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## Safeguarding Children Policy

This Policy is applicable to all pupils, including adult pupils and those in EYFS.

The Governing Body of Denstone College understands its regulatory responsibilities and will maintain an effective oversight of this policy, by evaluating its effectiveness, and reviewing and implementing change.

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## Aims and Principles

Denstone College fully recognises its legal duty under section 157 Education Act 2002 and the 1989 Children Act and takes seriously its responsibilities to protect and safeguard the interests and welfare of all children. The school recognises that effective safeguarding requires sound procedures, good inter-agency co-operation and a workforce that is competent and confident in responding to child protection situations. Safeguarding and promoting the welfare of children is everyone's responsibility. Children includes everyone under the age of 18. The school has a culture of safety, equality and protection, listening to children and that enables issues about safeguarding and welfare to be addressed.

We all have a statutory duty to safeguard and promote the welfare of children and to maintain a professional attitude of *it could happen here* where safeguarding is concerned.

Everyone has a responsibility to **act without delay** to protect children by reporting anything that might suggest a child is being abused or neglected. It is our willingness to work safely and challenge inappropriate behaviours, that underpins this commitment. We work in partnership with families and other agencies to improve the outcomes for children who are vulnerable or in need.

We have a culture of vigilance and staff are confident and competent in the timely challenge of unacceptable behaviours and these are dealt with appropriately and robustly

This policy provides the basis for good practice within the school for Child Protection work. It should be read in conjunction with and Staffordshire Safeguarding Children Board (SSCB) Inter-Agency Child Protection Policies and Procedures, *Keeping Children Safe in Education 2025*, *Working Together to Safeguard Children 2023*, *What to do if you are worried a child is being abused March 2015*, *Prevent Duty Guidance: for England and Wales (2023)*, *The use of social media for on-line radicalisation ( July 2015)*, *Information sharing (2018)* and the *Data Protection Act 2018*. These are in keeping with relevant national procedures and reflect what Staffordshire Safeguarding Children's Board considers to be safe and professional practice in this context. Child Protection has to be considered within the context of Every Child Matters, taking account of the need for children "being healthy and staying safe" and within professionals' wider safeguarding responsibilities that include a duty to co-operate, under the Children Act 2004.

The aim is to follow the procedures set out by Staffordshire Safeguarding Children's Board, *Working Together to Safeguard Children 2023*, and *Keeping Children Safe in Education 2025* by:

- Knowing that safeguarding and promoting the welfare of children is everyone's responsibility, and the voice of the child is evident, the child's wishes and feelings are taken into account when determining what action to take. This means at all times we will consider, what is in the best interests of the child
- Everyone who comes into contact with children and their families has a role to play.
- Everyone must ensure that their approach is child-centred considering, at all times, what is in the best interests of the child.
- By establishing a safe environment, we enable our children to learn and develop within an ethos of openness.
- No single practitioner can have the full picture of a child's needs and circumstances.
- If children and families are to receive the right help at the right time, everyone who comes into contact with children and their families has a role to play in identifying concerns, sharing information and taking prompt action.
- Providing help and support to meet the needs of children as soon as problems emerge

- Protecting children and young people at our school from maltreatment, whether that is within or outside the family home, including online.
- Establishing a safe environment in which our children can learn and develop within an ethos of openness
- Preventing impairment of our children and young people's mental and physical health or development
- Ensuring young people at our school grow up in circumstances consistent with the provisions of safe and effective care.
- Offering children, a balanced curriculum including PHSE, healthy relationship education, online safety, sexting
- Offering children and young people balanced curriculum through online activities, enabling them to enhance their safeguarding skills and knowledge whilst understanding the risks.
- Understanding that no single professional can have the full picture of a child's needs and circumstances. Everyone who comes into contact with children and their family has a role to play in identifying concerns, sharing information and taking prompt action.
- Undertaking the role so as to enable children and young people at Denstone have the best outcomes, knowing that their concerns will be treated seriously and knowing they can safely express their views and give feedback.
- Ensuring as a school we have a clear understanding of our staff's knowledge and understanding and embedding safeguarding through clear systems of communication and Continuous Professional Development (CPD) so that safeguarding is a robust element of our school

Staffordshire Safeguarding Children Board (SSCB) is the key decision-making forum and will consist of:

- Staffordshire Police represented by an Assistant Chief Constable
- Staffordshire Integrated Care systems represented by the Executive Director of Nursing and Quality
- Staffordshire County Council represented by the Director for Families and Communities

Invitations will be extended to Partners to present reports and to other guests, as and when required, to present information which is relevant to the Annual Business Plan and priorities and in keeping with children safe in Staffordshire. The chairing of the meeting will rotate every six months between the statutory Safeguarding Partners (Police, Clinical Commissioning Group and the Local Authority) . The board will meet on a quarterly basis with support provided by the Children's Safeguarding Board Team (or as required should the need arise) The three safeguarding partners should make arrangements to allow the school to be fully engaged, involved and included in safeguarding arrangements. It is expected that, locally, the three safeguarding partners will name the school as relevant agencies and will reach their own conclusions on the best way to achieve the active engagement with individual institutions in a meaningful way.

These procedures aim to provide a framework which ensures that all practice in the area of child protection is consistent with stated values and procedures that underpin all work with children and young people. Education staff have a crucial role to play in helping identify welfare concerns, and indicators of possible abuse or neglect at an early stage.

In order to fulfil this responsibility effectively, all professionals should make sure their approach is child centred. This means that they should consider, at all times, what is in the best interests of the child. No single professional can have a full picture of a child's needs and circumstances. If children

and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

They should refer those concerns to the appropriate organisation, normally the Local Authority children's social care, contributing to the assessment of a child's needs and where appropriate to ongoing action to meet those needs. *Working Together to Safeguard Children 2023*.

The school aims to ensure that staff have the skills, knowledge and understanding necessary to keep children safe, including those who are looked after by a local authority. All staff have responsibility to provide a safe environment in which children can learn. This includes ensuring that all staff are in a position to identify concerns early, provide help for children, and prevent concerns from escalating as well as having the information they need about the child's status, contact arrangements with parents, care arrangements and delegated authority to carers.

### **Underpinning Values**

Where there is a safeguarding issue, the school will work in accordance with the principles outlined in the Staffordshire Safeguarding Children Board (SSCB) Inter-agency Child Protection procedures:

- A child's welfare is paramount. Each child has a right to be protected from harm and exploitation and to have their welfare safeguarded. Staff are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the best interests of the child.
- Each child is unique. Action taken by child welfare organisations should be child-centred, taking account of a child's cultural, ethnic and religious background, their gender, their sexual orientation, their individual ability and any special needs.
- Children, parents and other carers should be made aware of their responsibilities and their rights, together with advice about the power of professionals to intervene in their family circumstances.
- Each child has a right to be consulted about actions taken by others on his/her behalf. The concerns of children and their families should be listened to and due consideration given to their understanding, wishes and feelings. However, it may not always be possible to respect a child/carer's request for confidentiality. If a child may be at risk of significant harm, there is a duty on the school to share information with children's social care. This should be explained to the child and appropriate reassurance given when the child has expressly asked for confidentiality in these circumstances. Parental consent is not required for a referral to statutory agencies where there is a concern regarding a child's safety.
- Individual family members must be involved in decisions affecting them. They must be treated with courtesy and respect and with due regard given to working with them in a spirit of partnership in safeguarding children's welfare. The welfare of the child is paramount in such situations.
- Open-mindedness and honesty must guide each stage of assessment and of operational practice. The strengths of individual family members, as well as their needs, should be given due consideration.
- Personal information is confidential. It should only be shared with the permission of the individual concerned, or unless the disclosure of confidential personal information is necessary in order to protect a child. In all circumstances, information must be confined to those people directly involved in the professional network of each individual child and on a strict need to know basis.
- Professionals should be aware of the effects of outside intervention upon children, upon family life and the impact and implications of what they say and do.
- Explanations by professionals to children, their families and other carers should be plainly stated and jargon-free. Unavoidable technical and professional terminology should be explained in simple terms.

- Sound professional practice is based upon positive inter-agency collaboration, evidence-based research and effective supervision and evaluation.
- Early intervention in providing support services utilising the Common Assessment Framework Process and if necessary, an assessment under Section 17 of the Children Act (1989) this is an important principle of practice in inter-agency arrangements for safeguarding the welfare of children.

### **Commitment**

The school is committed to the importance of safeguarding and promoting children's welfare. The Head

ensures that the policies and procedures, adopted by their governing bodies (particularly those concerning referrals of cases of suspected abuse and neglect), are understood, and followed by all staff and takes responsibility for monitoring the actions of Denstone staff to safeguard and promote the welfare of children, ensuring that all pupils are listened to appropriately and that appropriate action is taken regarding any concerns expressed about their welfare.

The school recognises the importance of children receiving the right help at the right time to address risks and prevent issues escalating, the importance of acting on and referring the early signs of abuse and neglect, keeping clear records, listening to views of the child, reassessing concerns when situations do not improve, sharing information quickly and challenging inaction. All staff should be aware of the early help process and understand their role in it. This includes identifying emerging problems, liaising with the Safeguarding Team, sharing information with other professionals to support early identification and assessment. It is recognised that pupils require high self-esteem, confidence, supportive friends and clear lines of communication with trusted adults.

Denstone College will therefore:

- Maintain an ethos where pupils feel secure, are encouraged to talk and are heard and are educated about safeguarding.
- Ensure that pupils are aware they can approach any member of staff if they have concerns or are in difficulties and that staff will listen.
- Ensure that pupils are aware of who the Safeguarding Team are, as well as other key staff who are there to listen and offer early help, including their teachers, Head of Prep, Head of Pre-Prep medical centre, school counsellor, tutors, Heads of House, Heads of School/Moss Moor, Assistant Head Wellbeing & Partnerships), Deputy Head (Pupils), Deputy Head (Pastoral), Chaplain, or any member of School staff. In particular the medical centre is available for pupils to drop in to discuss issues, the school counsellor also has regular drop in sessions.
- Include in the PSHE programme the knowledge and skills pupils require to keep themselves and others safe, including education on online safety including the dangers of cyber-bullying and sexting, Relationship and Sex Education and Health Education. A variety of approaches will be employed. Within that programme the encouragement for pupils to develop realistic attitudes regarding the responsibilities of adult life. To help children to adjust their behaviours in order to reduce risks and build resilience, including to radicalisation, with particular attention to the safe use of electronic equipment and the internet. Children should understand the risks posed by adults or young people, who use the internet and social media to bully, groom, abuse or radicalise other people, especially children, young people and vulnerable children and adults.
- Education will be tailored to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs or disabilities
- Ensure Internet safety will be integral to the School's ICT and PSHE curriculum
- Preventative education is taught in the context of a whole-school approach that prepares pupils for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment. The school has a clear set of values and standards, upheld and demonstrated throughout all aspects of school life. These will be underpinned by the school's behaviour policy and pastoral support system, as well as by a planned programme of evidence based RSHE delivered in regularly timetabled lessons and reinforced throughout the whole

curriculum. This programme is fully inclusive and developed to be age and stage of development appropriate (especially when considering the needs of children with SEND and other vulnerabilities). This program will tackle at age-appropriate stages issues such as healthy and respectful relationships, boundaries and consent, stereotyping, prejudice and equality, body confidence and self-esteem, how to recognise an abusive relationship, including coercive and controlling behaviour, the concepts of, and laws relating to- sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so called honour-based violence such as forced marriage and Female Genital Mutilation (FGM), and how to access support, and what constitutes sexual harassment and sexual violence and why these are always unacceptable.

- Ensure effective IT systems to safeguard pupils from potentially harmful and inappropriate online material. The School has appropriate filters and monitoring systems in place to safeguard children from potentially harmful and inappropriate material online when using the School's IT system. The School's uses Smoothwall. Such systems aim to reduce the risk of children being exposed to illegal, inappropriate or harmful materials online (content risk); reduce the risk of children being subjected to harmful online interaction with others including commercial advertising and grooming (contact risk); restrict access to online risks such as online gambling, phishing or financial scams (commerce risk); and help manage online behaviour that can increase a child's likelihood of, or causes, harm for example making, sending and receiving explicit images. The School recognises however that children have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G) which means that children may consensually and/or non-consensually share indecent images, sexually harass their peers via mobile and smart technology, and view and share pornography and other harmful content whilst at school undetected. Further detail of the School's policy and procedures in relation to online safety can be found in the School's Digital Safety Policy which also includes detail on the use of mobile and smart technology in School, including the School's management of the associated risks, and the School's IT arrangements to ensure that children are safe from harmful and inappropriate content, including terrorist and extremist material when accessing the internet through the School's systems.
- The School will liaise with parents to reinforce the importance of children being safe online and the systems the School uses to filter and monitor online use. Parents and carers will be made aware of what their children are being asked to do online when undertaking remote learning, including the sites they will be asked to access and who from the School their child is going to be interacting with online.
- Create an environment where staff feel able to raise a concern and feel supported in their safeguarding role.
- Ensure that every effort will be made to establish effective, communicative relationships between staff, parents and other agencies.

### **Overarching Framework**

All members of staff, whether permanent, temporary or volunteers, who have contact with children and/or their families, will have a clear understanding of the School's responsibilities for safeguarding children and promoting their welfare. All staff, including temporary staff and volunteers who work with children will be made aware of the child protection arrangements.

Designated Safeguarding Leads (DSL) will ensure that there is appropriate training of all staff so that they know how to seek advice and report any concerns- especially when they are concerned that a child may be suffering or be at risk of suffering harm – and that all staff have access to support and appropriate expert advice in this context. Individual responsibilities for safeguarding and promoting the welfare of children will be encompassed within relevant job descriptions and procedures.

Denstone College safeguarding policies and procedures will as far as possible, take account of the views of children and families, provide children and young people with a safe environment in which to learn and develop. The school will provide a range of preventive and statutory measures to safeguard and promote the welfare of children and young people.

Staff who work or have contact with children and families will have appropriate training consistent with their role and function. This training will include the necessity for effective multi-agency and inter-professional collaboration.

Information is to be shared efficiently and effectively in respect of issues that may affect the safety and welfare of children. This includes ensuring that concerns are shared early in order to prevent serious problems from developing. Clear procedures will ensure that information is shared effectively, appropriately and as the law prescribes. Denstone College will also fulfil its requirements to report concerns about any person (whether employed, contracted, a volunteer or student) in a position of trust, to the Disclosure and Barring Service (DBS) within one month of leaving Denstone School.

Recruitment and vetting procedures are in place to prevent unsuitable people from having contact with children. This includes seeking the assurance that appropriate child protection checks and procedures apply to any staff employed or engaged by another organisation who are working with the school's pupils on another site on behalf of Denstone School. The recruitment panel will have at least one member of staff who has completed the safer recruitment training

Safe practice is promoted and poor and unsafe practice is challenged appropriately. Allegations or concerns about permanent or temporary staff or volunteers are handled effectively and in accordance with the Employment Manual.

Within the EYFS setting, the use of personal mobile phones, cameras, any electronic devices with imaging and sharing capabilities, are not permitted by parents, visitors or staff whilst on the EYFS premises. All staff including staff in the EYFS department are aware and follow the policy and procedures relating to the use of mobile phones, cameras and use of social media and as outlined in the Mobile Phone Policy, Use of Social Media Policy and Staff Handbook.

Safeguarding is the responsibility of every adult in the school environment; staff must not work in isolation. The development of appropriate procedures and the monitoring of good practice are the responsibility of the Staffordshire Safeguarding Children Board (SSCB) and the school's procedures are based on those of the SSCB.

### **Safeguarding Team-Roles and Responsibilities**

The designated personnel for safeguarding and children's welfare issues are

Overall DSL is Karenann Hood (Deputy Head Pastoral, member of SMT)

DSL for the College is Michelle Edge (Senior Nurse)

DSL for the Prep is Phil Jankovskis (Deputy Head of the Prep,, member of SMT)

DSL for EYFS is Claire Clews (Head of Pre-Prep and Safeguarding Lead of EYFS)

Deputy DSLs in the College are Megan Barr (Medical Nurse), Alison Lee (Medical Nurse), Sophie Chadfield (Head of RS), Chris Farman Deputy Head Wellbeing), Kate Philips is DDSL for Lower School, Richard Mace is DDSL for Middle School & Rachel Hoey is DDSL for Senior School. Deputy DSL for The Prep are) and Liz Scott ( Head of the Prep).

Jon Tomlinson is the designated teacher to promote the educational achievement of looked after children (LAC), as well as having the responsibility for promoting the educational achievement of children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales and should liaise with the local authority personal advisor for the care leaver when they leave the school.

Karenann Hood is the overall DSL and so takes responsibility for the safeguarding policy and is the lead responsible for safeguarding and child protection (including online safety and understanding the

filtering and monitoring systems and processes in place) and responsible for organising Level one Safeguarding training for all members of Denstone College staff. Karenann Hood is the Senior Mental health Lead at Denstone School.

The DSLs will ensure that there is always cover for the role (including any out of hours/out of term activities). This policy is reviewed annually, or sooner if circumstances arise which require immediate amendments to the policy. The Safeguarding Team liaise with the SSCB and work with other agencies in line with *Working Together to Safeguard Children 2023*. The DSL and deputies are most likely to have a complete safeguarding picture. Any disclosure or suspicion of abuse will be referred to social services (either via **Staffordshire Childrens Advice and Support** or to a child's existing social worker) by telephone within 24 hours by one of the DSLs or Deputy DSLs. It will then be confirmed in writing within 24 hours. Regarding EYFS registered providers must inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere. These notifications must be made as soon as is reasonably practicable, but at the latest within 14 days of the allegations being made.

The DSL and any deputies should liaise with the three safeguarding partners and work with other agencies in line with *Working Together to Safeguard Children 2023*. National Police Chiefs Council (NPCC)- *When to call the police* [NPCC Guidance 'When to call the Police'](#). will help designated safeguarding leads understand when they should consider calling the police and what to expect when they do.

Qamar Siddiqi is the named Governor for Safeguarding Children and looked after children. The Governing body take leadership responsibility for safeguarding arrangements at Denstone College

- To ensure the school has appropriate policies and procedures in place in order for appropriate action to take place in a timely manner to safeguard and promote children's welfare.
- To ensure child protection files are maintained as set out in Annex C of KSCIE 2025
- To ensure appropriate safer recruitment policies in accordance with Part three of KCSIE 2025 is in place, embedded and effective
- Where reasonably possible, we hold more than one emergency contact number for each pupil.
- To liaise with SSCB on issues of Child Protection and to ensure that school's safeguarding arrangements reflect local protocols for assessment, to recognise the importance of information sharing between professionals and local agencies.
- To ensure that all staff members undergo safeguarding and child protection training (including online safety) at induction, that their training is regularly updated in line with advice from the SSCB, and that they receive child protection updates, including online safety at least annually.
- To ensure that children are taught about safeguarding, including online, through teaching and learning opportunities.
- To create an environment where staff feel supported in their safeguarding role and are able to raise concerns.
- To ensure staff have regular reviews of their own practice so that they have knowledge, skill and experience to improve.

Qamar Siddiqi has received Level One Child Protection Training. Governors are not given details of specific situations, to avoid breach of confidentiality. The governing body undertakes an annual review, each February of the school's safeguarding policies and procedures and of the efficiency with which the related duties have been discharged, which is signed off by the Chair of the Governors. The governing body also ensure that Denstone College has effective E-safety policies and procedures. The Safeguarding Governors sub committee meets each term. All Governors have safeguarding via Educare and this is updated annually. The Governing Bodies are aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and their local multi-agency safeguarding arrangements.

### **Safeguarding Team-Managing referrals:**

It is the role of the DSLs to ensure the SSCB procedures are followed within the school (full local procedures are available on the SSCB website; see [Appendix 1](#)), to make relevant referrals to the agency according to guidance given, and to refer all cases of suspected abuse to the local authority children's social care, other external safeguarding agencies and Ofsted (for EYFS). Normal referral processes are also available when there are concerns about children who may be at risk of being drawn into terrorism. The Head, or in her absence the Chair of the Governors, will refer all suspected cases which concern a member of staff to the local authority designated officer (LADO) for child protection concerns. The HR manager will notify the Disclosure and Barring Service (in cases where a person is dismissed or has left due to risk/harm to a child) and is responsible for informing Ofsted and the DfE of any information that is required to go on its register. The DSLs will refer all cases of suspected abuse to the Police (cases where a crime may have been committed) and will liaise with the Head to inform her of issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. The DSLs will act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies. The school must communicate readily with a local safeguarding agency whenever an allegation or disclosure of abuse has been made (*Working Together to Safeguard Children 2023*, and *Keeping Children Safe in Education 2025*). The DSLs are designated to take the responsibility for liaising with the local authority Children's Services department, and to co-ordinate action with Children Services and, where applicable, the police following any child protection allegation or suspicion affecting a pupil. The safeguarding team holds a copy of *Working Together to Safeguard Children 2023*, as well as access to all SSCB procedures via their website.

### **Safeguarding Team-Training**

The DSL and Deputy DSL will receive appropriate training carried out at least every two years in child protection training, from inter- agency working protocols and training in SSCB's approach to Prevent duties. Karenann Hood has undertaken the Prevent Awareness Training run by SSCB and Local Police.

In addition to the formal training set out above, the knowledge and skills of the Safeguarding Team will be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, but at least annually, to allow the team to understand and keep up with any developments relevant to their roles. The Safeguarding team will:

- Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.
- Ensure each member of staff has access to and understands the School's Safeguarding policy and procedures, especially new, part time staff and volunteers.
- Be alert to the specific needs of children in need, those with special educational needs and young carers.
- Be able to keep detailed, accurate, secure written records of concerns and referrals.
- Obtain access to resources and attend any relevant or refresher training courses.
- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school may put in place to protect them.

### **Safeguarding Team-Raising Awareness**

It is also a requirement to ensure all employed staff within the school are aware of its internal procedures, and to advise and support staff, where required. The safeguarding team will assist staff to understand and discharge their roles and responsibilities as set out in part 1 of *Keeping Children Safe in Education 2025*, which will include verbal briefings summarising the provisions of Part 1 and

Annex B. The DSLs should ensure the school's policies are known and used appropriately: Ensure the school's Safeguarding policy is reviewed annually and the procedures and implementation are updated and reviewed regularly, and work with governing bodies regarding this. Ensure the Safeguarding Policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this. The Safeguarding team has links with the SSCB to make sure staff are aware of training opportunities and the latest local policies on safeguarding. When children leave the school ensure their child protection file is copied for any new school as soon as possible but transferred separately from the main pupil file.

