move.
- 14.18. Receipt of information on children coming to the school should be recorded and shared within the school as required.
- 14.19. Confidential information on safeguarding, child protection, safer recruitment, concerns and allegations will be appropriately stored with restricted access to designated people and will be maintained in line with data protection laws so that information is accurate, regularly updated, relevant and secure.

14.20. Record retention periods will be in accordance with the School's general policy with due regard to the importance of the information in the context of the student's future life and outcomes.

### **Involving Parents/Carers**

14.21. Generally, we will discuss child protection concerns with parents/carers before approaching other agencies and will seek their consent to make a referral. Appropriate staff will approach parents/carers after consultation with the DSL. However, there may be occasions when the School will contact another agency before informing parents/carers because it considers that contacting parents/carers may increase the risk of significant harm to the student.

14.22. In the case of allegations of abuse made against other students, we will normally notify the parents of the students involved subject to any legal rights to anonymity.

14.23. Discussion with the victim's parents will relate to the arrangements being put in place to safeguard the victim, with the aim of understanding their wishes in terms of support arrangements and the progression of the report.

14.24. Discussion with the alleged perpetrator's parents will relate to the arrangements that will impact their child, such as moving classes for example, with the reasons behind decisions being explained and the available support discussed. External agencies will be invited to these discussions where necessary.

## **15. Teaching & Learning**

### **Curriculum**

15.1. Teaching students how to keep safe and recognise behaviour that is unacceptable is vitally important in supporting them to understand risk, to become able to cope with those risks and crucially to develop resilience so that they not only cope with risks today but are developing a growing understanding and a growing resilience, about coping with those risks we don't yet know are coming up in the future. This, together with child protection and wider child safety and other relevant issues, will be embedded into the curriculum and is likely to include, amongst other things, addressing topics such as self-esteem, emotional literacy, assertiveness, communication skills, power, relationships and sex education, drugs awareness, bullying, sexual violence and sexual harassment, safe online practices, citizenship, British Values and the issues of terrorism, extremism and the wider use of violence.

15.2. These matters are routinely addressed through our Beliefs and Issues programme<sup>25</sup>, in assemblies and in tutorials with the intention of enabling students to become better informed and providing a forum for reflective but open debate and discussion on sensitive and controversial topics so that they can develop strong values and be able to assess and assemble information on which they can make informed judgements and base decisions.

### **Online safety**

15.3. Technology has become integral to daily life whether in or outside of schools and the internet and other digital and information technologies and platforms are powerful tools as both a means of communication and in facilitating extensive access to, and sharing of, information. The School recognises and values the benefits this can bring to a student's education but are cognisant that these technologies can pose threats and risks not only to the user but also to others and have developed an Online Safety and Computer Usage Policy to specifically address this.

15.4. The breadth of issues classified within online safety is considerable, but can be categorised into the following areas of risk:

- Content: being exposed to illegal, inappropriate or harmful content; for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-semitism, radicalisation and extremism;

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<sup>25</sup> Having regard to statutory guidance relating to Relationships and sex education and health education (June 2019)

- Contact: being subjected to harmful online interaction with other users; for example: child to child pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes;
- Conduct: online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing others explicit images and online bullying; and
- Commerce – risks such as online gambling, inappropriate advertising, phishing and or financial scams.

15.5. The Online Safety and Computer Usage Policy seeks to give direction as to how the School looks to educate students<sup>26</sup> to explore their horizons by using online platforms, devices and technologies and to do this safely and with caution and responsibility for themselves and equal respect for others, focussing on underpinning knowledge and behaviours that can help students navigate the online world both safely and confidently regardless of the devices, platform or app they use, as well as introducing appropriate and proportionate controls to prevent access to harmful materials through the School's network.

15.6. Our communications with parents will seek to explain and reinforce the importance of children being safe online, the importance of reinforcing what they are taught about online safety and using what they are taught outside of school because whilst the School's systems and processes filter and monitor online use through the school network there is potential risk from unmonitored use or unrestricted access via a child's own or home internet resources.

15.7. Online safety is an integral part of safeguarding and the oversight role of the DSL. The School's Designated Online Safety Officer is Jon Adey (Subject Leader for ICT).

### **Remote Education**

15.8. Where students are learning remotely the School will follow advice on remote learning, virtual lessons and live streaming to ensure that this is done safely and in line with current best practice. Staff should keep in regular contact with parents and carers to ensure they are aware of what their children are being asked to do online, including the sites they will be asked to access and be clear who from the School their child is going to be interacting with online.

### **Work experience**

15.9. When a student goes on work experience, the School will ensure that the placement provider has appropriate policies and procedures in place to protect students from harm. The need for children's barred list checks will be given special consideration for any placement where a student is under the age of 16.

### **Homestay exchange visits**

15.10. Exchanges can benefit learning across a range of subjects and might involve staying with host families either in the UK or abroad. The School recognises its responsibility to consider how best to minimise the risk of harm to students during any exchange visit the School arranges and when organising for the care and accommodation of a student staying with a host family as part of the exchange.

15.11. When arranging a homestay, the School should consider the suitability of the adults in the respective families who will be responsible for the visiting student during the stay. Where the School is arranging for a visiting student to be provided with care and accommodation in the UK in the home of a family to which the student is not related, the School will be the regulated activity provider and the responsible adults are considered to be in regulated activity for the period of the stay. In these circumstances the School will obtain the necessary information required, including a

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<sup>26</sup> Having regard to guidance issued by the DfE Teaching online safety in school (June 2019)

DBS enhanced certificate with children's barred list information, to inform its assessment of the suitability of the responsible adults. In addition they will consider whether these checks should also be obtained for anyone else aged over 16 in the household.

- 15.12. Any such arrangement made by the student or their parent/carer themselves is a private arrangement. The School would not in these circumstances be the regulated activity provider.
- 15.13. The School is unable to obtain criminality information from the DBS about adults who provide homestays abroad but we will endeavour to ensure that appropriate and sufficient arrangements and assurances are in place to safeguard students effectively, through liaison with the relevant partner school/host organisation.
- 15.14. Students and parents will be made aware of whatever arrangements are in place and how a student can make contact with the responsible member of staff during the visit should an emergency occur or a situation arise which makes them feel uncomfortable.

## **16. Training and Development**

- 16.1. It is a statutory requirement<sup>27</sup> that all staff should undertake child protection training to equip them to carry out their responsibilities for Child Protection effectively and keep up to date with refresher training/updates at least annually.
- 16.2. It is similarly the case that all Governors should receive appropriate safeguarding and child protection training to equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place are effective and support the delivery of a robust whole school approach to safeguarding. This training also needs to be updated regularly.
- 16.3. All staff, governors and volunteers must have training sufficient to meet the requirements of KCSIE which will include:
- Undertaking, at a level appropriate to their role:
    - Initial child protection training, and
    - Online safety training which includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring.
  - Keeping their training up to date with refresher/update training, at least annually, and at other times at the request of the DSL.
  - Reading and understanding:
    - For SLT and the designated Safeguarding Governor, the entirety of KCSIE;
    - For all other staff and volunteers, including governors, Part 1 of KCSIE, safeguarding information for all staff;
    - For those directly involved with children, Annex B of KCSIE referring to specific safeguarding issues;
    - For governors, Part 2 of KCSIE referring to the management of safeguarding and the responsibility of governing bodies, and
    - For those involved with staff recruitment, Part 3 of KCSIE referring to safer recruitment procedures.
  - Undertaking reading, online modular training or any other training where requested.
- 16.4. The induction programme for new staff, governors and volunteers will include initial child protection training and receiving a copy of Part 1 of KCSIE (and Annex B and/or Parts 2/3 if applicable to their role). They will also be provided with copies, and acknowledge receipt and understanding, of:
- This Policy, which includes information on the safeguarding response to:

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<sup>27</sup> KCSIE

- Children who are absent or go missing from education and/or boarding, and
- Child on child abuse.
- The School's Online Safety and Computer Usage Policy
- The School's Behaviour Policy
- The School's Behaviour Management Policy
- The School's Code of Conduct
- Information on the role of the DSL, the name of the DSL in this School, the name of the Safeguarding Governor and names of other staff who may deputise if the DSL is unavailable.
- Information to enable them to access MyConcern.

When any of the information changes, or these policies are updated, they will be circulated<sup>28</sup>

- 16.5. New staff will also be directed to the master policies directory, boarding handbook and staff handbook<sup>29</sup> so that they can have access at any time to up to date versions of guidance for future reference.
- 16.6. Any staff, governors or volunteers who are unable to attend a training session must have good reason, which is authorised by the DSL, and attend an alternative session if requested by the DSL. Alternative sessions will be limited.
- 16.7. For any refresher/update training which is to be done individually such as reading updated guidance or undertaking training through an on-line module, the appropriate confirmation/certification that the directed training has been completed must be sent to HR within the time scale in the instructions given.
- 16.8. The School's commitment to safeguarding and protecting its students is such that failure to participate or complete the required training is not deemed acceptable and may be referred as a disciplinary matter as a serious breach of the School's Code of Conduct.
- 16.9. The DSL and any other person authorised to work with him, or to stand in during his absence, should undertake training every two years to provide them with the knowledge and skills required to carry out their role. This is additional to regular refresher/update training which must be done at least annually or more often, for example, in the event of updated guidance being issued during the year. Their training should provide them with a good understanding of:
- Their role and the processes, procedures and responsibilities of other agencies particularly LA children's social care.
  - How to identify, understand and respond to specific needs that can increase the vulnerability of children, as well as specific harms that can put children at risk.
  - The lasting impact that adverse experiences and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes.
  - The importance of information sharing, both within the school and with the safeguarding partners, other agencies, organisations and practitioners.
  - The unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school.
  - Encouraging a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures put in place to protect them.

<sup>28</sup> Via the EVERY document management system

<sup>29</sup> These directories also offer links to the relevant Government or other guidance for reference  
 Master Policies directory: T:\Staff Shared Area\MASTER POLICIES  
 Boarding Handbook: T:\Boarding Shared Area\Boarding\Boarding Handbook  
 Staff Handbook: T:\Staff Shared Area\Staff Handbook

- The difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships that facilitate communication.

16.10. If staff or volunteers have any concerns over their level of safeguarding knowledge or want further guidance on any aspect of safeguarding, then they should contact the DSL.

16.11. The links to guidance included in this Policy are not exhaustive and if any member of staff or volunteers are seeking further information on any aspect of safeguarding then they can also contact the DSL for guidance as to where more can be found.

Alternatively DSPPB guidance can be found at:

<https://safeguarding.dudley.gov.uk/safeguarding/child/work-with-children-young-people/> and

<https://safeguarding.dudley.gov.uk/safeguarding/child/parent-carers/useful-links/> where there is a library of information on a whole range of safeguarding topics. Or the NSPCC website can be accessed using: <https://www.nspcc.org.uk/preventing-abuse/>

## 17. Implementation, Review and Monitoring

17.1. This Policy is brought to the attention of all staff and volunteers. It will be monitored and reviewed annually and more often if there are updates to it, or to underlying guidance related to it.

17.2. Implementation will be monitored by ensuring safeguarding is discussed at Governors' meetings at least termly. It is also discussed and monitored on a routine and regular basis throughout the year by and with the designated Safeguarding Governor and in the Safeguarding Group.

## 18. Reflection

18.1. We all should have regular reviews of our own practice to ensure we have the knowledge, skills and expertise and to inform future improvement. It is so important for students to receive the right help at the right time to address risks, prevent issues escalating and promote their welfare. Serious case reviews have identified not only the dangers of failing to take effective action but also examples of where it went wrong and these include:

- Failing to act on and refer the early signs of abuse and neglect
- Poor record keeping
- Failing to listen to the views of the child
- Failing to re-assess concerns when situations do not improve
- Not sharing information with the right people within and between agencies
- Sharing information too slowly
- A lack of challenge to those who appear not to be taking action

18.2. It is important that staff are confident in their safeguarding and child protection practices so it is as important that any member of staff or any volunteer who thinks they need further help or guidance on how to handle a safeguarding concern or potential concern which comes to their attention, contacts the DSL and seeks support and advice and further guidance and training.

