



RUGBY
SCHOOL
GROUP

Safeguarding and Child Protection Policy and Procedures

October 2021

Contents

1	Aims	7
2	Scope and application.....	7
3	Regulatory framework	8
4	Publication and availability	11
5	Definitions.....	11
6	Responsibility statement and allocation of tasks: the School's approach to safeguarding leadership.....	12
7	Specific safeguarding duties in relation to children	14
8	Reporting obligations of staff	16
9	Managing support for pupils/students internally.....	17
10	Early help	18
11	Making a referral	19
12	Allegations against pupils/students - peer on peer / child on child abuse.....	20
13	Extra-familial harm	20
14	Risk assessment	21
15	What to do if staff have a safeguarding concern about someone else's welfare ..	21
16	Allegations made and or / concerns raised about staff and others in School.....	21
17	Inappropriate advances	22
18	Informing parents	22
19	Additional reporting.....	22
20	Safer recruitment and supervision of staff.....	23
21	Use of mobile technology	24
22	Training	24
23	Monitoring and review	27
24	Record keeping	28
25	Version control.....	29

Appendix

Appendix 1	Forms of abuse and neglect and specific safeguarding risks.....	30
Appendix 2	Concerns about a child - guidance for staff.....	43
Appendix 3	Dealing with allegations of peer on peer / child on child abuse	44
Appendix 4	Dealing with allegations made and/or concerns raised against members of staff, supply staff, volunteers and contractors	48
Appendix 5	Charity Safeguarding procedures	53

Key school contacts

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Bilton Grange: Mrs Mireille Everton, Assistant Head, Pastoral	email: mje@biltongrange.co.uk Telephone number (term time): 01788 810780 Mobile number (term time): 07423663038 Holiday contact number: Mobile number as above
Deputy Designated Safeguarding Leads (DDSL)	
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Bilton Grange	
Mr Mark Tovey, Assistant Head Boarding	Email: mgt@biltongrange.co.uk Telephone (term time): 01788 556172 Mobile number (term time): 07967 012838 Holiday contact number: Mobile number as above
Mrs Katie Gedye, Assistant Head Pre-Prep (for EYFS)	Email: kg@biltongrange.co.uk Telephone (term time): 01788 810719 Mobile number (term time): 07974303708 Holiday contact number: Mobile number as above

Mr Stefan de Bruin, Head of Upper School	Email: sdb@biltongrange.co.uk Telephone (term time): 01788 810217
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Additional Key Contacts	
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Head of Rugby School, Mr Gareth Parker-Jones	Email: head@rugbyschool.net Telephone number: 01788 556217
Head of Bilton Grange Mr Gareth Jones	Email: gebj@biltongrange.co.uk Telephone number: 01788 556217
Senior Counsellor and Emotional Wellbeing Lead Mrs Mikala Torrance	Email: mt@rugbyschool.net Telephone number: 01788 556199 / 07584 481068
Chair of Governors, Mr B O'Brien	Email: bob@rugbyschool.net Telephone number: 0207 359 2354 / 07802 630608
Nominated Child Protection Governor (Rugby School), Ms Charlotte Marten	Email: cm1@rugbyschool.net Telephone number: 07976 203164
Nominated Child Protection Governor (Bilton Grange School), Mr John Moreland	Email: jm2@rugbyschool.net Telephone number: 07545 496585
Sports Centre, Ms Aimi Knight-Allen, Sports Centre Manager	Email: ack@rugbyschool.net Telephone number: 01788 556339
Music Department, Mr James Williams, Head of Academic Music	Email: jaw@rugbyschool.net Telephone number: 01788 556207

Key external contacts

Designated Officer(s) of the local authority	Telephone number: 01926 745376 Email: lado@warwickshire.gov.uk
Warwickshire children's social care department¹ Warwickshire Multi-Agency Safeguarding Hub (MASH) now known as the Children and Families Front Door	Telephone number (Monday to Thursday 8.30am - 5.30pm, Friday 8.30am - 5.00 pm): 01926 414144 Email: triagehub@warwickshire.gov.uk Out of hours emergency duty team: 01926 886922 Duty team telephone number (non-emergencies): 01926 886922
Warwickshire Safeguarding Partners	Warwickshire Safeguarding Saltisford Buildings Ansell Way Saltisford, Warwick CV34 4UL Telephone number: 01926 410410 Email: WSCB@warwickshire.gov.uk
FGM reporting - non-emergency police contact number	101
Prevent partners and advice about extremism	Email: Prevent@warwickshireandwestmercia.pnn.police.uk Non-emergency DfE advice 020 7340 7264 counter-extremism@education.gsi.gov.uk
Independent Person (Rugby School and Bilton Grange School), Faith Matthews	Telephone: 07867 558511
UK Safer Internet Centre	0344 381 4772 helpline@saferinternet.org.uk
NSPCC whistleblowing helpline	Weston House 42 Curtain Road London EC2A 3NH Telephone: 0800 028 0285

¹ If you think a child or young person is at risk or being abused or neglected, contact the children's social care team at their local council. If you do not know where they live, contact your local council's team, the NSPCC or the Police for advice

	Email: help@nspcc.org.uk https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/
Childline	Telephone: 08001111
Office of the Children's Commissioner	Telephone: 020 7783 8330 Email: info.request@childrenscommissioner.gsi.gov.uk
Reporting serious wrongdoing to the Charity Commission	For further guidance see: https://www.gov.uk/guidance/report-serious-wrongdoing-at-a-charity-as-a-worker-or-volunteer whistleblowing@charitycommission.gsi.gov.uk]

1 Aims

- 1.1 This is the Safeguarding and child protection policy and procedures of Rugby School which includes Bilton Grange School (**School**).
- 1.2 The aims of this policy are as follows:
 - 1.2.1 to actively promote the wellbeing of pupils/students²;
 - 1.2.2 to safeguard and promote the welfare of children³, staff and others who come into contact with the School and to protect them from harm;
 - 1.2.3 to have clear procedures in place for dealing with and referring concerns about the welfare of any individual and/or allegations of abuse, neglect and/or exploitation;
 - 1.2.4 to raise awareness about how to report concerns and how they will be investigated, whether they are current or historic in nature;
 - 1.2.5 to raise staff awareness about the School's safeguarding expectations;
 - 1.2.6 to ensure staff are competent to carry out their safeguarding responsibilities and feel supported in this role;
 - 1.2.7 to ensure consistent good safeguarding practice throughout the School, to include the promotion of a zero tolerance approach to peer on peer sexual violence and harassment in which pupils/students are confident to report it and staff are confident to identify and respond to it; and
 - 1.2.8 to promote a whole school culture of safety, equality and protection.
- 1.3 Every pupil/student should feel safe and protected from any form of abuse and neglect.
- 1.4 All staff should understand the indicators of abuse and neglect and specific safeguarding risks so that they can identify them and report any concerns about children. The indicators and key safeguarding risks for the School community are set out in Appendix 1.
- 1.5 Members of the School community (to include alumni) should also feel able to raise any safeguarding concerns, whether current or non-recent, safe in the knowledge that they will be supported, the matter will be handled sensitively and appropriate action taken.
- 1.6 Anyone about whom a concern is raised should feel confident that they will be supported and the matter will be handled sensitively and that appropriate action will be taken.
- 1.7 This policy forms part of the School's whole school approach to promoting child safeguarding and wellbeing, which seeks to ensure that the best interests of pupils/students underpins and is at the heart of all decisions, systems, processes and policies.

2 Scope and application

- 2.1 This policy applies to the whole School including EYFS.

² This wording reflects the requirements in part 8 paragraph 34 of the ISSR. Wellbeing means wellbeing within the meaning of section 10(2) of the Children Act 2004(a): the physical and mental health and emotional wellbeing; protection from harm and neglect; education training and recreation; contribution made by pupils/students to society; social and economic wellbeing.

³ This wording reflects the requirements in part 3 paragraph 7 of ISSR.

- 2.2 This policy applies at all times including where pupils/students or staff are away from the School, whether they are on school- arranged activities or otherwise, and whether or not the School is open. It will therefore apply out of School hours and in the holidays.
- 2.3 This policy applies to core School activities and to out of hours and commercial activities.
- 2.4 This policy is designed to address:
 - 2.4.1 the specific statutory obligations on the School to safeguard and promote the welfare of children; and
 - 2.4.2 the School's charity law safeguarding duty to:
 - (a) provide a safe and trusted environment which safeguards anyone who comes into contact with it, including beneficiaries, staff and volunteers;
 - (b) set an organisational culture that prioritises safeguarding, so that it is safe for those affected to report incidents and concerns with the assurance they will be handled sensitively and properly;
 - (c) have adequate safeguarding policies, procedures and measures to protect people; and
 - (d) provide clarity as to how incidents and allegations will be handled should they arise, including reporting to the relevant authorities, such as the police, local authority and Charity Commission

3 Regulatory framework

- 3.1 This policy has been prepared to meet the School's responsibilities under the following legislation:
 - 3.1.1 Education (Independent School Standards) Regulations 2014;
 - 3.1.2 *Boarding schools: national minimum standards* (Department for Education (**DfE**), April 2015);
 - 3.1.3 *Statutory framework for the Early Years Foundation Stage* (DfE, September 2021);
 - 3.1.4 Education and Skills Act 2008;
 - 3.1.5 Children Act 1989;
 - 3.1.6 Children Act 2004;
 - 3.1.7 Childcare Act 2006;
 - 3.1.8 Safeguarding Vulnerable Groups Act 2006;
 - 3.1.9 Children and Social Work Act 2017;
 - 3.1.10 Data Protection Act 2018 and UK General Data Protection Regulation (**UK GDPR**);
 - 3.1.11 Equality Act 2010; and
 - 3.1.12 Charities Act 2011.