### **Training and support of Staff and Senior Pupils.**

Denstone College will ensure the DSLs and the Deputy DSLs and the nominated Governor receive training and updates relevant to their roles.

All school staff will undertake awareness training provided by SSCB, during induction and periodically (3 year intervals) to refresh and update knowledge and understanding, this includes on-line safety and prevent. In addition, all staff receive safeguarding and child protection updates, including online safety as required, but at least annually (via either staff meetings, email or INSET) to provide them with the relevant skills and knowledge to safeguard children effectively. Any reason for staff to be having personal and/or social contact with pupils at the school must be explained to the Head with the rationale and any safeguarding actions required will be recorded. Richard Neal is responsible for organising this training for staff. Alongside this the Safeguarding team will cascade information to staff as they attend training to further enhance the awareness of staff. All Staff are trained to know what to do if a child makes a safeguarding disclosure. All staff know what to do if a child tells them they are being abused, exploited, or neglected. All staff know how to manage the requirement to maintain an appropriate level of confidentiality. All staff will reassure the victim 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. All staff are aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

All staff are trained to manage a report of child on child sexual violence and sexual harassment. All staff including visiting peripatetic teachers, temporary, voluntary staff will have an induction into the child protection procedures when they join the school. They should be aware of the SSCB procedures as part of that induction programme, and these are explained to them as part of the staff induction. Staff will be provided with induction training that explains Denstone College's Safeguarding Policy (including online safety and identify and roles of the DSL and Deputy DSL), the Staff Code of Conduct, the Behaviour Policy, the Digital Safety Policy (online safety), within 6 months of joining the school and complete online prevent training <https://www.elearning.prevent.homeoffice.gov.uk/edu/screen1.html> . Each time Part 1 of *Keeping Children Safe in Education 2025* and Annex B is updated staff will be issued with a copy and required to read the document, INSET will be provided to ensure staff understand the document. All staff are also trained to manage a report of child on child sexual violence and sexual harassment. Contractors working regularly at school will also receive basic safeguarding training at a level appropriate to their role as a minimum it will include knowledge of the identity of the Safeguarding team, and the duty to pass on concerns and to adhere to appropriate behavioural boundaries.

Senior Pupils given positions of responsibility over other pupils are briefed on appropriate actions to take should they receive allegations of abuse.

Support will be available for staff from the DSLs, the Deputy DSLs and also the Senior Management team, with regard to concerns about safeguarding children.

The Safeguarding team will also offer peer support to each other. Opportunities are provided to staff to contribute and shape safeguarding arrangements and policy through discussion with the Safeguarding team and staff INSET.

This policy will be published to parents and guardians on the School website in line with statutory regulatory requirements.

### **The Role of School staff**

School staff are particularly important as they are in a position to identify concerns early, provide help for children, and prevent concerns from escalating.

- All school staff have a responsibility to provide a safe environment in which children can learn.
- The school has a designated safeguarding team who will provide support to staff members to carry out their safeguarding duties and who will liaise closely with other services such as children's social care. The DSL (and the deputy DSLs) are the most appropriate people to advise on the response to safeguarding concerns.
- All school staff should be prepared to identify children who may benefit from early help as well as to listen to children. In the first instance staff should discuss early help requirements with the DSL. Staff may be required to support other agencies and professionals in an early help assessment.
- Any staff member who has a concern about a child's welfare should follow the referral processes detailed in this policy. Staff may be required to support social workers and other agencies following any referral.
- The Teachers' Standards 2012 state that teachers, including Heads, should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.

Staff are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school. They can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online. As a residential school, we are alert to the extra vulnerabilities of SEND children in our setting, inappropriate pupil relationships and the potential for child-on-child abuse.

The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm.

Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life. Children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content. In all cases, if staff are unsure, they should always speak to the DSL or Deputy DSL.

An effective approach to online safety empowers the school to protect and educate the whole school community in their use of technology and establishes mechanisms to identify, intervene in, and escalate any incident where appropriate.

The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk:

- content: being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.
- conduct: personal 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 other explicit images and online bullying); (See Digital Safety Policy for further detail)
- commerce - risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>).

### **Thresholds for Intervention:**

#### **Early Support: Early Help Assessment (EHA)**

An EHA can be completed when:

- Age appropriate progress is not being made and the causes are unclear or
- The support of more than one additional agency is needed to meet the child or young person's needs.

Staff should discuss children who appear to have additional needs with a member of the Safeguarding Team, the child and parents. The DSL (or Deputy DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate). The school will need to obtain parental/pupil consent for an EHA to be completed. The young person may in certain circumstances be able to give their own consent for an EHA. The process is entirely voluntary and informed consent is mandatory, so families do not have to engage and if they do they can choose what information they want to share. Children and families should not feel stigmatised by the EHA; indeed they can ask for an EHA to be initiated. The EHA process is not a 'referral' process but a 'request for services'. The EHA should be offered to children who have additional needs to those being met by universal services. The practitioner assesses needs using the EHA. Staff may be required to support other agencies and professionals in an EHA, in some cases acting as the lead professional. Any such cases should be kept under constant review and consideration given to a referral to children's social care for assessment for statutory services if the child's situation does not appear to be improving or is getting worse. The EHA is not a risk assessment. If a child or young person reveals they are at risk of suffering actual or likely significant harm, the practitioner should follow the local safeguarding process immediately.

The DSL or Deputy DSL may need to make a referral directly to other agencies, or request the support of Staffordshire County Council Local Support Team (LST). Staff will follow the guidance of the SSCB Threshold Document - accessing the right help at the right time ([www.staffsscb.org.uk](http://www.staffsscb.org.uk)). The school will inform the LST Co-ordinator when an EHA is started, and when it is closed, irrespective of whether or not there is an LST worker involved with the family. Additional support may also be provided by Team around the Child (TAC) and Common Assessment Framework (CAF) approaches.

Any child may benefit from early help, but staff should be particularly alert to potential need for early help for child who is disabled or has certain health conditions and has specific additional needs, has SEN, has a mental health need, is a young carer, is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines, is frequently missing/goes missing from home or care, has experienced multiple suspensions, is at risk of being permanently excluded, is misusing drugs or alcohol, is at risk of

modern slavery, trafficking, sexual and/or criminal exploitation, has a family member in custody, or is affected by parental offending, is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues or domestic abuse, is misusing alcohol and other drugs themselves, has returned home to their family from care, is showing early signs of neglect or abuse, is at risk of being radicalised or exploited, is at risk of honour based abuse such as Female Genital Mutilation or Forced Marriage is a privately fostered child or is persistently absent from education, including persistent absences for part of the school day

### **Child in Need:**

Is this child in need? Section 17 of the Children Act 1989 says: "They are unlikely to achieve or maintain, or to have opportunity to achieve or maintain a reasonable standard 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. Such concerns should be passed immediately to the DSL or Deputy DSL. Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children's Act 1989." This includes all forms of abuse, neglect and exploitation.

A child in need referral should be considered where the needs of the child are unlikely to be met under an EHA, such as a child with complex disabilities, when a social work led assessment is required. If the Safeguarding team considers that the welfare concerns indicate that this is a 'child in need' or about whom there are concerns relating to radicalisation, one of the Safeguarding Team will normally make this decision in consultation with parents and pupil to make a referral to **Staffordshire Childrens Advice and Support** to request an assessment, however consent from parents and pupil is not required for a referral when there are reasonable grounds to believe that a child is at risk of significant harm.

### **Child Protection:**

Is this a child protection matter - is the child at risk? Section 47 of the Children Act 1989 says the Local Authority has a statutory duty to investigate when there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. School staff do not investigate whether a child has been abused, this is the duty of social workers.

If staff consider the concern is potentially a child protection matter, this should be discussed without delay with one of the DSLs or one of the Deputy DSLs who will refer, if satisfied that the significant harm threshold has been met to **Staffordshire Childrens Advice and Support** or, if applicable, the child's current social worker and to the police where a crime has been committed. If the child lives in an authority outside of Staffordshire, the matter will be referred to the relevant authority, immediately.

It is the 'significant harm' threshold that justifies statutory intervention into family life. A professional making a child protection referral under Section 47 must therefore provide information which clearly outlines that a child is suffering or likely to suffer significant harm. It is not possible to rely on one absolute criterion when judging what constitutes significant harm. Consideration of the severity of ill-treatment may include the extent of the harm suffered, the context within which it occurred and its duration.

Significant harm may also arise from a combination of significant events which are both acute and long standing and which may impair the child's physical, psychological and social development. In order to both understand and establish significant harm, it is necessary to consider the family context, together with the child's development within their wider social and cultural environment. It is also necessary to consider any special needs, e.g. medical condition, communication difficulties or disability that may affect the child's development and care within the family. The nature of harm, in

terms of ill-treatment or failure to provide adequate care also needs consideration alongside the impact on the child's health and development and the adequacy of care provided.

**Guidance on talking to and listening to children: Effective safeguarding practice:**

- Not promising confidentiality at this initial stage as it is very likely a concern will have to be shared further (for example, with the DSL or Deputy DSL or children's social care) to discuss next steps. Staff should only share the report with those people who are necessary in order to progress it. It is important that the victim understands what the next steps will be and who the report will be passed to.
- Recognising a child is likely to disclose to someone they trust: this could be anyone on the school staff. It is important that the person to whom the child discloses recognises that the child has placed them in a position of trust. They should be supportive and respectful of the child.
- Listening carefully to the child, being non-judgmental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions – where, when, what.
- Considering the best way to make a record of the report. Best practice is to wait until the end of the report and immediately write up a thorough summary. This allows the staff member to devote their full attention to the child and to listen to what they are saying. It may be appropriate to make notes during the report (especially if a second member of staff is present). However, if making notes, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking. Either way, it is essential a written record is made.
- Only recording the facts as the child presents them. The notes should not reflect the personal opinion of the note taker. Staff should be aware that notes of such reports could become part of a statutory assessment by children's social care and/or part of a criminal investigation.
- Where the report includes an online element, being aware of searching screening and confiscation advice- The key consideration is for staff not to view or forward illegal images of a child.
- If possible, managing reports with two members of staff present, (preferably one of them being the DSL or Deputy DSL). However, this might not always be possible; and informing the DSL (or deputy DSL), as soon as practically possible, if the DSL (or Deputy DSL) is not involved in the initial report.

Staff should always be vigilant and always raise any concerns with either the DSL or Deputy DSL.

**Remember**

If a child chooses to disclose, staff SHOULD:

- be accessible and receptive
- explain that confidentiality cannot be provided
- listen carefully and uncritically at the child's pace
- take what is said seriously
- reassure the child that they are right to tell
- tell the child that you must pass this information on
- make a careful record of what was said, record in the child's own words as much as possible
- make a note of any questions that were put to the child

Staff should NEVER:

- give the impression that the child is creating a problem by reporting the abuse
- take photographs or examine an injury
- investigate or probe aiming to prove or disprove possible abuse – never ask leading questions
- make promises to children about confidentiality or keeping 'secrets'
- ask leading questions

- assume that someone else will take the necessary action
- jump to conclusions or react with shock, anger or horror
- speculate or accuse anybody
- confront another person (adult or child) allegedly involved
- offer opinions about what is being said or about the persons allegedly involved
- forget to record what you have been told
- fail to pass the information on to the correct person
- ask a child to sign a written copy of the disclosure
- **Under no circumstances should the member of staff ask students to complete a student statement**

### **Supporting Pupils at Risk**

Children who are abused, or who witness violence, may have difficulty developing self – worth and the ability to view the world positively. Indeed school may be the only secure, stable and predictable element in their lives, but in school their behaviour could be challenging and defiant. Some children who have experienced abuse, may in turn abuse others. This requires a considered, sensitive approach, to enable the child to receive appropriate help and support.

The school will endeavour to support pupils through:

- The curriculum, to encourage self-esteem and motivation.
- The school ethos which promotes a positive, supportive and secure environment, to enable achievement, confidence and happiness.
- Liaison with other professionals, and agencies, who support the pupils and their families.
- Effective supportive communication with parents, if it is in the child's interest to do so.
- The development and support of a responsive and knowledgeable school staff, trained to respond appropriately, in child protection situations.

### **Procedures for dealing with a safeguarding concern about a child**

Any member of teaching staff who has a concern should immediately **speak to a member of the Safeguarding team and then make an entry on CPOMS**, ensuring that the safeguarding category is selected. All other staff must immediately complete a Child Protection – Record of Initial Concerns, located in the SCR (Appendix 2), this must be passed on to a member of the Safeguarding Team or emailed to [safeguarding@denstonecollege.net](mailto:safeguarding@denstonecollege.net). Wherever possible, there should be a conversation with one of the DSLs or in their absence one of the Deputy DSLs, who will help staff decide what to do next. Options include managing any support for the child internally via the School's own pastoral support processes, early help assessment or a referral to the Staffordshire Childrens Advice and Support Team. Where a child is suffering or likely to suffer from harm a referral to SSCB and if appropriate the police should be made immediately. For referral to **Staffordshire Childrens Advice and Support** phone **0300 111 8007** .Press Option one, there are then six further options

- Press 1-If you are looking for advice and guidance about services in Staffordshire for children and young people
- Press 2-If you have concerns about a child or young person's general wellbeing
- Press 3-If you have a child protection or safeguarding concern and you are worried that a child is suffering harm
- Press 4-If you already have a social worker or are calling about a previous referral
- Press 5-If you are looking for help in the early stages such as school attendance, alcohol abuse or anti-social behaviour
- Press 6-To speak to the adoption and fostering team

The out of hours emergency number 0845 604 2886.

This will then be followed up with written confirmation on the multi-agency referral form within 48 hours. If it is not possible to speak to a member of the Safeguarding team this should not delay appropriate action being taken, the member of staff should speak to a member of the SMT and contact **Staffordshire Childrens Advice and Support** to discuss concerns. If a child is in immediate danger or is at risk of harm a referral should be made to **Staffordshire Childrens Advice and Support** and/or the police immediately. Safeguarding is everyone's responsibility and **anyone** can make a referral to children's social care. Everyone working at Denstone College has a duty to raise concerns of a safeguarding nature immediately. Staff should not assume a colleague will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate provision of service. All staff should be aware of the process for making referrals to children's social care and for statutory assessments under the Children's Act 1989, especially section 17 (children in need) and Section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they may be expected to play in such assessments. If a referral is made by a member of the School to **Staffordshire Childrens Advice and Support** a member of the safeguarding team must be informed as soon as possible. Notes must be made as soon as possible by the member of staff to whom the disclosure is made and certainly within 24 hours of the incident giving rise to the concern. **Under no circumstances should the member of staff ask students to complete a student statement.** Staff do not require parental consent to make referrals to statutory agencies.

This online tool can be used to identify the relevant local children's social care contact number <https://www.gov.uk/report-child-abuse-to-local-council>

Sometimes staff may have doubts about a child's safety and welfare, things which may seem trivial at the time, could turn out to be vital pieces of information later. If there is no specific incident or information, information should be logged on CPOMS or a child protection initial concerns pro-forma should be completed. An attempt should be made to identify the cause of concern and the pro-forma given to the designated person.

It is important that children receive the right help at the right time to address risks and prevent issues escalating. This includes referring the early signs of abuse and neglect, radicalisation, keeping clear records, listening to views of the child, reassessing concerns when situations do not improve, sharing information quickly and challenging inaction.

The procedures set out in the document *Working Together to Safeguard Children 2023* will be followed in all cases, including dealing with abuse by one or more pupils against another pupil when there is 'reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm' - any such abuse will be referred to the SSCB. In the event of a disclosure about pupil on pupil abuse, all children involved, whether the perpetrator or victim, are treated as being "at risk".

If, following a referral, the child's situation does not appear to be improving, the DSL (or Deputy DSL) should consider following local escalation procedures to ensure their concerns have been addressed and the child situation improves.

### **Response by the local Authority**

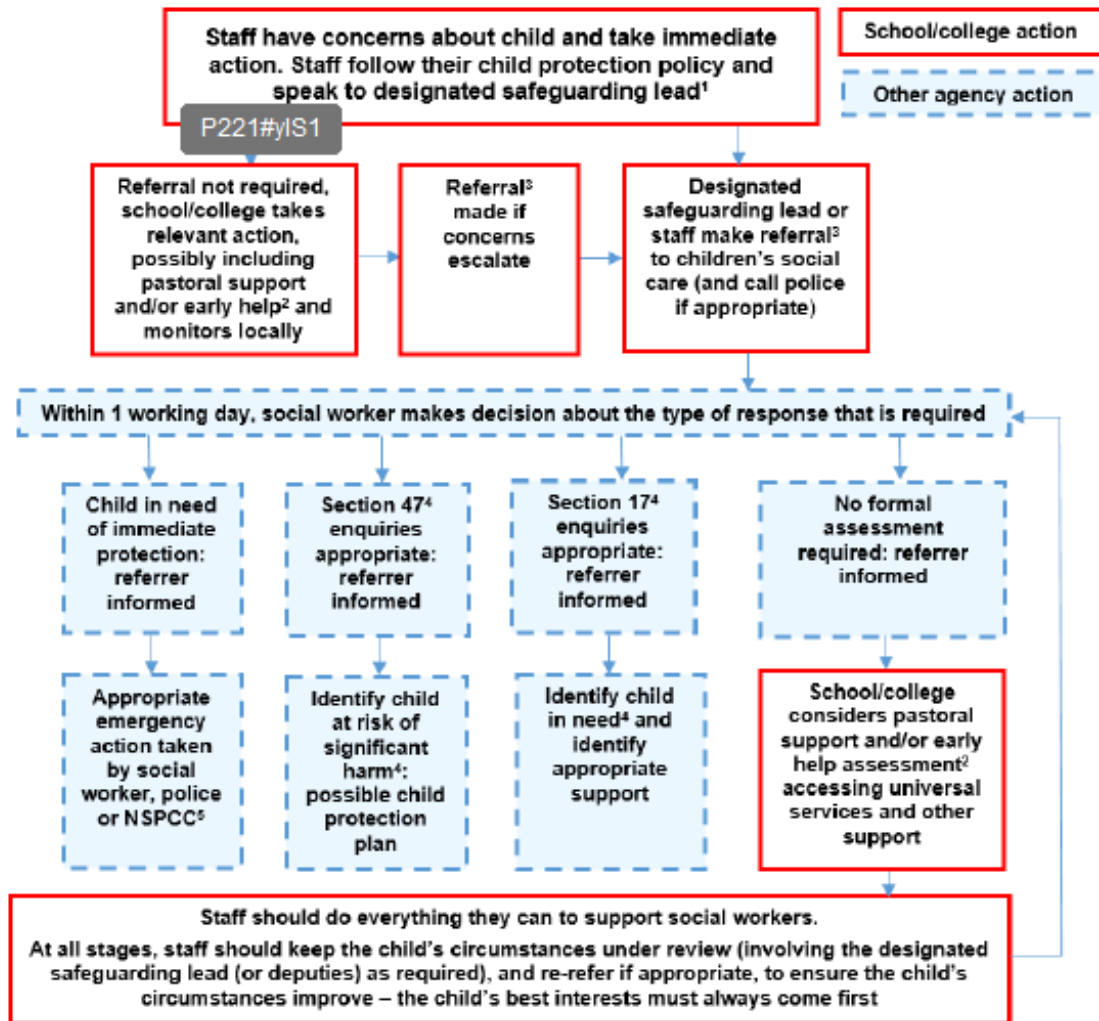
The local authority should make a decision, within one working day of a referral being made, about the type of response that is required and should let the referrer know the outcome. This will include determining whether:

- the child requires immediate protection and urgent action is required
- whether the child is in need, and should be assessed under section 17 of the Children Act 1989
- there is reasonable cause to suspect the child is suffering, or likely to suffer, significant harm, and whether enquiries must be made and the child assessed under section 47 of the Children Act 1989

- any services are required by the child and family and what type of services
- further specialist assessments are required in order to help the local authority to decide what further action to take.

The referrer should follow up if this information is not forthcoming. If social workers decide to carry out a statutory assessment, staff should do everything they can to support that assessment (supported by the DSL (or deputy DSL) as required). If, after a referral, the child's situation does not appear to be improving, the referrer should consider following local escalation procedures to ensure their concerns have been addressed and, most importantly, that the child's situation improves.

## Actions where there are concerns about a child



<sup>1</sup> In cases which also involve a concern or an allegation of abuse against a staff member, see Part four of this guidance.

<sup>2</sup> Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. [Working Together to Safeguard Children](#) provides detailed guidance on the early help process.

<sup>3</sup> Referrals should follow the process set out in the local threshold document and local protocol for assessment. See [Working Together to Safeguard Children](#).

<sup>4</sup> Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in [Working Together to Safeguard Children](#).

<sup>5</sup> This could include applying for an Emergency Protection Order (EPO).

## **Concerns about safeguarding practices within the School.**

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the School's safeguarding regime and know that such concerns will be taken seriously by SMT.

Appropriate whistleblowing procedures, which are suitably reflected in staff training and Code of Conduct, are in place for such concerns to be raised with the School's Senior Management Team. See Employment Handbook for further details.

Where a staff member feels unable to raise an issue with their employer, or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them. The NSPCC whistleblowing helpline <https://www.nspcc.org.uk/what-you-can-do/report-abuse/dedicated-helplines/whistleblowing-advice-line/> is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by the School. Staff can call 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday, and 9:00AM to 6:00PM at weekends and email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

General advice on whistleblowing can be found at whistleblowing for employees can be found at <https://www.gov.uk/whistleblowing>

## **Guidance on 'Whether this is a Child Protection Matter'**

All teaching and non-teaching staff should be aware of what constitutes abuse, neglect and exploitation. A person may abuse or neglect a child by inflicting harm, or by failing to prevent it. Children and young people may be abused in a family or in an institutional or community setting, by those known to them or more rarely by a stranger. In the Prep School if a child presents with an injury on arrival, an explanation will be requested and recorded on the injury on arrival form (Appendix 4) and must be signed by the parent/guardian.