18.3. Our own practices will continue to evolve, reflective of any lessons learned from 'near misses', or where incidents have happened or allegations were made, whether substantiated or not, either here or from other schools or in wider society. From this we can assess whether improvements could be made to our procedures or practice to help prevent similar events happening, whether we can add to what and how we educate our students about keeping safe and keep up to date with the changing risks scenarios that our students will face.

## 19. Supporting Documents

This Policy is in conjunction with:

- DSPPB Safeguarding Children Procedures (<http://safeguarding.dudley.gov.uk>) and related West Midlands Safeguarding Children Procedures (<http://westmidlands.procedures.org.uk>)
- Working Together to Safeguard Children (July 2018)
- Keeping Children Safe in Education (September 2023)
- Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers (July 2018)
- What to do if you're worried a child is being abused: Advice for practitioners (March 2015)
- Guidance for Safer Working Practice for those Working with Children and Young People in Educational Settings (February 2022)
- Listening to and involving children and young people (January 2014)
- The designated teacher for looked after and previously looked after children (February 2018)
- Mental health and behaviour in schools (November 2018)
- Summary of responsibilities where a mental health issue is affecting attendance (February 2023)
- Children missing education (statutory guidance for local authorities) (September 2016)
- Sharing nudes and semi nudes: advice for education settings working with children and young people (December 2020)
- Sharing nudes and semi-nudes: how to respond to incidents (overview) (December 2020)
- Revised Prevent Duty Guidance: for England and Wales (July 2015)
- The Prevent Duty: Departmental advice for schools and childcare providers (June 2015)
- National Minimum Standards for Boarding Schools (September 2022)
- General Data Protection Regulation & Data Protection Act 2018
- Data protection: toolkit for schools
- Sex Offences Act 2003 and Voyeurism (Offences) Act 2019
- Teaching online safety in school (June 2019)
- The School's policies:
  - Aims of the School
  - Behaviour Policy
  - Beliefs & Issues Policy
  - Code of Conduct for Staff and Volunteers
  - DBS Policy
  - Equality & Diversity Policy
  - Online Safety and Computer Usage Policy
  - SEND Policy
  - Careers Education, Information, Advice and Guidance Policy (Including Work Experience)
  - Looked After & Previously Looked After Children Policy
  - Attendance and Leave of Absence Policy
  - Behaviour Management Policy
  - Boarding Policy
  - Complaints Policy
  - Educational Visits Policy
  - Risk Assessment Policy for Student Welfare
  - Staff Recruitment Policy
  - Whistleblowing Policy
  - Supporting Children at School with Medical Conditions
  - Data Protection Policy
  - Remote Education Policy

# APPENDIX A

## Definitions and Indicators of Abuse

Abuse is defined as 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. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults, or another child or children.

Abuse, neglect and safeguarding issues are rarely stand-alone events and cannot be covered by one definition or one label alone and in most cases, multiple issues will overlap.

The signs of child abuse are not always obvious and they may depend on the type of abuse but there are some common signs and these include:

- Unexplained changes in behaviour or personality
- Becoming withdrawn or seeming anxious
- Becoming uncharacteristically aggressive
- Choosing to wear clothes that cover their body
- Knowledge of adult issues inappropriate for their age
- Lacking social skills and with few friends
- Poor relationships with parents and carers
- Running away or going missing

There are four types of child abuse – Physical Abuse, Emotional Abuse, Sexual Abuse and Neglect.

### Physical Abuse

A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Possible indicators of physical abuse may include:

- Bruises (particularly indicative of abuse if observed in infants and immobile children)
- Broken or fractured bones, or evidence of old fractures
- Burns or scalds, particularly to the feet or the bottom
- Bite marks, pinch marks, grip marks or slap marks
- Scarring
- Lacerations to the body or mouth
- The effects of poisoning (such as vomiting, drowsiness, seizures)
- Breathing problems from drowning, suffocation, or poisoning
- Seeming frightened of parents, reluctant to return home after school
- Constantly asking in words/actions what will happen next
- Shrinking away at the approach of adults
- Displaying frozen watchfulness

For more information on physical abuse and what it might look like follow the link below to see advice from the NSPCC

<https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/physical-abuse/>

### Emotional Abuse

The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development.

It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.

It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction.

It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying, including cyber bullying, causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

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

There may not be any obvious physical signs of emotional abuse or neglect which is why it is important to look out for signs in how a child is reacting. Possible indicators of emotional abuse might include:

- Lacking confidence and self-assurance
- Having difficulties in controlling emotions
- Having difficulty in making or maintaining relationships
- Acting in a way, or using language, that is inappropriate for their age
- Extreme behaviours, aggressive, having outbursts, or becoming passive or demanding
- Seeming to be isolated or distanced from parents/family
- Not caring how they act or what happens to them
- Seeking attention or becoming clingy
- Lacking social skills with few friends
- Anxiety, unhappiness or withdrawal
- Developmental delay (physical, mental, emotional)
- Persistent running away from home or being missing from school
- Admission of punishment which seems excessive
- Mental health concerns such as depression, anxiety, self-harm or suicidal thoughts
- Developing risky behaviour such as stealing or bullying
- Eating disorders

For more information on emotional abuse and what it might look like follow the link below to see advice from the NSPCC

<https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/emotional-abuse/>

## **Sexual Abuse**

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration, for example rape or oral sex, or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in 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 and all staff should be aware of it and of their school's policy and procedures for dealing with it. For this School see Appendix E.

Children often do not talk about sexual abuse because they think it is their fault or have been convinced by the abuser that it is normal or a 'special secret', children may also be bribed or threatened by their abuser and worry about getting them into trouble. Possible indicators of sexual abuse might include:

- Pain, itching, bleeding, bruising, or unusual discharge to the genital area or anus
- Urinary infections or sexually transmitted infections
- Avoiding or being afraid of being left alone with people or a specific person
- An inappropriate knowledge of sex or use of sexual language for their age

- Difficulty walking or sitting
- Persistent sore throats and other repeat ailments
- Changes in eating habits or developing eating disorders
- Anxiety, depression or difficulty coping with stress
- Sleep disturbances or nightmares
- Mood changes, becoming irritable or angry
- Bed-wetting
- Alcohol or drug use
- Refusing to go to school
- A lack of peer relationships
- Refusing to change for PE or participate in physical activities
- Exhibiting sexualised behaviour in their play or with other children
- Running away from home
- Pregnancy
- Dropping hints about abuse
- Self-harm or suicidal thoughts

There are also some common signs of abuse happening online and these include a child:

- Spending a lot more time or a lot less time than usual online, texting, gaming or on social media
- Being secretive about who they are talking to and what they are doing online or on their mobile phone
- Seeming distant, upset, or angry after using the internet or texting
- Having lots of new phone numbers, texts or email addresses on their mobile phone or other devices

For more information on sexual abuse and what it might look like follow the link below to see advice from the NSPCC

<https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/child-sexual-abuse/>

## Neglect

The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate caregivers)
- Ensure access to appropriate medical care or treatment

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

Possible indicators of neglect may include:

- Poor personal hygiene, being smelly or dirty
- Poor, inadequate, ill-fitting or unkempt clothing and shoes that might be inappropriate for the time of year
- Tiredness and hunger
- Repeated and/or untreated injuries (often cause by lack of supervision),
- Lack of medical/dental/optical care and missing appointments
- Living in an unsuitable home environment
- Being left home alone for long periods of time and/or becoming a carer for other family members
- Weight and growth issues
- Health concerns including anaemia, regular illness or infections and skin issues such as sores, rashes, flea bites, scabies or ringworm
- Poor language, communication or social skills
- Being late/early or missing school and finding it hard to concentrate or take part in activities
- Becoming clingy, aggressive, withdrawn, depressed, anxious or obsessive
- Changes in eating habits
- Self-harm, suicidal thoughts and substance misuse

For more information on neglect and what it might look like follow the link below to see advice from the NSPCC

<https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/neglect/>

# APPENDIX B

## What to do if.....

1. A student is suffering or likely to suffer harm or in immediate danger
2. A student makes a disclosure to you
3. You are concerned about a student
4. You discover or suspect a student at risk of FGM
5. You have a safeguarding concern, allegation or suspicion about another member of staff who may pose a risk of harm to children
6. You have concerns about the response
7. You have concerns about poor practice
8. You need to make a referral to social care or the police about suspected abuse

### **1. A student is suffering or likely to suffer harm or in immediate danger**

- 1.1. If you believe a student is suffering or likely to suffer harm, or in immediate danger you should make a referral to children's social care and/or the police immediately.
- 1.2. Anyone can make a referral but the DSL should be informed when you have done so.

### **2. A student makes a disclosure to you**

- 2.1. Staff should be alert to the fact that children and young people may communicate their experiences or concerns in a variety of ways including through pictures or drawings, play or other behaviours and any direct communication of concerns may similarly vary and may be verbal or written, either by hand or electronically.
- 2.2. The initial response to a report from a child is incredibly important. How the school responds to a report can encourage or undermine the confidence of future victims of any type of abuse to report or come forward. All staff should be aware of the process to follow if a child makes a disclosure or they have a concern for a child and how to escalate their concern and this is set out below. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse and/or neglect. Nor should a victim ever be made to feel ashamed for making a report or their experience minimised.
- 2.3. If a student discloses a safeguarding issue to you, you should:
  - Recognise that you are in a position of trust and understand the difficulties that children may have had in deciding to approach you about their circumstances.
  - Be clear about boundaries and who the report will be passed on to.
  - Listen to and believe them. Allow them time to talk freely but do not interview them or ask leading questions, however, you can ask them if they have been harmed and what the nature of the harm was.

'Listened to' means just that; on no account should suggestions be made to them as to alternative explanations for their worries. It is not your role to investigate the matter, that is for the DSL to do.
  - Stay calm, do not show that you are shocked or upset but tell them they have done the right thing in telling you. Do not tell them they should have told you sooner.
  - Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret although as far as possible the matter will be dealt with confidentially.
  - Write up your conversation as soon as possible including details such as timing, setting, who was

present and what was said, in the student's own words. The account should be obtained verbatim or as near that as possible. Stick to the facts; care should be taken not to make assumptions about what the student is saying or to make interpretations and do not put your own judgement on it.

- The written record of the allegations should be signed and dated by the person who received them as soon as practicable and where possible, using the School's incident form. The account should be passed to the DSL or alternatively, if appropriate, make a referral to LA children's social care and/or the police directly (see contact details below) and tell the DSL as soon as possible that you have done so.
- Where the report includes an online element, be aware of searching, screening and confiscation advice.
- A Victim may not disclose the whole picture immediately and they may be more comfortable talking about the incident on a piecemeal basis therefore the initial disclosure may be the start of a dialogue to be kept open.
- Do not discuss the issue with anyone other than the DSL, social services or the police.

2.4. Where you become aware of the sharing of nudes and semi-nudes imagery, either consensual or non-consensual, you must report it to the DSL immediately. You **must not**:

- View, copy, print, share, store or save the imagery yourself, or ask a student to share or download it. If you have already viewed the imagery by accident, you must report this to the DSL.
- Delete the imagery or ask the student to delete it.
- Ask the student(s) involved in the incident to disclose information regarding the imagery; this is the DSL's responsibility.
- Share information about the incident with other members of staff, the student(s) it involves or their, or other, parents and/or carers.
- Say or do anything to blame or shame any young people involved.

You should explain that you need to report the incident, and reassure the student(s) that they will receive support and help from the DSL.