3.2 This policy has regard to the following guidance and advice:

3.2.1 Statutory guidance:

- (a) [Keeping children safe in education](#) (DfE, September 2021) (**KCSIE**);
- (b) [Working together to safeguard children 2018](#) (HM Government, updated December 2020) (**WTSC**);
- (c) [Disqualification under the Childcare Act 2006](#) (DfE, August 2018);
- (d) [Revised Prevent duty guidance for England and Wales](#) (HM Government, April 2021);
- (e) [Multi-agency statutory guidance on female genital mutilation](#) (HM Government, July 2020);
- (f) [Children missing education](#) (DfE, September 2016);
- (g) [Relationships education, relationships and sex education and health education guidance](#) (DfE, June 2019); and
- (h) [Channel duty guidance: protecting vulnerable people from being drawn into terrorism](#) (HM Government, February 2021);

3.2.2 Non-statutory advice:

- (a) [What to do if you're worried a child is being abused: advice for practitioners](#) (HM Government, March 2015);
- (b) [Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers](#) (HM Government, July 2018);
- (c) [Sexual violence and sexual harassment between children in schools and colleges](#) (DfE, September 2021);
- (d) [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) (DCMS and UKCIS, December 2020)
- (e) [Searching, screening and confiscation: advice for schools](#) (DfE, January 2018);
- (f) [Teaching online safety in schools](#) (DfE, June 2019);
- (g) [Harmful online challenges and online hoaxes](#) (DfE, February 2021);
- (h) [Child sexual exploitation: definition and a guide for practitioners local leaders and decision makers working to protect children from child sexual exploitation](#) (DfE, February 2017);
- (i) [Safeguarding children and protecting professionals in early years settings: online safety considerations](#) (UK Council for Internet Safety, February 2019);
- (j) [Educate Against Hate](#) (HM Government 2018); and
- (k) [Sponsorship Duties](#) (UKVI, June 2021)

3.2.3 Charities advice:

- (a) [Strategy for dealing with safeguarding issues in charities](#) (Charity Commission, December 2017);
- (b) [Regulatory alert to charities - safeguarding](#) (Charity Commission, December 2017);
- (c) [How to report a serious incident in your charity](#) (Charity Commission, June 2019);
- (d) [Reporting a serious incident in your charity when it involves a partner](#) (Charity Commission, December 2019);
- (e) [Report serious wrongdoing at a charity as a worker or volunteer](#) (Charity Commission, June 2019);
- (f) [Guidance on handling safeguarding allegations in a charity](#) (Office for Civil Society, January 2019); and

3.2.4 Warwickshire Safeguarding Partners referral / threshold procedures / guidance.

3.3 The following School policies, procedures and resource materials are relevant to this policy:

- 3.3.1 Staff code of conduct;
- 3.3.2 Staff acceptable use of technology policy;
- 3.3.3 Whistleblowing policy;
- 3.3.4 Safer recruitment and selection policy;
- 3.3.5 Mobile phones and personal devices;
- 3.3.6 Photographs and images of children;
- 3.3.7 Discipline and rewards policy (RS);
- 3.3.8 Good Behaviour Policy (BG including EYFS);
- 3.3.9 Anti-bullying policy;
- 3.3.10 Safeguarding information for visitors
- 3.3.11 Visiting speakers policy;
- 3.3.12 Risk assessment policy for pupil/student welfare;
- 3.3.13 Registration and attendance policy;
- 3.3.14 Student online safety policy (RS), ICT online safety policy (BG);
- 3.3.15 SEN and learning difficulties policy;
- 3.3.16 First aid policy;
- 3.3.17 Health and safety policy;

- 3.3.18 Relationships and sex education policy;
- 3.3.19 Medical care policy;
- 3.3.20 Student mental health and wellbeing policy;
- 3.3.21 Education guardianship policy;
- 3.3.22 Student manual (RS)

4 **Publication and availability**

- 4.1 This policy is published on the School website.
- 4.2 This policy is available in hard copy on request.
- 4.3 A copy of the policy is available for inspection from The Head's Office during the School day.
- 4.4 This policy can be made available in large print or other accessible format if required.
- 4.5 This policy and all policies referred to in it are also available to staff on the School's intranet.

5 **Definitions**

- 5.1 Where the following words or phrases are used in this policy:
 - 5.1.1 References to the **Governing Body** are references to the proprietor of the School.
 - 5.1.2 References to **working days** mean Monday to Friday, even if a boarding school or the School is open on Saturdays when the School is open during term time. The dates of terms are published on the School's website. If referrals to an external agency are required outside term time, references to **working days** are to the days on which the relevant external agency is working;
 - 5.1.3 **Safeguarding** is the protection of people from harm.
 - 5.1.4 **Safeguarding and promoting the welfare of children** is defined in WTSC and KCSIE as:
 - (a) protecting children from maltreatment;
 - (b) preventing impairment of children's mental and physical health or development;
 - (c) ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
 - (d) taking action to enable all children to have the best outcomes.
 - 5.1.5 **CSC** means Children's Social Care and includes, depending on the context, the team based in the local authority where the School is located and, where appropriate, the team based in the local authority where the child is resident.
 - 5.1.6 **DSL** means the School's Designated Safeguarding Lead. References to the DSL include the Deputy DSL (**DDSL**) where the DSL is unavailable.

- 5.1.7 **Designated Officer** means designated officer at the local authority (often referred to as the LADO). The designated officer(s) has overall responsibility for oversight of the procedures for dealing with allegations, for resolving any inter-agency issues, and for liaison with the three safeguarding partners
- 5.1.8 References to **the Executive Head Master** means the Executive Head Master of the Rugby School Group.
- 5.1.9 References to **harmful sexual behaviour** in this policy refer to the DfE's definition: sexual behaviours expressed by children and young people under the age of 18 years old that are developmentally inappropriate, may be harmful towards self or others, or abusive towards another child, young person or adult.
- 5.1.10 References to the **Head** means the Head of Rugby School, the Head of Bilton Grange School as appropriate.
- 5.1.11 Reference to **staff** includes all those who work for or on behalf of the School, regardless of their employment status, including contractors, supply staff, volunteers and Governors unless otherwise indicated.

6 **Responsibility statement and allocation of tasks: the School's approach to safeguarding leadership**

- 6.1 The Governing Body have overall responsibility for all matters which are the subject of this policy, including
 - 6.1.1 and has specific responsibilities as described in Part 2 of KCSIE. Legal responsibility to ensure that arrangements are made to safeguard and promote the welfare of pupils/students at the school, having regard to relevant guidance issued by the Secretary of State;
 - 6.1.2 strategic leadership responsibility for the School's safeguarding arrangements; and
 - 6.1.3 specific responsibilities to facilitate a whole school approach to safeguarding, set out in more detail in Part 2 of KCSIE.
- 6.2 The Governing Body:
 - 6.2.1 appoints a Board level lead on safeguarding matters, whose contact details are set out in the School contacts list at the front of this policy;
 - 6.2.2 ensures that appropriate arrangements are in place for the whole Board to discharge their function, including appropriate consideration of safeguarding matters at Board meetings and a holistic annual review of safeguarding; and
 - 6.2.3 establishes appropriate delegation arrangements at School level, led by the Head and DSL, to enable the School to discharge its safeguarding duties effectively.
- 6.3 To ensure the efficient discharge of its responsibilities under this policy, the Governing Body has allocated the following tasks:

Task	Allocated to	When / frequency of review
Keeping the policy up to date and compliant with the law and best practice		As required, and at least termly
Monitoring the implementation of the policy, relevant risk assessments and any action taken in response and evaluating effectiveness ⁴	The Deputy Head Pastoral (RS) The Assistant Head Pastoral (BG)	As required, and at least termly
Seeking input from interested groups (such as pupils/students, staff, parents) to consider improvements to the School's processes under the policy	The Deputy Head Pastoral (RS) The Assistant Head Pastoral (BG)	As required, and at least annually
Formal annual review of the School's safeguarding policies and procedures and their implementation.	Governing Body	At least annually
Assessing the adequacy of safeguarding arrangements for those who use or hire premises	Governing Body	Before commencement of arrangement and thereafter at least annually

6.4 **Executive Headmaster**

6.4.1 The Executive Head Master is responsible for the overall strategy and ethos of the Rugby School Group.

6.4.2 The Executive Head Master delegates the day to day management of the School and for the management of concerns and allegations about Staff to the Head.

6.5 **Head**

6.5.1 The Head ensures that the School's policies and procedures, particularly those concerning referrals of cases of suspected abuse and neglect, are understood, and followed by all staff.⁵

6.6 **Designated Safeguarding Lead (DSL)**

6.6.1 The DSL is a senior member of staff of the School's leadership team with the necessary status and authority to take lead responsibility for all ⁶ aspects of safeguarding and child protection (including online safety) throughout the School.

- (a) The DSL has the time, funding, training, resources and support to enable them to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings (and / or to support other staff to do so) and to contribute to the assessment of children. The name and contact details of the DSL are set out in the School contacts list at the front of this policy. The main responsibilities of the DSL are set out in Annex C of KCSIE 2021.
- 6.6.2 The DSL will take lead responsibility for pupils/students who are looked after children.
- 6.6.3 The DSL will also undertake the role of senior mental health lead and is responsible for developing a holistic approach to promoting and supporting the mental wellbeing of pupils/students and staff.
- 6.6.4 If the DSL is unavailable the activities of the DSL will be carried out by the Deputy DSL. The Deputy DSL's details are also set out in the School contacts list at the front of this policy.

7 Specific safeguarding duties in relation to children

- 7.1 Safeguarding and promoting the welfare of children is **everyone's** responsibility.
- 7.2 The School is committed to acting in the best interests of the child so as to safeguard and promote the welfare of children and young people. The School requires everyone who comes into contact with children and their families to share this commitment.
 - 7.2.1 The School will:
 - (a) understand its role in the safeguarding partner arrangements <https://www.safeguardingwarwickshire.co.uk/safeguarding-children/i-work-with-children-and-young-people/interagency-safeguarding-procedures> and make itself aware of and follow the local inter-agency procedures of Warwickshire Safeguarding.
 - (b) be alert to signs of abuse whether in school, within the child's family or from outside, and take steps to protect individuals from any form of abuse, or neglect whether from an adult or another child;
 - (c) include opportunities within the curriculum for children to develop the skills they need to recognise, and stay safe from abuse;
 - (d) promote the systems in place for children to confidentially report abuse, ensuring they know their concerns will be treated seriously, they can safely express their views and give feedback;
 - (e) deal appropriately with every suspicion or complaint of abuse and support children who have been abused in accordance with appropriate education, child protection and/or welfare plans;
 - (f) design and operate procedures which, so far as possible, ensure that staff pupils/students and others who are innocent are not prejudiced by malicious, false, unsubstantiated or unfounded allegations;

- (g) prepare staff to identify children who may benefit from early help and encourage them to be particularly alert to the potential need for early help for children with the indicators listed in KCSIE or WTSC;
- (h) be alert to children who are at potentially greater risk of harm including children who need a social worker and children requiring mental health support;
- (i) be alert to the needs of pupils/students with physical or mental health conditions, special educational needs or disabilities, which could be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation, and where additional barriers can exist when detecting abuse or neglect;
- (j) encourage a culture of listening to pupils/students and victims of abuse and taking account of their wishes and feelings in any measure put in place and actions taken by the School to protect them. To promote a culture of listening the School has trained Counsellors who support pupils/students and staff;
- (k) operate robust and sensible health and safety procedures and operate clear and supportive policies on drugs, alcohol and substance misuse;
- (l) assess the risk of pupils/students being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology, based on an understanding of the potential risk in the local area;
- (m) identify pupils/students who may be vulnerable to radicalisation and know what to do when they are identified;
- (n) consider and develop procedures to deal with any other safeguarding issues which may be specific to individual pupils/students in the School or in the local area. See Warwickshire Safeguarding "Interagency Safeguarding Procedures" for more details;
- (o) ensure that appropriate policies and procedures are in place to ensure the safety, wellbeing and protection from exploitation of the children which it sponsors to study in the UK under the Child Student route. Including: ensuring the children's living arrangements meet the requirements of the route, sites at which children are taught or accommodated meet all legally required standards and all staff coming into contact with children have current enhanced Disclosure and Barring Checks.