## **Signs of abuse**

All staff should be aware of indicators of abuse and neglect understanding that children can be at risk of harm inside and outside of the school, inside and outside of home and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection. All staff are aware that abuse, neglect, exploitation and safeguarding issues are rarely standalone events that can be covered by one definition. In most cases multiple issues will overlap with one another. Children may be abused in a family or in an institutional or community setting by those known to them, or more rarely, by others (e.g. via the internet). Staff are aware that safeguarding incidents and/or behaviours can be associated with factors outside the School and/or can occur between children outside of these environments. Staff and especially the Safeguarding team should consider whether children are at risk of abuse or exploitation in situations outside of their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation. All staff should have an awareness of safeguarding issues that can put children at risk of harm. Staff should be aware that behaviours linked to the likes of drug taking, alcohol abuse, deliberately missing education and sexting put children in danger.

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist

messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content. In all cases, if staff are unsure, they should always speak to one of the School's DSLs or Deputy DSLs without delay.

The tell-tale signs of abuse can vary depending on the type of abuse, but there are some common signs. These include:

- Children whose behaviour changes – they may become aggressive, challenging, disruptive, withdrawn or clingy, or they might have difficulty sleeping or start wetting the bed
- Children with clothes which are ill-fitting and/or dirty
- Children with consistently poor hygiene
- Children who make strong efforts to avoid specific family members or friends, without an obvious reason
- Children who don't want to change clothes in front of others or participate in physical activities
- Children who are having problems at school, for example, a sudden lack of concentration and learning or they appear to be tired and hungry
- Children who talk about being left home alone, with inappropriate carers or with strangers;
- Children who are regularly missing from school
- Children who reach developmental milestones later, with no medical reason
- Children who are reluctant to go home after school
- Children with poor school attendance and punctuality, or who are consistently late being picked up
- Parents who are dismissive and non-responsive to practitioners' concerns
- Parents who collect their children from school when drunk, or under the influence of drugs
- Children who drink alcohol regularly from an early age
- Children who are concerned for younger siblings without explaining why
- Children who talk about running away
- Children who shy away from being touched or flinch at sudden movements

**Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. 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, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children

Departmental advice *What to Do if You Are Worried a Child is Being Abused - Advice for Practitioners* provides more information on understanding and identifying abuse and neglect and can be accessed via <https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2> The NSPCC website <https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/> also provides useful additional information on abuse and neglect and what to look out for.

## **Types of Abuse**

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

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

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

**Neglect** is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy 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), failing to protect a child from physical and emotional harm or danger, failure to ensure adequate supervision including the use of inadequate caregivers, or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

### **Specific Safeguarding Issues**

Children potentially at greater risk of harm both on and offline:

- Children who engage in behaviours such as drug taking or alcohol misuse, unexplainable and/or persistent absences from 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 can be signs that children are at risk.
- Children who need a social worker (Child in Need and Child Protection Plans).
- Children who need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect or complex family circumstances.
- Children who are absent from school,
- Children who are Elective Home Educated,
- Children requiring mental health support,
- Looked after or previously looked after children . A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.
- Children with SEND or health issues
- Children who are lesbian, gay, bisexual or gender questioning

Local authorities should share the fact a child has a social worker, and the designated safeguarding lead should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This should be considered as a matter of routine.

Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

### **Children requiring mental health support**

The School has an important role to play in supporting the mental health and wellbeing of their pupils. All staff are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood.

It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

Any concerns staff have regarding pupils mental health will be referred immediately to the medical team and safeguarding team (In the safeguarding category on CPOMS there is a mental health category), who will take the lead in appropriate next steps. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, by discussing with a member of the Safeguarding team. In addition to qualified nursing staff Karenann Hood is trained Mental Health First Aiders.

Research suggests that for young people with mental health problems early and effective intervention will prevent longer term mental health problems.

It is likely that either the pupil will present at the Medical Centre or they will have been referred there by a concerned member of staff. Young people with mental health problems typically visit the GP more than their peers, often presenting with a physical concern. This gives the medical team a key role in identifying mental health issues early and therefore extended appointment time is expected and allocated for pupils where necessary. The pupil can then continue to be assessed and monitored with appropriate appointments with School doctor or medical team.

Assessment of mental health in a pupil involves thinking about several aspects. It is highly likely that medical staff will need to make an initial assessment. Much of this is 'second nature' to nursing professionals but it is helpful to outline key points:

- What has brought the pupil to see you; what has triggered this?
- How do they look? Body language, demeanour, eye contact.
- How are they feeling?
- What are the pupil's current support mechanisms e.g. family structure? (ISAMs family information)
- Are there risk factors that are a concern?

After nursing assessment, any immediate concern for a pupil's mental health would be reported to the school doctor and an appointment made. The Medical Centre staff will liaise with the pupil's parent and key School staff as appropriate. Confidentiality will be maintained within the boundaries of safeguarding the pupil.

When there is an identified cause for concern, and it is deemed to be beneficial for a pupil to be monitored more carefully to safeguard their emotional wellbeing, an Individual Healthcare Plan will be initiated by the Medical team in consultation with the rest of the Safeguarding Team

### **Child Abduction and community safety incidents**

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers. Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation. As children get older and are granted more independence, we will ensure they are given practical advice on how to keep themselves safe, this will be done via Assemblies, PSHE, tutorials and the LIFE Programme.

### **Children and the court system**

Children are sometimes required to give evidence in criminal court, either for crimes committed against them or for crimes they have witnessed. This can be particularly stressful and so the children may need additional pastoral support. The Ministry of Justice has launched an online child arrangements information tool <https://helpwithchildarrangements.service.justice.gov.uk/> with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

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

All staff should be aware that children being absent from school or college, particularly repeatedly and/or for prolonged periods, and children missing education can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect such as 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. 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. It is important that staff are aware of their school's or college's unauthorised absence procedures and children missing education procedures.

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

These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health and so may require additional pastoral support. The National Information Centre on Children of Offenders, NICCO <https://www.nicco.org.uk/> provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

### **Drug and Substance Misuse**

Where issues come to attention of the school in relation to drugs and substance misuse we will follow the School's Policy on Drugs, Alcohol and Smoking. This document clearly sets out issues around broader behaviour and pastoral support, as well as managing drugs and drug related incidents within school. This preventative and supportive approach will sit hand in hand with our statutory functions of child protection in line with established referral procedures and the law of the land.

**Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)** Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual or criminal activity and sexual exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial advantage (such as increased status) of the perpetrator or facilitator and can include violence or the threat of violence. The abuse can be perpetrated by individuals or groups, males or females. Children may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim. The abuse can be a one-off occurrence or a series of incidents over time and

range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online

**Child Criminal exploitation (CCE)** CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology. CCE can include children being forced 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 well as 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 may be missed by adults and professionals, (particularly older children), and so it is essential that staff are alert to this.

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

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

Some of the following can be indicators of CCE:

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

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

**Child Sexual Exploitation (CSE)** is a form of sexual abuse CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity (such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet). CSE can occur over time or as one- off occurrence and

may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media).

The above CCE indicators can also be indicators of CSE, as can:

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

What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation does not always involve physical contact and can happen online. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

Like all forms of child sex abuse, child sexual exploitation can affect;

- any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex
- can still be abuse even if the sexual activity appears consensual
- can include both contact (penetrative and non-penetrative acts) and noncontact sexual activity
- can take place in person or via technology, or a combination of both
- can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence
- may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media)
- can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse
- is typified by some form of power imbalance in favour of those perpetrating the abuse.
- Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

### **County Lines**

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

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of

availability of local services/third sector providers who offer support to victims of county lines exploitation.

Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person under the age of 18 years.
- can still be exploitation even if the activity appears consensual.
- can involve force and/or enticement- based methods of compliance and is often accompanied by violence or threats of violence.
- can be perpetrated by individuals or groups, males or females, young people or adults.
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Power imbalance can be due to a range of factors such as age, gender, cognitive ability, physical strength, status and access to economic or other resources.

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

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

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available at <https://www.gov.uk/government/publications/modern-slavery-how-to-identify-and-support-victims>

### **Cybercrime**

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

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

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

If there are concerns about a child in this area, the DSL (or a deputy), should consider referring into the Cyber Choices programme via [cyberchoices@nca.gov.uk](mailto:cyberchoices@nca.gov.uk) or Tel:0370 496 7622 . This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests. (Note that Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.)

**'Honour-based' abuse (HBA)** encompasses 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. All forms of so called HBA are abuse (regardless of the motivation) and should be handled and escalated as such. 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 if staff have a concern regarding a child that might be at risk of HBA or who has suffered from HBA, they should speak to a member of the Safeguarding team.

**Female Genital Mutilation (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. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practise FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. Staff should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care.

FGM mandatory reporting duty for teachers Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory legal duty on teachers along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases may face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies.

Teachers **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has good reason not to, they should still consider and discuss any such case with a member of the Safeguarding Team and follow local Safeguarding Procedures.

If a pupil has disclosed that they are at risk in this way, the case will still be referred to social care even if it is against the pupil's wishes. **Do not consult or discuss with the pupil's parents or family, or others within the community.** The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures.

Guidance Documents:

- Promoting the Welfare & Safety of Children in Specific Circumstances - Section 4M
- Multi Agency Statutory guidance on Female Genital Mutilation

Further guidance to be found on Female Genital Mutilation Act 2003

**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 communities use religion and culture as a way to coerce a person into marriage. School staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email [fm@fcdo.gov.uk](mailto:fm@fcdo.gov.uk). 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.

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

Sexual violence and sexual harassment can occur between two children of any age and sex from primary to secondary stage and into colleges. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physically and verbally) and are never acceptable. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

### **Youth Violence and Gang Activity**

"The vast majority of young people and educational establishments will not be affected by serious violence or gangs. However, where these problems do occur there will almost certainly be a significant impact." Taken from the Home Office '*Preventing youth violence and gang involvement - Practical advice for schools and schools*'. In light of this we will embrace the Home Office document and follow this guidance which clearly sets out understanding the issue, seeking support, working with local partners, early intervention and legal powers for staff. The School has a duty and a responsibility to protect our pupils and staff and we recognise dealing with violence also helps attainment. To this end we will ensure pupils must, understand very clearly what safe situations are and be highly aware of how to keep themselves and others safe.

### **Serious Violence**

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

There are a range of risk factors which increase the likelihood of involvement in serious violence, such as 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. It is also worth noting that violence can often peak in the hours just before or just after school, when pupils are travelling to and from school. These times can be particularly risky for young people involved in serious violence

**Missing children** a child going missing from an education setting is a potential indicator of abuse and neglect. All staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and child criminal exploitation- particularly county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where going missing from education may increase known safeguarding risks within the family or in the community.

The School holds more than one emergency contact for each child (where reasonably possible) to enable additional options to make contact with an adult when a child missing education is identified. Further information regarding missing children and other specific safeguarding issues can be found via the GOV.UK website and the School's Missing Pupil Policy, which is set against the backdrop of the legal framework of the Children Act 1989 where it is 'reasonable in all circumstances to safeguard and promote the child's welfare'.

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

From September 2016 the Education (Pupil Registration) (England) Regulations 2006 were amended so that schools must inform their LA of all deletions from their admission register when a child is taken off roll. Where a parent/carer has expressed their intention to remove a child from School with a view to educating at home, the school, and other key professionals will work together to coordinate a meeting with parents/carers where possible. Ideally, this would be before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child. This is particularly important where a child has SEND or a disability, and/or is vulnerable, and/or has a social worker.

### **Preventing Extremism and Radicalisation**

Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to: (1) negate or destroy the fundamental rights and freedoms of others; or (2) undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights or intentionally create a permissive environment for others to achieve the results in (1) or (2)

Extremism goes beyond terrorism and is defined in the Government's Counter Extremism Strategy as vocal or active opposition to our fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. The death of members of armed forces is also regarded as extremism. Extremists often target the vulnerable – including the young – by seeking to sow divisions between communities on the basis of race, faith or denomination; justifying discrimination towards women and girls; seeking to persuade others that minorities are inferior; or arguing against the primacy of democracy and the rule of law in our society. Radicalisation refers to the process of a person legitimising support for, or use of, terrorist violence.

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

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a

child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home). However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the DSL (or deputy) making a Prevent referral.

As part of our safeguarding ethos we encourage pupils to respect the fundamental British values of democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs. We ensure that partisan political views are not promoted in the teaching of any subject in the School and where political issues are brought to the attention of the pupils, reasonable practicable steps have been taken to offer a balanced presentation of opposing views to pupils. We also have a duty under the Counter Terrorism and Security Act 2015 to have due regard to the need to prevent people from being drawn into terrorism. Any prejudice, discrimination or extremist views, including derogatory language, displayed by pupils or staff will always be challenged and where appropriate dealt with in line with our Discipline and Exclusion Policy or the Staff Code of Conduct. We will share information with the **Staffordshire Childrens Advice and Support** Team and/ or the Staffordshire police Prevent team when appropriate. (See Appendix 1 for full contact details) We will also work with Staffordshire's Prevent in relevant circumstances.

Channel is a key element of the Prevent Strategy. It is a multi-agency approach to protect people at risk of radicalisation. Channel uses existing collaboration between local authorities, statutory partners, the police and the local community to identify individuals at risk of being drawn into terrorism, assess the nature and extent of that risk and develop the most appropriate support for the individuals concerned. Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages. The School also recognises the importance of effective engagement with parents.

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

The *Prevent* statutory guidance requires schools to ensure that any visiting speakers who might fall within the scope of the *Prevent* duty, whether invited by staff or pupils, are suitable and appropriately supervised. This means that even in cases where specific vetting checks are not required, action must be taken to ensure that they are suitable. An internet search, testimonial feedback, viewing a speech are examples of how staff can assess suitability. It is necessary to record this information on the spreadsheet. At least one member of staff must be in attendance during the speaker's speech at the School. (See Visitors Policy for further details)

### **Children with special education needs and disabilities or physical health issues**

Children with special educational needs or disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges both online and offline. Additional barriers can exist when recognising abuse and neglect in this group of children. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children

- the potential for children 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.
- cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so. Any reports of abuse involving children with SEND will therefore require close liaison with the designated safeguarding lead (or deputy) and the SENCO to consider extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place.

### **Children who are lesbian, gay, bisexual or gender questioning**

The fact that a child or a young person may be lesbian, gay, bisexual or gender questioning is not in itself an inherent risk factor for harm. However, children who are lesbian, gay, bisexual or gender questioning can be targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay, bisexual or gender questioning (whether they are or not) can be just as vulnerable as children who identify as lesbian, gay, bisexual or gender questioning.

However, the Cass review identified that caution is necessary for children questioning their gender as there remain many unknowns about the impact of social transition and children may well have wider vulnerabilities, including having complex mental health and psychosocial needs, and in some cases additional diagnoses of autism and/or attention deficit hyperactivity disorder. It recommended that when families/carers are making decisions about support for gender questioning children, they should be encouraged to seek clinical help and advice. When parents are supporting pre-pubertal children, clinical services should ensure that they can be seen as early as possible by a clinical professional with relevant experience. As such, when supporting a gender questioning child, we will take a cautious approach and consider the broad range of their individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying. We will refer to Guidance for Schools and Colleges in relation to Gender Questioning Children, when deciding how to proceed.

Home education Risks can be compounded where children who are lesbian, gay, bisexual or gender questioning lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of staff. Lesbian, gay, bisexual or gender questioning inclusion is covered as part of the statutory Relationships Education, Relationship and Sex Education and Health Education curriculum.

### **Domestic Abuse**

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

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, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. 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.

All children who witness domestic abuse between family members can be adversely affected. Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Young people can also experience domestic abuse within their own intimate relationships. This form of child on child abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.

### **Operation Encompass**

Denstone College has signed up to Operation Encompass. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the safeguarding team in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs. Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the safeguarding team would make a referral to 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. 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.

**Homelessness.** Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The Safeguarding team should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and or discussion with the Local Housing Authority should be progressed as appropriate, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm. The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis. In most cases School 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. Children's services will be the lead agency for these young people and the DSL or Deputy 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 <https://www.gov.uk/government/publications/homelessness-reduction-bill-policy-factsheets>

**Looked after children and previously looked after children.** The most common reason for children becoming looked after is as a result of abuse and/or neglect. The School ensures that staff have the skills, knowledge and understanding to keep looked after children safe. In particular, that they have the information they need in relation to a child'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 birth parents or those with parental responsibility. They should also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. DSL should have details of the child's social worker and the name of the virtual school head in the authority that looks after the child. A previously looked after child potentially remains vulnerable and all staff have the skills, knowledge and understanding to keep previously looked after children safe. When dealing with looked after children and previously looked after children, 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. Jon Tomlinson is the Designated Teacher for Looked after children and is appointed to work with local authorities to promote the educational achievement of registered pupils who are looked after. He will also have responsibility for promoting the educational achievement of children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales. Local authorities have on-going responsibilities to the young people who cease to be looked after and become care leavers. That includes keeping in touch with them, preparing an assessment of their needs and appointing a personal adviser who develops a pathway plan with the young person. This plan describes how the local authority will support the care leaver to participate in education or training. DSL should therefore have details of the local authority Personal Advisor appointed to guide and support the care leaver, and should liaise with them as necessary regarding any issues of concern affecting the care leaver.

### **Private Fostering**

Many adults find themselves looking after someone else's child without realising that they may be involved in private fostering. A private fostering arrangement is one that is made privately (that is to say without the involvement of a local authority) for the care of a child under the age of 16 (under 18, if disabled) by someone other than a parent or immediate relative. If the arrangement is to last, or has lasted, for 28 days or more, it is categorised as private fostering.

The Children Act 1989 defines an immediate relative as a grandparent, brother, sister, uncle or aunt (whether of full blood or half blood or by marriage or civil partnership), or a stepparent.

People become involved in private fostering for all kinds of reasons. Examples of private fostering include:

- Children who need alternative care because of parental illness;
- Children whose parents cannot care for them because their work or study involves long or antisocial hours;
- Children sent from abroad to stay with another family, usually to improve their educational opportunities;
- Unaccompanied asylum seeking and refugee children;
- Teenagers who stay with friends (or other non-relatives) because they have fallen out with their parents;
- Children staying with families while attending a school away from their home area.

There is a mandatory duty on the school to inform Staffordshire Children's Social Care of a private fostering arrangement by contacting Staffordshire Children's Advice and Support (**0300 111 8007**), who then has a duty to check that the young person is being properly cared for and that the arrangement is satisfactory.

### **Safeguarding within the Boarding context**

As a boarding school it is essential that we also take into account the safeguarding considerations which arise from the boarding context:

#### ***Safeguarding vulnerabilities faced by boarders( including adult boarders) within their boarding setting:***

School is 24 hours for fulltime boarders and so it can be difficult to escape situations brought about, for example, if there is an instance of child on child abuse. Differences between pupils can be particularly clear in boarding, with means there is potential for this to be a source of unkindness, and for this to escalate in boarding.

Supervision needs to be active and operate with awareness. Communication between staff needs to be effective and timely. Sleeping hours present opportunities for abuse in all forms to arise. Staff must do all that is reasonably possible to prevent this and to act on any instances quickly and effectively, using the school's behaviour policy and systems. Nurturing a culture of respect, kindness, trust and openness within boarding is a key defence against safeguarding failings here. Strong boarding relationships between all boarders and staff are very important.

Good supervision around site is essential. It is, of course, impossible to survey the whole site at once. Pupils need to be clear about out of the behaviour policy, bounds areas, in-house times, expectations when they visit areas around the site and expectations with regard to signing out. Staff should be aware of areas which are of heightened concern.

Site security is very important. Staff are identifiable with lanyards. Visitors are unable to enter buildings primarily used by boarders. All staff should exercise vigilance in the interests of site security for the safeguarding of all boarders (including adult boarders).

#### ***Safeguarding vulnerabilities faced by boarders ( including adult boarders) because of their situation in needing or choosing boarding:***

It is important to be aware that boarders (including adult boarders) come from a range of backgrounds and have a wide variety of reasons for boarding. Often boarding will be a positive choice, but it can also arise out of necessity, for cultural reasons and/or out of parental choice which may be firmly out of alignment with the feelings of the pupil. Staff must endeavour to make everyone's boarding experience positive and developmentally-beneficial, but must remain aware that a minority of boarding pupils will find their experience challenging and may need additional support.

Many of our boarders are a long way from home and consideration should be given to what this situation means for them. There is the possibility of parental input into boarding pupil's daily-routine and their personal development varying significantly. Staff should be particularly aware of the additional needs which some boarders may have in this regard.

There is a risk that some of our boarders may have feelings of abandonment. This can make them vulnerable to exploitation and harmful behaviours. Staff must be aware of this, so that they are attuned to looking for any signs.

#### ***Safeguarding considerations for staff working in the boarding setting:***

Staff should respect boarders' privacy. Generally, bedrooms should be entered after a knock and response. There are occasions where a more immediate entry into a room may be required, often for safeguarding reasons, where this is the case they will knock and announce their entrance.

Conversations between staff and boarding pupils should be respectful, friendly and professional. Staff should be aware of the greater potential in boarding for unprofessional or even inappropriate relationships to form. Staff have appropriate training and should be conscious of pupil perception and

must always operate with a sense of fairness, supporting all boarders (including adult boarders) equally.

Staff should adhere to all risk assessments for boarding and be particularly aware of the important role they have to keep all safe when on duty. This will require an active role in kitchen management and other domestic areas where common Health and Safety risks are likely to occur.

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

*Keeping Children Safe in Education, 2025* states that “All staff should be aware that children can abuse other children, including online (often referred to as Child-on-Child abuse) and that it can happen both inside and outside of school or college and online”. It is important that all staff recognise the indicators and signs of Child-on-Child abuse and know how to identify it and respond to reports. All staff should understand, that even if there are no reported cases in school it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding Child-on-Child abuse they should speak to their designated safeguarding lead (or deputy). It is essential as a boarding school that the risks associated with children sharing overnight accommodation are recognised and managed.