### 3. You are concerned about a student

- 3.1. Staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. Children may feel embarrassed, humiliated, or threatened or it may be because of their vulnerability, disability, sexual orientation or language barriers. This should not prevent staff from having a professional curiosity, picking up on signs and changes in behaviour, assuming it is happening here, understanding that children can be at risk of harm inside and outside of school, their own home or online and speaking to the DSL if they have concerns about a child.
- 3.2. Any concerns should be reported to the DSL who will assess whether to manage any support for the child internally via the School's own pastoral processes, whether early help is appropriate or whether to contact the DSPPB – Single Point Access Team (SPA) or the Police. Staff can do this by logging their concern on MyConcern<sup>30</sup> and they should do this when they start to have concerns; it does not need to have reached a critical stage, as the system can help manage observation and further monitoring which supports the early help process.
- 3.3. Staff should not assume someone else will report the concern, they need to make the report, mindful also that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision and support.

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<sup>30</sup> If a concern has been communicated by email or through MyConcern, and it is not immediately acknowledged by the DSL it must be followed up by a telephone call or a face to face conversation. Staff must not assume it has been actioned by anyone else until they receive positive confirmation.

- 3.4. To ensure there is no delay in seeking advice or making a referral, if the DSL is not available, then the Headmaster or, in his absence the person responsible for the School at that time, should be informed.
- 3.5. Staff may, if necessary, make the referral themselves and should do so, for example, where a student is in immediate danger or at risk of harm. They should inform the DSL of having done so.
- 3.6. The SPA Team and the DSL will decide how to involve the parents/carers. Parents/carers should not be informed if to do so would increase risk to the student.
- 3.7. Maintain confidentiality on a need to know basis only.
- 3.8. If there are concerns a student may be a potential victim of modern slavery or human trafficking then a referral should be made to the National Referral Mechanism, as soon as possible.
- 3.9. If you are unsure about anything please speak to the DSL.

#### **4. You discover or suspect a student at risk of FGM**

If any member of staff discovers or suspects or considers a student at risk of female genital mutilation (FGM) they must immediately raise the case with the DSL who will follow the School's safeguarding procedures and involve the SPA team as appropriate. If that member of staff is a teacher,<sup>31</sup> and in the course of their work in the profession, they have discovered that an act of (FGM) appears to have been carried out on a girl under the age of 18 then that teacher also has a mandatory duty to personally report this to the Police.<sup>32</sup>

#### **5. You have a safeguarding concern, allegation or suspicion about another member of staff who may pose a risk of harm to children**

- 5.1. If staff have a safeguarding concern or an allegation is made about another member of staff harming or posing a risk of harm to children, they have a responsibility to act on their concerns, whether they are concerns that would reach the harm threshold or are lower level concerns, by reporting these to the appropriate officer or the appropriate authorities.
- 5.2. In these instances staff includes any member of staff (whether teaching staff, admin or other support staff), supply staff, volunteers, contractors or visitors.
- 5.3. It is much clearer for staff to make a decision to report a more serious concern or allegation than perhaps a lower level concern however, overlooking minor infringements or bending the rules is just one example of how inappropriate behaviours can become normalised, resetting the expected standards. These behaviours should be challenged before they become embedded and 'accepted'. Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse. Whatever it is, the School will be responsive and consider the concern and the context of the behaviour, proportionally, sensitively and without delay.
- 5.4. Staff should be assured that the School will fully support and protect anyone who, in good faith, reports their concern that a colleague is, or may be, abusing a child or poses a risk of doing so.

#### **6. You have concerns about the response**

You should always follow up your concerns if you are not satisfied with the response or the student's situation does not seem to improve.

#### **7. You have concerns about poor practice**

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<sup>31</sup> A teacher is a person employed or engaged to carry out teaching work

<sup>32</sup> FGM Act 2003 Section 5B

- 7.1. Any suspicion of poor practice must be reported to the DSL who will, where required, take such steps as considered necessary to ensure the safety of the child in question and any other child who may be at risk.
- 7.2. If the allegation is about poor practice by the DSL, or if the matter has been handled inadequately and concerns remain, it should be reported to the Headmaster who will decide on whether disciplinary action should be taken and the next steps to take. If the Headmaster is the DSL referral will be to the Chair of Governors.
- 7.3. If the concern is with regards to the Headmaster, it will be referred to the Chair of Governors.
- 7.4. If a staff member feels unable to raise an issue internally they should use the channels open to them in the School's Whistleblowing Policy.

## **8. You need to make a referral to social care or the police about suspected abuse**

8.1. To ensure that this information is as helpful as possible, a detailed record should always be made at the time of the disclosure/concern, which should include the following:

- The reasons for your concern
- Full name and date of birth of the student
- Names and dates of birth of the student's family/household members
- Other agencies/professionals involved with the family
- The student's first language and any special needs
- The student's developmental needs, context, family and environmental factors and parenting capacity
- Any work you may have already undertaken with the student and family

8.2. All incidents will be reported on a MARF.

8.3. The contact details for passing on a referral are:

<b>DSL – Clive Kay</b>	01384 815019 or 07900 161569 <a href="mailto:ckay@oshsch.com">ckay@oshsch.com</a>
<b>SPA team (Dudley)</b>	0300 555 0055 0300 555 8574 (out of hours line)
<b>Online directory</b>	The online tool <a href="#">Report child abuse to local council</a> directs to the relevant LA children's social care contact number
<b>Police</b>	Child Abuse Investigation Unit, Halesowen Police Station 101 or in emergency 999

# APPENDIX C

## Specific Safeguarding Issues

### Addressing issues

Standard child safeguarding procedures will apply in all cases where abuse or neglect is suspected, including those that may be related to particular safeguarding issues.

As a general principle the School will aim, where possible, to address any matters coming to their attention that are student led low level issues, for example, minor incidents of bullying, through the School's Behaviour Policy and behaviour management practices however there may be instances where the DSL considers the involvement of other agencies, including the police, may be required.

They will be escalated, or may be started at a higher level, where appropriate and particular consideration will be given to students for whom there are additional barriers or where they have an increased risk of abuse including, but not limited to, children with SEN and/or disabilities, those who have English as an additional language, those who are asylum seekers or may experience discrimination due to their race, ethnicity, religion, gender identification or sexuality and those who are at risk from the settings below.

In all cases we will follow our safeguarding procedures and provide appropriate support and guidance.

1. Child abduction and community safety incidents
2. Child exploitation
  - Child criminal exploitation (CCE)
  - Child sexual exploitation (CSE)
  - County lines
3. Child on child abuse
4. Children and the court system
  - Criminal Court
  - Family Court
  - Other Courts
5. Children missing from education
6. Children with family members in prison
7. Cybercrime
8. Domestic abuse
9. Homelessness
10. Mental health
11. Modern Slavery and the National Referral Mechanism
12. Preventing Radicalisation, the Prevent Duty & Channel
13. Sexual violence and sexual harassment between children in schools
  - Sexual Violence
  - Sexual Harassment
  - Harmful Sexual Behaviour (HSB)
14. Serious Violence
15. So-called 'honour'-based abuse
  - FGM
  - Forced marriage

## 1. Child abduction and community safety incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. It can be committed by parents or other family members, by people known but not related to the victim (such as neighbours, friends and acquaintances) or by strangers.

Other community safety incidents in the vicinity of a school can also raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Our integral approach to child safety should ensure that the curriculum embeds these principles.

Further information is available at:

[www.actionagainstabduction.org](http://www.actionagainstabduction.org)

[www.clevernevergoes.org](http://www.clevernevergoes.org)

## 2. Child exploitation

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

Child exploitation, both sexual and criminal, is a form of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence.

CSE and CCE can affect children, both male and female, and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation and where this is the case, it is important that the child perpetrator is also recognised as a victim.

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

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

### 2.1. Child criminal exploitation (CCE)

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

The indicators may not be the same, however girls are at risk of CCE as well as boys although the experience of girls who are criminally exploited can be very different to that of boys. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Some of the following can be indicators of CCE:

- Appearing with unexplained gifts or new possessions
- Associating with other children involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and/or alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing school or education, or not taking part in education

## **2.2. Child sexual exploitation (CSE)**

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include noncontact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence and it may happen without the child's immediate knowledge such as through others sharing videos or images of them on social media.

CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited so, for example, they believe they are in a genuine romantic relationship.

Indicators of sexual exploitation can include those indicators of CCE above as well as some additional specific indicators including children:

- Having older boyfriends or girlfriends, or
- Suffering from sexually transmitted infections, displaying sexual behaviours beyond expected sexual development or becoming pregnant

## **2.3. County lines**

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of "deal line". This activity can happen locally as well as across the UK, no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can be targeted and recruited into county lines in a number of locations including any type of schools (including special schools), further and higher educational institutions, pupil referral units, children's homes and care homes. Children are increasingly being targeted and recruited online using social media and they can easily become trapped by this type of exploitation as county lines gangs manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

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

[County Lines: criminal exploitation of children and vulnerable adults](#)

[Child sexual exploitation: guide for practitioners](#)

[Trafficking: safeguarding children](#)

[Preventing youth violence and gang involvement](#)

[Metropolitan Police guidance for schools and college](#)

['NPCC- When to call the Police'](#)

### **3. Child on child abuse**

See Appendix E

## **4. Children and the court system**

### **4.1. Criminal Court**

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. Age appropriate guidance, provided by the Ministry of Justice, explains the process and support measures can be found through the links below.

[Advice for 5-11-year olds witnesses in criminal courts](#)

[Advice for 12-17 year old witnesses in criminal courts](#)

### **4.2. Family Court**

Making child arrangements via the family courts, following separation for example, can be stressful for all family members and especially so for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents/carers and for information for those staff caring for a child in school.

<https://helpwithchildarrangements.service.justice.gov.uk/>

### **4.3. Other Courts**

There may be other instances of court involvement for a child or their family, or involvement of other official agencies such as immigration for example, all of which are likely to be stressful and cause a child to become unsettled, unsure and requiring a significant degree of support.

## **5. Children absent or missing from education**

See Appendix D

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

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

[National Information Centre on Children of Offenders](#)

## 7. Cybercrime

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

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

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

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

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

[Cyber Choices](#)

['NPCC- When to call the Police'](#)

[National Cyber Security Centre – NCSC.GOV.UK](#)

## 8. Domestic abuse

The Domestic Abuse Act 2021 introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse ensures that different types of relationships are captured, including ex-partners and family members. The definition also captures a range of different abusive behaviours, including psychological, physical, sexual, financial or emotional abuse and coercive and controlling behaviour. These behaviours may be a single incident or a pattern of incidents and children can be victims of domestic abuse both directly and indirectly. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse), all of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn and in some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected".

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

Where children experience domestic abuse within their own intimate relationships, this form of child on child abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the child, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or

welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.

It can be difficult to tell if domestic abuse is happening, because perpetrators can act very differently when other people are around. Signs that a child is witnessing domestic abuse include:

- Challenging behaviour, bullying or aggression towards others
- Nightmares, trouble sleeping or insomnia
- Bed-wetting
- Anti-social behaviour such as vandalism
- Tantrums
- Anxiety, depression or suicidal thoughts
- Problems in school
- Constant or frequent sicknesses (such as headaches or colds)
- Drug or alcohol use
- Attention seeking
- Withdrawal
- Constant worry about possible danger or safety of family members
- Running away from home

### **Operation Encompass**

'Operation Encompass' operates across all police forces in England helping police and schools work together to provide emotional and practical help to children. The system ensures that when the police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the DSL) in school before the child or children arrive at school the following day, ensuring the school has up to date relevant information about the child's circumstances and can enable support to be put in place according to the child's needs.

Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or schools should make a referral to LA children's social care if they are concerned about a child's welfare.

Operation Encompass provides an advice and helpline service for all staff members from educational settings who may be concerned about children who have experienced domestic abuse. The helpline is available 8AM to 1PM, Monday to Friday on 0204 513 9990 (charged at local rate).

### **National Domestic Abuse Helpline**

Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked.

Advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

[NSPCC- UK domestic-abuse signs symptoms effects](#)

[Refuge what is domestic violence/effects of domestic violence on children](#)

[Safe Young Lives: Young people and domestic abuse | Safelives](#)

[Domestic abuse: specialist sources of support](#) (includes information for adult victims, young people facing abuse in their own relationships and parents experiencing child to parent violence/abuse)

[Operation Encompass](#) (includes information for schools on the impact of domestic abuse on children)

## **9. Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse, anti-social behaviour or any mention of a family 'having to move' as they may have potentially been asked to leave.

The Homelessness Reduction Act 2017 places a legal duty on English councils so that everyone who is homeless or at risk of homelessness has access to meaningful help including an assessment of their

needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a place to live. The factsheets below usefully summarise these duties.

These duties shift focus to early intervention and encourages those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

Whilst referrals and or discussion with the Local Housing Authority should be progressed as appropriate, this does not, and should not, replace a referral into LA children's social care where a child has been harmed or is at risk of harm.

In most cases school staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. LA children's services will be the lead agency for these young people and the DSL should ensure appropriate referrals are made based on the child's circumstances. The Department for Levelling Up, Housing and Communities have published joint statutory guidance on the provision of accommodation for 16 and 17 year olds who may be homeless and/or require accommodation.

[Homeless Reduction Act Factsheets](#)

## **10. Mental health**

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour, and education.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. However, education staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Schools can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies.

More information can be found in the [Mental health and behaviour in schools](#) guidance.

The UK Health Agency has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among children in [Every Mind Matters](#) (links to materials and lesson plans).

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

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in statutory guidance:

[Modern slavery: how to identify and support victims](#)

## **12. Preventing Radicalisation, the Prevent Duty & Channel**

See Appendix G

## **13. Sexual violence and sexual harassment between children in schools**

Sexual violence/harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. They are forms of child on child abuse and exist on a continuum and may overlap. They can occur online and offline (both physically and verbally) and are never acceptable.

### **13.1. Sexual Violence**

Sexual violence refers to sexual offences under the Sexual Offences Act 2003 which include rape, assault by penetration, sexual assault and causing someone to engage in sexual activity; all carried out without express consent<sup>33</sup> of the person on whom they are inflicted and provided that those involved have the freedom and capacity to make that choice. It is a serious offence and includes rape, assault by penetration, sexual assault and causing someone to engage in sexual activity without consent.

### **13.2. Sexual Harassment**

Sexual harassment is unwanted conduct of a sexual nature that can occur online and offline. It is likely to violate dignity, intimidate, degrade or humiliate and/or create a hostile, offensive or sexualised environment. It may include:

- Sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names
- Sexual “jokes” or taunting
- Physical behaviour, such as deliberately brushing against someone, interfering with someone’s clothes
- Displaying pictures, photos or drawings of a sexual nature
- Upskirting, which is a criminal offence
- Online sexual harassment, which may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
  - Consensual and non-consensual sharing of nude and semi-nude images and/or videos. The taking and sharing of nude photographs of under 18’s is a criminal offence.
  - Sharing of unwanted explicit content
  - Sexualised online bullying
  - Unwanted sexual comments and messages, including, on social media
  - Sexual exploitation, coercion and threats and
  - Coercing others into sharing images of themselves or performing acts they are not comfortable with online

It is important that sexual harassment is considered in broad terms. It can create a culture that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence.

### **13.3. Harmful Sexual Behaviour (HSB)**

Children’s sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected, to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. It can occur online or face-to-face and simultaneously online and offline. When considering HSB, both ages and the stages of development of the children are critical factors. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years’ difference or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature.

HSB can, in some cases, progress on a continuum. Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Children displaying HSB have often experienced their own abuse and trauma and they will need their own support.

Children who are victims of sexual violence and sexual harassment will find the experience stressful and distressing and, in all likelihood, it will adversely affect their educational attainment. It is important that all victims are taken seriously and offered appropriate support. Staff should be aware that some groups

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<sup>33</sup> The age of consent is 16; a child under 13 can never consent to any sexual activity.

are potentially more at risk and evidence points to these including girls, children with SEND and LGBTQ+ children.

Our approach to sexual violence and sexual harassment is integral to our whole school approach to safeguarding and our response to any form of child on child abuse is set out in Appendix E

## **14. Serious Violence**

Children can be both at risk of harm from, or involved with, serious violent crime. There are a number of risk factors which increase the likelihood of involvement including being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery as well as a range of indicators that might signal that children are at risk from, or are involved with serious violent crime for example:

- Increased absence from school
- Changes in friendships or relationships with older individuals or groups
- A significant decline in academic performance
- Signs of self-harm or a significant change in wellbeing and signs of assault or unexplained injuries
- Unexplained gifts or new possessions could indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gang and may be at risk of criminal exploitation

A fuller list of risk factors can be found in the Home Office's Serious Violence Strategy.

Evidence suggests that violence can often peak in the hours just before or just after school, when children are travelling to and from school. These times can be particularly risky for children who are involved in serious violence.

Home Office funded Violence Reduction Units (VRU) operate in the 20 police force areas across England and Wales that have the highest volumes of serious violence, as measured by hospital admissions for injury with a sharp object. The West Midlands is one of these areas.

## **15. So-called 'honour'-based abuse (including female genital mutilation and forced marriage)**

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

### **15.1. FGM**

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

For more information on FGM and the signs which might indicate it may happen/or has happened follow the link below to see advice from the NSPCC

<https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/female-genital-mutilation-fgm/signs-symptoms-and-effects/>

All staff are reminded of their duty to report any concerns to the DSL but teachers are also reminded of their statutory duty to personally report any cases of FGM they discover during the course of their work to the police as set out in Appendix B to this Policy.

Information on FGM and when and how to make a report can be found at:

[Female genital mutilation: information and resources](#)

[Female genital mutilation: multi agency statutory guidance](#)

[FGM Fact Sheet](#)

[Mandatory reporting of female genital mutilation procedural information](#)

## **15.2. Forced marriage**

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

Since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages. Schools can play an important role in safeguarding children from forced marriage. Staff should be alert for a range of possible indicators including, amongst other things, students becoming anxious, depressed and emotionally withdrawn with low self-esteem, showing signs of mental health disorders and behaviours such as self-harm or anorexia, displaying a sudden decline in their educational performance, aspirations or motivation, regularly being absent from, or late to, school, or not being allowed to socialise or go on to further education.

The Forced Marriage Unit has published statutory guidance (The Right to Choose) and Multi-agency guidelines for handling cases of forced marriage. Both of these, together with more general advice, can be accessed using the links below.

[The Right to Choose: Multi-agency statutory guidance for dealing with forced marriage](#)

[Multi-agency practice guidelines: Handling cases of Forced Marriage](#)

School staff can also contact the Forced Marriage Unit if they need advice or information on:  
Telephone: 020 7008 0151 Email [fmfco.gov.uk](mailto:fmfco.gov.uk).

# APPENDIX D

## Children Absent or Missing

### 1. Children Absent or Missing from Education

- 1.1. All children are entitled to a full-time education, regardless of their circumstances. Unfortunately, children absent from education not only risk underachieving, they also risk being victims of many forms of abuse and not being in education, employment or training (NEET) in later life.
- 1.2. All staff should be aware that persistent and/or prolonged absence, and children missing education (CME), can be a vital warning sign of a range of safeguarding possibilities. Behaviours linked to deliberately missing education can put children in danger. This may include abuse and neglect, which may include sexual abuse or exploitation and can be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, so-called 'honour'-based abuse or risk of forced marriage.
- 1.3. Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future.
- 1.4. The LA has a legal duty<sup>34</sup> to identify when there are absences or CME and help them back into education. This procedure highlights what our school will do to help the LA meet that duty and to safeguard and promote the welfare of children.

### 2. What is a CME?

- 2.1. For the purpose of this procedure, a CME is defined as a child of compulsory school age who is:
  - Not attending school
  - Not placed in alternative provision by an LA
  - Not receiving a suitable education elsewhere.
- 2.2. This definition also includes children who are receiving an education, but one that is not suitable, which could include children who are not receiving full-time education suitable to their needs, such as age, ability, aptitude, SEND.
- 2.3. There are many circumstances in which a child may become missing from education, but some children are particularly at risk. These include children who:
  - Are at risk of harm or neglect
  - Come from Gypsy, Roma, or Traveller families
  - Come from the families of service personnel
  - Go missing or run away from home or care
  - Are supervised by the youth justice system
  - Cease to attend a school
  - Come from new migrant families

### 3. Our Role

- 3.1. Statutory guidance<sup>35</sup> makes it clear that all staff should be aware of systems within their school which support safeguarding including the safeguarding response to children who are absent or go missing from education and in this school one of the key aims of our Safeguarding Policy is to

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<sup>34</sup> Children missing education Statutory guidance for local authorities (September 2016)

This guidance can be used as a non-statutory advice by.....School leaders, school staff and governing bodies in all maintained schools and academies, independent schools

<sup>35</sup> Keeping Children Safe in Education (September 2022)

All staff should be aware of systems within their school or college which support safeguarding and these should be explained to them as part of staff induction. This should include ..... the safeguarding response to children who go missing from education

ensure that there is a whole school approach to safeguarding and this includes absent or missing children.

- 3.2. It is absolutely crucial that appropriate action is taken in a timely manner to safeguard and promote children's welfare. As part of the whole school approach to safeguarding the School is committed to the early help process because it is vitally important that support is provided as soon as a problem emerges in a child's life. It equally important to do this where children are already known to an LA children's social care team and need a social worker, where unauthorised absence or missing education may increase known safeguarding risks within the family or in the community.
- 3.3. Schools have a safeguarding duty in respect of their students, and as part of this should investigate any unexplained absences. We start to monitor attendance of students as soon as they are recorded on the School's admissions register which is at the beginning of the first day on which it has been agreed by the School, or the day that the School has been notified, that the student will attend the school. From that point on we need to know when they attend, when they do not attend and where they are when they are attending or not attending. It is therefore important that:
  - Morning and afternoon registration is recorded accurately and completely
  - Lesson attendance is recorded at the start of each lesson during the school day via Edulink
  - All reasonable enquiries are made and appropriate follow up steps taken for any absences<sup>36</sup>
  - Any unaccounted absences of boarding students are referred back to Housemasters who investigate and report back to Reception who update the registers
  - Any unaccounted absences of day students are followed up with Tutors, the Head of the Day House, and/or parents as appropriate, from which information Reception update the registers
  - Students recorded as being in school but who do not turn up at lessons are reported and followed up
  - Patterns of absence, unauthorised absence or recurring absences are investigated by a senior staff member<sup>37</sup> who liaises with parents and involves outside agencies as appropriate
- 3.4. Where staff have concerns about students, relating to CME, they must use their professional judgement and their knowledge of the individual(s) involved to inform their decision as to whether welfare concerns should be escalated to the DSL<sup>38</sup>.
- 3.5. Staff can escalate this by logging their concern on MyConcern<sup>39</sup> and they should do this when they start to have concerns; it does not need to have reached a critical stage, as the system can help manage observation and further monitoring which supports the early help process.
- 3.6. The DSL will keep cases of early help under constant review and consider a referral to the LA children's social care team if the situation does not seem to be improving.
- 3.7. Staff must remember:
  - The importance of recording all concerns, discussion and decisions made and the reasons for these decisions and of record keeping
  - That information sharing both within the school and with safeguarding partners, other agencies, organisations and practitioners is essential for the effective safeguarding and promoting the welfare of children.<sup>40</sup>

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<sup>36</sup> The School has a policy on Attendance and Leave of Absence which can be found in the Master Policies file on the Staff Shared Area.

<sup>37</sup> This may be a Deputy Head (including acting deputy or second deputy), the Head of Sixth Form, or, depending on the particular case, another nominated member of staff.

<sup>38</sup> Or, in his absence, a DDSL.