7.3 Staff may follow the School's Whistleblowing policy to raise concerns about poor or unsafe safeguarding practices at the School or potential failures by the School or its staff to properly fulfil its safeguarding responsibilities. Such concerns will be taken seriously. The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns about child protection failures internally (see the front of this policy for the relevant contact details). Staff may also report concerns direct to the School's Local Authority or to the Charity Commission if they consider that the School has failed to deal with concerns appropriately.

8 Reporting obligations of staff

8.1 Reporting obligations generally

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

8.1.2 All staff have a duty to:

- (a) report any concerns they may have about the safety and/or wellbeing of pupils/students;
- (b) report any concerns they may have about the safety and/or wellbeing of other persons associated with the School;
- (c) report any safeguarding concerns about staff or anyone else associated with the School; and
- (d) follow up on any such reports to ensure that appropriate action is or has been taken.

8.1.3 The procedures for doing so are set out below. If staff are unsure about the appropriate process to use, they should not hesitate to speak to the DSL, any member of the SLT or directly to children's social care (whether the School's local authority or that local to the child's home address) or police in their absence for guidance.

8.2 What to do if staff have a concern about a pupil's/student's welfare

8.2.1 If staff have **any concern about a pupil's/student's welfare**, they should report their concern to the DSL (or the DDSL in the DSL's absence) **immediately**.

- (a) The contact details of the DSL and DDSL are set out in the contacts list at the front of this policy;
- (b) See paragraph 24 below Appendix 2 for guidance about what to do when receiving a disclosure and recording a concern.

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

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

8.2.4 If the concern involves an **allegation or concern raised about a member of staff**, supply staff, contractors or volunteers⁷ this must be reported in accordance with the procedures set out in Appendix 4 and parts 1 and 4 of KCSIE.

8.2.5 What if the DSL is unavailable?

- (a) The DSL or the DDSL should always be available to discuss safeguarding concerns and may be contacted on their mobile phones in relation to any safeguarding concerns out of School hours.
- (b) If in exceptional circumstances the DSL and DDSL are unavailable, staff must not delay taking action. Staff should speak to their line manager or a member of the SLT and/or advice should be taken from children's social care. Their contact details are set out at the front of this policy.
- (c) Where a child is suffering, or is likely to suffer from harm, a referral to children's social care and/or police should be made immediately. Staff should be aware of the process for making referrals direct to children's social care and/or the police in these circumstances. See section 11 below for further details on making a referral.
- (d) Any action taken by a member of staff pursuant to this requirement should then be shared with the DSL or DDSL, or a member of the SLT, as soon as is practically possible.

8.3 Action by the DSL

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

- (a) managing any support for the pupil/student internally via the School's own pastoral support processes, seeking advice from children's social care where required (see 9 below);
- (b) undertaking an early help assessment (Early Help Pathway to Change Assessments), which generally requires parental consent (see 10 below); or
- (c) making a referral for statutory services (see 11 below).

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

8.3.3 Where the concern relates to the welfare of a student who is aged 18 or over, the DSL will consider whether it is necessary to refer such concerns to the Safeguarding Adults Board rather than, or in addition to, children's social care.

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

9 Managing support for pupils/students internally

9.1 The School has a framework for the identification, assessment, management and review of risk to pupil/student welfare, so that appropriate action can be taken to reduce the risks identified. See section 23 and the School's Risk assessment policy for pupil/student welfare or policy where this content is included.

9.2 The School will ensure that appropriate advice and consultation is sought about the management of safeguarding issues, including advice from CSC where necessary.

10 Early help

10.1 Early help, also known as early intervention, is support given to a family when a problem first emerges. It can be provided at any stage of a child or young person's life to parents, children or whole families, and is generally supported by CSC in consultation with the family.

10.2 The School understands that providing early help is more effective in promoting the welfare of children than reacting later.

10.3 The School's safeguarding training includes guidance about early help processes and prepares all staff to identify children who may benefit from early help. Staff are mindful of specific safeguarding issues and those pupils/students who may face additional safeguarding challenges. Staff should be particularly alert to the potential need for early help for a child who:

10.3.1 is disabled or has certain health conditions and has specific additional needs;

10.3.2 has special educational needs (whether or not they have a statutory education, health and care plan);

10.3.3 has a mental health need;

10.3.4 is a young carer;

10.3.5 is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;

10.3.6 is frequently missing / goes missing from care or from home;

10.3.7 is at risk of modern slavery, trafficking, sexual or criminal exploitation;

10.3.8 is at risk of being radicalised or exploited;

10.3.9 has a family member in prison, or is affected by parental offending;

10.3.10 is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;

10.3.11 is misusing drugs or alcohol themselves;

10.3.12 is looked after or has returned home to their family from care;

10.3.13 is at risk of 'honour' based abuse such as Female Genital Mutilation or Forced Marriage;

10.3.14 is a privately fostered child; and

10.3.15 is persistently absent from education including persistent absences for part of the school day.

10.4 A member of staff who considers that a pupil/student may benefit from early help should make a written record of their concerns, using My Concern, and in the first instance discuss this with the DSL (see paragraph 24 below and Appendix 2 for further guidance). The DSL

will consider the appropriate action to take in accordance with the child's Safeguarding Children Partners menu of early help services and their referral threshold document and will support staff in liaising with parents and other agencies and setting up an inter-agency assessment as appropriate.

- 10.5 If early help is appropriate, staff may be required to support other agencies and professionals in an early help assessment and will be supported by the DSL in carrying out this role. In some cases School staff may be required to take a lead role.
- 10.6 The matter will be kept under review and consideration given to a referral to children's social care for assessment for statutory services if the pupil's/student's situation appears to be getting worse, or does not appear to be improving.

11 Making a referral

- 11.1 **Where a child is suffering, or is likely to suffer from harm, a referral to children's social care (and if appropriate the police) should be made immediately.**
- 11.2 "Harm" is the "ill treatment or impairment of the health or development of a child."⁸ Seeing or hearing the ill-treatment of another person is also a form of harm. It can be determined "significant" by "comparing a child's health and development with what might be reasonably expected of a similar child."
- 11.3 The contact details for the School's CSC team are set out at the front of this policy. Staff should bear in mind that referrals may be required to the School's CSC team and/or the pupil's/student's CSC team.
- 11.4 Anyone can make contact with CSC to discuss concerns before a referral is made. This includes professional as well as a child themselves, family members and members of the public. The child's local safeguarding partnership will have a threshold of need framework and guidance which will provide more information which can support decision making in relation to contacting CSC.
- 11.5 **Statutory assessments**
- 11.5.1 Children's social care may undertake a statutory assessment under the *Children Act 1989* into the needs of the child. It is likely that the person making the referral will be asked to contribute to this process. Statutory assessments include:
- (a) **Children in need:** *A child in need is a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled.* Children in need may be assessed under section 17 of the Children Act 1989.
 - (b) **Children suffering or likely to suffer significant harm:** Local authorities have a duty to make enquiries under section 47 of the Children Act 1989 if they have reasonable cause to suspect that *a child is suffering, or is likely to suffer, significant harm.*

⁸ Section 31 Children Act 1989

- 11.6 Staff required to make a direct referral may find helpful the flowchart set out on page 23 of KCSIE and the flowcharts set out in Chapter 1 of WTSC for information about the likely actions and decisions required.
- 11.7 Staff will need to have access to certain information about the child and the safeguarding concern in order to make the referral. In general terms, this information will comprise:
- 11.7.1 personal details of the child including the child's developmental needs;
 - 11.7.2 detailed information about the concern;
 - 11.7.3 information about the child's family and siblings including the capacity of the child's parents or carers to meet the child's developmental needs and any external factors that may be undermining their capacity to parent.
- 11.8 If the referral is made by telephone, this should be followed up in writing.
- 11.9 If the referral is made by someone other than the DSL, the DSL should be informed of the referral as soon as possible.
- 11.10 Confirmation of the referral and details of the decision as to what course of action will be taken should be received from the local authority within one working day. If this is not received, the DSL (or the person that made the referral) should contact children's social care again.
- 11.11 Following a referral, if the child's situation does not appear to be improving, the local escalation procedures should be followed to ensure that the concerns have been addressed and that the child's situation improves, in accordance with the procedures set out in [Warwickshire Safeguarding "Practitioner Escalation Protocol"](#).
- 12 Allegations against pupils/students - peer on peer / child on child abuse**
- 12.1 Allegations against pupils/students should be reported in accordance with the procedures set out in this policy in Appendix 3. If harmful sexual behaviour is alleged to have occurred, the DSL will have regard to Part 5 of KCSIE and the non-statutory guidance [Sexual Violence and Sexual Harassment between children in schools](#) (DfE, September 2021) and take into account the local response of the police and children's social care to these issues. The views of the alleged victim will be taken into account but will not be determinative.
- 12.2 All those involved in such allegations will be treated as being at risk and in need of support and the safeguarding procedures in accordance with this policy will be followed. Appropriate support will be provided to all pupils/students involved, including support from external services as necessary.
- 13 Extra-familial harm**
- 13.1 Safeguarding incidents and/or behaviours can be associated with factors outside the School and/or can occur between children outside the School.
- 13.2 All staff, including the DSL, should consider the context within which such incidents and/or behaviours occur, for example where wider environmental factors are present in a child's life that may be a threat to their safety and/or welfare, and should record these appropriately.