It is important to be aware that safeguarding issues can manifest themselves via Child-on-Child abuse, which can happen both inside and outside of school and online. Often there is a gendered nature of Child-on-Child abuse and it is more likely that girls will be victims and boys perpetrators, however all Child-on-Child abuse is unacceptable and will be taken seriously. This is most likely, but not limited to bullying (including cyber bullying, prejudice-based and discriminatory bullying), abuse in intimate personal relationships between peers, physical abuse (such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm this may include an online element which facilitates, threatens and/or encourages physical abuse), sexual violence (such as rape, assault by penetration and sexual assault), sexual harassment (such as sexual comments, remarks, jokes, online sexual harassment, which may be stand alone or part of a broader pattern of abuse), causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party, consensual and non-consensual sharing of nudes and semi nudes images and or videos, Upskirting (which typically involves taking a picture under a person’s clothing without their permission and or knowledge , with the intention of viewing their genitals or buttocks ( with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence and anyone of any gender can be a victim), initiation type violence and rituals and sexting. This may include an online element which facilitates, threatens and/or encourages sexual violence. Initiation/hazing type violence and rituals. (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element. Such abuse will **never** be tolerated or passed off as "banter", "just having a laugh" or "part of growing up" and will be treated as a safeguarding issue where it is reasonable to suspect that the child is suffering or likely to suffer significant harm. Denstone takes a Zero tolerance approach to abuse. All children involved whether victim or perpetrator will be treated “at risk” and supported. (See Discipline & Exclusion Policy & Anti- Bullying Policy).

### **Signs that a child is being abused by their peers**

All staff should be alert to the well-being of pupils and to signs of abuse, and should engage with these signs, as appropriate, to determine whether they are caused by peer-on-peer abuse. However, staff should be mindful of the fact that the way(s) in which children will disclose or present with behaviour(s) as a result of their experiences will differ.

Signs that a child may be suffering from peer-on-peer abuse can also overlap with those indicating other types of abuse and can include:

- failing to attend school, disengaging from classes or struggling to carry out school related tasks to the standard ordinarily expected
- physical injuries
- experiencing difficulties with mental health and/or emotional wellbeing
- becoming withdrawn and/or shy; experiencing headaches, stomach aches, anxiety and/or panic attacks suffering from nightmares or lack of sleep or sleeping too much
- broader changes in behaviour including alcohol or substance misuse
- changes in appearance and/or starting to act in a way that is not appropriate for the child's age
- abusive behaviour towards others

Abuse affects children very differently. The above list is by no means exhaustive and the presence of one or more of these signs does not necessarily indicate abuse. The behaviour that children present with will depend on their particular circumstances. Rather than checking behaviour against a list, staff are trained to be alert to behaviour that might cause concerns, to think about what the behaviour might signify, to encourage children to share with them any underlying reasons for their behaviour, and, where appropriate, to engage with their parents so that the cause(s) of their behaviour can be investigated. Where a child exhibits any behaviour that is out of character or abnormal for his/her age, staff should always consider whether an underlying concern is contributing to their behaviour (for example, whether the child is being harmed or abused by their peers) and, if so, what the concern is and how the child can be supported going forwards.

The power dynamic that can exist between children is also very important when identifying and responding to their behaviour: in all cases of peer-on-peer abuse, a power imbalance will exist within the relationship. This inequality will not necessarily be the result of an age gap between the child responsible for the abuse and the child being abused. It may, for example, be the result of their relative social or economic status. Equally, while children who abuse may have power over those who they are abusing, they may be simultaneously powerless to others.

### **Children with particularly vulnerability to abusing or being abused by their peers**

Any child can be vulnerable to peer-on-peer abuse due to the strength of peer influence during adolescence, and staff should be alert to signs of such abuse amongst all children. Individual and situational factors can increase a child's vulnerability to abuse by their peers. For example, an image of a child could be shared, following which they could become more vulnerable to peer-on-peer abuse due to how others now perceive them, regardless of any characteristics which may be inherent in them and/or their family. Peer group dynamics can also play an important role in determining a child's vulnerability to such abuse. For example, children who are more likely to follow others and/or who are socially isolated from their peers may be more vulnerable to peer-on-peer abuse. Children who are questioning or exploring their sexuality may also be particularly vulnerable to abuse by their peers.

Research suggests that peer-on-peer abuse may affect boys differently from girls, and that this difference may result from societal norms (particularly around power, control and the way in which femininity and masculinity are constructed) rather than biological make-up.

Barriers to disclosure will also be different. As a result, schools need to explore the gender dynamics of peer-on-peer abuse within their settings, and recognise that these will play out differently in single sex, mixed or gender imbalanced environments.

### **Definition of Child-on-Child Abuse**

There is no clear boundary between incidents that should be regarded as abusive and incidents that should be dealt with by the School's behavioural and disciplinary systems. If one child causes harm to another, this should not necessarily be dealt with as abuse: unkindness, physical fighting and harassment between children are not always or inevitably seen as child protection issues. However, it may be appropriate to regard Child-on-Child behaviour as abusive if harm is caused because:

- There is a **significant power** imbalance between the children concerned. The abuse of children is often constructed around an age differential between the abuser and the abused, but in cases of peer-on-peer abuse this may not always be the case. In such circumstances, power imbalances can manifest in other ways, for example gender, social status within peer groups, intellectual ability, physical development, economic wealth, social marginalisation and so on. It is important to note that the perpetrator and/or victim may well be subject to power imbalances with other individuals in an incident of abuse and so it is important to investigate any incident as fully as possible.
- The perpetrator has **repeatedly** tried to harm one or more other children.
- There are concerns about the **intention** of the alleged perpetrator. If evidence suggests that there was an intention to cause severe harm to the victim, this should be regarded as abusive whether severe harm was caused or not.

Abusive behaviour can happen to pupils in schools and settings and it is necessary to consider what abuse is and looks like, how it can be managed and what appropriate support and intervention can be put in place to meet the needs of the individual and what preventative strategies may be put in place to reduce further risk of harm.

### **Types of Child-on-Child abuse**

There are many forms of abuse that may occur between peers and this list is not exhaustive. Each form of abuse or prejudiced behaviour is described in detail followed by advice and support on actions to be taken.

#### **Physical abuse e.g. (biting, hitting, kicking, hair pulling)**

Physical abuse may include, hitting, kicking, nipping, shaking, biting, hair pulling, or otherwise causing physical harm to another person. There may be many reasons why a child harms another and it is important to understand why a child has engaged in such behaviour, including accidentally before considering the action or punishment to be undertaken.

#### **Harmful sexual Behaviours /sexual abuse e.g. (inappropriate sexual language, touching, sexual assault)**

Harmful sexual behaviour (HSB) is developmentally inappropriate sexual behaviour which is displayed by children and young people and which may be harmful or abusive. Harmful sexual behaviour from children is not always contrived or with the intent to harm others. There may be many reasons why a child engages in harmful sexual behaviour and it may be just as distressing to the child who instigates it as well as the child it is intended towards. Harmful sexual may range from inappropriate sexual language, inappropriate role play, to sexually touching another, causing someone to engage in sexual activity without consent such as forcing someone to strip or touch themselves sexually or engage in sexual activity with a third part or other sexual assault/abuse.

### **Signs and indicators**

Children and young people demonstrate a range of sexual behaviours as they grow up, and this is not always harmful.

Sexualised behaviour sits on a continuum with five stages:

- **appropriate** – the type of sexual behaviour that is considered 'appropriate' for a particular child depends on their age and level of development
- **inappropriate** – this may be displayed in isolated incidents, but is generally consensual and acceptable within a peer group
- **problematic** – this may be socially unexpected, developmentally unusual, and impulsive, but have no element of victimisation
- **abusive** – this often involves manipulation, coercion, or lack of consent
- **violent** – this is very intrusive and may have an element of sadism

In terms of relationships our College regulations state – Personal relationships are one particularly significant area in which values are important. While it is natural and right for relationships to develop, College is essentially a place for a wide range of friendship, activity and intellectual discovery. In relationships do please remember to think of the other person. One useful guideline for what you can and cannot do is defined by the phrase ‘causing embarrassment to others’. It is therefore inappropriate for students of any age to engage in sexual petting or kissing around College, in common rooms, or at School social events. Walking arm in arm or holding hands and so on should be reserved for later in the day, that is after supper. You should also remember, at all times, to respect the feelings of others. If a member of staff comes across a couple who are to some extent undressed and clearly engaging in a sexual act other than sexual intercourse, individuals are likely to be suspended. It is very likely that anyone who engages in sexual intercourse at School will be permanently excluded. For legal reasons, the relative ages of those involved in such activity could seriously exacerbate the consequences, as it could for any misconduct of a sexual nature.

### **Bullying (physical, name calling, homophobic)**

Bullying is unwanted, aggressive behaviour among school aged children that involves a real or perceived power imbalance. The behaviour is repeated, or has the potential to be repeated, over time. Both children who are bullied and who bully others may have serious, lasting problems.

In order to be considered bullying, the behaviour must be aggressive and include:

**An Imbalance of Power:** Children who bully use their power—such as physical strength, access to embarrassing information, or popularity—to control or harm others. Power imbalances can change over time and in different situations, even if they involve the same people.

**Repetition:** Bullying behaviours happen more than once or have the potential to happen more than once.

Bullying includes actions such as making threats, spreading rumours, attacking someone physically or verbally or for a particular reason e.g. size, hair colour, gender, sexual orientation, and excluding someone from a group on purpose. (See Anti Bullying Policy)

### **Cyber bullying**

Cyber bullying is the use of phones, instant messaging, e-mail, chat rooms or social networking sites such as Facebook and Twitter to harass, threaten or intimidate someone for the same reasons as given above.

It is important to state that cyber bullying can very easily fall into criminal behaviour under the Malicious Communications Act 1988 (section 1) which states that electronic communications which are indecent or grossly offensive, or convey a threat or false information or demonstrate that there is an intention to cause distress or anxiety to the victim would be deemed to be criminal. This is also supported by the Communications Act 2003, Section 127 which states that electronic communications which are grossly offensive or indecent, obscene or menacing, or false, used again for the purpose of causing annoyance, inconvenience or needless anxiety to another could also be deemed to be criminal behaviour.

If the behaviour involves the use of taking or distributing indecent images of children under the age of 18 then this is also a criminal offence under the Sexual Offences Act 2003. Outside of the immediate support children may require in these instances, the school will have no choice but to involve the police to investigate these situations. (See Digital safety Policy)

**Sexting (youth-produced sexual imagery)** is one of a number of ‘risk-taking’ behaviours associated with the use of digital devices, social media or the internet. It is accepted that young people experiment and challenge boundaries and therefore the risks associated with ‘online’ activity can never be completely eliminated. However, Denstone College takes a pro-active approach in its ICT and PSHE programmes to help students to understand, assess, manage and avoid the risks associated with

'online activity'. The School recognises its duty of care to its young people who do find themselves involved in such activity as well as its responsibility to report such behaviours where legal or safeguarding boundaries are crossed.

Sexting (youth-produced sexual imagery) includes the sending of sexually explicit photos, images, text messages, or e-mails by using a phone or other mobile device. These images are shared between young people and/or adults via a mobile phone, handheld device, computer, 'tablet' or website with people they may not even know. Once the image is taken and sent, the sender has lost control of the image and these images could end up anywhere. By having in their possession indecent images of a person under 18, or distributing them to someone else, children are unlikely to be aware that they could be breaking the law as these are offences under the Sexual Offences Act 2003. There are many different types of sexting and it is likely that no two cases will be the same. It is necessary to carefully consider each case on its own merit. However, it is important that the School applies a consistent approach when dealing with an incident to help protect children. For this reason, the DSL (or Deputy) needs to be informed of any sexting (youth-produced sexual imagery) incidents. The range of contributory factors in each case also needs to be considered in order to determine an appropriate and proportionate response (see Discipline & Exclusion Policy).

### **Initiation/Hazing**

Hazing is a form of initiation ceremony which is used to induct newcomers. There are a number of different forms, from relatively mild rituals to severe and sometimes violent ceremonies.

The idea behind this practice is that it welcomes newcomers by subjecting them to a series of trials which promote a bond between them. After the hazing is over, the newcomers also have something in common with older members of the organisation, because they all experienced it as part of a rite of passage. Many rituals involve humiliation, embarrassment, abuse, and harassment.

### **Prejudiced Behaviour**

The term prejudice-related bullying refers to a range of hurtful behaviour, physical or emotional or both, which causes someone to feel powerless, worthless, excluded or marginalised, and which is connected with prejudices around belonging, identity and equality in wider society – in particular, prejudices to do with disabilities and special educational needs, ethnic, cultural and religious backgrounds, gender, home life, (for example in relation to issues of care, parental occupation, poverty and social class) and sexual identity.

### **Teenage relationship abuse**

Teenage relationship abuse is defined as a pattern of actual or threatened acts of physical, sexual, and/or emotional abuse, perpetrated by an adolescent (between the ages of 13 and 18) against a current or former partner. Abuse may include insults, coercion, social sabotage, sexual harassment, threats and/or acts of physical or sexual abuse. The abusive teen uses this pattern of violent and coercive behaviour in order to gain power and maintain control over the partner.

Issues surrounding Honour Based Violence (HBV), Forced Marriage and Radicalisation may also be relevant where coercion or power imbalances are involved between peers. It is also important to recognise that Child-on-Child abuse may well involve pupils here at the School and children in other contexts, thus making a full range of abuse types possible. When dealing with any disclosure of abuse it is important to remember the three bullet points above regarding power, frequency and intention. The extent to which any victim has given consent is also important.

### **Expected action taken by all staff to Child-on-Child abuse**

Although the type of abuse may have a varying effect on the victim and initiator of the harm, these simple steps can help clarify the situation and establish the facts before deciding the consequences for those involved in perpetrating harm.

It is important to deal with a situation of peer abuse immediately and sensitively. It is necessary to gather the information as soon as possible to get the true facts around what has occurred and before the children may have forgotten. It is equally important to deal with it sensitively and think about the language used and the impact of that language on both the children and the parents when they become involved. For example, do not use the word perpetrator, this can quickly create a blame culture and leave a child labelled.

In all cases of Child-on-Child abuse it is necessary that all staff are trained in dealing with such incidents, talking to children and instigating immediate support in a calm and consistent manner. Staff should not be prejudiced, judgmental, dismissive or irresponsible in dealing with such sensitive matters.

### **Preventative Strategies to minimise the risk of Child-on-Child abuse**

In the broadest sense, the School's Pastoral, Academic and Co-Curricular aims create and sustain an environment that helps to minimise the risk and occurrence of Child-on-Child abuse. The School also looks to take a proactive, preventive and educative approach to safeguarding issues with its staff and pupils. Opportunities are sought to give teaching and learning opportunities to our pupils, within the context of PSHE and the wider curriculum. For example, by addressing gender inequality in a statistics class, or by reviewing literature in an English class which addresses bullying and its effect on mental health. Pupils are frequently told what to do if they witness or experience such abuse, the effect that it can have on those who experience it and the possible reasons for it, including vulnerability of those who inflict such abuse. The possible avenues for such education to take place, including education about abusive behaviour, include the following:

- Assemblies
- Pastoral discussion between pupils and Teachers, Tutors, Heads of House, Safeguarding Team, Medical Centre, SMT
- Engagement between pupils and the wider pastoral team, including Medical Centre staff, and School Counsellor
- PSHE presentations from external speakers
- Challenging the attitudes that underlie such abuse (both inside and outside the classroom)
- Working with Governors, Senior Management Team, all staff and volunteers, pupils and parents to address equality issues, to promote positive values, and to encourage a culture of tolerance and respect amongst all members of the School community
- Creating conditions in which our pupils can aspire to and realise safe and healthy relationships
- Creating a culture in which our pupils feel able to share their concerns openly, in a non-judgmental environment, and have them listened to, including the use of The Student Voice for anonymous reporting.
- Responding to cases of peer-on-peer abuse promptly and appropriately.

Denstone College will seek to ensure that it has an open environment where pupils feel safe to share information about anything that is upsetting or worrying them. To enable such an open and honest environment we will aim to make sure that all staff feel confident and able to talk about issues and challenge the perceptions and attitudes of children including where relevant their use of inappropriate language and behaviour towards one another, for example stereotyping of protected characteristics. Staff will never dismiss issues as "banter" or "growing up" or compare them to our own experiences of childhood, when the world was very different. All staff must consider each situation in its own right before taking action. If we minimise the concerns raised it may result in a child seeking no further help or advice and their predicament becoming far worse.

Pupils should be aware that there are a variety of ways in which they can express their views and feelings on any pastoral matter; to access support in order to prevent abuse from occurring, to report abuse that is happening, and to find ongoing support after abuse has been identified. Pupils are able to seek support from staff if they feel they are being abused or that one of their peers is at risk from abuse

or Child-on-Child abuse. Main School pupils are also able to email [shareit@denstoneschool.net](mailto:shareit@denstoneschool.net) to voice any concerns or use the Student Voice platform <https://denstone.thestudentvoice.co.uk/>

### **Multi-agency working regarding Child-on-Child abuse**

The School actively engages with its local partners in relation to peer-on-peer abuse, and works closely with SSCB. The relationships the School has built with SSCB is essential to ensuring that the School is able to prevent, identify early and appropriately handle cases of peer-on-peer abuse. SSCB will help the School

- to develop a good awareness and understanding of the different referral pathways that operate in its local area, as well as the preventative and support services which exist
- to ensure that our pupils are able to access the range of services and support they need quickly
- to support and help inform our local community's response to peer-on-peer abuse
- to increase our awareness and understanding of any concerning trends and emerging risks in our local area to enable us to take preventative action to minimise the risk of these being experienced by our pupils.

The School actively refers concerns/allegations of peer-on-peer abuse where necessary to SSCB via **Staffordshire Childrens Advice and Support** and/or other relevant agencies. This is particularly important because peer-on-peer abuse can be a complex issue, and even more so where wider safeguarding concerns exist. It is often not appropriate for one single agency (where the incident cannot be managed internally) to try to address the issue alone – it requires effective partnership working.

### **Procedures Adopted when a Disclosure of Child-on-Child Abuse is made**

The following general principles and guidelines should be followed: Initial response

- Any direct disclosure by a pupil of an incident of abuse should be taken very seriously and managed sensitively. Basic principles of listening sensitively, providing reassurance, not asking leading questions and not guaranteeing confidentiality should be remembered. Gather the facts and consider the Intent, has this been a deliberate or contrived situation for a child to be able to harm another?
- All incidents should be responded to in line with the Safeguarding Policy Clearly recorded clearly and reported to a member of the safeguarding Team without delay. See Guidance on talking to and listening to children: Effective safeguarding practice ). All information regarding the matter will be recorded on CPOMS.

The DSL will discuss the concerns or allegations with the member of staff who has reported them and will, where necessary, take any immediate steps to ensure the safety of all children affected e.g. victim, alleged perpetrator and any other children affected. DSLs should always use their professional judgement to determine whether it is appropriate for alleged behaviour to be dealt with internally and, if so, whether any external specialist support is required. In borderline cases the DSL may wish to consult SSCB on a no-names basis to determine the most appropriate response. Where the DSL considers or suspects that the behaviour in question might be abusive or violent on a spectrum as opposed to inappropriate or problematic (see below), the DSL should contact Staffordshire **Staffordshire Childrens Advice and Support** Team (See Appendix 1 for contact details) immediately, and in any event within 24 hours of the DSL becoming aware of it.

### **Harmful Sexual Behaviour**

Normal	Inappropriate	Problematic	Abusive	Violent
<ul style="list-style-type: none"> <li>• Developmentally expected</li> <li>• Socially acceptable</li> <li>• Consensual, mutual, reciprocal</li> <li>• Shared decision making</li> </ul>	<ul style="list-style-type: none"> <li>• Single instances of inappropriate sexual behaviour</li> <li>• Socially acceptable behaviour within peer group</li> <li>• Context for behaviour may be inappropriate</li> <li>• Generally consensual and reciprocal</li> </ul>	<ul style="list-style-type: none"> <li>• Problematic and concerning behaviour</li> <li>• Developmentally unusual and socially unexpected</li> <li>• No overt elements of victimisation</li> <li>• Consent issues may be unclear</li> <li>• May lack reciprocity or equal power</li> <li>• May include levels of compulsivity</li> </ul>	<ul style="list-style-type: none"> <li>• Victimising intent or outcome</li> <li>• Includes misuse of power</li> <li>• Coercion and force to ensure compliance</li> <li>• Intrusive</li> <li>• Informed consent lacking or not able to be freely given</li> <li>• May include elements of expressive violence</li> </ul>	<ul style="list-style-type: none"> <li>• Physically violent sexual abuse</li> <li>• Highly intrusive</li> <li>• Instrumental violence which is psychologically and/or sexually arousing to the child responsible for the behaviour</li> <li>• Sadism</li> </ul>

Source: Hackett's Continuum

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. 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. 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. It is important that they are offered appropriate support.

The DSL will discuss the allegations/concerns with **Staffordshire Childrens Advice and Support** and agree on a course of action, which may include:

**A** - Manage internally with help from external specialists where appropriate and possible Where behaviour between peers is abusive or violent (as opposed to inappropriate or problematic), scenarios B, C or D should ordinarily apply. However, where support from local agencies is not available, the School may need to handle allegations/concerns internally. In these cases, the School will engage and seek advice from external specialists (either in the private and/or voluntary sector).

**B** – Undertake/contribute to an inter-agency early help assessment, with targeted early help services provided to address the assessed needs of a child/children and their family These services may, for example, include CAMHS, a specialist harmful sexual behaviour team, and/or youth offending services.

**C** – Refer child/children to children's social care for a section 17 and/or 47 statutory assessment as a matter of best practice, if an incident of peer-on-peer abuse requires referral to and action by children's social care and a strategy meeting is convened, then the School will hold every professional involved in the case accountable for their safeguarding response, including themselves, to both the child who has experienced the abuse, and the child who was responsible for it, and the contexts to which the abuse was associated.

**D** – Report alleged criminal behaviour to the Police Alleged criminal behaviour will ordinarily be reported to the Police, however, there are some circumstances where it may not be appropriate to report such behaviour. For example, where the exchange of youth produced sexual imagery does not

involve any aggravating factors. All concerns/allegations will be assessed on a case by case basis, and in light of the wider context.

### **Points to consider regarding Child-on-Child abuse:**

**What is the age of the children involved?** How old are the children involved in the incident and is there any age difference between those involved?

**Where did the incident or incidents take place?** Was the incident in an open, visible place to others? If so was it observed? If not, is more supervision required within this particular area?

**What was the explanation by all children involved of what occurred?** Can each of the children give the same explanation of the incident and also what is the effect on the children involved? Is the incident seen to be bullying for example, in which case regular and repetitive? Is the version of one child different from another and why?

**What is each of the children's own understanding of what occurred?** Do the children know/understand what they are doing? For example, do they have knowledge of body parts, of privacy and that it is inappropriate to touch? Is the child's explanation in relation to something they may have heard or been learning about that has prompted the behaviour? Is the behaviour deliberate and contrived? Does the child have understanding of the impact of their behaviour on the other person?