<sup>39</sup> If a concern has been communicated by email or through MyConcern, and it is not immediately acknowledged by the DSL it must be followed up by a telephone call or a face to face conversation. Staff must not assume it has been actioned by anyone else until they receive positive confirmation

<sup>40</sup> Data protection regulation or human rights law provide a framework to ensure that personal information about living individuals is shared appropriately but neither prevents or limits the sharing of information when it is shared for the purposes of keeping children safe

3.8. Effective information sharing between parents, schools and the LA is critical to ensuring that all children of compulsory school age are safe and receiving suitable education. In most cases the DSL will be the person in school who takes concerns further and notifies and liaises with the LA<sup>41</sup> but staff need to be aware of process for making referrals as set out in Appendix B above and for statutory assessments that may follow a referral, including the role they might be expected to play.

## 4. Guidance

4.1. Here at OSH we follow the local guidance available on the following link:

<http://westmidlands.procedures.org.uk/pkpls/regional-safeguarding-guidance/children-missing-from-care-home-and-education>

4.2. Further information from the DfE and Home Office can be found by following the links below:

[Working together to improve school attendance](#)

[Children missing education](#)

[Child missing from home or care](#)

[Children and adults missing strategy](#)

## 5. Children Missing from Boarding

5.1. If a student is missing more than **30 minutes** after a scheduled check, or if staff have reason to suspect unauthorised absence, staff should:

- Carefully scrutinise the signing-out book, including for entries on "incorrect pages"
- Carefully check all parts of the House
- Check with peers for any useful information
- Follow-up any leads as appropriate, either by means of searches or by means of phone calls to other locations or on mobiles
- Not leave the House unsupervised under any circumstances
- Call for assistance from any available member of the House team
- Use senior students (Sixth Form), where appropriate, for searches within the school grounds, but not younger students

5.2. If the above fail to resolve the solution, call for assistance from the Housemaster and/or any available senior member of staff – check for the name of the senior member of staff on duty.

5.3. At this point, responsibility for the incident passes to the senior member of staff, who will take decisions regarding contact with parents and outside agencies, including the police.

5.4. For absence when away from the House, for example on trips or town visits, the member of staff must immediately contact the Housemaster, the Duty House or a senior member of staff as appropriate.

5.5. However, if circumstances warrant it, for example if senior staff cannot be contacted immediately, staff are authorised to take all reasonable steps to safeguard the welfare of students.

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<sup>41</sup> If a child does not attend school regularly (when child has missed between 12-24 consecutive sessions. (6-12 consecutive school days) the School will contact the Education Investigation Service (EIS)

# APPENDIX E

## Managing Allegations

In this section we set out our approach to managing safeguarding concerns and allegations about abuse between children and suspicions or allegations made against staff.

1. Child on Child Abuse & Managing Allegations of Abuse Against Other Children
2. Responding to safeguarding allegations or suspicions about a member of staff who may pose a risk of harm to children

## Child on Child Abuse & Managing Allegations of Abuse Against Other Children

### 1. Our approach

We recognise that children are capable of abusing other children and have a zero-tolerance approach to any form it may take, ensuring that all members of the school community, staff and students alike, are clear that this is our approach. The School's policies and procedures both for guarding against child on child abuse happening, and our procedures for managing allegations, are set out below. They form an integral part of our whole school approach to safeguarding and promoting the welfare of children. It will be achieved by:

- Creating a culture of mutual respect amongst students, irrespective of protected characteristics;
- Teaching students about behaviour that is acceptable and unacceptable, how they can report it and encouraging them to be confident to do this;
- Identifying and making provision for any student that has been subject to abuse;
- Ensuring that all staff and members of this school community understand their responsibilities under safeguarding legislation and statutory guidance, can recognise the indicators and are alert to the signs of child on child abuse, and know to how to respond and to refer concerns to the DSL, and
- Applying our whole school approach to safeguarding, behaviour and equality.

### 2. What is child on child abuse

Children can abuse other children and this is often referred to as child on child abuse. It can occur between two children of any age and sex or through a group of children abusing a single child or group of children. It can happen both inside and outside of school and it can happen online and offline (both physically and verbally) and is never acceptable.

It can take many forms and typically it is most likely to include, but may not be limited to:

- Bullying, including cyberbullying, prejudice-based and discriminatory bullying;
- Abuse in intimate personal relationships between children (teenage relationship abuse);
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm and which may include an online element which facilitates, threatens and/or encourages physical abuse;
- Sexual violence, such as rape, assault by penetration and sexual assault and which may include an online element which facilitates, threatens and/or encourages sexual violence;
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse.

### 3. What do we need to look out for and how do we respond?

It is important to understand that children may not find it easy to tell staff about their abuse verbally. Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the

victim may not make a direct report. For example, a friend may make a report, or a member of school staff may overhear a conversation that suggests a child has been harmed or a child's own behaviour might indicate that something is wrong. If staff have any concerns about a child's welfare, they should act on them immediately rather than wait to be told.

All staff recognise the indicators and signs of child on child abuse and know how to respond to reports. They should be clear as to the school's zero tolerance policy, the procedures with regards to child on child abuse and the important role they have to play in prevention and responding where they believe a child may be at risk from it. When concerned about the welfare of a child, staff should always act in the best interest of the child.

Indicators of abuse may include, but not be limited to:

- Injuries in unusual places, such as bite marks on the neck, that are also inconsistent with their age
- Lack of concentration and acting withdrawn
- Sexual knowledge ahead of their age
- Use of explicit language
- Fear of abandonment
- Depression and low self-esteem
- Changes to their social group, such as spending time with older students, or social isolation
- Alcohol or substance misuse

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator or perpetrators attend the same school.

- 3.1. All staff should understand, that even if there are no reports of this happening in school it does not mean it is not going on; it may be that it is just not being reported so staff need to be vigilant and have an attitude of 'it could happen here'.
- 3.2. The School has a zero-tolerance approach to this type of behaviour and all staff are aware of the School's procedures for dealing with it.
- 3.3. The School's Safeguarding Policy cannot be separated from the general ethos of the School, which seeks to ensure that students are treated with respect and dignity, taught to treat each other with respect, feel safe, have a voice, and are listened to.
- 3.4. It is essential that all staff understand the importance of challenging all and any inappropriate behaviours between children even at low level, because, downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up", "boys being boys" or "girls being girls" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.
- 3.5. Addressing inappropriate behaviour, even if it appears to be relatively innocuous, can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.
- 3.6. The initial response to a report from a child is incredibly important. How we do this can encourage or undermine the confidence of future victims to make a report or come forward. It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the school should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by making a report of any form of abuse and/or neglect nor should they ever be made to feel ashamed for doing so or their

experience minimised. It should be made clear to all victims that the law on child on child abuse is there to protect them, not to criminalise them.

- 3.7. Sexual assault covers a wide range of behaviour so a single act of kissing someone without consent, or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.
- 3.8. Effective safeguarding practice and having a good understanding of harmful sexual behaviour helps the planning of preventative education, implementing preventative measures and establishing early help.
- 3.9. The School's policies which address issues of power and potential harm, for example, bullying, sexual violence/harassment, equal opportunities, and behaviour management, are linked to ensure a whole school approach to such matters. The means provided within the School's policies and procedures for investigating and dealing with child on child abuse concerns, using low level intervention measures, will be considered in the first instance. However, action will be escalated where necessary, and even in the first instance where, for example:
  - There is immediate danger or risk of harm to a student or other students
  - It relates to a serious or potentially criminal offence or is violent
  - Involves students being forced or coerced to use drugs or alcohol
  - Involves sexual exploitation or sexual abuse, such as indecent exposure, sexual assault or sexually inappropriate pictures or videos and including 'upskirting' and sexting
- 3.10. As a boarding school we know we have additional factors to consider with regard to safeguarding and the need for us to be alert to signs of abuse in boarding and that this includes being alert to the possibility of child on child issues and the extra vulnerabilities of SEND children. Our Safeguarding Policy is a whole school approach to all aspects of children's lives here, both in school and boarding, and we ensure all staff are equally aware and trained.
- 3.11. The School meets and aims to exceed the National Minimum Standards<sup>42</sup> for boarding schools.
- 3.12. Staff understand and are aware of the early help process and how this intervention can provide support as soon as a problem emerges and may prevent escalation of inappropriate behaviours.
- 3.13. Staff are aware and recognise the gendered nature of child on child abuse and the potential for this to happen where there is a gender imbalance. The School introduced integration programmes to ensure that there was genuine mutual respect between all students, both boys and girls, in preparation for the admission of girls to the lower school from September 2021. School number gender balance will be achieved by 2025.
- 3.14. The Safeguarding Policy recognises that there are a variety of vulnerable groups who are likely to face barriers and pose additional safeguarding challenges and that these children are more prone to peer group isolation or bullying, including prejudice-based or discriminatory bullying, than others.
- 3.15. The Safeguarding Policy recognises wider societal factors that make some individuals more likely to be abused, such as girls or LGBTQ+ (or perceived to be LGBTQ+) students and others who suffer discrimination or who are at increased risk of acting as a perpetrator because, for example, they have an abusive home situation or anger management issues. It also recognises the important role the School can play in giving additional support from an early stage and seeking further assistance from appropriate partners where necessary.
- 3.16. Staff recognise that safeguarding issues can manifest in child on child abuse and the need to consider the wider picture which may reach beyond school.

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<sup>42</sup> National minimum standards for boarding schools (September 2022)

- 3.17. The School maintains the position that education surrounding respectful and healthy attitudes and behaviour towards others is the best way to combat child on child abuse in the school. They will address the wider societal factors that can influence behaviour, educating students about abuse, its forms and the importance of discussing any concerns and respecting others through the curriculum, tutorial/pastoral programme and extra-curricular activities. All staff, not just teaching staff, are responsible for passing this knowledge on to students.
- 3.18. The School's practices will minimise the risk of child on child abuse by:
- Challenging, and not dismissing, any form of derogatory or sexualised language or behaviour so that it does not become normalised.
  - Identifying, through routine behaviour management processes, low level concerns and ensuring action is taken, where possible, before major concerns arise.
  - Providing planned preventative education across the curriculum throughout all school years.
  - Being vigilant to issues that particularly affect different genders ensuring our curriculum helps to educate students about appropriate behaviour and consent,
  - Ensuring students are clear about what is acceptable and unacceptable behaviour.
  - Publicising where students can go to get help and ensuring they know they can talk to staff confidentially and are confident of doing so.
  - Ensuring staff are trained to understand that a student harming another student could be a sign that the student is being abused themselves, and that this would fall under the scope of this Policy.
  - Making sure that students are taught about safeguarding, including online safety both at home and in school, through teaching and learning opportunities as part of providing a broad and balanced curriculum. These issues will be addressed in an age-appropriate and inclusive way, and explored through Computing and Beliefs & Issues (including relationships and sex education) and tackling such matters as:
    - Healthy and respectful relationships;
    - Boundaries and consent;
    - Stereotyping, prejudice and equality;
    - Body confidence and self-esteem;
    - How to recognise an abusive relationship, including coercive and controlling behaviour;
    - The concepts of, and laws relating to sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so called 'honour'-based violence such as forced marriage and FGM and how to access support, and
    - What constitutes sexual violence and sexual harassment and why these are always unacceptable
  - Teaching students how to raise concerns and make a report, including concerns about their friends or peers, and how a report will be handled.
  - Advertising/publishing sources of help and support, how to reach these and encouraging conversations to start using posters such as attached at the end of this section of the Appendix.
  - Understanding the problems that children are facing both in school and in their local community. Where an alleged incident took place away from the school or online but involved children from the school, the School's duty to safeguard students remains the same and the incident will be treated equally as seriously and investigated in the same way as an incident that took place in school.
  - Giving staff safeguarding training as part of their induction and providing annual refresher training. This training will include guidance on how to recognise indicators of child on child abuse of all kinds, and how to distinguish between behaviours, particularly sexual behaviours,

that are developmentally appropriate and that which is harmful.