- 13.3 Children's social care should be informed of all such information to allow any assessment process to consider all available evidence and the full context of any abuse.
- 13.4 Extra-familial harm: all staff, but especially the DSL (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines.
- 14 Risk assessment**
- 14.1 Where a concern about a pupil's/student's welfare is identified, the risks to that pupil's/student's welfare will be assessed and appropriate action will be taken to reduce the risks identified.
- 14.2 The format of risk assessment may vary and may be included as part of the School's overall response to a welfare issue, including the use of individual pupil/student welfare plans (such as behaviour, healthcare and education plans, as appropriate). Regardless of the form used, the School's approach to promoting pupil/student welfare will be systematic and pupil/student focused.
- 14.3 The Head has overall responsibility for ensuring that matters which affect pupil/student welfare are adequately risk assessed and for ensuring that the relevant findings are implemented, monitored and evaluated.
- 14.4 Day to day responsibility to carry out risk assessments under this policy will be delegated to the DSL who has been properly trained in, and tasked with, carrying out the particular assessment.
- 15 What to do if staff have a safeguarding concern about someone else's welfare**
- 15.1 Staff who have safeguarding concerns about the welfare of others or any other safeguarding issue not expressly covered by this policy, should report them.
- 15.2 In the absence of an express procedure about reporting, they should report such concerns to their line manager or the DSL in the first instance.
- 16 Allegations made and or / concerns raised about staff and others in School**
- 16.1 The School has procedures for dealing with allegations made and/or concerns raised about staff or anyone working in the School, including supply teachers, volunteers and contractors.⁹ The recommended format for all staff to record any such poor practice or possible child abuse is the pro forma 'Logging A Concern about a member of staff' found on the Employee Self Service (ESS): Safeguarding section at Rugby School.
- 16.2 The procedures in this policy apply to staff who pose a risk of harm to children or may behave in a way that indicates that they may be unsuitable to work with children. They also apply to low level concerns that do not meet the harms threshold. The procedures aim to strike a balance between the need to protect children from abuse and the need to protect staff from malicious, unfounded, false, or unsubstantiated allegations. These procedures are set out in Appendix 4 and follow the guidance in Parts 1 and 4 of KCSIE.

- 16.3 The School will follow its employment procedures for dealing with any other safeguarding concern raised about staff, involving external agencies as appropriate.
- 16.4 Detailed guidance is provided to staff to ensure that all staff are clear on the rules of conduct and the expectations of the School in relation to contact with pupils/students, parents, colleagues and any other person who comes into contact with the School. This guidance is contained in the Staff Code of Conduct and includes details of additional safeguarding arrangements where staff engage in one-to-one teaching and meetings with pupils/students.

17 **Inappropriate advances**

- 17.1 Children can sometimes make suggestive approaches to an adult. For whatever reason, they may act in an inappropriate manner. Sometimes, inappropriate physical contact can be made either intentionally or accidentally.
- 17.2 It is vital that members of staff take the responsibility to:
- 17.2.1 Tell the child that his or her language or behaviour is unacceptable;
 - 17.2.2 Tell the DSL/Deputy DSL about the incident, however, embarrassing this is; and
 - 17.2.3 Record the incident, indicating what was said and/or done via private note to the DSL. This is a necessary safeguard if accusations are made at a later stage.
- 17.3 The member of staff and the DSL should decide on the appropriate course of action. It may be necessary for the DSL and/or the member of staff to discuss the incident with the Head and/or to seek advice from Children's Social Care.

18 **Informing parents**

- 18.1 Parents will normally be kept informed, as appropriate, of any action to be taken under these procedures. However, there may be circumstances when the DSL will need to consult the Head, the Designated Officer(s), children's social care, the police and/or the pupil/student before discussing details with parents.
- 18.2 In all cases, the DSL will be guided by the Warwickshire Safeguarding referral threshold document.
- 18.3 See also Appendix 4 for details about the disclosure of information where an allegation has been made against a member of staff.

19 **Additional reporting**

- 19.1 In addition to the reporting requirements explained above, the School will consider whether it is required to report safeguarding incidents to any other regulatory body or organisation, including but not limited to:
- 19.1.1 **Health and Safety Executive**
 - (a) The School is legally required under RIDDOR to report certain incidents to the Health and Safety Executive. Please see the School's Health and Safety Policy for further details about this.

- 19.1.2 **Charity Commission**

- (a) The School is a registered charity and will report all serious incidents to the Charity Commission promptly in accordance with the guidance [How to report a serious incident in your charity \(Charity Commission, June 2019\)](#);

19.1.3 Disclosure and Barring Service (DBS)

- (a) A referral to the DBS will be made promptly if the criteria are met. See Appendix 4, 7.1 - 7.2 for further details.

19.1.4 Teaching Regulation Agency (TRA)

- (a) Separate consideration will be given as to whether a referral to the TRA should be made where a teacher has been dismissed, or would have been dismissed if he/she had not resigned. See Appendix 4, 7.3 for more details.

19.1.5 Insurers

- (a) The School will consider whether it is necessary to report a safeguarding incident to the relevant insurers and/or brokers. It may be necessary to report to a number of insurers as there may be concurrent cover under existing and historic policies.
- (b) Care should be taken to ensure this is done before renewal to ensure that the School complies with its duties under the Insurance Act 2015. If the School is in any doubt with regard to the correct insurer and/or policy and/or if it is unable to locate the relevant insurer, professional advice should be sought.

19.1.6 Boarding Schools Association (BSA)

- (a) The School will report safeguarding matters to the BSA as required by their Safeguarding "Commitment to Care" Charter.

19.1.7 UK Visas and Immigration

- (a) In the event that a pupil/student holding a Student or Child Student visa sponsored by the School under the Points Based System goes missing, the School will report to UKVI if the pupil/student misses ten consecutive expected contact points.
- (b) Each time the School's attendance register is completed is treated as a contact point for these purposes
- (c) The report will be made by the School's Level 1 user via the Sponsor Management and in accordance with prevailing UKVI guidance.

20 Safer recruitment and supervision of staff

20.1 The School is committed to practising safer recruitment in checking the suitability of staff (including staff employed by another organisation). See the School's separate Safer recruitment policy.

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

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

20.4 The School's protocol for ensuring that visiting speakers are suitable and appropriately supervised is set out in the School's separate Safeguarding Information for Visitors

21 Use of mobile technology

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

21.1.1 the School's Acceptable Use Policy for pupils/students sets out the expectations on pupils/students from Year 1 to Year 13. In the EYFS setting, pupils are not permitted to bring mobile phones or any mobile device with a camera facility onto the premises;

21.1.2 all staff (including staff in the EYFS setting) should use mobile devices and cameras in accordance with the guidance set out in the staff code of conduct;

21.1.3 parents of all pupils/students (including parents of pupils in the EYFS setting) may bring mobile devices onto the premises but may only take photographs during events such as plays, concerts or sporting events for personal use. Parents should be reminded that the publication of such images (including on personal social networking sites even where access to the image may be limited) may be unlawful. A notice to this effect is also displayed within 'The Nest' at Bilton Grange.

21.2 The School allows access to the internet onsite. Appropriate internet safety measures are taken to manage associated risks, including use of filters and monitoring of usage.

21.3 The School's approach to online safety is set out in the School's Pupil/Student Online Safety policy.

22 Training

22.1 The School ensures that regular guidance and training is arranged on induction and at regular intervals thereafter so that staff understand what is expected of them by this policy and have the necessary knowledge and skills to carry out their roles¹⁰.

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

22.3 The School maintains written records of all staff training.

22.4 All training will be carried out in accordance with Warwickshire Safeguarding procedures where possible.

22.5 Induction

22.5.1 All staff, including temporary staff and volunteers, will be provided with induction training that includes (and where relevant includes the provision of copies of):

- (a) this policy;
- (b) the role, identity and contact details of the DSL and the Deputy DSL's;
- (c) the discipline and rewards policy for pupils/students;
- (d) the staff code of conduct including the Whistleblowing policy, Staff social media policy and Acceptable use policy;
- (e) the safeguarding response to children who go missing from education;
- (f) the School's approach to online safety;
- (g) safeguarding training in accordance with Warwickshire Safeguarding procedures including guidance on managing a report of peer-on-peer harmful sexual behaviour;
- (h) a copy of Annex A of KCSIE to those staff not working directly with children;
or
- (i) a copy of Part 1 and, where appropriate, Annex B of KCSIE; and
- (j) appropriate Prevent duty training.

22.6 Safeguarding training

- 22.6.1 Staff not working directly with children will receive a copy of this policy and Annex A of KCSIE and will be required to confirm that they have read and understand these;
- 22.6.2 Staff working directly with children will receive a copy of this policy and Part 1 and where appropriate, Annex B of KCSIE, and will be required to confirm that they have read and understand these.¹¹
- 22.6.3 Members of the SLT (including the Head and the Executive Head Master) and the Nominated Child Protection Governors will receive a copy of this policy and be expected to read all of KCSIE. All other Governors should additionally read at least Part 2 of KCSIE.
- 22.6.4 The Head and Executive Head Master and all staff members will undertake appropriate annual safeguarding training in line with Warwickshire Safeguarding advice. In addition, all staff members will receive safeguarding and child protection updates including online safety via email and staff briefings on a regular basis. Staff are also issued with a Safeguarding Aide Memoire which is designed to be carried on their ID card holder which sets out contact details of staff to whom concerns must be reported.
- 22.6.5 Staff development training will also include training on online safety, searching pupils/students for prohibited and banned items, and Prevent duty training assessed as appropriate for them by the School.
- 22.6.6 Additionally, the School will make an assessment of the appropriate level and focus for staff training and responsiveness to specific safeguarding concerns such as

radicalisation, peer on peer abuse, harmful sexual behaviour, child criminal and child sexual exploitation, female genital mutilation, cyberbullying, prejudiced-based and discriminatory bullying and mental health and to ensure that staff have the skills, knowledge and understanding to keep looked after children safe.

22.6.7 All Governors receive safeguarding training on induction. The Nominated Child Protection Governors will receive additional appropriate training to enable them to fulfil their safeguarding responsibilities.

22.6.8 The School has mechanisms in place to assist staff to understand and discharge their role and responsibilities and to ensure that they have the relevant knowledge, skills and experience to safeguard children effectively, including questionnaires, staff meetings and professional development reviews. This includes information on how staff can report concerns occurring out of hours / out of term time.

22.6.9 Designated Safeguarding Lead (DSL)

- (a) The DSL and Deputy DSL will undertake training to provide them with the knowledge and skills required to carry out the role. This training includes Prevent awareness training and will be updated at least every two years.
- (b) In addition, their knowledge and skills will be refreshed at regular intervals, at least annually, to allow them to understand and keep up with any developments relevant to their role. For further details about the training of the DSL, see Annex C of KCSIE
- (c) Prevent duty training will be consistent with the Government's Prevent training for schools. See [Educate Against Hate](#) (HM Government, 2018) for further details.

22.6.10 Teaching pupils/students about safeguarding

- (a) The School teaches pupils/students about safeguarding through the curriculum and PSHE. This includes guidance on adjusting behaviour to reduce risks, particularly online, building resilience to protect themselves and their peers, fostering healthy and respectful relationships with others and providing information about who they should turn to for help.
- (b) The School recognises that a one size fits all approach may not be appropriate for children, and a more personalised or contextualised approach for more vulnerable children, victims of abuse and some SEND children might be needed.
- (c) Pupils/students are taught about harmful sexual behaviours, including sexual violence and sexual harassment, relationships and sex education and PSHE education appropriate to their age and stage of development. It will tackle issues such as: healthy and respectful relationships, what respectful behaviour looks like, consent, gender roles, stereotyping, equality, body confidence and self-esteem, prejudiced behaviour, that sexual violence and sexual harassment is always wrong, and addressing cultures of sexual harassment.
- (d) Pupils/students are given the opportunity to talk about safeguarding issues within the classroom environment and are made aware of the processes by

which any concerns they have can be raised, including the processes for reporting a concern about a friend or peer, and how any report will be handled.