**Repetition:** Has the behaviour been repeated on more than one occasion? In the same way it must be considered has the behaviour persisted after the issue has already been discussed or dealt with and appropriately resolved?

### **Next Steps**

Once the outcome of the incident(s) has been established it is necessary to ensure future incidents of abuse do not occur again and consider the support and intervention required for those involved.

### **For the child who has been harmed**

What support they require depends on the individual child. It may be that they wish to seek counselling or one to one support via a member of the School's Pastoral Team. It may also be that they feel able to deal with the incident(s) on their own or with support of family and friends. In that case, it is necessary that the child continues to be monitored and offered support should they require it at a future time. If the incidents are of a bullying nature, the child may need support in improving peer groups/relationships with other children or some restorative justice work with all those involved may be required. Other interventions that could be considered may target a whole class or year group, for example a speaker on cyber bullying, relationship abuse etc. It may be that through the continued curriculum of assemblies, PSHE, that certain issues can be discussed and debated more frequently.

If the child feels particularly vulnerable it may be that a risk assessment can be put in place for them whilst in school so that they have a key contact that they can talk to, support strategies for managing future issues and identified services to offer additional support.

### **For the child who has displayed harmful behaviour**

In this circumstance it is important to find out why the child has behaved in such a way. It may be that the child is experiencing their own difficulties and may even have been harmed themselves in a similar way. In such cases support such as counselling or one to one support via a member of the School's Pastoral Team may also be necessary. Particular support from identified services may be necessary through an early help referral and the child may require additional support from family members.

Once the support required to meet the individual needs of the child has been met, it is important that the child receives a consequence for their behaviour. This may be in the form of restorative justice e.g. making amends with the child they have targeted if this has been some form of bullying. In the cases of sexually harmful behaviour it may be a requirement for the child to engage in one to one work with a

particular service or agency (if a crime has been committed this may be through the police or youth offending service).

Even following the conclusion of any investigation, the behaviour that the child has displayed may continue to pose a risk to others in which case an individual risk assessment may be required. This should be completed via a multi-agency response to ensure that the needs of the child and the risks towards others are measured by all of those agencies involved including the child and their parents. This may mean additional supervision of the child or protective strategies if the child feels at risk of engaging in further inappropriate or harmful behaviour.

The school may also choose a punishment as a consequence such as exclusion or suspension for a period of time to allow the child to reflect on their behaviour.

### **After care**

It is important that following the incident the children involved continue to feel supported and receive help even if they have stated that they are managing the incident. Sometimes the feelings of remorse, regret or unhappiness may occur at a much later stage than the incident. It is important to ensure that the children do not engage in any further harmful behaviour either towards someone else or to themselves as a way of coping (e.g. self-harm). In which case, regular reviews with the children following the incident(s) are imperative.

### **Understanding motivations and behaviours for the sharing of nudes and semi nudes**

Nudes and semi-nudes can be shared by, and between, children and young people under a wide range of circumstances and are often not sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may also occur where:

- children and young people find nudes and semi-nudes online and share them claiming to be from a peer
- children and young people digitally manipulate an image of a young person into an existing nude online or use artificial intelligence (AI) to generate a new nude or semi-nude image of a young person
- images created or shared are used to abuse or blackmail peers. Situations could include: children and young people selling nudes or semi-nudes of others online
- children and young people coercing a peer into sharing a nude or semi-nude to blackmail them for money, further images, or force them into illegal activity
- children and young people hacking a peer's account to share images more widely without consent to publicly shame
- children and young people create and share a nude or semi-nude with an adult who has presented themselves as someone under the age of 18 to groom, sexually abuse or blackmail them.

### **Defining the incident of nudes and semi nudes**

Incidents can broadly be divided into two categories:

- **aggravated:** incidents involving additional or abusive elements beyond the creation, sending or possession of nudes and semi-nudes. These can further be sub- categorised into:
  - **adult involved:** adult offenders (even criminal gangs) attempt to develop relationships by grooming children and young people, in criminal sex offences even without the added element of nudes and semi-nudes. Victims may be family friends, relatives, community members or contacted via the Internet. The images may be solicited by adult offenders. Some offenders may coerce or blackmail the child or young person into sending more images or making a payment (known as financially motivated sexual extortion or 'sextortion') These are all forms of child sexual abuse.

- **youth only – intent to harm:** these cases can arise from interpersonal conflict, such as break-ups and fights among friends, or criminal/abusive conduct such as blackmail (including financial), threats or deception, sexual abuse or exploitation by young people
- **youth only – reckless misuse:** no intent to harm but images are taken or sent without the knowing or willing participation of the young person who is pictured. In these cases, pictures are taken or sent thoughtlessly or recklessly and a victim may have been harmed as a result
- **experimental:** incidents involving the creation and sending of nudes and semi- nudes with no adult involvement, no apparent intent to harm or reckless misuse. These can further be subcategorised into:
  - romantic: incidents in which young people in ongoing relationships make images for themselves or
  - each other, and images were not intended to be distributed beyond the pair
  - ‘sexual attention seeking’: the phrase ‘sexual attention seeking’ is taken directly from the typology however it is important to note that incidents within this category can be a part of normal childhood. A child or young person should not be blamed for taking and sharing their image
  - other: cases that do not appear to have aggravating elements, like adult involvement, malicious motives, or reckless misuse, but also do not fit into the Romantic or Attention Seeking sub-types. These involve either young people who take pictures of themselves for themselves (no evidence of
  - any sending or sharing or intent to do so) or pre-adolescent children (age 9 or younger) who did not appear to have sexual motives

### **Handling incidents-Initial response of sharing nudes and semi nudes**

When an incident involving nudes and semi-nudes comes to the attention of any member of staff in an education setting:

- the incident should be referred to the Safeguarding team as soon as possible
- the Safeguarding Team should hold an initial review meeting with appropriate staff.
- there should be subsequent interviews with the children or young people involved (if appropriate)
- parents and carers should be informed at an early stage and involved in the process in order to best support the child or young person unless there is good reason to believe that involving them would put the child or young person at risk of harm
- A referral should be made to children’s social care and/or the police immediately if there is a concern that a child or young person has been harmed or is at risk of immediate harm at any point in the process

### **Initial review meeting regarding sharing of nudes and semi nudes**

The initial review meeting should consider the initial evidence and aim to establish:

- whether there is an immediate risk to any child or young person
- if a referral should be made to the police and/or children’s social care
- if it is necessary to view the image(s) in order to safeguard the child or young person – **in most cases, images or videos should not be viewed.**
- what further information is required to decide on the best response

- who has created the nude or semi-nude? For example, is it an AI-generated image shared by another child or young person
- whether the image(s) has been shared widely and via what services and/or platforms. This may be unknown
- whether immediate action should be taken to delete or remove images or videos from devices or online services
- any relevant facts about the children or young people involved which would influence risk assessment
- if there is a need to contact another education, setting or individual
- whether to contact parents or carers of the children or young people involved - in most cases they should be involved

An immediate referral to police and/or children's social care should be made if at this initial stage any of the following points apply:

- The incident involves an adult. Where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident.
- There is reason to believe that a child or young person has been coerced, blackmailed or groomed, or there are concerns about their capacity to consent (for example, owing to special educational needs)
- What you know about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The images involves sexual acts and any child or young person in the images or videos is under 13
- You have reason to believe a child or young person is at immediate risk of harm owing to the sharing of nudes and semi-nudes, for example, they are presenting as suicidal or self-harming

The decision to respond to the incident without involving the police or children's social care should only be made in cases where the DSL is confident that they have enough information to assess the risks to any child or young person involved and the risks can be managed within the education setting's pastoral support and disciplinary framework and, if appropriate, their local network of support.

The decision should be made and recorded in line with this policy and be based on consideration of the best interests of any child or young person involved. This should take into account proportionality as well as the welfare and protection of any child or young person. The decision should be reviewed throughout the process of responding to the incident.

If doubts remain after following child protection procedures, local safeguarding arrangements should be followed.

### **Assessing the risks or sharing nudes and semi nudes**

The circumstances of incidents can vary widely. If at the initial review stage a decision has been made not to refer to police and/or children's social care, the Safeguarding team (alert) should conduct a further review (including an interview with any child or young person involved) to establish the facts and assess the risks, referring back to any relevant assessment tools.

When assessing the risks and determining whether a referral is needed, the following should be also considered:

- why was the nude or semi-nude shared? Was it consensual or was the child or young person put under pressure or coerced?
- has the nude or semi-nude been shared beyond its intended recipient? Was it shared without the consent of the child or young person who produced the image?

has the nude or semi-nude been shared on social media or anywhere else online?

If so, what steps have been taken to contain the spread?

- how old are any of the children or young people involved?
- did the child or young person send the nude or semi-nude to more than one person?
- do you have any concerns about the child or young person's vulnerability?
- are there additional concerns if the parents or carers are informed?

These questions will help the Safeguarding Team decide whether a child or young person is at risk of harm, in which case a referral will be appropriate, whether additional information or support is needed from other agencies or whether the education setting can manage the incident and support any child or young person directly. The Safeguarding Team will always use their professional judgement in conjunction with that of their colleagues to assess incidents.

### **Supporting the young person/people involved in sharing nudes and semi nudes**

Once a school has assessed a child or young person as not at immediate risk, it may be necessary to have a conversation with them and decide the best course of action.

The purpose of the conversation is to:

- identify, **without viewing wherever possible**, what the image contains and whether anyone else has been involved
- find out whether the image has been shared between two people or shared further. This may be speculative information as images or videos may have been shared more widely than the child or young person is aware of
- discuss what actions and support might be needed, including preventing further distribution. This discussion should take into account the views of the child or young person as well as balancing what are considered to be appropriate actions for responding to the incident

When discussing the sharing of nudes and semi-nudes, it is important that the Safeguarding Team

- reassures the child or young person that they are not alone, and the education setting will do everything that they can to help and support them. They should also be reassured that they will be kept informed throughout the process
- recognises the pressures that children and young people can be under to take part in sharing an image and, if relevant, supports their parents and carers to understand the wider issues and motivations around this
- remains solution-focused and avoids any victim-blaming questions such as 'why have you done this?' as this may prevent the child or young person from talking about what

has happened. For example, use questions such as 'describe what happened' or 'explain to me who was involved'

- helps the child or young person to understand what has happened by discussing the wider pressures that they may face and the motivations of the person that sent on the image(s)
- discusses issues of consent and trust within healthy relationships. Explain that it is not ok for someone to make them feel uncomfortable, to pressure them into doing things that they do not want to do, or to show them things that they are unhappy about. Let them know that they can speak to the DSL or equivalent if this ever happens
- in the case of an AI-generated or digitally manipulated nudes or semi-nudes being created of the child or young person and shared with others, reassures them that it will be treated in the same way as any other incident
- explains the law on the sharing of nudes and semi-nudes. It is important to highlight that the law is in place to protect children and young people rather than criminalise them and should be explained in such a way that avoids alarming or distressing them
- advises the child or young person to use the IWF and Childline's Report Remove tool to report an image that has been shared online: [www.childline.org.uk/info- advice/bullying-abuse-safety/online-mobile-safety/sexting/report-nude-image- online/](http://www.childline.org.uk/info-advice/bullying-abuse-safety/online-mobile-safety sexting/report-nude-image-online/). NCMEC's Take It Down tool can also be used to help them to anonymously remove nudes or semi-nudes that have yet to be shared online but they think might be (for example, in an incident where a young person has been threatened to have their image shared but threat has not yet been carried out): <https://takeitdown.ncmec.org>. (see [section 2.12](#) for further detail on reporting routes)

**Children and young people who have had their nudes or semi-nudes shared publicly should be:**

- reassured that they have done the right thing by speaking to an adult and that the education setting and other adults are there to help
- advised:

**Children and young people who have been sent a nude or semi-nude should be:**

- reassured that they have done the right thing by speaking out and that the education setting and other adults are there to help
- asked whether it was sent by an adult or another child or young person and if they requested the photo or if it was sent unsolicited
- advised:
  - on the importance of reporting the image online if it has been shared
  - to permanently delete it from their devices and accounts
  - on the importance of not sharing the image further
  - if they asked to receive the photos, explain that they should not put pressure onto others to do things that they are uncomfortable with

**Children and young people who have shared another child's or young person's nudes or semi-nudes should be:**

- asked:

- whether they asked for the photo or were initially sent it without requesting
  - who the image has been sent to and where it has been shared. Agree next steps for taking the image down, including deleting the image from their phone or any social media accounts and reporting it to online service providers
  - about their motivations for sharing the photo and discuss what they could have done differently. If they have reacted to an upsetting incident, such as the break-up of a relationship, by sending the photo onwards, talk about how they could have managed their feelings in a healthier and more positive way. Emphasise that whatever the reason, it is always wrong to share nudes and semi-nudes of another child or young person. This can be used as an opportunity to discuss the importance of consent and not putting pressure on others to take or share nudes and semi-nudes
- advised on the law on the sharing of nudes and semi-nudes

**Children and young people who have created a nude or semi-nude of another child or young person and shared it should be:**

- asked:
  - who the image has been sent to and where it has been shared. Agree next steps for taking the image down, including deleting the image from their devices, any social media accounts and anywhere else it has been posted online such as group chats, and reporting it to online service providers
  - about their motivations for creating and sharing the photo and discuss what they could have done differently. If they have reacted to an upsetting incident, such as the break-up of a relationship, by creating or sending the photo onwards, talk about how they could have managed their feelings in a healthier and more positive way. Emphasise that whatever the reason, it is always wrong to share nudes and semi-nudes of another child or young person. This can be used as an opportunity to discuss the importance of consent and how it still applies when nude and semi-nude has not been taken by the child or young person in it
  - advised on the law on the sharing of nudes and semi-nudes and how it still applies to digitally manipulated or AI-generated imagery of other children and young people

**Child on Child Sexual violence and sexual harassment.**

It is important that School staff are aware of sexual violence and sexual harassment can occur between two or more children of any age and sex, from primary through to secondary stage and into college. It can occur also through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face-to-face (both physically and verbally) and are never acceptable.

We will respond to all reports and concerns of child on child sexual violence and sexual harassment, including those that have happened outside of the school or school premises, and or online. Whilst any report of sexual violence or sexual harassment should be taken seriously, staff should be aware of, it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report or their experience minimised. Children who are victims of sexual violence and sexual harassment wherever it happens, may find the experience stressful and

distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

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

Staff are aware of the importance of:

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

When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

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

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

**Sexual Assault:** A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. (sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent, or touching someone’s bottom/breasts/genitalia without consent, can still constitute sexual assault.)

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

**Consent** is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

- a child under the age of 13 can never consent to any sexual activity
- the age of consent is 16
- sexual intercourse without consent is rape

**Sexual harassment** when referring to sexual harassment we mean ‘unwanted conduct of a sexual nature’ that can occur online and offline and both inside and outside of school. When we reference sexual harassment, we do so in the context of child on child sexual harassment.

Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Whilst not intended to be an exhaustive list, sexual harassment can include: sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names; sexual "jokes" or taunting; physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (we should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; upskirting and online sexual harassment. This 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 nudes and semi-nudes images and/or videos. As set out in UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people taking and sharing nude photographs of under 18 year olds 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're not comfortable with online.

### **Responding to the report of Sexual violence and sexual harassment**

The School will respond on a case-by-case basis, with the DSL (or a deputy DSL) taking a leading role and using their professional judgement, supported by other agencies, such as children's social care and the police as required. All victims will be taken seriously, supported and kept safe.

- If possible, managing reports with two members of staff present, (preferably one of them being the designated safeguarding lead or a deputy). However, this might not always be possible.
- Where the report includes an online element, being aware of searching screening and confiscation advice and UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people. The key consideration is for staff not to view or forward illegal images of a child. The highlighted advice provides more details on what to do when viewing an image is unavoidable. In some cases, it may be more appropriate to confiscate any devices to preserve any evidence and hand them to the police for inspection.
- Not promising confidentiality at this initial stage as it is very likely a concern will have to be shared further (for example, with the designated safeguarding lead or children's social care) to discuss next steps. Staff should only share the report with those people who are necessary in order to progress it. It is important that the victim understands what the next steps will be and who the report will be passed to.
- Recognising that a child is likely to disclose to someone they trust: this could be anyone on the school staff. It is important that the person to whom the child discloses recognises that the child has placed them in a position of trust. They should be supportive and respectful of the child.
- Recognising that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory and so children may not be able to recall all details or timeline of abuse.
- Keeping in mind that certain children may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity and/or sexual orientation.
- Listening carefully to the child, reflecting back, using the child's language, being non-judgmental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions – where, when, what, etc. It is important to note that whilst leading questions should be avoided, staff can ask children if they have been harmed and what the nature of that harm was.
- Considering the best way to make a record of the report. Best practice is to wait until the end of the report and immediately write up a thorough summary. This allows the staff member to devote their full attention to the child and to listen to what they are saying. It may be

appropriate to make notes during the report (especially if a second member of staff is present). However, if making notes, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking. Either way, it is essential a written record is made.

- Only recording the facts as the child presents them. The notes should not reflect the personal opinion of the note taker.

### **Remember**

- Sexual violence and abuse can occur between two children of any age and sex and within an intimate relationship
- A group of children may sexually assault or sexually harass a single child or group of children
- Abuse that occurs online or outside of school will be treated equally seriously
- That safeguarding incidents and behaviours can be associated with factors outside of school, including intimate personal relationships.
- Children who are victims are likely to find the experience stressful and distressing, which is likely to adversely affect their educational attainment and will be exacerbated if the alleged perpetrator attends the same school.

### **Confidentiality**

Staff taking a report should never promise confidentiality as it is very likely that it will be in the best interest of the victim to seek advice and guidance from others in order to provide support and engage appropriate agencies. Advice should be sought from the DSL or DDSL, who should consider the following:

- parents or carers should normally be informed (unless this would put the victim at greater risk)
- the basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
- rape, assault by penetration and sexual assaults are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of referring to the police remains. The police will take a welfare, rather than a criminal justice approach, in these cases.

### **Anonymity**

We will do all we reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment. Amongst other things, this will mean carefully considering, based on the nature of the report, which staff should know about the report and any support that will be put in place for the children involved.

### **Risk Assessment Following a report of sexual violence**

Following a report of sexual violence, the DSL (or deputy 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 all the other children, (and, if appropriate, adult students and staff) at the school, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from any future harm.

Risk assessments will be recorded and kept under review. At all times, the school will actively consider the risks posed to all their pupils and students and put adequate measures in place to protect them and keep them safe. The DSL (or deputy DSL) should ensure they are engaging with children's social care and specialist services as required.

The School will consider:

- the victim, especially their protection and support
- whether there may have been other victims

- the alleged perpetrator(s)
- all the other children, (and, if appropriate, adult students and staff) at the school or college, 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 required to make the location safer.

As always, all staff should act in the best interests of the child sexual violence and sexual harassment is not acceptable and will not be tolerated.

### **Action following a report of sexual violence and/or sexual harassment**

Important considerations will include:

- the needs and wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however need to be balanced with the school's duty and responsibilities to protect other children.
- the nature of the alleged incident(s), including: whether a crime may have been committed or whether HSB has been displayed
- the ages of the children involved
- the developmental stages of the children involved
- any power imbalance between the children. For example, is/are the alleged perpetrator(s) significantly older, more mature, confident? Does the victim have a disability or learning difficulty?
- Consider the proportionality of the response. Support should be tailored on a case-by-case basis. The support required regarding a one-off incident of sexualised name-calling is likely to be vastly different from that for a report of rape.
- if the alleged incident is a one off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature
- that sexual violence and sexual harassment can take place within intimate personal relationships between peers
- importance of understanding intra familial harms and any necessary support for siblings following incidents
- are there ongoing risks to the victim, other children or school staff
- other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation

Immediate consideration should be given as to how best to support and protect the victim and the alleged perpetrator (and any other children involved/impacted). As always when concerned about the welfare of a child, all staff should act in the best interests of the child. In all cases, School should follow general safeguarding principles as set out in *Keeping Children Safe in Education 2025*. The starting point regarding any report should always be that there is a zero tolerance approach to sexual violence and sexual harassment and it is never acceptable and it will not be tolerated. It is especially important not to pass off any sexual violence or sexual harassment as 'banter', 'part of growing up' or 'boys being boys' as this can lead to a culture of unacceptable behaviours and an unsafe environment for children. 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. 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 or college 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 reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. It is important to explain that the law is in place to

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

Four scenarios for schools and schools to consider when managing any reports of sexual violence and/or sexual harassment. (See *Keeping Children Safe in Education 2025* for further details)

1. Manage internally – the school manages incidents.
2. Early help – multi-agency early help
3. Referrals to children’s social care
4. Reporting to the police – in parallel to children’s social care

It is unlikely that a child will be on police bail with conditions attached. There may be delays in any criminal case, and in such instances the School should not wait for the outcome before protecting the victim, alleged perpetrator and other children in the School. The DSL will complete a risk management plan. The guidance makes it clear that the School needs to consider safeguarding issues around the victim and alleged perpetrator sharing classes and sharing space at school. The School needs to manage the balance between supporting the victim and ensuring the alleged perpetrator has an education and safeguarding support themselves.

### **Ongoing response -Safeguarding and supporting the victim**

The following principles are based on effective safeguarding practice and should help shape any decisions regarding safeguarding and supporting the victim.

- The needs and wishes of the victim should be paramount (along with protecting the child) in any response. It is important they feel in as much control of the process as is reasonably possible. Wherever possible, the victim, if they wish, should be able to continue in their normal routine. Overall, the priority should be to make the victim’s daily experience as normal as possible, so that the school is a safe space for them.
- Consider the age and the developmental stage of the victim, the nature of the allegation(s) and the potential risk of further abuse. Schools should be aware that, by the very nature of sexual violence and sexual harassment, a power imbalance is likely to have been created between the victim and alleged perpetrator(s).
- The victim should never be made to feel they are the problem for making a report or made to feel ashamed for making a report.
- Consider the proportionality of the response. Support should be tailored on a case-by-case basis.
- It is important to be aware that sexual assault can result in a range of health needs, including physical, mental, and sexual health problems and unwanted pregnancy. Children and young people that have a health need arising from sexual assault or abuse can access specialist NHS support from a Sexual Assault Referral Centre (SARC). SARCs offer confidential and non-judgemental support to victims and survivors of sexual assault and abuse. They provide medical, practical, and emotional care and advice to all children and adults, regardless of when the incident occurred.
- It will be important in all scenarios that decisions and actions are regularly reviewed and that relevant policies are updated to reflect lessons learnt. It is particularly important to look out for potential patterns of concerning, problematic or inappropriate behaviour. Where a pattern is identified, the school should decide on a course of action. Consideration should be given as to whether there are wider cultural issues within the school that enabled the inappropriate behaviour to occur and where appropriate extra teaching time and/or staff training could be delivered to minimise the risk of it happening again.