- 3.19. All staff are made aware of the process to follow if a child makes a disclosure of they have a concern for a child and how to escalate their concern and this is set out in Appendix B.
- 3.20. Abuse will never be tolerated or passed off and the School's Behaviour Policy makes this abundantly clear. In most cases we would expect to deal with matters under that policy however there may be instances where the DSL considers the involvement of other agencies, including the police<sup>43</sup> where appropriate, may be required.
- 3.21. The DSL will take the lead in delivering a preventative approach to child on child abuse and act as a source of support for students who have been abused by, or who have abused, others.
- 3.22. If an allegation or disclosure is made the DSL must be informed immediately. The DSL will decide the School's initial response, taking into consideration:
- The victim's wishes about how they want to proceed;
  - The nature of the incident and whether any crime has been committed or harmful sexual behaviours displayed;
  - The ages and developmental stages of the students involved;
  - Any power imbalance between the students such as age or disability;
  - Whether the incident is a one-off or part of a pattern of abuse;
  - That sexual violence and sexual harassment can take place within intimate personal relationships between children;
  - The importance of understanding intra familial harms and any necessary support for siblings following incidents;
  - Any ongoing risks and the need to protect other children;
  - Any related issues and the wider context, such as whether there are wider environmental or societal factors in a student's life that threaten their safety and/or welfare or whether there are any links to child sexual exploitation or child criminal exploitation, and
  - The best interests of the student.

Abuse is always unacceptable and will not be tolerated. Immediate consideration will also be given as to how to support the victim, alleged perpetrator and any other students involved.

- 3.23. Where there is a report of sexual violence the DSL should make an immediate risk and needs assessment considering:
- The victim, especially their protection and support;
  - Whether there may have been other victims;
  - The alleged perpetrator(s) and whether they too have unmet needs or are/were themselves abused by harmful sexual behaviours;
  - All the other children (and, if appropriate, adult students and staff), especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms, and
  - The time and location of the incident, and any action needed to make the location safer.

Where there has been a report of sexual harassment the need for a risk assessment and the development of a proportionate response, should be considered on a case by case basis.

- 3.24. The DSL will instigate the School's response, following the relevant DSPPB procedures.
- 3.25. Throughout the process the School will keep their risk assessment under review, considering the measures it requires to manage any assessed risk of harm and how it is keeping all students safe

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<sup>43</sup> [NPCC-When to call the police](#)

and meeting their needs. At the conclusion of the process the School will be both proactive and reflective. It will:

- Consider any requirement to change the School's Behaviour Policy and/or systems of behaviour management;
- Review its risk assessments;
- Set clear boundaries and expectations if a convicted or cautioned perpetrator remains in the School;
- Consider the need for ongoing support for those involved and where necessary protect them from the risk of bullying or harassment, whether online or offline, because of their involvement, and
- Consider the need for any disciplinary action in the event of deliberately invented or malicious allegations.

# NEED HELP?

OR SOMETHING ON YOUR  
**MIND?**



**WE ARE HERE FOR YOU**



## WORRIES ABOUT BOARDING?

Why not talk to your Matron, Housemaster, Duty Tutor or Student Head of House?

## WORRIES IN THE CLASSROOM?



Why not talk to your Teacher, Academic Tutor, Head of Year or a Learning Support Assistant?



## BUT REMEMBER, FOR ANY ISSUE, ANY TIME...

You can always talk to:

- Any Member of the Safeguarding Team: Mr Kay, Mr Kilbride, Mr Adey, Miss Hunt or Mrs Mullen
- The Med Centre staff
- The School Counsellor, Mrs Lovering, who is contactable via the Med Centre
- Mrs Pattinson, Mental Health Lead
- ANY MEMBER OF STAFF

And don't forget you can always 'CALL IT OUT' ( [callitout@oshsch.com](mailto:callitout@oshsch.com) )

## FOR HELP OUTSIDE OF SCHOOL:

**Our Independent Listener** is Rev'd John Flitcroft, Rector of St Mary's, Old Swinford

 01384 395410, or by email at [theoshlistener@gmail.com](mailto:theoshlistener@gmail.com)

**Kooth** - Free, safe and anonymous online counselling and support at [www.kooth.com](http://www.kooth.com)

**Here4Youth** - A young people's wellbeing service. A safe space to make positive changes around healthy lifestyles, emotional health & wellbeing and drugs & alcohol.

 01384 241440, [www.here4youth.org.uk](http://www.here4youth.org.uk) or email [here4YOUth@cranstoun.org.uk](mailto:here4YOUth@cranstoun.org.uk) and also available on Facebook (@Here4YOUthDudley) and twitter (@Here4YOUth)

**Help at Hand** - If you're in care, leaving care, living away from home or working with social services, Help at Hand can give you free, impartial help and advice.

 0800 528 0731 or by email at [help.team@childrenscommissioner.gov.uk](mailto:help.team@childrenscommissioner.gov.uk)

**CHILDLINE** – is open 24/7

 0800 1111 will get you through to a counsellor. Alternatively you can have a 1-2-1 counsellor chat online or email them via [www.childline.org.uk](http://www.childline.org.uk)

For details of other help available in your area visit [www.hubofhope.co.uk](http://www.hubofhope.co.uk)

**Want to start the conversation?**  
Email [safeguarding@oshsch.com](mailto:safeguarding@oshsch.com)

# Responding to safeguarding allegations or suspicions about a member of staff who may pose a risk of harm to children

## 1. Our approach

The School aims to promote an open and transparent culture, in which all concerns, whether they meet the harm threshold or not, about all adults working in or on behalf of the school are shared responsibly and with the right person, recorded and dealt with promptly and appropriately. In this way we can identify inappropriate, problematic or concerning behaviour early, minimise the risk of abuse, and ensure that adults working in or on behalf of the school are clear about professional boundaries and act within these boundaries, and in accordance with our ethos and values.

As with any other instance of abuse we have a zero-tolerance approach to any form it may take, ensuring that all members of the school community, staff and students alike, are clear that this is our approach. The School's policies and procedures both for guarding against this type of abuse happening, and our procedures for managing allegations, are set out below. They form an integral part of our whole school approach to safeguarding and promoting the welfare of children.

It will be achieved by:

- Creating a culture of mutual respect amongst all members of the School community;
- Adopting strong safer recruiter practices;
- Providing all staff training in safeguarding and child protection with regular reminders and updates;
- Training more staff to a higher level to provide wider oversight across the school and in boarding;
- Teaching students about behaviour that is acceptable and unacceptable, how they can report it and encouraging them to be confident to do this;
- Ensuring that all staff and members of this school community understand their responsibilities under safeguarding legislation and statutory guidance, can recognise the indicators and are alert to the signs of child on child abuse, and know to how to respond and to refer concerns to the DSL;
- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others;
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage;
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised, and
- Applying our whole school approach to safeguarding, behaviour and equality.

## 2. Allegations or suspicions

Allegations and concerns fall into two broad categories - those concerns or allegations that reach the 'harm threshold' and those that do not. The latter are more generally referred to as low level concerns.

### Concerns or allegations that reach the 'harm threshold'

8.4. These are concerns or an allegation that any person, who works with children, in connection with their employment, voluntary or personal activity, has:

- Behaved in a way that has harmed a child, or may have harmed a child
- Possibly committed a criminal offence against, or related to a child
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to

children

- Behaved or may have behaved (either in or outside of school) in a way that indicates they may not be suitable to work with children.<sup>44</sup>

8.5. These behaviours will be considered within the context of the four categories of abuse (i.e. physical, sexual and emotional abuse and neglect)<sup>45</sup> and following assessment of any transferable risk. This includes concerns relating to inappropriate relationships between members of staff and children, for example:

- Having a sexual relationship with a child under 18 if in a position of trust in respect of that child, even if consensual (s16-19 Sexual Offences Act 2003).
- 'Grooming', such as meeting a child under 16 with intent to commit a relevant offence (s15 Sexual Offences Act 2003).
- Other 'grooming' behaviour giving rise to concerns of a broader child protection nature (such as inappropriate text/e-mail messages or images, gifts, socializing etc.).
- Possession of indecent photographs of children/pseudo-photographs of children.

### **Concerns or allegations of low level concerns**

8.6. Low level concerns are those that do not meet the harm threshold. The term 'low level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold as set out above but is a concern, no matter how small, that an adult working in or on behalf of the school may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, but
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

8.7. Examples of such behaviour could include, but are not limited to:

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Humiliating students

8.8. Overlooking minor infringements or bending the rules is just one example of how inappropriate behaviours can become normalised, resetting the expected standards. These behaviours should be challenged before they become embedded and 'accepted'. Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse. Whatever it is, the School will be responsive and consider the concern and the context of the behaviour, proportionally, sensitively and without delay.

## **9. What to look out for and our response**

9.1. All staff will adhere to the Guidance for safer working practice for those working with children and young people in educational settings which provides simple, detailed and practical advice to support schools and their staff in their safeguarding responsibilities by highlighting awareness of illegal, unsafe, unprofessional and unwise behaviour and assisting them to monitor their own standards and practice and reduce the risk of concerns or allegations being raised about them. However there may be occasions when staff have a safeguarding concern or raise an allegation about another member

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<sup>44</sup> Behaviour outside of school is known as transferable risk

<sup>45</sup> For more information on these categories see Appendix A

of staff harming or posing a risk of harm to children and they have a responsibility to act on their concerns, whether they are concerns that would reach the harm threshold or are lower level concerns, by reporting these to the appropriate officer or the appropriate authorities.

9.2. All safeguarding concerns or allegations, no matter how small, will be managed and responded to appropriately. Any concern or allegation of abuse, whoever they are reported by, will be taken seriously and treated in accordance with DSPPB procedures.

### 9.3. **Concerns about suspected abuse:**

- Any suspicion that a child has been abused by either a member of staff, volunteer or contractor must be reported to the DSL who will take such steps as considered necessary to ensure the safety of the child in question and any other child who may be at risk.
- In the first instance safeguarding concerns or allegations should be discussed with and referred to the LADO in accordance with both Working Together to Safeguard Children (2018) and the DSPPB procedures. The SPA Team may involve the Police. Consideration will be given to:
  - Looking after the welfare of the child, ensuring the child is not at risk, and
  - Agreeing a course of action for the investigation of the concern or allegation and supporting the person subject to the concern or allegation.
- The LADO's role in these is not to investigate the concern or allegation but to provide advice and guidance to schools when considering concerns and allegations about adults working with children to ensure that an appropriate investigation is carried out, whether that is by the police, LA children's social care, the school, or a combination of these.
- The parents/carers of the child will be contacted as soon as possible following advice from the SPA Team.
- Advice should be sought, from the SPA team where the child lives, on who should approach the alleged abuser (or parents/carers if the alleged abuser is a child).
- The School will provide effective support for any member of staff or volunteer facing a safeguarding concern or an allegation and provide them with a named contact if they are suspended. The process will be expedited thoroughly and as quickly as possible, and in a fair and consistent way that provides effective protection for the child but at the same time supports the person who is the subject of the concern or allegation.
- Where the concern is about agency staff or contractors, the DSL will raise the matter with the employer as well as the LADO to ensure that the allegations are properly dealt with. It is likely the School will still take the lead in any investigation because agencies do not have direct access to children or other school staff, so they will not be able to collect the facts when an allegation is made, nor do they have all the relevant information required by the LADO as part of the referral process.
- If the DSL is the subject of the suspicion/allegation, the concern must be shared with the Chair of Governors who will liaise with the Headmaster for managing allegations.
- Safeguarding concerns or allegations made about the DSL will be managed by the Headmaster and safeguarding concerns or allegations against the Headmaster will be managed by the Chair of Governors.
- If the School removes a member of staff or volunteer from work in regulated activity with children, or would have, had the person not left first, because the person poses a risk of harm to children, the School must make a referral to the DBS.
- Where a safeguarding concern or allegation is substantiated and the individual is dismissed or resigns, the School will consider referring the matter to the TRA for consideration for a prohibition order.
- Safeguarding concerns or allegations about a teacher who is no longer teaching will be referred to the police, as will historical allegations of abuse.