- (e) The safe use of technology is a focus in all areas of the curriculum and key ICT safety messages are reinforced as part of assemblies and tutorial / pastoral activities. The School has appropriate filters and monitoring systems in place (see the Online safety policy) and is mindful that this should not lead to unnecessary restrictions on learning.

23 Monitoring and review

- 23.1 The DSL will ensure that the procedures set out in this policy and the implementation of these procedures are updated and reviewed regularly, working with the Governing Body as necessary and seeking contributions from staff. The DSL will update the Senior Management Team regularly on the operation of the School's safeguarding arrangements.
- 23.2 Any safeguarding incidents at the School will be followed by a review of these procedures by the DSL and a report made to the Governing Body. Where an incident involves a member of staff, the Designated Officer(s) will be asked to assist in this review to determine whether any improvements can be made to the School's procedures. Any deficiencies or weaknesses with regards to safeguarding arrangements at any time will be remedied without delay.
- 23.3 The Governing Body will undertake an annual review of this policy and the School's safeguarding procedures, including an update and review of the effectiveness of procedures and their implementation and the effectiveness of inter-agency working. It will also undertake an annual review of its approach to online safety, supported by an annual risk assessment that considers and reflects the risks its pupils/students face.
- 23.4 The DSL will work with the Nominated Child Protection Governor to prepare a written report commissioned by the Governing Body. The written report should address how the School ensures that this policy is kept up to date; staff training on safeguarding; referral information; issues and themes which may have emerged in the School and how these have been handled, including lessons learned; and the contribution the School is making to multi-agency working in individual cases or local discussions on safeguarding matters. The Governing Body should also consider independent corroboration, such as:
 - 23.4.1 inspection of records or feedback from external agencies including the Designated Officer(s);
 - 23.4.2 reports of ISI inspections;
 - 23.4.3 the outcome of any relevant complaints, claims or related proceedings; and
 - 23.4.4 press reports.
- 23.5 The Governing Body will review the report, this policy and the implementation of its procedures and consider the proposed amendments to the policy before giving the revised policy its final approval. Detailed minutes recording the review by the Governing Body will be made.

24 Record keeping

24.1 All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing. Information should be kept confidential and stored securely. Concerns and referrals will be kept in a separate child protection file for each child. These should include:

24.1.1 a clear and comprehensive summary of the concern;

24.1.2 details of how the concern was followed up and resolved;

24.1.3 a note of any action taken, decisions reached and the outcome.

24.2 The information created in connection with this policy may contain personal data. The School's use of this personal data will be in accordance with data protection law. The School has published on its website privacy notices which explain how the School will use personal data.

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

24.4 Insofar as pupil/student records are concerned:

24.4.1 Staff must record all concerns about a pupil/student on the School's pro forma record which is available on My Concern. Guidance on record keeping is set out in Appendix 2.

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

24.5 Information sharing and multi-agency working

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

24.5.2 The School understands that information sharing is essential for effective safeguarding and promoting the welfare of children and young people, including their educational outcomes. Fears about sharing information will not stand in the way of the need to promote the welfare, and protect the safety, of pupils/students, which is always the School's paramount concern. Schools have clear powers to share, hold and use information for these purposes and the UK GDPR and Data Protection Act 2018 provide a framework to ensure that personal information is shared appropriately.

24.5.3 When the School receives a request for safeguarding information (e.g. a subject access request from a parent or a request from the police), the School will carefully consider its response to make sure that any disclosure is in accordance with its obligations under the UK GDPR and Data Protection Act 2018. The School will also have regard to its data protection policies. The School's Information Security Officer will work with the DSL as appropriate to determine what should be disclosed.

24.5.4 The School will co-operate with children's social care, and where appropriate the police, to ensure that all relevant information is shared for the purposes of early help assessments, and assessments and child protection investigations under the Children Act 1989.

24.5.5 Where allegations have been made against staff, the School will consult with the Designated Officer(s) and, where appropriate, the police and children's social care to agree the information that should be disclosed and to whom.

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

25 **Version control**

Date of adoption of this policy	September 2021
Date for next review of this policy	September 2022
Policy owner (SMT)	Designated Safeguarding Leads
Policy owner (Governing Body)	Governing Body

Appendix 1 Forms of abuse and neglect and specific safeguarding risks

1 Abuse and neglect

- 1.1 Staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label and in most cases, multiple issues will overlap with one another, therefore staff should always be vigilant and always raise any concerns with the DSL (or deputy).
- 1.2 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.

2 Definitions of abuse and neglect

- 2.1 **Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children.
- 2.2 **Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
- 2.3 **Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or "making fun" of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill treatment of another. It may involve serious bullying (including cyberbullying and prejudiced-based or discriminatory bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
- 2.4 **Sexual abuse** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline

abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as peer on peer abuse) in education and all staff should be aware of it. The school policy and procedures can be found in Appendix 3.

- 2.5 **Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

3 Signs of abuse

- 3.1 Possible signs of abuse include, but are not limited to:
- 3.1.1 the pupil/student says he/she has been abused or asks a question or makes a comment which gives rise to that inference;
 - 3.1.2 there is no reasonable or consistent explanation for a pupil's/student's injury, the injury is unusual in kind or location or there have been a number of injuries and there is a pattern to the injuries;
 - 3.1.3 the pupil's/student's behaviour stands out from the group as either being extreme model behaviour or extremely challenging behaviour, or there is a sudden or significant change in the pupil's/student's behaviour;
 - 3.1.4 the pupil/student asks to drop subjects with a particular teacher and seems reluctant to discuss the reasons;
 - 3.1.5 the pupil's/student's development is delayed, the pupil/student loses or gains weight or there is deterioration in the pupil's/student's general wellbeing;
 - 3.1.6 the pupil/student appears neglected, e.g. dirty, hungry, inadequately clothed;
 - 3.1.7 the pupil/student is reluctant to go home, or has been openly rejected by his/her parents or carers; and
 - 3.1.8 inappropriate behaviour displayed by other members of staff or any other person working with children, for example inappropriate sexual comments; excessive one-to-one attention beyond the requirements of their usual role or responsibilities; or inappropriate sharing of images.
- 3.2 Warwickshire Safeguarding Partners can provide advice on the signs of abuse and the DfE advice [What to do if you're worried a child is being abused](#) (March 2015) provides advice in identifying child abuse. The [NSPCC website](#) is also a good source of information and advice.

4 **Specific safeguarding issues**

- 4.1 Statutory guidance acknowledges the following as specific safeguarding issues:
- 4.1.1 child abduction and community safety incidents;
 - 4.1.2 children and the court system;
 - 4.1.3 children missing from education (see section 5 below);
 - 4.1.4 children with family members in prison;
 - 4.1.5 child criminal exploitation and child sexual exploitation (see section 7 below);
 - 4.1.6 county lines (see section 8 below);
 - 4.1.7 modern slavery and the national referral mechanism;
 - 4.1.8 cybercrime (see section 10 below);
 - 4.1.9 domestic abuse (see section 11 below);
 - 4.1.10 homelessness;
 - 4.1.11 so-called "honour-based" abuse (including Female Genital Mutilation and Forced marriage) (see sections 12, 13 and 14 below);
 - 4.1.12 preventing radicalisation (see section 15 below);
 - 4.1.13 peer on peer / child on child abuse (see Appendix 3);
 - 4.1.14 sexual violence and sexual harassment between children in schools and colleges (see Appendix 3);
 - 4.1.15 upskirting (see section 19 below).
- 4.2 Further advice and links to guidance on these specific safeguarding issues can be found in Annex B of KCSIE. Staff should be particularly aware of the safeguarding issues set out below.

5 **Children missing from education**

- 5.1 Children going missing, particularly persistently, can act as a vital warning sign of a range of safeguarding issues including neglect, sexual abuse and child sexual and criminal exploitation including involvement in county lines. School attendance registers are carefully monitored to identify any trends. Action should be taken in accordance with this policy if any absence of a pupil/student from the School gives rise to a concern about their welfare.
- 5.2 Where reasonably possible the School will hold more than one emergency contact for each pupil/student.
- 5.3 The School shall inform the local authority of any pupil/student who is going to be added to or deleted from the School's admission register at non-standard transition

points in accordance with the requirements of the Education (Pupil Registration) (England) Regulations 2006 (as amended).

- 5.4 This will assist the local authority to:
- 5.4.1 fulfil its duty to identify children of compulsory school age who are missing from education; and
 - 5.4.2 follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect or radicalisation or involvement with serious violent crime.
- 5.5 The School shall inform the local authority of any pupil/student who:
- 5.5.1 fails to attend School regularly; or
 - 5.5.2 has been absent without the School's permission for a continuous period of ten school days or more, at such intervals as are agreed between the School and the local authority (or in default of such agreement, at intervals determined by the Secretary of State).

6 **Elective Home Education (EHE)**

- 6.1 Where a parent expresses their intention to remove a pupil/student from School with a view to educating at home, the School will work with the local authority and other key professionals to coordinate a meeting with parents where possible, ideally before a final decision has been made. This is to ensure parents have considered what is in the best interests of their child. This will be particularly important where a child has SEND, is vulnerable, and/or has a social worker.

7 **Child Sexual Exploitation (CSE) and Child criminal exploitation (CCE)**

- 7.1 Both CSE and CCE are forms of abuse where an individual or group (adult or another child) takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity:
- 7.1.1 in exchange for something the victim needs or wants e.g. money, gifts or affection; and/or
 - 7.1.2 for the financial advantage or increased status of the perpetrator or facilitator; and/or
 - 7.1.3 through violence or threat of violence to victims (and their families).
- 7.2 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.
- 7.3 CSE and CCE can affect children of any sex and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.
- 7.4 international pupils/students may be particularly vulnerable to trafficking, particularly those who are or will be in the UK without their parent(s) or legal guardian, and schools which hold a Child Student sponsor licence may be targeted

by traffickers as a means of facilitating a child's entry to the UK for the purposes of CSE or CCE.

- 7.5 CCE can include children being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.
- 7.6 Some of the following can be indicators of both CSE and CCE, including children who:
 - 7.6.1 appear with unexplained gifts, money or new possessions;
 - 7.6.2 associate with other young people involved in exploitation;
 - 7.6.3 suffer from changes in emotional wellbeing;
 - 7.6.4 misuse drugs and alcohol;
 - 7.6.5 go missing for periods of time or regularly come home late; or
 - 7.6.6 regularly miss school or education or do not take part in education.
- 7.7 Children who have been exploited will need additional support to help maintain them in education.
- 7.8 CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.
- 7.9 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 include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media). The above CCE indicators can also be indicators of CSE, as can children who:
 - 7.9.1 have older boyfriends or girlfriends; or
 - 7.9.2 suffer from sexually transmitted infections or become pregnant.