### **Unsubstantiated, unfounded, false or malicious reports**

If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children’s social care may be appropriate. If a report is shown to be deliberately invented or malicious, the school should

consider whether any disciplinary action is appropriate against the individual who made it as per the behaviour policy.

### **Contextual safeguarding**

Safeguarding incidents and behaviours can be associated with factors outside School and can occur between children outside School. All staff need to consider the context within which such incidents/behaviour occur. This is known as contextual safeguarding, meaning that assessment of the children should consider whether wider environmental factors are present in a child's lives that are a threat to their safety and/or welfare.

### **Procedures - Dealing with an allegation of abuse against members of staff ( including supply staff contractors and volunteers ) or the Head**

If an allegation or safeguarding concern (no matter how small) is made concerning a member of staff (including supply staff, contractors and volunteers) , who is currently working in any Educational establishment regardless of whether the School is where the alleged abuse took place, the procedures set out in *Working Together to Safeguard Children 2023*, *Keeping Children Safe in Education 2025* and the Employment Manual will be followed. Parents/guardians will be informed of the allegations involving their child before the end of the school day. The child and his/her family will be supported throughout the procedure. Suspension is not automatic, and proceedings will be without prejudice. If the member of staff is from a supply agency the school will still take the lead while keeping the supply agency fully informed.

Staff have a professional duty to report concerns about the conduct of other adults working in the School if there are indications that a child or children could be at risk of harm.

If staff have a safeguarding concern or an allegation of harming or posing a risk of harm to children is made about another member of staff (including supply staff, volunteers, and contractors), then the Head must be informed immediately, in the absence of the Head, the Chair of Governors must be informed. If the allegation concerns the Head, the person receiving the allegation should immediately inform the Chair of the Governors (Nigel Ratcliffe [NRatcliffe@denstonecollege.net](mailto:NRatcliffe@denstonecollege.net)) without notifying the Head first. If there is considered to be a conflict of interest in reporting the matter to the Head or Chair of the Governors the matter should be referred directed to the LADO via the Staffordshire Childrens Advice and Support.

There are the two levels of allegation/concern: Allegations that may meet the harms threshold and allegation/concerns that do not meet the harms threshold – referred to for the purposes of this guidance as 'low level concerns'.

**Allegations that may meet the harms threshold.** This will be followed where it is alleged that anyone working in the school, including supply teachers, volunteers and contractors has: behaved in a way that has harmed a child, or may have harmed a child and/or possibly committed a criminal offence against or related to a child and/or behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or behaved or may have behaved in a way that indicates they may not be suitable to work with children. This includes behavior that may have happened outside of school, that might make an individual unsuitable to work with children, this is known as transferable risk

**Initial response to an allegation** In the first instance, the Head, or where the Head is the subject of an allegation, the Chair of Governors (referred as the case manager), will consult the LADO and as appropriate the police immediately. The Head / Chair of the Governors will contact the **Staffordshire Childrens Advice and Support** team within 24 hours of any situation arising on **0300 111 8007**, if the concern or allegation is urgent and outside of office hours the Head will contact the Emergency Duty Team on 0845 6042 886. The Head / Chair of the Governors will alert the call taker in the **Staffordshire Childrens Advice and Support** Team that this is a position of trust issue, and after taking initial details

the call taker will ensure that the matter is passed promptly to the Staffordshire LADO Duty Officer who will assist in initiating any additional safeguarding activities. The Head/Chair will also complete the LADO referral form ( this must be completed within 24 hours of an allegation being made) This can be found by visiting the [Staffordshire Safeguarding Children Partnership \(SSCP\) website](#)

These discussions with the LADO should be recorded in writing and any conversations between either the child or parents agreed with the LADO. In the case of serious harm, the police should be informed at the outset. Allegations of abuse made against staff, whether historical or contemporary, should be dealt with by the Head and not the DSLs.

There are two aspects to consider when an allegation is made:

1. Looking after the welfare of the child - the DSL is responsible for ensuring that the child is not at risk and referring cases of suspected abuse, where a child has been harmed, there is an immediate risk of harm to a child or the situation is an emergency to Staffordshire Childrens Advice and Support and as appropriate to the Police immediately.

2. Investigating and supporting the person subject to the allegation - the case manager should discuss with the LADO, the nature, content and context of the allegation, and agree a course of action.

When dealing with allegations, the school will:

- apply common sense and judgement;
- deal with allegations quickly, fairly and consistently; and
- provide effective protection for the child and support the person subject to the allegation.

The School must not undertake its own investigations of allegations without prior consultation with the LADO, or in the most serious cases, the police, so as not to jeopardise statutory investigations. However the school should make basic enquires to establish facts to help them determine where there is a foundation for any allegation, such as was the individual in school at the time of the allegation, did or could the individual come into contact with the child, are there any witnesses, do we have any CCTV footage, in line with SSCB procedures. The LADO should be informed within one working day of all allegations that come to the Head's attention.

Discussions with the LADO will consider the nature, content and context of the allegation and agree a course of action including any involvement of the police. These discussions should be recorded by the Head in writing and communication with both the individual and parents of the child/children agreed with the LADO. This initial discussion will establish the validity of any allegation under SSCB procedures and if a child protection safeguarding referral is required due to a child having suffered or being at risk of suffering 'significant harm' If this is the case a referral will be raised with the relevant Safeguarding team and a section 47 child protection strategy meeting will be convened that the Head / Chair of the Governors should attend.

If there is cause to suspect a child is suffering, or is likely to suffer significant harm, a strategy discussion involving the police and/or children's social care will be convened in accordance with the statutory guidance Working Together to Safeguard Children 2023. If the allegation is about physical contact, for example restraint, the strategy discussion or initial evaluation with the LADO should take into account that teachers and other school staff are entitled to use reasonable force to control or restrain children in certain circumstances, including dealing with disruptive behaviour.

Where the case manager is concerned about the welfare of other children in the community or the member of staff's family, they should discuss these concerns with the designated safeguarding lead and make a risk assessment of the situation. It may be necessary for the designated safeguarding lead to make a referral to children's social care. The DSL or Deputy will take the lead in supporting the child(ren) involved and the parents or careers of any child involved.

If an individual child is not identified but there are concerns about the behaviour of a person in a position of trust which require consideration by other agencies or organisations, the LADO will convene a Joint Evaluation Meeting (JEM) to consider the issues and any action required.

The decision of the strategy/joint evaluation meeting could be:

- investigation by children's social care
- police investigation if there is a criminal element to the allegation
- single agency investigation completed by the School which should involve the HR Manager

Where it is clear that an investigation by the police or children's social care is unnecessary, or the strategy discussion or initial assessment decides that is the case, the LADO should discuss the next steps with the case manager.

**No further action-**Where the initial discussion leads to no further action, the case manager and the LADO should:

- record the decision and justification for it; and,
- agree on what information should be put in writing to the individual concerned and by whom.

**Further enquiries-**Where further enquiries are required to enable a decision about how to proceed, the LADO and case manager should discuss how and by whom the investigation will be undertaken. The case manager should monitor the progress of cases to ensure that they are dealt with as quickly as possible in a thorough and fair process. Reviews should be conducted at fortnightly or monthly intervals, depending on the complexity of the case. Wherever possible, the first review should take place no later than four weeks after the initial assessment. Dates for subsequent reviews, ideally at fortnightly intervals, should be set at the review meeting if the investigation continues. The LADO will provide advice and guidance to school when considering allegations against adults working with children. The LADO's role is not to investigate the allegation, but to ensure that an appropriate investigation is carried out, whether that is by the police, children's social care, the school, or a combination of these. In straightforward cases, the investigation should normally be undertaken by the HR manager. The case manager should monitor the progress of cases to ensure that they are dealt with as quickly as possible in a thorough and fair process. Wherever possible, the first review should take place no later than four weeks after the initial assessment. Dates for subsequent reviews, ideally at fortnightly (and no longer than monthly) intervals, should be set at the review meeting if the investigation continues.

If the matter does not meet the threshold for intervention by other agencies, but concerns remain about the conduct of a person in position of trust working with children, the School will take appropriate investigatory and, if appropriate, disciplinary action. Referrals to the Disclosure and Barring Service (DBS) will be made by the School when appropriate, in line with current guidance.

An accurate record of all that has happened must be made to include facts of any injury, timings, explanations, persons present at time and action taken by the School. If an allegation is made against a teacher, the quick resolution of that allegation must be a clear priority to the benefit of all concerned. At any stage of consideration or investigation, all unnecessary delays should be eradicated. In response to an allegation staff suspension will not be the default option. Suspension should be considered only in a case where there is cause to suspect a child or other children at the School is/are at risk of harm or the case is so serious that it might be grounds for dismissal. However, a person should not be suspended

automatically: the case manager must consider carefully whether the circumstances warrant suspension from contact with children at the School or until the allegation is resolved, and may wish to seek advice from their personnel adviser and the LADO. In cases where the School is made aware that the Secretary of State has made an interim prohibition order in respect of an individual who works at the School, immediate action should be taken to ensure the individual does not carry out work in contravention of the order, i.e. pending the findings of the TRA investigation, the individual must not carry out teaching work. The case manager should also consider whether the result that would be achieved by immediate suspension could be obtained by alternative arrangements. In many cases an investigation can be resolved quickly and without the need for suspension. If the Police and LADO have no objections to the member of staff continuing to work during the investigation, the case manager should be as inventive as possible to avoid suspension.

Based on advice from the school's HR Manager and/or a risk analysis drawn up with the LADO, the following alternatives should be considered by the case manager before suspending a member of staff: redeployment within the school so that the individual does not have direct contact with the child or children concerned, providing an assistant to be present when the individual has contact with children, redeploying to alternative work in the school so the individual does not have unsupervised access to children, moving the child or children to classes where they will not come into contact with the member of staff, but this decision should only be made if it is in the best interest of the child or children concerned and takes accounts of their views. It should be made making it clear that this is not a punishment and parents have been consulted.

These alternatives allow time for an informed decision regarding the suspension and possibly reduce the initial impact of the allegation. This will, however, depend upon the nature of the allegation. The case manager should consider the potential permanent professional reputational damage to employees that can result from suspension where an allegation is later found to be unsubstantiated or maliciously intended. If immediate suspension is considered necessary, the rationale and justification for such a course of action should be agreed and recorded by the case manager. This should also include what alternatives to suspension have been considered and why they were rejected. Alternatives that should be considered by the case manager before suspending a member of staff include :

- redeployment within the school or college so that the individual does not have direct contact with the child or children concerned
- providing an assistant to be present when the individual has contact with children
- redeploying to alternative work in the school or college so the individual does not have unsupervised access to children
- moving the child or children to classes where they will not come into contact with the member of staff, but this decision should only be made if it is in the best interest of the child or children concerned and takes accounts of their views. It should be made making it clear that this is not a punishment and parents have been consulted.
- temporarily redeploying the member of staff to another role in a different location, for example to an alternative school.

Suspension should be considered only in cases where there is cause to suspect a child or other children at the school or college is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. If in doubt, the case manager should seek views from their personnel adviser and the LADO, as well as the police and local authority children's social care where they have been involved. Where it has been deemed appropriate to suspend the person, written confirmation should be dispatched within one working day, giving as much detail as appropriate for the reasons for the

suspension. Due weight will be given to the views of the LADO, *Keeping Children Safe in Education 2025 and Working Together 2023*.

The school has a duty of care to its employees and will act to manage and minimise the stress inherent in the allegations process. Support for the individual is vital to fulfilling this duty. Individuals should be informed of concerns or allegations as soon as possible and given an explanation of the likely course of action, unless there is an objection by the SSCB or the police. The individual should be advised to contact their trade union representative, if they have one, or a colleague for support.

It is not acceptable for an employer to leave a person who has been suspended without any support. The person should be informed at the point of their suspension who their named contact is within the organisation and provided with their contact details. Provide access to counselling or medical advice where appropriate and not prevent social contact with work colleagues and friends, when staff are suspended, unless there is evidence to suggest this may prejudice the gathering of evidence.

Children's social care services or the police cannot require the case manager to suspend a member of staff or a volunteer, although they should give appropriate weight to their advice. The power to suspend is vested in the governing bodies of the school who are the employers of staff at the School. However, where a strategy discussion or initial evaluation concludes that there should be enquiries by the children's social care services and/or an investigation by the police, the LADO should canvass police and children's social care services for views about whether the accused member of staff needs to be suspended from contact with children in order to inform the decision regarding suspension. Police involvement does not make it mandatory to suspend a member of staff; this decision should be taken on a case-by-case basis having undertaken a risk assessment. Where an allegation is made against a member of boarding staff living on site, should this lead to suspension pending an investigation of a child protection nature they will need to find alternative accommodation away from the boarders (including adult boarders).

Parents or Carers of the child or children involved should be told about the allegation as soon as possible if they do not already know of it. However, where a strategy discussion is required, or police or social services need to be involved the case manager should not do so until those agencies have been consulted and have agreed what information can be disclosed to parents or carers. Parents or carers should also be kept informed about the progress of the case, only in relation to their child - no information can be shared regarding the staff member. The deliberations of a disciplinary hearing, and the information taken into account in reaching a decision, cannot normally be disclosed but parents or carers of the child should be told the outcome in confidence. Parents or carers should be made aware of the requirement to maintain confidentiality about allegations made against teachers whilst investigations are ongoing (as set out in section 141F of the Education Act 2002 paragraphs 372-380)

If the allegation is substantiated and the person is dismissed, resigns, or otherwise ceases to provide his or her services, or the employer ceases to use the person's services. The school will fulfil its legal duty to make a referral to the DBS for consideration of whether inclusion on the barred lists is required. Whether or not a member of staff offers to resign should not prevent the allegation procedure reaching a conclusion. The School will fulfil its duty to report promptly to the DBS, within one month of leaving the School any person, whether employed, contracted, a volunteer or student, whose services are no longer used or they are removed from regulated activity because he or she is considered unsuitable to work with children (ceasing to use a person's services includes: dismissal; non-renewal of a fixed-term contract; no longer engaging/refusing to engage a supply teacher provided by an employment agency; terminating the placement of a student teacher or other trainee; no longer using staff employed by contractors; no longer using volunteers; resignation; and voluntary withdrawal from supply teaching, contract working, a course of initial teacher training, or volunteering). The school will also make a referral to the Secretary of State if a teacher including a supply teacher, is dismissed or the school ceases to use the services of a teacher because of serious misconduct or might have dismissed them or ceased to use their services had they not left first, they must consider whether to refer the case to

the Secretary of State via [www.gov.uk/report-teacher-misconduct](http://www.gov.uk/report-teacher-misconduct)

From 1st October 2012, there have been restrictions on the reporting or publishing of allegations against teachers and the School must make every effort to maintain confidentiality and guard against unwanted publicity. These restrictions apply up to the point where the accused person is charged with an offence, or the Secretary of State or the General Teaching Council for Wales publishes information about an investigation or decision in a disciplinary case. The Head / Chair of the Governors should take advice from the DSL, police and SSCB to agree the following: who needs to know, exactly what information can be shared, how to manage speculation, leaks and gossip; what, if any information can be reasonably given to the wider community to reduce speculation; and how to manage press interest if and when it should arise.

Where a case of “whistle blowing” has been made staff reporting incidents in the public interest will have immunity from retribution or disciplinary action. In essence the School has a culture of safety and of raising concerns, of valuing staff and of reflective practice. There are procedures for reporting and handling concerns, including poor or unsafe practice and potential failures in the School’s Safeguarding regime, provision for mediation and dispute resolution where necessary. There is transparency and accountability in relation to how concerns are received and handled. However, if staff feel unable to raise an issue with their employer or feels that their genuine concerns are not being addressed, other whistleblowing channels include the NSPCC whistleblowing on 0800 028 0285 or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk). And advice is available at [www.gov.uk/whistleblowing](http://www.gov.uk/whistleblowing) Alternatively, staff can write to: National Society for the Prevention of Cruelty to Children (NSPCC), Weston House, 42 Curtain Road, London EC2A 3NH.

Where a school is made aware that the Secretary of State has made an interim prohibition order, in respect of an individual who works at the College, they should take immediate action to ensure the individual does not carry out work in contravention of the order. This means that pending the findings of the TRA investigation, the individual must not carry out teaching work.

### **Confidentiality and Information sharing**

Where the police are involved, wherever possible the school should ask the police to obtain consent from the individuals involved to share their statements and evidence for use in the employer’s disciplinary process. This should be done as their investigation proceeds and will enable the police to share relevant information without delaying the conclusion of their investigation or any court case. The school must make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. The Education Act 2011 amended the Education Act 2002, to introduce reporting restrictions. These provisions made it an offence (except in the limited circumstance expressly permitted by the legislation), for any person to publish any material that may lead to the identification of a teacher in a school who has been accused by, or on behalf of, a child from the same school (where that identification would identify the teacher as the subject of the allegation).

The reporting restrictions apply until:

- the point that the accused person is charged with a relevant offence, or
- the Secretary of State or the General Teaching Council for Wales 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 court lifts the reporting restrictions in response to a request to do so. The legislation prevents the “publication” of material by any person that may lead to the identification of the teacher who is the subject of the allegation. “Publication” includes “any speech, writing, relevant programme or other communication in whatever form, which is addressed to the public at large or any section of the public.” This means that a parent who, for example, published details of the allegation on a social networking site would be in breach of the reporting restrictions (if what was published could lead to the

identification of the teacher by members of the public). In circumstances where schools need to make parents aware about an allegation, they should make parents and others aware that there are restrictions on publishing information.

### **Following a criminal investigation or a prosecution**

The police should inform the LADO and the employer immediately when:

- a criminal investigation and any subsequent trial is complete,
- it is decided to close an investigation without charge, or
- it is decided not to continue to prosecute after the person has been charged.

In those circumstances, during the joint assessment meeting the LADO should discuss with the case manager whether any further action, including disciplinary action, is appropriate and, if so, how to proceed. The information provided by the police and/or children's social care should also inform that decision. The options will depend on the circumstances of the case and the consideration should take into account the result of the police investigation or the trial, as well as the different standard of proof required in disciplinary and criminal proceedings.

### **Supply teachers**

In some circumstances the School will have to consider an allegation against an individual not directly employed by us, where its disciplinary procedures do not fully apply. Whilst the School is not the employer of supply teachers, it will ensure allegations are dealt with properly. In no circumstances will the School decide to cease to use a supply teacher due to safeguarding concerns, without first liaising with the local authority designated officer (LADO) regarding next steps and to determine a suitable outcome. The Governing body should discuss with the agency or agencies where the supply teacher is working across a number of schools or colleges whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation. Agencies should be fully involved and co-operate in any enquiries from the LADO, police and/or children's social care. The School will usually take the lead 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. Supply teachers, whilst not employed by the School, are under the supervision, direction and control of the governing body when working in the School. They should be advised to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting which is often arranged by the LADO should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the school during the investigation. When using an agency, the School should inform the agency of its process for managing allegations but also take account of the agency's policies and their duty to refer to the DBS as personnel suppliers. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

### **Governors**

If an allegation is made against a governor, the school will follow SSCB procedures. Where an allegation is substantiated, the School will follow the procedures to remove them from office.

Allegations that are found to have been malicious will be removed from personnel records and any that are not substantiated, are unfounded or malicious will not be referred to in employer references. A history of repeated concerns or allegations which have all been found to be false, unsubstantiated or malicious should also not be included in any reference. The LADO will need to keep a record of how the matter was investigated and how the outcome to the allegation was reached. However, for all other allegations, it is important that a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached, is kept on the confidential personnel file of the accused, and a copy provided to the person concerned where agreed by children's social care or the police and a declaration on whether the information will be referred to in any future reference. The purpose of the record is to enable accurate information to be

given in response to any future request for a reference, where appropriate. It will provide clarification in cases where future DBS checks reveal information from the police about an allegation that did not result in a criminal conviction and it will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation re-surfaces after a period of time. The school has an obligation to preserve records which contain information about allegations of sexual abuse for the Independent Inquiry into Child Sexual Abuse (IICSA) for the term of the inquiry. All other records should be retained at least until the accused has reached normal retirement age or for a period of 10 years from the date of the allegation if that is longer.

### **Unsubstantiated, unfounded, false or malicious allegations**

If an allegation is determined to be unsubstantiated or malicious, the DSL should refer the matter to SSCB to determine whether the child concerned is in need of services or may have been abused by someone else. Pupils that are found to have made malicious allegations are likely to have breached School behavior policies. The School will therefore consider whether to apply an appropriate sanction, which could include temporary or permanent exclusion (as well as referral to the police if there are grounds for believing a criminal offence may have been committed).

For those cases where it is clear immediately that the allegation is unsubstantiated or malicious, they should be resolved within one week. Where the initial consideration decides that the allegation does not involve a possible criminal offence it will be for the employer to deal with it, although if there are concerns about child protection, the employer should discuss them with the DSL. In such cases, if the nature of the allegation does not require formal disciplinary action, the employer should instigate appropriate action within three working days. If a disciplinary hearing is required and can be held without further investigation, the hearing should be held within 15 working days.

The following definitions should be used when determining the outcome of allegation investigations:

**Substantiated:** there is sufficient evidence to prove the allegation.

**Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive.

**False:** there is sufficient evidence to disprove the allegation.

**Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation. The term therefore does not imply guilt or innocence.

**Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made.

Options open to the school depend on the nature and circumstances of the allegations and the evidence and information available. This will range from taking no further action, to dismissal or a decision not to use the person's services in future. If the allegation is substantiated and:

- the person is dismissed; resigns, or otherwise ceases to provide his or her services, or
- the employer ceases to use the person's services.

In the case of a member of teaching staff the case manager must consider whether to refer the matter to the TRA to consider whether the individual should be prohibited from teaching. There is a legal requirement for employers to make a referral to the DBS where they consider an individual has engaged in conduct that harmed (or is likely to harm) a child; or if a person otherwise poses a risk of harm to a child, this will be done by the HR Manager.