- As part of the closure of any investigation into a safeguarding concern or allegation, whether the concern or allegation was substantiated or not, the School will consider whether there may be lessons to be learned or, after any cases where allegations are substantiated, the School will review the circumstances of the case with the LADO to determine whether improvements could be made to the School's procedures or practice to help prevent similar events in the future.

#### 9.4. **Low level concerns**

- Any suspicion of low level concerns must be reported to the DSL who will, where required, take such steps as considered necessary to ensure the safety of the child in question and any other child who may be at risk.
- The DSL will keep the Headmaster informed of any low level concerns reported.
- Depending upon the findings of the review, the DSL may need to instigate the DSPPB procedures and refer the allegation as appropriate and outlined above.
- If after reviewing the allegation it is found to be clearly about poor practice of another member of staff, the Headmaster will deal with it as appropriate, for example, it may be a misconduct issue.
- Where the concern is about agency staff or contractors, the Headmaster will also raise the matter with the employer.
- Low level concerns will be recorded and monitored so that any patterns of concerning behaviour emerging can be recognised and appropriate action taken.

#### 9.5. **Concerns about the response**

- You should always follow up your concerns if you are not satisfied with the response or the student's situation does not seem to improve.

#### 9.6. **Concerns about poor practice**

- Any suspicion of poor practice must be reported to the DSL who will, where required, take such steps as considered necessary to ensure the safety of the child in question and any other child who may be at risk.
- If after review the allegation is clearly about poor practice of another member of staff, the Headmaster will deal with it as appropriate, for example, it may be a misconduct issue.
- If the allegation is about poor practice by the DSL, or if the matter has been handled inadequately and concerns remain, it should be reported to the Headmaster who will decide on whether disciplinary action should be taken and the next steps to take. If the Headmaster is the DSL referral will be to the Chair of Governors.
- If the concern is with regards to the Headmaster, it will be referred to the Chair of Governors.
- If a staff member feels unable to raise an issue internally they should use the channels open to them in the School's Whistleblowing Policy.

#### 9.7. **Internal Enquiries and Suspension**

- Suspension is not automatic in all cases. The Headmaster will liaise with the Chair of Governors and make an immediate decision about whether any individual accused of abuse should be temporarily suspended pending further Police and social care inquiries. Advice can also be sought from the LADO. Where the individual is the Headmaster, the Chair of Governors will seek advice from the LADO in making the decision.
- Irrespective of the findings of the SPA team or Police inquiries the Headmaster/Chair of Governors will assess all individual cases to decide whether an individual can be reinstated and, if so, how this can be sensitively handled. This may be a difficult decision, particularly where there is insufficient evidence to uphold any action by the Police. In such cases, the Chair of Governors and Headmaster must reach a decision based upon the available information which could suggest that on a balance of probability it is more likely than not that the allegation is

true. The welfare and the best interests of students should remain of paramount importance throughout.

9.8. The School will consider the need for any disciplinary action in the event of deliberately invented or malicious allegations.

## Appendix F

### Safer recruitment – our approach

Effective recruitment and selection are essential to the successful functioning of the School and this must be achieved within the context of our responsibility for creating a culture of safe recruitment and adopting safe recruitment procedures that help deter, reject or identify people who might abuse children so that children can have a quality education in a safe environment.

To do this we adopt a consistent approach to our recruitment and selection practices that are applied to all candidates irrespective of the role they are applying for and whether that role is paid or voluntary.

Our safer recruitment practices include:

- Stating our commitment to safeguarding and of the intent to undertake a DBS check in advertisements for employment and volunteering.
- Ensuring every job description makes reference to the responsibility for safeguarding and promoting the welfare of children and the person specification making specific reference to suitability to work with children.
- Where a role involves engaging in regulated activity relevant to children<sup>46</sup>, ensuring applicants are aware that it is an offence to apply for the role if they are barred from engaging in such activity relevant to children and seeking confirmation that the applicant is not barred.
- Providing a copy, or a link to a copy, of this Policy and the School's Safeguarding Policy and practices and the policy on employment of ex-offenders in the application pack. All applicants are required to complete the School's online application form; no substitutes are accepted.
- Obtaining, from shortlisted candidates, a signed self-declaration of their criminal record or information that would make them unsuitable to work with children including if they:
  - Have a criminal history;
  - Are included on the children's barred list;
  - Are prohibited from teaching;
  - Are prohibited from taking part in the management of an independent school;
  - Are known to the police and children's services, or
  - Have been disqualified from providing childcare,and:
  - Information about any criminal offences committed in any country in line with the law as applicable in England and Wales, not the law in their country of origin or where they were convicted, and
  - Any relevant overseas information.
- Depending on the number of applicants there may be both a long listing and a short listing exercise. In all cases at least two persons will draw up the list and at least one of these persons will be Safer Recruiter trained.
- At least two persons will carry out any interviews and at least one of member of the interview panel will be Safer Recruitment trained.
  - Carrying out an online search of publicly available information, as part of due diligence on the shortlisted candidates and which may be discussed at interview where relevant to the

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<sup>46</sup> In summary, a person will be engaging in regulated activity with children if, as a result of their work, they:

- will be responsible, on a regular basis in a school or college, for teaching, training instructing, caring for or supervising children;
- will be working on a regular basis in a specified establishment, such as a school, for or in connection with the purposes of the establishment, where the work gives opportunity for contact with children; or
- engage in intimate or personal care or healthcare or any overnight activity, even if this happens only once.

application.

- Asking at least one safeguarding question in the interview that explores the candidate's suitability to work with children as well as their suitability for the post. This may be explored further in the interview where it is relevant to the position.
- Obtaining, scrutinising and vetting comprehensive information sourced directly from candidates or online sources carefully to ensure they originate from a credible source and taking up and satisfactorily resolving any discrepancies or anomalies.
- Obtaining independent professional and character references before interview, where possible, to allow concerns raised to be explored further with the referee and taken up with the candidate at interview.
- Obtaining references directly from a senior person (not a colleague) with appropriate authority at the place of current employment, or last relevant place of employment if not currently working, and which are not open testimonials. They must include the answer to specific questions to help assess an applicant's suitability to work with children. Any concerns will be followed up. Where current employment is not with children, obtaining a reference from the place they last worked with children if they previously did so. Satisfactory references must be obtained before any post is confirmed.
- Checking previous employment history and experience and exploring any gaps in employment at the interview and verifying this independently if required.
- Establishing the reason for leaving their current or most recent post.
- Recording all information used in decision making as well as the decisions made.
- Carrying out pre-employment checks including:
  - Verifying interviewed applicants' identity and their right to work in the UK.
  - Obtaining an enhanced Disclosure and Barring Service (DBS) check for all staff, trainee and volunteer appointments, with children's barred list information where appropriate.
  - Obtaining a separate children's barred list check if the individual will commence regulated activity before the DBS certificate is available.
  - Verifying the candidate's mental and physical fitness to carry out the work and meet their responsibilities.
  - Further checks on people who have lived or worked outside the UK.
  - Verifying that interviewed applicants' have the academic or vocational qualifications claimed and, for teachers, checking on the Teacher Services' system to confirm Qualified Teacher Status (QTS) and the completion of teacher induction or probation.
  - Completing the prohibition of teaching checks for anyone engaged in 'teaching work' whether a qualified teacher or not and ensuring no person managing the school in governance is subject to a section 128 direction prohibiting them from holding office.
  - Any electronic declarations must be signed for at interview.
- Obtaining written notification from any agency, training agency or third-party organisation that it has carried out the necessary safer recruitment checks that the School would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.
- Applying the same recruitment measures that apply for paid staff to those who are self-employed and working for the School or volunteer on a regular basis.
- All Governors are required to have an enhanced DBS.
- The School has procedures in place for assessing the reason/value of visits by individuals/groups to the site and for the supervision of visitors and contractors, using professional judgment when considering safeguarding risks in making arrangements for events

and larger groups of visitors to the School.

All concerns must be satisfactorily resolved before the appointment is confirmed.

If the School knows or has reason to believe that an individual is barred it will make the appropriate referrals.

If an individual moves from a position within the school that did not involve the provision of education and or boarding to one that does, they will be treated as if they were a new member of staff and all required pre-appointment checks, including the obtaining of updated references, will be carried out. Internal candidates who already work with children will be similarly treated but require only one additional reference, which cannot come from a member of the interview panel. The School may use its existing DBS check or children's barred list check for staff moving internally.

A person who is dismissed, removed or resigns due to safeguarding concerns, or would have been had they not resigned, will be referred to the DBS and, where appropriate, to the Teaching Regulation Agency (TRA).

A complete, accurate and up-to-date Single Central Record will be maintained.

It is extremely important that we foster a positive and open safeguarding culture and an environment in which staff feel comfortable to discuss matters and to question and challenge behaviours and where appropriate raise their concerns which may have implications for the safeguarding of children. The School has a full suite of employment practices and policies in place which provide detail on how employment and volunteering is checked and managed.

# APPENDIX G

## The Prevent Duty<sup>47</sup>

The Counter-Terrorism and Security Act 2015 puts a responsibility on schools to participate in work to prevent people from being drawn into terrorism and to challenge extremist ideas that support or are shared by terrorist groups.

Preventing extremism and radicalisation is one element within our whole school approach to safeguarding and promoting the welfare of our students.

### 1. Preventing Extremism<sup>48</sup> and Radicalisation<sup>49</sup>

- 1.1. The School will teach a broad and balanced curriculum which promotes strong spiritual, moral and cultural development of its students and informs and prepares them for the opportunities, responsibilities and experiences of life.
- 1.2. The School's extra and co-curricular activities will build upon the spiritual, moral and cultural values developed within the curriculum.
- 1.3. The issues of terrorism,<sup>50</sup> extremism and the wider use of violence should not be hidden from students rather they should be provided with information which is sufficient and balanced to enable them to:
  - Explore and be able to understand the wider world and the differences within communities and ideologies within it;
  - Develop strong values, which they can use to make informed decisions;
  - Be able to assess and make judgements on how individual or community ideologies might impact upon life in society;
  - Allow time to explore sensitive and controversial issues and provide a safe environment for debate;
  - Develop resilience and the knowledge and skills to understand and manage potentially difficult situations, recognise risk, make safe choices and recognise where pressure from others threatens their personal safety and wellbeing, and
  - Come to an understanding of the place for moderation and democratic processes in politics and conflict resolution.
- 1.4. All staff should be aware of the Prevent strategy and appropriate training should be given both in relation to the issues and in identifying concerns.

### 2. The risk of students being drawn into terrorism

- 2.1. One of the notable features of this School is that it has a multicultural student body. Its students are made up of a variety of nationalities, ethnic backgrounds and of all faiths and none. A multicultural community is a healthy and valuable asset in developing greater understanding between its students. Our School's ethos strongly promotes respect, the understanding of differences, the place for moderation and tolerance of others. It is a strength we will draw on in building understanding and values in students so that they can be prepared to challenge prejudices and extremist ideologies whilst developing strength of character to defend their views and resist extremism.

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<sup>47</sup> Revised *Prevent* Duty Guidance: for England and Wales (July 2015) and The Prevent Duty: Departmental advice for schools and childcare providers (June 2015)

<sup>48</sup> 'Extremism' is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. It also includes calling for the death of members of our armed forces.