8 County lines

- 8.1 County lines¹² is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas within the UK, using dedicated mobile phone lines or other form of "deal line". They are likely to exploit children and vulnerable adults to move store and sell drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons.
- 8.2 Children are increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs

¹² See the Home Office's [Preventing youth violence and gang involvement](#) and its [Criminal exploitation of children and vulnerable adults: county lines](#) guidance for more information.

can manufacture drug debts which need to be worked off and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

8.3 A number of the indicators for CSE and CCE as detailed above (and in Annex B of KCSIE) may also be applicable to children involved in county lines.

8.4 Additional reporting duties:

8.4.1 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;

8.4.2 where a pupil/student may have been trafficked for the purpose of transporting drugs, a referral to the National Referral Mechanism¹³ should be considered.

9 **Serious violence**

9.1 Indicators which may signal children are at risk from, or are involved with serious violent crime may include:

9.1.1 Increased absence from school;

9.1.2 a change in friendships or relationships with older individuals or groups;

9.1.3 a significant decline in performance;

9.1.4 signs of self-harm or a significant change in wellbeing;

9.1.5 signs of assault or unexplained injuries; and

9.1.6 unexplained gifts or new possessions (which may also indicate a child is at risk of criminal exploitation).

9.2 Staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence e.g. being male, having frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. Further advice for schools is provided in the Home Office's Preventing youth violence and gang involvement and its Criminal exploitation of children and vulnerable adults: county lines guidance.

10 **Cybercrime**

10.1 Cybercrime is a criminal activity committed using computers and/or the internet. It's broadly categorised as either "cyber-enabled" (crimes that can happen off-line but enabled at scale and speed online e.g. fraud, purchasing of illegal drugs, child sex abuse and exploitation) or "cyber-dependent" (crimes that can only be committed by using a computer).

¹³ For further information and a definition of trafficking, see: [National Crime Agency - modern slavery and human trafficking](#) and the DfE and Home Office guidance: [Trafficking: safeguarding children](#)

- 10.2 Cyber-dependent crimes include:
 - 10.2.1 unauthorised access to computers (illegal hacking) e.g. accessing a school's computer network to look for test papers or change grades awarded;
 - 10.2.2 denial of service (**Dos** or **DDos**) attacks or "booting" - attempts to make a computer, network or website unavailable by overwhelming it with internet traffic;
 - 10.2.3 making, supplying or obtaining malware e.g. viruses, spyware, ransomware, botnets and Remote Access Trojans with intent to commit further offence.
- 10.3 Children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.
- 10.4 The DSL (or deputy) should consider referring into the Cyber Choices programme if they have concerns. This is a nationwide programme which intervenes when 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.

11 **Domestic abuse**

- 11.1 The statutory definition of domestic violence and abuse is based on the previous cross-government definition: it is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The definition captures a range of different abusive behaviours, including physical, sexual, emotional and economic abuse and coercive and controlling behaviour. The Domestic Abuse Act 2021 now recognises the impact of domestic abuse on children, as victims in their own right, if they see hear or experience the effects of abuse.
- 11.2 All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.
- 11.3 Further advice on identifying children who are affected by domestic abuse and how they can be helped can be found in Annex B of KCSIE. This includes details about Operation Encompass which operates in all police forces across England, helping schools and police work together to provide emotional and practical help to children.

12 **So-called "honour-based" abuse**

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

- 12.2 If appropriate, the DSL will activate local safeguarding procedures, using existing national and local protocols for multiagency liaison with police and children's social care.

13 **Female genital mutilation (FGM)**

- 13.1 FGM is a form of so-called "honour-based" abuse. It comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long lasting harmful consequences.
- 13.2 There is a range of potential indicators that a child or young person may be at risk of FGM. Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 38-43 of the [Multi-agency statutory guidance on FGM](#) (HM Government, July 2020) (pages 61-63 focus on the role of schools).
- 13.3 All staff must be aware of the requirement for teachers to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. The report should be made orally by calling 101, the single non-emergency number. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they must not be examining pupils/students. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve children's social care as appropriate.
- 13.4 If the teacher is unsure whether this reporting duty applies, they must refer the matter to the DSL in accordance with this policy. See the Home Office guidance [Mandatory reporting of female genital mutilation - procedural information \(January 2020\)](#) for further details about the duty.
- 13.5 Guidance published by the [Department for Health](#) also provides useful information and support for health professionals which will be taken into account by the School's medical staff. The National FGM Centre has also produced FGM guidance to help schools understand their role in safeguarding girls, engaging parents and teaching about FGM.

14 **Forced marriage**

- 14.1 Forced marriage is also a form of so-called "honour-based" abuse. Forcing a person into marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage.
- 14.2 Guidance on the warning signs that forced marriage may be about to take place, or may have already taken place, can be found on pages 13-14 of the [Multi-agency guidelines: handling cases of forced marriage](#) (HM Government, June 2014).

- 14.3 Staff should speak to the DSL if they have any concerns. Pages 32-36 of the [Multi-agency guidelines: handling cases of forced marriage](#) (HM Government, June 2014) focus on the role of schools in detecting and reporting forced marriage and the Forced Marriage Unit can be contacted on 020 7008 0151 or fm@fco.gov.uk for advice and information.

15 Radicalisation and the Prevent duty

- 15.1 The School has a legal duty to have due regard to the need to prevent people from being drawn into terrorism.
- 15.2 The School aims to build pupils'/students' resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views. Being drawn into terrorism includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit. The School is committed to providing a safe space in which children, young people and staff can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments.
- 15.3 The School has adopted the government's definitions for the purposes of compliance with the Prevent duty:
- 15.4 **Extremism:** *"vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas"*
- 15.5 **Radicalisation:** *"the process by which a person comes to support terrorism and forms of extremist ideologies associated with terrorist groups."*
- 15.6 **Terrorism:** *"an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and made for the purpose of advancing a political, religious or ideological cause."*
- 15.7 There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Radicalisation can occur through many different methods (such as social media) and settings (such as the internet).
- 15.8 It is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the DSL making a Prevent referral.

- 15.9 Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. An individual's engagement with the programme is entirely voluntary at all stages. Guidance on Channel is available at: [Channel duty guidance: protecting vulnerable people from being drawn into terrorism](#) (HM Government, February 2021) The DfE and Home Office's briefing note [The use of social media for online radicalisation](#) (DfE, July 2015) includes information on how social media is used to radicalise young people and guidance on protecting pupils/students at risk.

16 Peer on peer / child on child abuse

- 16.1 All staff should be aware that children can abuse other children (often referred to as peer on peer abuse) and that it can happen both inside and outside of school or online.
- 16.2 The School's policy and procedures for dealing with peer on peer abuse can be found in Appendix 3 below.

17 Online safety

- 17.1 All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. 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.
- 17.2 It is essential that children are safeguarded from potentially harmful and inappropriate online material. An effective, whole school approach to online safety empowers a school to protect and educate pupils/students, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.
- 17.3 The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:
- 17.3.1 **content:** being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
- 17.3.2 **contact:** being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- 17.3.3 **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; and
- 17.3.4 **commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams. If pupils/students or staff are at risk, it should be reported to the [Anti-Phishing Working Group](#).

18 Sharing nudes and semi-nude images and videos

- 18.1 Consensual and non-consensual sharing of nudes and semi-nude images and/or videos can be signs that children are at risk.
- 18.2 "Sharing nudes and semi-nudes" means the taking and sending or posting of nude or semi-nude images, videos or live streams by young people under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. It can also involve sharing between devices offline e.g. via Apple's AirDrop. This is also known as sexting or youth produced sexual imagery.
- 18.3 The School treats all incidences of sharing nudes and semi-nude images as safeguarding matters to be actioned in accordance with this policy.
- 18.4 Members of staff must not intentionally view any nude or semi-nude images which are reported to them, or copy, print or share the images under any circumstances. In referring any incident of sharing images, members of staff should describe the content of the images as reported to them.
- 18.5 The DSL may in exceptional circumstances view images with the prior approval of the Head and only where:
 - 18.5.1 it is the only way to make a decision whether to involve other agencies, as there is insufficient information available as to its contents;
 - 18.5.2 it is necessary to report the image to a website, app or suitable reporting agency to have it taken down, or to support the pupil/student or parent in making a report; or
 - 18.5.3 a pupil/student has reported the image directly to a member of staff in circumstances where viewing the image is unavoidable or images have been found on the school's devices or network.
- 18.6 Where viewing an image is unavoidable:
 - 18.6.1 viewing should take place on School premises wherever possible;
 - 18.6.2 the image should be viewed by a person of the same sex as the person alleged to be shown in the image (where this is known);
 - 18.6.3 a senior member of staff should be present to monitor and support the person viewing the image. This member of staff should not view the image;
 - 18.6.4 full details of the viewing must be recorded in the School's safeguarding records, including who was present, the date and time, the nature of the image and the reasons for viewing it;
 - 18.6.5 any member of staff who views an indecent image should be given appropriate support.
- 18.7 If any devices need to be confiscated (whether in order to view the image(s) or to pass evidence to the appropriate authority), they should be turned off and locked away securely until they are required.
- 18.8 If an electronic device that is prohibited by the school rules has been seized and the member of staff has reasonable grounds to suspect that it contains evidence in

relation to an offence, or that it contains a pornographic image of a child or an extreme pornographic image, the device will be given to the police.

- 18.9 If external agencies do not need to be involved, the School must consider the deletion of any images. Pupils/students should be asked to delete images themselves and to confirm that this is done. Members of staff should not search devices to delete images.
- 18.10 If images have been shared online and cannot now be deleted by the person who shared them, the School should consider reporting the images to the relevant web host or service provider (if an option is provided), or contacting the Internet Watch Foundation or ChildLine (if the website does not provide this option).
- 18.11 Where a pupil/student receives unwanted images, the School should advise the pupil/student and his/her parents of options that may be available to block the sender or to change the pupil's/student's mobile phone number or email address.
- 18.12 The UK Council for Internet Safety's advice note [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) (DCMS and UKCIS, December 2020) contains details of support agencies and provides further information for schools on how to responding to incidents of sexting.
- 18.13 The Home Office has published [Indecent images of children: guidance for young people](#) (Home Office, November 2019) to help young people understand the law on indecent images of children and how to navigate the internet confidently and safely within legal boundaries.