If there is a substantiated allegation against a member of staff, the School will work with the LADO

- to determine whether there are any improvements to be made to the School's procedures or practice to help prevent similar events in the future.
- consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to local authority children's social care may be appropriate

- If an allegation is shown to be deliberately invented or malicious, the school will consider whether any disciplinary action is appropriate against the individual who made it as per their own behaviour policy

### **Returning to work**

Where it is decided on the conclusion of a case that a person who has been suspended can return to work, the case manager should consider how best to facilitate that. Guidance and advice are usually provided via HR or the LADO. Most people will benefit from some help and support to return to work after a stressful experience. Depending on the individual's circumstances, a phased return and/or the provision of a mentor to provide assistance and support in the short term may be appropriate. The case manager should also consider how the person's contact with the child or children who made the allegation can best be managed if they are still attending the school.

### **Managing the situation and exit arrangements -Resignations and 'settlement agreements'**

'Settlement agreements' (sometimes referred to as compromise agreements), by which a person agrees to resign if the employer agrees not to pursue disciplinary action and both parties agree a form of words to be used in any future reference, will not be used, where there are allegations that indicate the person is a risk or poses a risk of harm to children or deemed not suitable to work with children. Such an agreement will not prevent a thorough police and/or school investigation where that is appropriate. School will not cease our investigations if the person leaves, resigns or ceases to provide their services. It is important that every effort is made to reach a conclusion in all cases of allegations with a bearing on the safety or welfare of children, including any in which the person concerned refuses to cooperate.

Wherever possible, the accused should be given full opportunity to answer the allegation and make representations about it. The process of recording the allegation and any supporting evidence and reaching a judgement about whether it can be substantiated or otherwise on the basis of all the information available, should continue even if the accused does not cooperate. It may be difficult to reach a conclusion in those circumstances, and it may not be possible to apply any disciplinary sanctions if a person's period of notice expires before the process is complete, but it is important to reach and record an outcome wherever possible. The person concerned should be notified of the conclusion of the allegations and sanctions that might be posed.

Other than where allegations are false, malicious, unsubstantiated, or unfounded, the outcome should be made clear when providing references to prospective employers. This is particularly important where the person moves into another position involving working with children.

It is not appropriate to reach a settlement/compromise agreement if the person subject to the allegation resigns or their services cease to be used.

### **Record Keeping**

For all allegations other than of those found to be malicious or false, the following information must be kept on the file of the person accused of all other allegations, i.e. substantiated, unfounded and unsubstantiated

- a clear and comprehensive summary of the allegation
- details of how the allegation was followed up and resolved
- a note of any action taken, the decision reached and whether the outcome was substantiated, unsubstituted or unfounded
- a copy provided to the person concerned, where agreed by SSCB or the Police
- a declaration on whether the information will be referred to in any future references.

The purpose of the record is to enable accurate information to be given in response to any future request for a reference. It will provide clarification in cases where future DBS checks reveal information

from the police about an allegation that did not result in a criminal conviction and it will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation re-surfaces after a period of time. All other records should be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer.

### **References**

Cases in which an allegation was found to be false, unfounded, unsubstantiated or malicious should not be included in employer references. Any repeated concerns or allegations which have all been found to be false, unfounded, unsubstantiated or malicious should also not be included in any reference. Substantiated allegations will be included in references, provided that the information is factual and does not include opinion.

### **Learning Lessons**

The LADO should review the circumstances of the case with the case manager to determine whether there are any improvements to be made to the school's procedures or practice to help prevent similar events in the future. This should include issues arising from any decision to suspend the member of staff, the duration of the suspension and whether or not suspension was justified. Lessons should also be learnt from the use of suspension when the individual is subsequently reinstated. The LADO and case manager should consider how future investigations of a similar nature could be carried out without suspending the individual.

For all other cases, where the allegation concluded to be either, unfounded, false, malicious or unsubstantiated the case manager should consider the facts and determine whether any improvements can be made.

### **Non recent allegations**

Where an adult makes an allegation to a school or school that they were abused as a child, the individual should be advised to report the allegation to the police. Non recent allegations made by a child, should be reported to the LADO in line with SSCB procedures for dealing with non-recent allegations. The LADO will coordinate with children social care and the police. Abuse can be reported no matter how long ago it happened.

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

Concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

### **Low level concerns ( see low level Concerns Policy)**

As part of our whole school approach to safeguarding, we promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

Our culture is such that all concerns about adults (including allegations that do not meet the harms threshold) are shared responsibly and with the right person, recorded and dealt with appropriately. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or school may have acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

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

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door

- using inappropriate sexualised, intimidating or offensive language.
- humiliating pupils

The importance of sharing low-level concerns is to create and embed a culture of openness, trust and transparency in which the school's values and expected behaviour which are set out in the staff code of conduct are constantly lived, monitored and reinforced by all staff.

### **Sharing low-level concerns**

Low-level concerns about any member of staff should be reported to the Head, it is recognised that depending on the nature of some low-level concerns the Head may wish to consult with the DSL and take a more collaborative decision making approach. These can be reported by using the "Low Level Concern" tab on CPOMS. Low Level concerns regarding the Head should be reported to the Chair of the Governors. This includes where a low-level concern relates to a person employed by a supply agency or a contractor to work in a school, that concern should be shared with the Head, and recorded and their employer notified about the concern, so that any potential patterns of inappropriate behaviour can be identified. If the Head is in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, they should consult with their LADO.

### **Recording low-level concerns**

All low-level concerns should be recorded in writing by the Head on CPOMS. The record should include details of the concern, the context in which the concern arose, any evidence collected by the DSL where the concern has been raised via a third party, the decision categorising the type of behaviour, action taken and the rationale for the decisions and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

These records will be kept confidential, by the Head and held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the school will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it should be referred to the LADO.

Consideration should also be given to whether there are wider cultural issues within the School that enabled the behaviour to occur and where appropriate policies could be revised or extra training delivered to minimise the risk of it happening again. This information will be retained at least until the individual leaves their employment.

### **Responding to low-level concerns**

Concerns about safeguarding should be reported to the Head. If the concern has been raised via a third party, the Head will collect as much evidence as possible by speaking directly to the person who raised the concern, unless it has been raised anonymously or to the individual involved and any witnesses.

The information collected to categorise the type of behaviour and determine what further action may need to be taken. All of this needs to be recorded in writing along with the rationale for any decisions and action taken.

### **References**

Low level concerns should not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) should not be referred to in a reference. However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it should be referred to in a reference.

### **Professional Confidentiality**

The only purpose of confidentiality in Safeguarding Children is if it benefits the child. A member of staff must never guarantee confidentiality to a pupil with regard to safeguarding issues. This could lead to a breakdown of trust, and potentially compromise the staff member's well-being and safety. A suggested form of words that may help when talking to children is as follows:

"I will keep our conversation confidential and agree with you what information I can share, unless you tell me something that will affect your personal safety or that is illegal, but I will tell you if I am going to pass information on and to whom."

Staff should explain to the child how information may be shared and why and seek their agreement. This involves only sharing information with those who need to be involved, such as the DSL (or Deputy DSL) and children's social care. The exception to this is when to do so would put the child or others at increased risk of significant harm or an adult at risk of serious harm, or if it would undermine the prevention, detection or prosecution of a serious crime. The sharing of information will always take a proportionate risk based approach including the level of information that is provided to temporary staff, volunteers and contractors.

Professionals can only work together to safeguard children if there is an exchange of relevant information between them. At all times we will work in partnership and endeavour to establish effective working relationships with parents, carers and colleagues from other agencies in line with Working Together to Safeguard Children 2023. The school works closely with SSCB and where appropriate other local authorities.

As a School we recognise the importance of information sharing between professionals and local agencies. The General Data Protection Act places a duty on organisations and individuals with regards to processing personal information fairly and lawfully. As a school we adhere to data protection yet we do not allow this to stand in our way in the need to promote the welfare and protect the safety of our children in our care.

The law requires the disclosure of confidential information necessary to safeguard a child or children. Under Section 47 of the Children Act 1989 statutory agencies have a duty to co-operate. Therefore, if the Police or Social Care/Services are conducting a Section 47 investigation under the 1989 Children Act, staff must share requested information relevant to the investigation. Legal advice should be sought if in doubt from the County Legal Services Department. The DSLs or Deputy DSLs will invoke the local agreed guidelines and procedures of referral. Staff will be informed of relevant aspects in respect to safeguarding children on a "need to know" basis only. Any information shared with a member of staff must be treated as confidential.

### **Record Keeping**

Well-kept records are essential to good practice. Staff should be made aware of the need to record all concerns about children, the status of such records, and when to pass them over to other agencies. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing and include the reasons for decisions made.

These records will be reviewed regularly by the Safeguarding team so that any concerning patterns of behaviour can be spotted. These will be stored securely on CPOMS.

Records should:

- state who was present, time, date and place
- use the child's words wherever possible
- be factual/state exactly what was said

- differentiate clearly between fact, opinion, interpretation, observation and/or allegation
- Include a clear and comprehensive summary of the concern
- be written in ink/typed and signed and dated by the recorder and passed to one of the DSL
- Details of how the concern was followed up and resolved including notes of any action taken, decisions reached and the outcome.
- All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing

A file note will be entered into the pupil's central file highlighting that there is a safeguarding concern. This will alert staff preparing records for school leavers, that there is information held within the Safeguarding file.

All information is held on CPOMS or in a confidential file and locked away. If a child's file is taken off premises it is signed for and its return monitored.

### **Information sharing**

Information sharing is vital in identifying and tracking all forms of abuse and neglect and in promoting children's welfare, including their educational outcomes. As part of meeting a child's needs, it is important for governing bodies to recognise the importance of information sharing between professionals and local agencies and ensure relevant staff have due regard to the data protection principles, which allow them to share personal information, in line with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR). School staff should be proactive in sharing information within the School and with SSCB, other organisations, agencies and practitioners as required. Staff should also be proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to children's social care. Guidance in *Working Together to Safeguard Children 2023* will be followed. The General Data Protection Act 2018 places a duty on organisations and individuals with regards to processing personal information fairly and lawfully.

The Governing body will ensure relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the UK GDPR.

This includes:

- being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information which is sensitive and personal, and should be treated as 'special category personal data'.
- understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data. This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner but it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.
- for schools, not providing pupils' personal data where the serious harm test under the legislation is met. For example, in a situation where a child is in a refuge or another form of emergency accommodation, and the serious harms test is met, they must withhold providing the data in compliance with schools' obligations under the Data Protection Act 2018 and the UK GDPR. Where in doubt the School will seek independent legal advice. The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare.

As an education establishment we adhere to data protection yet we do not allow this to stand in our way in the need to promote the welfare and protect the safety of our children in our care. Data protection fears **MUST NOT** be a barrier to information sharing, as the safety and welfare of the child is of the utmost importance.

<https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>

### **Transfer of files**

Where children leave the school or school (including in year transfers) the DSL should ensure their child protection file is transferred to the new school or school as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. When we receive files, the safeguarding team will ensure that the SENCO is made aware as required.

In addition to the child protection file, the DSL will consider if it would be appropriate to share any additional information with the new school or college in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school or college. For example, information that would allow the new school or school to continue supporting children who have had a social worker and been victims of abuse and have that support in place for when the child arrives.

A copy of the sent file will be kept as dormant, in case the file is lost in transit. If the original files are physically handed to the receiving school by the sending school and a record of all files transferred is fully documented and signed off by both parties, as having been sent and received, then copying the documents would not be necessary. If this is not possible, the security of the file must be considered e.g. secure courier. The School should copy the file and the original documents should be sent under separate cover to new school whilst the child is still under 18. The copies should be shredded once confirmation is received from the receiving school that all relevant documents have arrived. The School should retain a record of the confirmation and a record of when the files were shredded. When it is known a child will be leaving the school the DSL will be proactive and consider if it would be appropriate to share information with the school in advance of the child leaving, for example where it would allow the new school to continue to support victims of abuse and have support in place for when the child arrives.

When a pupil leaves the School and is not moving to another school, relevant information will be shared with local social services. Child protection information will be kept by the School until the child's 25<sup>th</sup> birthday. If a pupil should die before their 25<sup>th</sup> birthday, any files will be disposed of appropriately. Records concerning allegations of abuse must be preserved for the term of the Independent inquiry into Child Sexual Abuse and at least until the accused has reached normal pension age or for 10 years from the date of the allegation if it is longer.

### **Attendance at Safeguarding Conferences**

One of the DSLs or Deputy DSLs will attend Safeguarding Strategy meetings called in respect of a pupil. They may be accompanied by other relevant staff (e.g. the pupil's Head of House, Head of School or tutor) if necessary. Staff attending such meetings will be offered support, and access to appropriate counselling if they so wish.

### **Safer Recruitment (See *Employee Recruitment Policy for further details*)**

When recruiting new volunteers, staff, contractors and staff of contractors the School follows the guidance given in the *Keeping Children Safe in Education 2025*, and the SSCB guidelines. The School is committed to safer recruitment and ensures that DBS and pre-appointment checks are undertaken in line with the School policy and that references are obtained and that qualifications are verified and prohibition checks are completed as necessary, dependant on the role and duties of the applicant.

Any staff member, volunteer or governor who becomes the subject of a police investigation or who are cautioned or charged with a criminal offence, in relation to physical or sexual offences against adults or children must inform the Head. Staff must also disclose any convictions, cautions, court orders,

reprimands and warnings which may affect their suitability to work with children whether received before, or during their employment at the School. The Head will discuss any potential safeguarding matters with the LADO and any required action will be agreed.

Any staff member, volunteer or governor whose own children become subject to child protection investigations must inform the Head. The Head will discuss with the LADO via the **Staffordshire Childrens Advice and Support** Team procedures for dealing with allegations against persons who work in a position of trust with children. [LADO Referral form](#) Appropriate action will be agreed.

### **Staff Protection against allegations of abuse:**

Staff should seek to keep personal contact with children under review and seek to minimise the risk of any situation arising in which misunderstandings can occur. The following sensible precautions can be taken when working one-to-one with children:

- Work in a room where there is a glass panel in the door or leave the door open.
- Make sure that other adults visit the room occasionally.
- Avoid working in isolation with children unless thought has been given to safeguards, particularly regarding one-to-one teaching. Advice can be sought from the DSL (or Deputy DSL).
- Avoid giving out personal mobile phone numbers or private e-mail addresses.
- Avoid giving pupils lifts home in your car.
- Avoid meeting pupils outside School.
- Avoid chatting to pupils via social media.

Given that some staff are involved in Boarding there may be occasions when some of the above may be necessary but in all cases due care and consideration should be given to ensure staff and pupil safety. If in doubt staff should liaise with a member of the Safeguarding team.

Under the Sexual Offences Act 2003 it is a criminal offence for anyone working in an education setting to have a sexual relationship with a pupil even when the pupil is over the age of consent but under 18 years of age.

Any use of physical force or restraint against pupils will be carried out and documented in accordance with the Restraint Policy. If it is necessary to use physical action to prevent a child from injury to themselves or others parents will be informed.

Children will not be punished by any form of hitting, slapping, shaking or other degrading treatment.

### **Dissemination of Policy and Review**

This policy is published on the School website. All members of staff will be expected to read the policy within their first month of employment. This policy and procedures will be reviewed annually by SMT, and will be updated whenever necessary, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt. The governing body undertakes an annual review, each February of the School's safeguarding policies and procedures and of the efficiency with which the related duties have been discharged, which is signed off by the Chair of the Governors. The Governor's Safeguarding Subcommittee meets each term and oversees the systems, processes and policies to ensure these operate in the best interests of the children. This policy should be considered alongside other related policies. If there is a substantiated allegation against a member of staff, the School will work with the LADO to determine whether there are any improvements to be made to the School's procedures or practice to help prevent similar events in the future. Any deficiencies or weaknesses identified in child protection arrangements will be remedied without delay.

## Appendix 1

### **Details for the Head and Chair of the Governors**

**Head** Lotte Tulloch [LTulloch@dentsonecollege.net](mailto:LTulloch@dentsonecollege.net)  
**Chair of the Governors** Nigel Ratcliffe [NRatcliffe@denstonecollege.net](mailto:NRatcliffe@denstonecollege.net)

### **School's Safeguarding Team- Designated Safeguarding Leads**

Michelle Edge (College) Tel: 07976 710272 Karenann Hood (Overall) Tel: 01889 594305  
Phil Jankovskis (Prep) Tel: 01889590484

### **Deputy Designated Safeguarding Leads**

Alison Lee	Tel: 07745115987	Sophie Chadfield	Tel: 01889 590484 ext 4110
Megan Barr	Tel: 07933 504946	Liz Scott	Tel: 01889590484
Claire Clews	Tel: 07988640954	Jon Tomlinson	Tel: 01889590484 ext 4176
Chris Farman	Tel: 07871 416877	Kate Philips	Tel: 01889 590484 ext 4162
Richard Mace	Tel: 01889590484 ext 4215	Rachel Hoey	Tel: 01889 590484 ext 4148

### **Contact Details for Referrals Staffordshire**

**Staffordshire Childrens Advice and Support** -Tel: 0300 111 8007  
Central Referral Unit - Tel: 0300 123 44 55  
Emergency Duty Service - Tel: 0845 604 2886 Out of hours- Tel: 0845 604 2889

### **[LADO Referral form](#)**

### **Stoke on Trent**

Stoke on Trent Advice and referral team (The Regent Centre, Hanley) Tel: 01782 235100  
Emergency Duty team Tel: 01782 234234

### **Pupils' Welfare Issues**

Local Authority Designated Officer (LADO)

Contact via **Staffordshire Childrens Advice and Support** Tel: 0300 111 8007  
Staffordshire County Council Educational Safeguarding Advice Tel: 01785 895836  
Email [esas@staffordshire.gov.uk](mailto:esas@staffordshire.gov.uk)

Website [Staffordshire Education Safeguarding Advice](#) Staffordshire Vulnerable Adults referral contact details (for schools where pupils may be over the age of 18 years and have a physical or sensory impairment; drug or alcohol problems; mental health problem; or learning disability and may not be able to protect themselves from harm or abuse)Tel:0845 604 2719 or Emergency Duty Service number.

### **The online tool which directs to the relevant local children's social care contact number**

**[www.gov.uk/report-child-abuse-to-local-council](http://www.gov.uk/report-child-abuse-to-local-council)**

### **Concerns about an individual in relation to extremism or radicalisation or FGM**

Local Police Tel:101

**Staffordshire County Council's Safer Communities Team** Tel: 01785 854428

Email: [becky.murphy@staffordshire.gov.uk](mailto:becky.murphy@staffordshire.gov.uk)

**Staffordshire Police Prevent Co-ordinator** Tel: 01785 232054

**Prevent Team** Tel: 01785 238239 or 01785 233109 Email: [prevent@staffordshire.pnn.police.uk](mailto:prevent@staffordshire.pnn.police.uk)

DfE dedicated helpline for non-emergency advice for staff & governors Tel: 020 7340 7264

Email: [counter-extremism@education.gov.uk](mailto:counter-extremism@education.gov.uk).

### **Whistleblowing**

NSPCC Whistleblowing Helpline Tel:08000280285 Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

And advice is available at [www.gov.uk/whistleblowing](http://www.gov.uk/whistleblowing)

National Society for the Prevention of Cruelty to Children (NSPCC), Weston House, 42 Curtain Road, London EC2A 3NH.

### **Forced Marriage Unit**

Tel: 020 7008 0151 Email [fm@fco.gov.uk](mailto:fm@fco.gov.uk).