<sup>49</sup> 'Radicalisation' refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

<sup>50</sup> 'Terrorism' is an action that endangers or causes serious violence to a person/people, causes serious damage to property or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

- 2.2. As part of the broader requirements relating to the quality of education and to promoting the spiritual, moral and cultural development of its students the School will promote the fundamental British values of:
- Democracy
  - Mutual respect
  - The rule of law
  - Tolerance of those of different faiths and beliefs
- 2.3. The School's policies on Behaviour<sup>51</sup> and Equality and Diversity are built on the fundamental principles of respect and tolerance. They are clear that discrimination, harassment or bullying behaviour in any form is unacceptable and accordingly the School will not tolerate any student or student group seeking to influence others within the community in any way which may be contrary to fundamental British values.
- 2.4. The School's Code of Conduct for staff requires all staff, including volunteers, to always act in a manner which safeguards and promotes the physical, emotional and moral welfare of students and to show exemplary standards of professionalism and propriety in their work. They should take every opportunity to reinforce the School's fundamental principles and British values and to model them in what they say and do.
- 2.5. Any prejudice, discrimination or extremist views, including derogatory language, displayed by students or staff should always be challenged. Positively promoting fundamental values, within and alongside the curriculum, will enable us reduce as far as possible the risks of violent and non-violent extremism.
- 2.6. The School's Code of Conduct for staff also requires proper supervision of visitors and their access to students.

### **3. Awareness**

- 3.1. Children may be susceptible to extremist ideology and radicalisation. Although there is no single way of identifying an individual who is likely to be susceptible to terrorist ideology, there are possible indicators that should be taken into consideration alongside other factors and contexts. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home) but as a boarding school staff will spend a significant amount of time with students both in and out of the classroom and they should be observant and listen well.
- 3.2. Radicalisation in children can happen over a long period of time. In some cases it is triggered by a specific incident or news item and can happen much quicker. Sometimes there are clear warning signs of radicalisation, in other cases the changes are less obvious.
- 3.3. As with managing all safeguarding risks staff should be alert, for example, to unexplained changes in behaviour or outward appearance that may suggest a new social, political or religious influence, the appearance of ideological extreme literature, students using closed network groups, peer/social/family or faith group pressure or rejection, developing different patterns of travel and wider travel and for extended periods, social isolation from peers, or students using language or voicing opinions based on extremist ideologies or unusual groupings or gatherings of students.

Outwardly, children may:

- Become increasingly argumentative and refuse to listen to different points of view;
- Be unwilling to engage with students who are different or become abusive to them;
- Feel persecuted;
- Embrace conspiracy theories, converting to a new religion or become sympathetic to extremist ideologies and groups;

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<sup>51</sup> Which includes the School's Rules, Code of Conduct for Students, Anti-Bullying Policy and Guidance on the Use of Electrical and Electronic Equipment & Internet Guidance

- Change friends and appearance and distancing themselves from old friends, and/or
- No longer do things they used to enjoy and be secretive and reluctant to discuss their whereabouts.

They may also spend more time online or on the telephone, have more than one online identity, accessing extremist online content or join/try join an extremist organisation

Any concerns should be reported to the DSL.

- 3.4. The School's IT department will routinely monitor student access to the internet through the School's network and have the absolute right to remove access from any user who is, or appears to be, abusing access rights for whatever reason and this will therefore include access to sites promoting extremism. Any such activity should be reported to the DSL.
- 3.5. Staff should be particularly aware that the School is unable to monitor students' use of their own internet provision but need to be alert for possible abuse of this and including any information brought into the School from outside on students' own electronic devices.
- 3.6. The School must encourage parents to look for similar undesirable traits in their children when they are not in school.

#### **4. Information sharing & working with others**

- 4.1. Information sharing is essential for the effective safeguarding and promoting the welfare of children; it is vital in identifying and tackling all forms of abuse and neither data protection regulation or human rights law prevents or limits the sharing of information when it is shared for the purposes of keeping children safe but they do provide a framework to ensure that personal information about living individuals is shared appropriately and section 14 in the main body of this Policy refers.
- 4.2. The DSL will be alert to reports from other schools, authorities or agencies of issues affecting students in other schools or in the locality. The DSL will make other staff aware of these reports so that they might better monitor the welfare of the students in this school.
- 4.3. Where a student is leaving the School, the DSL will consider whether it is appropriate to share any information with the student's new provider that would allow the new provider to continue supporting those who are currently receiving support through the Channel' programme.
- 4.4. Where a student is participating in the voluntary 'Channel' programme, the DSL will contribute to the Channel panel where required.
- 4.5. The DSL will make Prevent referrals, liaising with the relevant agencies.
- 4.6. The School will assure all staff that it will fully support and protect anyone who, in good faith, reports their concern that a colleague or student is being drawn into extremism.

#### **5. What to do if you have a concern**

- 5.1. As a safeguarding concern the procedures set out in Appendix B apply.
- 5.2. The DSL will act in accordance with the School's safeguarding arrangements and this includes, where appropriate, contacting the Police or other relevant agencies and including Prevent referrals.

#### **6. Further information**

The Government, in conjunction with the DfE and the Home Office have developed the website 'Educate Against Hate' to support and equip school leaders, teachers, and parents with information, tools and resources (including on the promotion of fundamental British values) to help recognise and address extremism and radicalisation in young people. It can be accessed from the following link:

[Educate Against Hate](#)

The DfE has published advice for schools which is intended to complement the Prevent guidance and signposts other sources of advice and support. It can be accessed from: [Prevent duty](#)

The Home office has also developed e-learning modules focussing on an introduction to the Prevent duty and supporting staff in making referrals or contributing to a multi-agency Channel panel.

[Prevent awareness e-learning](#)

[Prevent referrals e-learning](#)

[Channel awareness e-learning](#)

The [ETF Online Learning environment](#) provides online training modules for practitioners, leaders and managers, support staff and governors/Board members outlining their roles and responsibilities under the duty

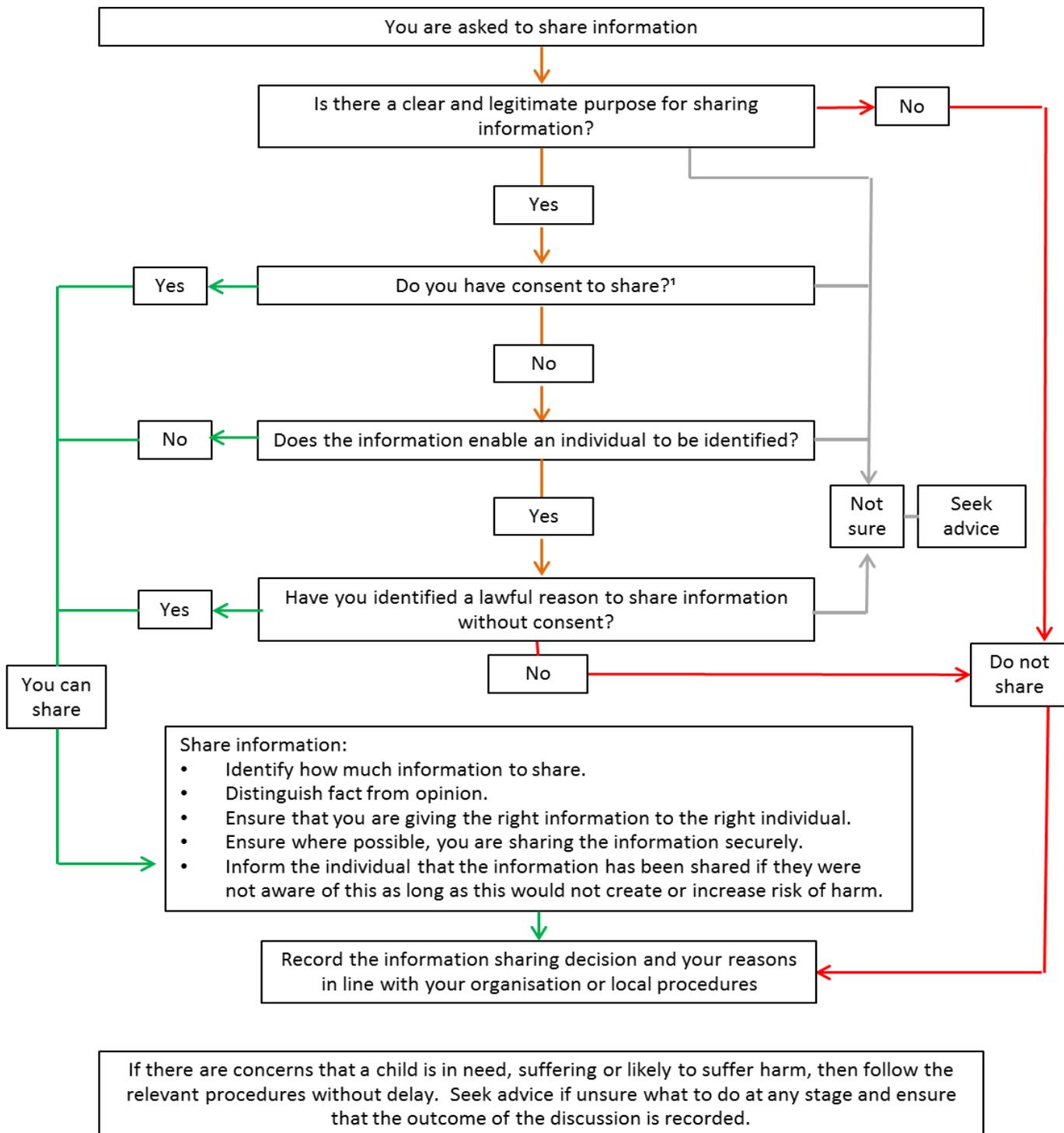
London Grid for Learning have also produced useful resources on Prevent: [Online Safety Resource Centre - London Grid for Learning \(lgfl.net\)](#).

# APPENDIX H

## When and how to share information

When asked to share information, consider the following line of questioning to help decide if, and when, to share and, if the decision is taken to share, consider how best to share effectively.

### Flowchart of when and how to share information



### If in doubt seek guidance from the DSL or DPO

DSL – Clive Kay

01384 815019 or 07900 161569

[ckay@oshsch.com](mailto:ckay@oshsch.com)

DPO – Paul Kilbride

01384 817375 or 07703 785 721

[headmaster@oshsch.com](mailto:headmaster@oshsch.com)

# Commitment to Care Charter

**BSA schools are committed to the highest duty of care and safeguarding**

Keeping boarders safe, secure and cared for are the main priorities for members.

**Everyone working in a BSA school will raise any concerns immediately**

'Everyone' includes all full or part-time staff, volunteers, governors and contractors. It also means pupils, such as prefects in boarding houses. 'Immediately' is without hesitation or delay, and 'abuse' is any suspicion, belief or evidence of abuse by an adult against a pupil or by a pupil against another pupil.

**BSA schools will follow all statutory safeguarding guidance and laws and report concerns to the relevant authority and the BSA**

Follow all 'safeguarding guidance and laws' means that all policies and procedures, including a school's guidelines for reporting, must comply with any applicable rules and expectations<sup>1</sup>, and in relation to any requirement to report to the police where necessary. 'Report concerns to the relevant authority' means to follow those guidelines and, if an unsatisfactory response is received, to escalate the concern. Report 'to the BSA' means to inform the BSA that a referral has been made, but without disclosing any details by which a case or an individual can be identified.

**BSA schools will support any present pupils affected by abuse and those who report concerns, and offer support to past pupils**

'Support' means to provide open, honest communication, provide counselling or similar services or referral to them. 'Offer of support' means referral to other organisations (e.g. the police for past pupils), counselling or similar services. Support will be given if there is no conflict of interest or legal restriction.

**BSA will support member schools which responsibly follow the Charter**

The BSA will support member schools to help them to follow the Charter. Member schools are expected to endorse the Charter clearly and strongly. The Safeguarding Governor is expected to have a clear oversight of safeguarding procedures and practice. BSA will review any instances where the Charter has not been responsibly followed (especially where cases and allegations have not been reported to the BSA as soon as it is permissible to do so) and consider any appropriate action.

<sup>1</sup>For member schools in England and Wales, this includes, but is not limited to, statutory guidance set out in Keeping Children Safe in Education (as updated from time to time). In other UK regions and overseas, this includes any relevant guidance or legislation.