19 **Upskirting**

- 19.1 Upskirting typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission 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. Anyone of any gender can be a victim.
- 19.2 Upskirting is a criminal offence. Attempting to commit an act of upskirting may also be a criminal offence e.g. if actions are taken to do something that is more than merely preparatory to committing the offence such as attempting to take a photograph on a telephone or camera but failing to do so because of lack of storage space or battery.
- 19.3 The School will treat incidences of upskirting as a breach of discipline and also as a safeguarding matter under the School's child protection procedures.
- 19.4 All matters relating to upskirting images and devices which may have been used in connection with an allegation of upskirting will be dealt with in a similar manner to sharing sexual images / sexting.

20 **Special educational needs and disabilities or physical health issues**

- 20.1 The School welcomes pupils/students with special educational needs and disabilities (SEND) and will do all that is reasonable to ensure that the School's curriculum, ethos, culture, policies, procedures and premises are made accessible to everyone.

See the School's policy on special educational needs and learning difficulties and disability policy.

- 20.2 Additional barriers can exist when detecting the abuse or neglect of pupils/students with SEND or certain health conditions that can create additional safeguarding challenges for those involved in safeguarding and promoting the welfare of this group of children. The School is mindful in particular that:
- 20.2.1 assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the pupil's/student's condition without further exploration;
 - 20.2.2 pupils/students with SEND or certain health conditions may be more prone to peer group isolation and can be disproportionately impacted by bullying (including prejudice-based and discriminatory bullying) without outwardly showing any signs; and
 - 20.2.3 there may be communication barriers which are difficult to overcome to identify whether action under this policy is required.
- 20.3 the School should consider providing extra pastoral support and attention for these pupils/students, along with ensuring any appropriate support for communication is in place.

21 Looked after children and previously looked after children

- 21.1 The Governing Body, via the nominated safeguarding governors, ensure that staff have the skills, knowledge and understanding to keep looked after children safe and the information they need in relation to a child's looked after legal status, for example:
- 21.1.1 whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order;
 - 21.1.2 contact arrangements with birth parents or those with parental responsibility;
 - 21.1.3 information about a child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her.
- 21.2 The DSL maintains these details, including contact details of the child's social worker. The DSL will also ensure that the Personal Education Plan is maintained and will meet with looked after children in order to monitor the extent to which their educational, emotional and physical needs are being met. They will also ensure that the appropriate team around the looked after child is provided with appropriate information and will ensure that progress and development are monitored. The DSL will work in accordance with the statutory guidance and will maintain an active and up to date link with key services, including the Virtual School Head, Social Workers and PEP Coordinator.

22 Care leavers

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

Appendix 2 Concerns about a child - guidance for staff

1 Receiving a disclosure

- 1.1 Listen carefully and keep an open mind. Do not take a decision as to whether or not the abuse has taken place.
- 1.2 Do not ask leading questions, i.e. a question which suggests its own answer. Use "tell me, explain to me, describe to me" (**TED**) questioning.
- 1.3 Reassure the pupil/student they are being taken seriously and they will be supported and kept safe.
- 1.4 Do not give a guarantee of absolute confidentiality. Explain the need to pass on the information in accordance with this policy so that the correct action can be taken.
- 1.5 Keep a sufficient written record of the conversation (see 2 below). All other evidence, for example, scribbled notes, mobile phones containing text messages, clothing, computers, must be kept securely with the written record.
- 1.6 Pass on the record when reporting the concern in accordance with this policy.

2 Recording a concern

- 2.1 Staff must record all concerns in writing.
- 2.2 The School has a pro forma record which should be completed and passed on when reporting the matter in accordance with this policy. This pro forma is available on My Concern. The record can be completed after an initial discussion with the DSL and completed with the DSL where appropriate.
- 2.3 Records should be factual and signed and dated, with the name of the signatory clearly printed in writing. Records should include:
 - 2.3.1 the pupil's/student's details: name; date of birth; address and family details;
 - 2.3.2 date and time of the event/concern/conversation;
 - 2.3.3 a clear and comprehensive summary of the event/concern/conversation;
 - 2.3.4 details of how the concern was followed up and resolved,
 - 2.3.5 a note of any action taken and by whom, decisions reached and the outcome;
 - 2.3.6 the name and position of the person making the record.

3 Use of reasonable force

- 3.1 There are circumstances when it would be appropriate for staff to use reasonable force to safeguard pupils/students. "Reasonable" in these circumstances means using no more force than is needed to prevent them harming themselves or others.
- 3.2 Staff should refer to the School's discipline and rewards policy and the staff code of conduct for more detailed guidance about the use of reasonable force.

Appendix 3 Dealing with allegations of peer on peer / child on child abuse

1 Peer on peer/child on child abuse

- 1.1 Children of any age can abuse other children (often referred to as peer on peer abuse) and this can happen inside and/or outside school and/or online. This includes, but is not limited to:
- 1.1.1 bullying (including cyber-bullying and prejudice-based and discriminatory bullying);
 - 1.1.2 abuse within intimate personal relationships between peers;
 - 1.1.3 physical abuse such as hitting, kicking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates and/or encourages physical abuse);
 - 1.1.4 sexual violence, such as rape, assault by penetration and sexual assault (including grabbing bottoms, breasts and genitalia under or over clothes, bra flicking, unwanted kisses or embraces) possibly with an online element which encourages sexual violence;
 - 1.1.5 sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
 - 1.1.6 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;
 - 1.1.7 consensual and non-consensual sharing of nude and semi-nude images (also known as "sexting" or "youth produced sexual imagery") means the taking and sending or posting of nude or semi-nude images, videos or lives streams by young people under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. It can also involve sharing between devices offline, for example via Apple's AirDrop;
 - 1.1.8 upskirting, typically involving taking a picture under a person's clothing without their permission, 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;
 - 1.1.9 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 include an online element);

2 The School's approach to peer on peer abuse

- 2.1 Such behaviour is never accepted and should be considered as both a safeguarding issue and potentially a disciplinary one. The School will adopt a zero-tolerance approach to abuse. Downplaying certain behaviours (by, for example, dismissing sexual harassment as "banter", "having a laugh" or "part of growing up") can lead to a culture of unacceptable behaviours, an unsafe environment for children and its worst to a culture that normalises abuse.

- 2.2 All staff should challenge inappropriate behaviour between pupils/students and anyone who suffers, witnesses or hears of abuse of any form between pupils/students is asked to report it in accordance with this policy and/or the school's behaviour and discipline and anti-bullying policies, so that appropriate action can be taken.
- 2.3 Appropriate action will involve supporting all members of the school community who may be involved as a priority. This may require investigation by the school or other agencies. Until investigations have been undertaken and findings made, the school will work on the basis that the allegations may or may not be true and undertake careful risk assessment of the welfare of those involved to determine how best to manage the situation. This should be undertaken whether or not the incident is alleged to have occurred at school, or when the pupils/students involved was under the school's care and whether or not the pupil/student is under 18, as an issue which may impact pupil/student welfare. Disciplinary action will follow separately, if appropriate.

3 Sexual violence and sexual harassment (SVSH)

- 3.1 Where the misconduct may constitute sexual violence ¹⁴ (rape, assault by penetration, sexual assault ¹⁵ or causing someone to engage in sexual activity without consent) or sexual harassment (unwanted conduct of a sexual nature), it should be reported to the DSL and will be managed in accordance with this policy. SVSH is never acceptable.
- 3.2 SVSH can occur between two or more children of any age or sex from primary to secondary stage. 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. SVSH exists on a continuum and may overlap. Addressing inappropriate behaviour (even where it seems to be relatively innocuous) can be an important intervention which helps to prevent problematic or abusive behaviour in the future by setting and enforcing clear expectations of behaviour, supporting victims and encouraging them and others to speak out and facilitating targeted support for those demonstrating harmful sexual behaviour.
- 3.3 The 2021 Ofsted report concluded that whether or not schools are aware of reported instances of SVSH in their community, it is likely to be occurring. The school acknowledges this and that children are likely to report such matters, if at all, to people they trust. All staff are therefore trained to identify signs of abuse and on how to respond to a report.

4 Management of allegations of child on child SVSH

4.1 The initial report

- 4.1.1 The School recognises that it is not easy for children to tell staff about abuse. Staff are trained in signs of abuse and required to look out for them and act upon them; and to respond to all reports of abuse, however they are reported and whether they are made by victims directly or third parties.

¹⁴ When referring to sexual violence the statutory guidance refers to sexual offences under the Sexual Offences Act 2003 as described above

¹⁵ 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).

4.1.2 The School acknowledges that the initial response is incredibly important and may impact not just the management of that issue, but others of SVSH. Staff are also trained in how to receive a report. Where possible they should be accompanied by the DSL or other member of staff.

4.1.3 They should:

- (a) listen carefully and respectfully, reassuring the person making the report that they are being taken seriously and offer support without promising confidentiality or making a judgement about its veracity;
- (b) where possible they should ask open questions about whether the pupil(s)/student(s) have been harmed, the nature of the harm or if they may be at risk of harm;
- (c) where there is an online element, consider the searching, screening and/or confiscation of devices. See the 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;¹⁶
- (d) explain the next steps and how the report will be progressed;
- (e) make a written record of the report (recording the facts as the child has presented them);
- (f) inform the DSL (or deputy) as soon as practically possible, if they are not involved in the initial report and then only share the report with those necessary in order to progress it.

4.2 DSL's considerations

4.2.1 Reports of SVSH are often complex and require difficult professional decisions to be made. Further disclosures may follow and the facts may be difficult to establish. These decisions are made on a case by case basis taking all of the circumstances into account, in the best interest of the pupils/students involved. The School's response is led by the DSL who will always have regard to Part 5 of KCSIE and the more detailed non-statutory Sexual violence and sexual harassment between children in schools and colleges (DfE, September 2021) in the management of the issue.

4.3 School's considerations

4.3.1 The school will consider:

- (a) the victim's wishes in terms of how they want to proceed. Victims should be given as much control as is reasonably possible over decisions made about investigation and support, but their wishes will not always be determinative as the school may have to take action to protect other children;

¹⁶ School staff can search pupils/students with their consent for any item. Staff can search pupils/students without consent if they have reasonable grounds for suspecting a pupil is in possession of a prohibited item or is likely to be used to commit an offence or cause personal injury or damage to property. See [Searching, screening and confiscation: advice for schools](#) for further information and the School's Search and confiscation policy..

- (b) the nature of the alleged incident (including whether it was a one-off or sustained pattern), whether a crime may have been committed and whether harmful sexual behaviour¹⁷ has been displayed;
- (c) the ages and developmental stages of the children involved and any imbalance between them;
- (d) if there is an intimate personal relationship between the children;
- (e) whether there are any ongoing risks to those involved;
- (f) the wider context.