### **Operation Encompass**

Operation Encompass Teachers National helpline Tel: 0204 513 9990

Refuge runs the National Domestic Abuse Helpline, 24 hours a day Tel: 0808 2000 247

### **Cybercrime**

Cyber Choices programme via [cyberchoices@nca.gov.uk](mailto:cyberchoices@nca.gov.uk) Tel:0370 496 7622

**NSPCC helpline to provide both children and adults who are victims of sexual abuse in schools support and advice including how to report incidents to the police. Tel: 0800 136 663**

## Useful safeguarding contacts

- Staffordshire Education Safeguarding Advice Service (ESAS) on 01785 895836 or email [esas@staffordshire.gov.uk](mailto:esas@staffordshire.gov.uk)
- Local Authority Designated Officer (LADO) 0300 111 8007
- Staffordshire Childrens Advice and Support (SCAS) 0300 111 8007
- Emergency Duty Services (EDS-out of hours safeguarding concerns) 0345 604 2886 or email [eds.team.manager@staffordshire.gov.uk](mailto:eds.team.manager@staffordshire.gov.uk)
- Stoke-on-Trent Children's Services: Chat and Advice Service (CHAD) 01782 235100 Emergency Duty Team: 01782 234234 (outside office hours)
- Staffordshire Police Prevent Team 01785 232054, 01785 233109 or email [prevent@staffordshire.police.uk](mailto:prevent@staffordshire.police.uk)
- PHSE Coordinator Natalie McGrath [natalie@staffscvys.org.uk](mailto:natalie@staffscvys.org.uk)
- Child Exploitation and Online Protection Centre [CEOP](http://CEOP)
- [NSPCC](http://NSPCC)– 24-hour Child Protection Helpline 0808 800 5000 [NSPCC Staffs School contacts](http://NSPCC)  
[rachel.willis@nspcc.org.uk](mailto:rachel.willis@nspcc.org.uk) & [Matthew.Harding@nspcc.org.uk](mailto:Matthew.Harding@nspcc.org.uk)
- [Stop It Now! child sexual abuse helpline](http://StopItNow.org)
- Women's Aid - 24 Hour Helpline: 0870 2700 123
- UNICEF – Support Care Team 0300 330 5580 (Mon – Fri 8am-6pm). If you think a child is in immediate danger, please call 999. [Unicef](http://Unicef)

### **National Contacts**

- CEOP (Child Exploitation and Online Protection) [CEOP Safety Centre](http://CEOP)
- Professionals Online Safety Helpline (POSH) 0344 3814772. Email [helpline@saferinternet.org.uk](mailto:helpline@saferinternet.org.uk)
- Internet Watch Foundation (IWF) – [Internet Watch Foundation](http://InternetWatchFoundation.org)
- Safer Internet Centre – [helpline@saferinternet.org.uk](mailto:helpline@saferinternet.org.uk)
- Childline – 0800 1111 [Childline](http://Childline)
- Ofsted – General enquiries: 0300 123 1231  
About Schools: 0300 123 4234  
Concerns: 0300 123 4666  
e-mail: [enquiries@ofsted.gov.uk](mailto:enquiries@ofsted.gov.uk)
- HM Government (advice on protecting children from radicalisation for parents, teachers, and leaders) [www.educateagainsthate.com](http://www.educateagainsthate.com)
- NSPCC Harmful Sexual Behaviour project: 0844 892 0273

### Prevent Contacts

<b>Prevent Leads</b>	<b>Contact Name</b>	<b>Email Address</b>
<b>Cannock</b>	Oliver Greatbach	<a href="mailto:olivergreatbatch@cannockchasedc.gov.uk">olivergreatbatch@cannockchasedc.gov.uk</a>
<b>East Staffs</b>	Mike Hovers	<a href="mailto:Michael.hovers@eaststaffsbc.gov.uk">Michael.hovers@eaststaffsbc.gov.uk</a>
<b>East Staffs</b>	Joanne Barrington	<a href="mailto:joanne.barrington@eaststaffsbc.gov.uk">joanne.barrington@eaststaffsbc.gov.uk</a>

<b>Lichfield</b>	Yvonne James	<a href="mailto:Yvonne.James@lichfielddc.gov.uk">Yvonne.James@lichfielddc.gov.uk</a>
<b>Newcastle</b>	Georgina Evans	<a href="mailto:Georgina.Evans@newcastle-staffs.gov.uk">Georgina.Evans@newcastle-staffs.gov.uk</a>
<b>South Staffs</b>	Maggie Quinn	<a href="mailto:M.Quinn@sstaffs.gov.uk">M.Quinn@sstaffs.gov.uk</a>
<b>Stafford</b>	Victoria Cooper	<a href="mailto:vcooper@staffordbc.gov.uk">vcooper@staffordbc.gov.uk</a>
<b>Staffs Moorlands</b>	Paula Goodwin	<a href="mailto:paula.goodwin@staffsmoorlands.gov.uk">paula.goodwin@staffsmoorlands.gov.uk</a>
<b>Tamworth</b>	Anna McLauchlan	<a href="mailto:anna-mclauchlan@tamworth.gov.uk">anna-mclauchlan@tamworth.gov.uk</a>
<b>Staffordshire County Council (Safer Communities)</b>	Fiona Chapman	<a href="mailto:fiona.chapman@staffordshire.gov.uk">fiona.chapman@staffordshire.gov.uk</a>
<b>Staffordshire Police Prevent Team</b>	Sam Cartlidge	<a href="mailto:prevent@staffordshire.police.uk">prevent@staffordshire.police.uk</a>

### CONFIDENTIAL: Safeguarding Record of Initial Concerns

<b>Pupils Full Name</b>				<b>Boarding Status</b>	B / D
<b>Address (inc postcode)</b>		<b>House</b>		<b>D.O.B</b>	
				<b>Age</b>	
<b>Nature of concern</b>  (Brief outline, record in detail below)				<b>Date that concern was raised</b>	
				<b>Time that concern was raised</b>	
<b>Name of person raising concern</b>				<b>Relationship to child/young person</b>	
<b>Information passed to?</b>				<b>On what date?</b>	
<p><b>Detail of concern</b> (Please include as much detailed information in this section as possible, including any background information about the child . Remember - the quality of your information will inform the level of intervention initiated. If necessary, attach additional sheet)</p>					
<b>Signature of person raising concern</b>				<b>Date</b>	<b>Time</b>

### Safeguarding Notes removed from site

<b>Pupils Full Name</b>			
<b>Alias/Also know as</b>		<b>D.O.B</b>	

Reason for removal from site	Time and date removed	By Whom	Time and date returned	By whom

### Transfer of Pupil Safeguarding Forms

Pupils Full Name:		
D.o.B.:		
Name and address of receiving school/school		
Date child on new school/school roll:		
Name of Designated Safeguarding Lead in receiving school/school		
Date(s) of telephone discussion or meeting between designated safeguarding leads		
Date file confidentially passed (or sent by secure mail) to Designated Safeguarding Lead in Receiving school/school		
Name, Designation, Signature & date file Received at new setting	Name	Signature
	Designation	
	Date received	
Signature of (current) school Designated Safeguarding Lead and date form completed:	Name	Date form returned complete:
Signature of person shredding the copy		Date file shredded

A copy of the file must be kept until file has been received by the new setting and a signature obtained from an appropriate representative (usually the Designated Safeguarding Lead) in the receiving School/College. A copy of this form must be retained.

### **Appendix 3: Role of the Designated Safeguarding Leads and Deputy Designated Leads**

The Governing body committees should ensure an appropriate senior member of staff, from the School leadership team, is appointed to the role of designated safeguarding lead. The designated safeguarding lead should take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place). This should be explicit in the role holder's job description. This person should have the appropriate status and authority within the school to carry out the duties of the post. They should be given additional time, funding, training, resources and support to they need to carry out the role effectively. Their additional responsibilities include providing advice and support to other staff on child welfare, safeguarding and child protection matters, to take part in strategy discussions and inter-agency meetings, and/or supporting other staff to do so, and contributing to the assessment of children.

Deputy Designated Safeguarding - any deputies should be trained to the same standard as the Designated Safeguarding Lead. Whilst the activities of the Designated Safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection as set out above, remains with the designated safeguarding lead, this lead responsibility should not be delegated.

#### **Availability**

During term time a member of the safeguarding team should always be available (during school hours) for staff in the school to discuss any safeguarding concerns.

#### **Manage referrals**

The designated safeguarding lead is expected to:

- Refer cases of suspected abuse to the local authority children's social care as required and support staff who make referrals to local authority children's social care
- Refer cases to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme
- Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required
- Where a crime may have been committed to the Police as required. NPCC - When to call the police should help understand when to consider calling the police and what to expect when working with the police.

#### **Working With others**

The designated safeguarding lead is expected to:

- Act as a source of support, advice and expertise for all staff
- Act as a point of contact with the safeguarding partners
- Liaise with the headteacher or principal to inform him or her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance - PACE Code C 2019
- As required, liaise with the "case manager" (as per Part four) and the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member

- Liaise with staff (especially teachers, pastoral support staff, school nurses, IT Technicians, Senior Mental health leads and SENCO on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically
- Liaise with the senior mental health lead and, where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health
- Promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances
- Work with the Head and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at school This includes: ensuring that the school knows its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort; and supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker, reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.

### **Raise Awareness**

The designated safeguarding lead should:

- ensure each member of staff has access to, and understands, the school's child protection policy and procedures, especially new and part-time staff;
- ensure the school's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this;
- ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements; and
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and school and school leadership staff.

### **Information sharing and managing the child protection file**

The designated safeguarding lead is responsible for ensuring that child protection files are kept up to date.

Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child.

Records should include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved;
- a note of any action taken, decisions reached and the outcome

They should ensure the file is only accessed by those who need to see it and where the file or content within it is shared.

Where children leave the school (including in year transfers) the designated safeguarding lead should ensure their child protection file is transferred to the new school or school as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main pupil file, ensuring secure transit, and

confirmation of receipt should be obtained. Receiving schools and schools should ensure key staff such as designated safeguarding leads and SENCOs or the named person with oversight for SEN in schools, are aware as required.

Lack of information about their circumstances can impact on the child's safety, welfare and educational outcomes. In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any additional information with the new school or school in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school or school. For example, information that would allow the new school or school to continue supporting children who have had a social worker and been victims of abuse and have that support in place for when the child arrives.

### **Availability**

During term time the DSL (or a deputy) should always be available (during School hours) for staff in the school to discuss any safeguarding concerns. Out of hours/Out of term activities contact is via phone to one of the DSL or Deputies.

### **Training, knowledge and skills**

The designated safeguarding lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The designated safeguarding lead should undertake Prevent awareness training. Training should provide designated safeguarding leads with a good understanding of their own role, 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, and the processes, procedures and responsibilities of other agencies, particularly children's social care, so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so
- understand the importance of the role the designated safeguarding lead has in providing information and support to children social care in order to safeguard and promote the welfare of children
- understand the lasting impact that adversity 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
- are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers
- understand the importance of information sharing, both within the school, and with the safeguarding partners, other agencies, organisations and practitioners
- understand and support the school with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school
- can recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support children with SEND to stay safe online
- obtain access to resources and attend any relevant or refresher training courses

- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or school may put in place to protect them.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.

### **Providing support to staff**

Training should support the designated safeguarding lead in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters. This includes specifically to ensure that staff are supported during the referral process and support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

### **Understanding the views of children**

It is important that children feel heard and understood. Therefore, designated safeguarding leads should be supported in developing knowledge and skills to encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school may put in place to protect them and understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

### **Holding and sharing information**

The critical importance of recording, holding, using and sharing information effectively is set out in Parts one, two and five of KCSIE 2025, and therefore the designated safeguarding lead should be equipped to:

- understand the importance of information sharing, both within the school and school, and with other schools and schools on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners;
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR); and
- be able to keep detailed, accurate, secure written records of concerns, discussions and decisions made including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program etc

### **Additional advice and support**

The following list is not exhaustive but should provide a useful starting point:

#### **Abuse**

Supporting practice in tackling child sexual abuse - CSA Centre of Expertise on Child Sexual Abuse has free evidence-based practice resources to help professionals working with children and young people to identify and respond appropriately to concerns of child sexual abuse.

What to do if you're worried a child is being abused – DfE advice Domestic

abuse: Various Information/Guidance - Home Office (HO) Faith based abuse:

National Action Plan - DfE advice

Forced marriage resource pack

Disrespect NoBody campaign - GOV.UK - Home Office website Tackling Child

Sexual Abuse Strategy – Home Office policy paper Together we can stop child

sexual abuse – HM Government campaign

## **Bullying**

Preventing bullying including cyberbullying - DfE advice

## **Children missing from education, home or care**

Children missing education - DfE statutory guidance

Children who run away or go missing from home or care - DfE statutory guidance

Missing Children and Adults strategy - Home Office strategy

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

National Information Centre on Children of Offenders - Barnardo's in partnership with HM Prison and Probation Service

## **Child Exploitation**

Safeguarding children who may have been trafficked - DfE and Home Office guidance

Care of unaccompanied migrant children and child victims of modern slavery – DfE statutory guidance

Modern slavery: how to identify and support victims – HO statutory guidance

Child exploitation disruption toolkit - HO statutory guidance

County Lines Toolkit For Professionals - The Children's Society in partnership with Victim Support and National Police Chiefs' Council

Multi-agency practice principles for responding to child exploitation and extra-familial harm – non-statutory guidance for local areas, developed by the Tackling Child Exploitation (TCE) Support Programme, funded by the Department for Education and supported by the Home Office, the Department for Health and Social Care and the Ministry of Justice

**National Crime Agency's** CEOP Safety Centre aims to keep children and young people safe from online sexual abuse. Online sexual abuse can be reported on their website and a report made to one of its Child Protection Advisors.

**The NSPCC** provides a helpline for professionals at 0808 800 5000 and [help@nspcc.org.uk](mailto:help@nspcc.org.uk). The helpline provides expert advice and support for school and college staff and will be especially useful for the designated safeguarding lead (and their deputies)

Support from **specialist sexual violence sector organisations** such as Rape Crisis or The Survivors Trust

**The Anti-Bullying Alliance** has developed guidance for schools about Sexual and sexist bullying.

## **Confidentiality**

[Gillick competency Fraser guidelines](#) - Guidelines to help with balancing children's rights along with safeguarding responsibilities.

## **Drugs**

[From harm to hope: A 10-year drugs plan to cut crime and save lives](#) - Home Office strategy

[Honest information about drugs](#) - Talk to Frank website

[Drug and Alcohol education — teacher guidance & evidence review](#) – PSHE Association

## **(So-called) “Honour Based Abuse” including FGM and forced marriage**

[Female genital mutilation: information and resources](#)- Home Office guidance

[Female genital mutilation: multi agency statutory guidance](#) - DfE, Department for Health, and Home Office

[Forced marriage](#) - Forced Marriage Unit (FMU) resources

[Forced marriage](#) - Government multi-agency practice guidelines and multi-agency statutory guidance

[FGM resource pack](#) – HM Government guidance

## **Health and Well-being**

[Rise Above: Free PSHE resources on health, wellbeing and resilience](#) - Public Health England

[Supporting pupils at schools with medical conditions](#) - DfE statutory guidance [Mental health and behaviour in schools](#) - DfE advice

[Overview - Fabricated or induced illness](#) - NHS advice

## **Homelessness**

[Homelessness code of guidance for local authorities](#) – Department for Levelling Up,

Housing and Communities guidance

## **Information Sharing**

[Government information sharing advice](#) - Guidance on information sharing for people who provide safeguarding services to children, young people, parents and carers.

[Information Commissioner's Office: Data sharing information hub](#) - Information to help schools and colleges comply with UK data protection legislation including UK GDPR.

## **Online safety-advice**

[Childnet](#) provide guidance for schools on cyberbullying

[Educateagainsthate](#) provides practical advice and support on protecting children from extremism and radicalisation

[London Grid for Learning](#) provide advice on all aspects of a school or college's online safety arrangements

NSPCC E-safety for schools provides advice, templates, and tools on all aspects of a school or college's online safety arrangements

Safer recruitment consortium "guidance for safe working practice", which may help ensure staff behaviour policies are robust and effective

Searching screening and confiscation is departmental advice for schools on searching children and confiscating items such as mobile phones

South West Grid for Learning provide advice on all aspects of a school or college's online safety arrangements

Use of social media for online radicalisation - A briefing note for schools on how social media is used to encourage travel to Syria and Iraq

Online Safety Audit Tool from UK Council for Internet Safety to help mentors of trainee teachers and newly qualified teachers induct mentees and provide ongoing support, development and monitoring

Online safety guidance if you own or manage an online platform DCMS advice A business guide for protecting children on your online platform DCMS advice

UK Safer Internet Centre provide tips, advice, guides and other resources to help keep children safe online **The UK Safer Internet Centre** provides an online safety helpline for professionals at 0344 381 4772 and [helpline@saferinternet.org.uk](mailto:helpline@saferinternet.org.uk). The helpline provides expert advice and support for school and college staff with regard to online safety issues

**Internet Watch Foundation:** If the incident/report involves sexual images or videos that have been made and circulated online, the victim can be supported to get the images removed by the Internet Watch Foundation (IWF)

**Childline/IWF:** Report Remove is a free tool that allows children to report nude or sexual images and/or videos of themselves that they think might have been shared online

**UKCIS Sharing nudes and semi-nudes advice:** Advice for education settings working with children and young people on responding to reports of children sharing non-consensual nude and semi-nude images and/or videos (also known as sexting and youth produced sexual imagery).

National Crime Agency's CEOP Education Programme provides information for the children's workforce and parents and carers on protecting children and young people from online child sexual abuse.

LGFL 'Undressed' advice about how to teach young children about being tricked into getting undressed online in a fun way without scaring them or explaining the motives of sex offenders.

### **Online safety- Remote education, virtual lessons and live streaming**

Guidance Get help with remote education resources and support for teachers and school leaders on educating pupils and students

Departmental guidance on safeguarding and remote education including planning remote

education strategies and teaching remotely

London Grid for Learning guidance, including platform specific advice

[National cyber security centre](#) guidance on choosing, configuring and deploying video conferencing

[UK Safer Internet Centre](#) guidance on safe remote learning

## **Online Safety- Support for children**

[Childline](#) for free and confidential advice

[UK Safer Internet Centre](#) to report and remove harmful online content [CEOP](#) for advice on making a report about online abuse

## **Online safety- Parental support**

[Childnet](#) offers a toolkit to support parents and carers of children of any age to start discussions about their online life, and to find out where to get more help and support

[Commonsensemedia](#) provide independent reviews, age ratings, & other information about all types of media for children and their parents

[Government advice](#) about protecting children from specific online harms such as child sexual abuse, sexting, and cyberbullying

[Internet Matters](#) provide age-specific online safety checklists, guides on how to set parental controls, and practical tips to help children get the most out of their digital world

[How Can I Help My Child?](#) Marie Collins Foundation – Sexual Abuse Online

[London Grid for Learning](#) provide support for parents and carers to keep their children safe online, including tips to keep primary aged children safe online

[Stopitnow](#) resource from [The Lucy Faithfull Foundation](#) can be used by parents and carers who are concerned about someone's behaviour, including children who may be displaying concerning sexual behaviour (not just about online)

[National Crime Agency/CEOP Thinkuknow](#) provide support for parents and carers to keep their children safe online

[Parentzone](#) provides help for parents and carers on how to keep their children safe online

[Talking to your child about online sexual harassment: A guide for parents](#) – This is the Children's Commissioner's parental guide on talking to their children about online sexual harassment

## **Private fostering**

[Private fostering: local authorities](#) - DfE statutory guidance

## **Radicalisation**

[Prevent duty guidance](#)- Home Office guidance

[Prevent duty: additional advice for schools and childcare providers](#) - DfE advice [Educate Against](#)

[Hate website](#) - DfE and Home Office advice

[Prevent for FE and Training](#) - Education and Training Foundation (ETF)

[Extremism and Radicalisation Safeguarding Resources](#) – Resources by London Grid for Learning

[Managing risk of radicalisation in your education setting](#) – DfE guidance

## **Serious Violence**

Serious violence strategy - Home Office Strategy

Factors linked to serious violence and how these factors can be used to identify individuals for intervention – Home Office

Youth Endowment Fund – Home Office

Gangs and youth violence: for schools and colleges – Home Office advice Tackling

violence against women and girls strategy- Home Office strategy

Violence against women and girls: national statement of expectations for victims - Home Office guidance

## **Sexual violence and sexual harassment**

### **Specialist Organisations**

Barnardo's - UK charity caring for and supporting some of the most vulnerable children and young people through their range of services.

Lucy Faithful Foundation - UK-wide child protection charity dedicated to preventing child sexual abuse. They work with families affected by sexual abuse and also run the confidential Stop it Now! Helpline.

Marie Collins Foundation – Charity that, amongst other things, works directly with children, young people, and families to enable their recovery following sexual abuse.

NSPCC - Children's charity specialising in child protection with statutory powers enabling them to take action and safeguard children at risk of abuse.

Rape Crisis - National charity and the umbrella body for their network of independent member Rape Crisis Centres.

UK Safer Internet Centre - Provides advice and support to children, young people, parents, carers and schools about staying safe online.

## **Harmful sexual behaviour**

Rape Crisis (England & Wales) or The Survivors Trust for information, advice, and details of local specialist sexual violence organisations.

NICE guidance contains information on, amongst other things: developing interventions; working with families and carers; and multi-agency working.

HSB toolkit The Lucy Faithfull Foundation - designed for parents, carers, family members and professionals, to help everyone play their part in keeping children safe. It has links to useful information, resources, and support as well as practical tips to prevent harmful sexual behaviour and provide safe environments for families.

The Lucy Faithfull Foundation also run shorespace.org.uk which provides a safe and anonymous place for young people to get help and support to prevent harmful sexual behaviours.

NSPCC Learning: Protecting children from harmful sexual behaviour and NSPCC - Harmful sexual behaviour framework- free and independent advice about HSB.

Contextual Safeguarding Network – Beyond Referrals (Schools) provide a school self- assessment toolkit and guidance for addressing HSB in schools.

Preventing harmful sexual behaviour in children - Stop It Now provides a guide for parents, carers and professionals to help everyone do their part in keeping children safe, they also run a free confidential helpline.

## **Support for Victims**

Anti-Bullying Alliance - Detailed information for anyone being bullied, along with advice for parents and schools. Signposts to various helplines and websites for further support.

Rape Crisis - Provide and signpost to a range of services to support people who have experienced rape, child abuse or any kind of sexual violence.

The Survivors Trust- UK-wide national umbrella agency with resources and support dedicated to survivors of rape, sexual violence and child sex abuse.

Victim Support - Supporting children and young people who have been affected by crime. Also provides support to parents and professionals who work with children and young people – regardless of whether a crime has been reported or how long ago it was.

Childline provide free and confidential advice for children and young people.

## **Toolkits**

NSPCC – Online Self-assessment tool to ensure organisations are doing everything they can to safeguard children.

NSPCC – Resources which help adults respond to children disclosing abuse.

NSPCC also provide free and independent advice about HSB: [NSPCC - Harmful sexual behaviour framework](#)

[Safeguarding Unit, Farrer and Co. and Carlene Firmin, MBE, University of Bedfordshire](#) - Peer-on-Peer Abuse toolkit provides practical guidance for schools on how to prevent, identify early and respond appropriately to peer-on-peer abuse.

[Contextual Safeguarding Network](#) – self-assessment toolkit for schools to assess their own response to HSB and levers for addressing HSB in schools.

[Childnet - STAR SEND Toolkit](#) equips, enables and empowers educators with the knowledge to support young people with special educational needs and disabilities (SEND).

[Childnet - Just a joke?](#) provides lesson plans, activities, a quiz and teaching guide designed to explore problematic online sexual behaviour with 9-12 year olds.

[Childnet - Step Up, Speak Up](#) a practical campaign toolkit that addresses the issue of online sexual harassment amongst young people aged 13-17 years old.

[NSPCC - Harmful sexual behaviour framework](#) an evidence-informed framework for children and young people displaying HSB.

Farrer & Co: [Addressing child on child abuse: a resource for schools and colleges](#). This resource provides practical guidance for schools and colleges on how to prevent, identify early and respond appropriately to child-on-child abuse.

### **Sharing nudes and semi-nudes**

[London Grid for Learning-collection of advice](#) - Various information and resources dealing with the sharing of nudes and semi-nudes.

[UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) - Advice for schools and colleges on responding to incidents of non-consensual sharing of nudes and semi-nudes.

### **Support for parents/carers**

National Crime Agency's [CEOP Education Programme](#) provides information for parents and carers to help protect their child from online child sexual abuse, including [#AskTheAwkward - help to talk with your children about online relationships](#) ([thinkuknow.co.uk](http://thinkuknow.co.uk)) guidance on how to talk to their children about online relationships



**Injury on arrival**

<u>Name</u>	<u>Age</u>	<u>Class</u>
<b><u>Date and time of injury noticed:</u></b>		
<b><u>Description of injury (location on body, colour, size)</u></b>		
<b><u>Explanation offered by parent</u></b>		
<b><u>Explanation offered by child (if any)</u></b>		
<b><u>Signature of parent</u></b>	<b><u>Signature of staff member</u></b>	
<b><u>Please scan this form and upload to CPOMS</u></b>		