4.3.2 Before deciding how best to support and protect those involved. This will include:

- (a) immediate risk and needs assessments: these will be undertaken in cases of sexual violence and considered otherwise. Where appropriate, they will be discussed with those involved and their parents. This may involve suspension pending investigation. Risk and needs assessments will be recorded and kept under review in the knowledge that police investigation and criminal proceedings can take several months to conclude; and
- (b) what, if any, further action is appropriate. The School will make a proportionate response to these matters in light of the circumstances and the factors identified above.

5 Investigations and findings

- 5.1 The School will record the findings of investigations undertaken by the police and/or the CPS, and if the police decide not to take any further action, will consider whether investigation should be undertaken or commissioned by the School to enable it to determine, whether or not it is likely that the allegations are substantiated, unsubstantiated, unfounded, false or malicious. There may be circumstances where this is not appropriate, as it may prejudice a possible future investigation, for example if a victim does not currently wish to make a victim statement. In those circumstances the School should consider whether a limited investigation is appropriate. The concerns, discussions, decisions and reasons for these should be recorded.
- 5.2 The School should continue to support those involved, with reference to the range of support options set out in Part 5 of KCSIE and should also consider whether further referral and/or disciplinary action may be appropriate against either the perpetrator where concerns are substantiated and/ or harmful sexual behaviours identified or the victim where concerns were found to be deliberately invented or malicious.

¹⁷ Hackett's sexual behaviours across a continuum table - which helps to identify whether sexual behaviours are normal, inappropriate, problematic, abusive or violent - may be helpful here.

Appendix 4 Dealing with allegations made and/or concerns raised against members of staff, supply staff, volunteers and contractors. See also page 21, section 16.

1 The School's procedures

- 1.1 The School promotes an open and transparent culture in which all concerns about all members of staff working in or behalf of the School, in a paid or unpaid capacity, including supply staff, volunteers and contractors are dealt with promptly and appropriately, whether they are low level concerns or constitute an allegation that the person poses a risk of harm.
- 1.2 By doing this, it aims to identify any concerning, problematic or inappropriate behaviour early, in order to minimise the risk of abuse, support everyone affected and to inform members of staff, supply staff, volunteers and contractors of any behaviour which is or could be deemed inappropriate or to cross acceptable professional boundaries and help them to reflect, manage and learn from this.
- 1.3 The School has procedures for dealing with two levels of allegations made - concerns raised about staff, supply staff, volunteers and contractors. These cover:
 - 1.3.1 Allegations/concerns that do not meet the harms threshold, otherwise known as "low level concerns";
 - 1.3.2 allegations that may meet the harms threshold¹⁸.

2 Low level concerns

- 2.1 The School encourages everyone affected by its operation to report any concern, even if no more than one which causes a sense of unease or a "nagging doubt", they may have that a member of staff, supply staff, volunteer or contractor working in or on behalf of the School may have acted in a way that is inconsistent with expected professional standards and/or the staff code of conduct to the Head, so that the appropriate action can be taken.
- 2.2 All members of staff, supply staff, volunteers and contractors are themselves encouraged to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider may fall below the expected standards.
- 2.3 The Head will usually share the concern with the DSL (or deputy) and they will address the concern in a proportionate manner. They will consider whether the matter is a low level concern - one which does not meet the allegations threshold (as set out in this section) or is otherwise not considered serious enough to consider a referral to the Designated Officer(s), or whether it is sufficiently serious to meet the harms threshold. A referral to the Designated Officer(s) should be submitted on a Position of Trust (POT) MARF form and sent to lado@warwickshire.gov.uk.
- 2.4 The School considers that all concerns about members of staff, supply staff, volunteers and contractors should be shared responsibly with the right person, that they should be recorded and that they should be dealt with appropriately. In most cases that will involve some form of investigation and a discussion with the person

¹⁸ The harms test is explained on the DBS website and "harm" is defined in section 31 (9) of the Children Act 1989 (as amended by the Adoption and Children Act 2002).

raising the concern and the person about whom the concerns have been raised. The information collected will help to categorise the type of behaviour and determine what further action may need to be taken. This should be recorded along with the context, the rationale for the decisions made and action taken. This information should be kept confidential and stored securely. The name of individuals sharing concerns should also be noted, but a wish to remain anonymous should be respected as far as reasonably possible.

- 2.5 The Head will consider whether reports about supply staff and contractors should be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.
- 2.6 Low level concerns should not be included in staff, supply staff, volunteer and contractor references unless they relate to issues which would normally be included e.g. misconduct or poor performance. Those that relate exclusively to safeguarding should not be referred unless they meet the threshold for referral to the Designated Officer(s) and are found to be substantiated.

3 Allegations that may meet the harms threshold

- 3.1 Allegations that may meet the harms threshold are those that might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in the school, for example where the member of staff, supply staff, volunteer or contractor has:
 - 3.1.1 behaved in a way that has harmed a child, or may have harmed a child; and/or
 - 3.1.2 possibly committed a criminal offence against or related to a child; and/or
 - 3.1.3 behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children; and/or
 - 3.1.4 behaved or may have behaved in a way that indicates they may not be suitable to work with children. This includes behaviour that may have happened outside school and creates a transferable risk.
- 3.2 The School should consider whether any allegations not meeting these criteria should be dealt with as low level concerns. Advice from the local authority Designated Officer(s) will be sought in borderline cases.
- 3.3 All such allegations must be dealt with as a priority without delay.
- 3.4 The local authority has designated a particular officer, or team of officers, to be involved in the management and oversight of allegations against people that work with children (Designated Officer(s)). The Designated Officer(s) will be informed immediately and in any event within one working day of all allegations that come to the School's attention and appear to meet the criteria in paragraph 3.1 above.
- 3.5 Allegations against a teacher who is no longer teaching and historical allegations will be referred to the police and may also be discussed with the Designated Officer.

4 Reporting an allegation

- 4.1 Where an allegation or complaint is made against any member of staff (other than the Head or the Executive Head Master), including the DSL, the matter should be reported immediately to the Head. The allegation will be discussed immediately with the Designated Officer(s) before further action is taken. Where appropriate, the Head will consult with the DSL.
- 4.2 Where an allegation or complaint is made against the Head or the Executive Head Master, the matter should be reported immediately to the Chair of Governors or the Nominated Child Protection Governor, without first notifying the Head or the Executive Head Master (as applicable). The allegation will be discussed immediately with the Designated Officer(s) before further action is taken. The Chair of Governors will consult the Nominated Child Protection Governor, and vice versa.
- 4.3 Where an allegation is made against any Governor, the matter should be reported immediately to the Chair of Governors or the Nominated Child Protection Governor. If either the Chair of Governors or the Nominated Child Protection Governor are the subject of an allegation, the matter should be reported to the other. The allegation will be discussed immediately with the Designated Officer(s) before further action is taken. Where appropriate, the Chair of Governors will consult the Nominated Child Protection Governor, and vice versa.
- 4.4 If it is not possible to report to the Head or Chair of Governors or Nominated Child Protection Governor in the circumstances set out above, a report should be made immediately to the DSL. The DSL will take action in accordance with these procedures and will as soon as possible inform the Head or, where appropriate, the Chair of Governors and the Nominated Child Protection Governor.
- 4.5 The person taking action in accordance with the procedures in this Appendix is known as the Case Manager.

5 Disclosure of information

- 5.1 The Case Manager will inform the accused person of the allegation as soon as possible after the Designated Officer(s) has been consulted.
- 5.2 The parents or carers of the child / children involved will be informed of the allegation as soon as possible if they do not already know of it. They may also be kept informed of the progress of the case, only in relation to their child - no information can be shared regarding the staff member. The timing and extent of disclosures, and the terms on which they are made, will be dependent upon and subject to the laws on confidence and data protection and the advice of external agencies.
- 5.3 Where the Designated Officer(s) advises that a strategy discussion is needed, or the police or children's social care need to be involved, the Case Manager will not inform the accused or the parents or carers until these agencies have been consulted and it has been agreed what information can be disclosed.
- 5.4 The reporting restrictions preventing the identification of a teacher who is the subject of such an allegation in certain circumstances will be observed.

6 Further action to be taken by the School

- 6.1 A school has a duty of care towards its employees and as such, it must ensure that effective support is provided for anyone facing an allegation. The School will take action in accordance with Part 4 of KCSIE and the School's employment procedures as well as and para 1.14 of WS inter-agency safeguarding procedures Allegations against staff or volunteers:
<https://www.safeguardingwarwickshire.co.uk/safeguarding-children/i-work-with-children-and-young-people/interagency-safeguarding-procedures>.
- 6.2 Where the School is not an employer of an individual about whom safeguarding concerns are raised with the School, it will still have responsibility to ensure allegations are dealt with appropriately and will liaise with relevant parties. This includes supply staff, volunteers and contractors. Any action taken will be in accordance with Part 4 of KCSIE. As stated above, reports about supply staff and contractors which do not meet the referral threshold, should be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.
- 6.3 Where a member of boarding staff is suspended pending an investigation of a child protection nature, arrangements for alternative accommodation away from children will be made for the member of staff.

7 Ceasing to use staff

- 7.1 If the School ceases to use the services of a member of staff because they are unsuitable to work with children, a settlement agreement will not be used and a referral to the Disclosure and Barring Service (DBS) will be made promptly if the criteria for a referral are met. Any such incidents will be followed by a review of the safeguarding procedures within the School, with a report being presented to the Governing Body without delay. The School may also need to consider a referral to the DBS if a member of staff is suspended, or deployed to another area of work that is not regulated activity.
- 7.2 If a member of staff tenders his or her resignation, or ceases to provide his or her services at a time when child protection concerns exist in relation to that person, those concerns will still be followed up by the School in accordance with this policy and a referral to the DBS will be made promptly if the criteria for referral are met.
- 7.3 Separate consideration will be given as to whether a referral to the Teaching Regulation Agency (TRA) should be made where a teacher has been dismissed, or would have been dismissed had he/she not resigned, because of unacceptable professional conduct, conduct that may bring the profession into disrepute, or a conviction at any time for a relevant offence. An interim referral to the TRA may also be considered and made if appropriate.
- 7.4 When an allegation is made, an investigation should be carried out to gather enough evidence to establish if it has foundation, and employers should ensure they have sufficient information to meet the referral duty criteria explained in the [DBS referral guidance](#).

8 Malicious allegations

- 8.1 Where an allegation by a pupil/student is shown to have been deliberately invented or malicious, the Head will consider whether to take disciplinary action in accordance with the School's behaviour and discipline policy.

- 8.2 Where a parent has made a deliberately invented or malicious allegation the Head will consider whether to require that parent to withdraw their child or children from the School on the basis that they have treated the School or a member of staff unreasonably.
- 8.3 Whether or not the person making the allegation is a pupil/student or a parent (or other member of the public), the School reserves the right to contact the police to determine whether any action might be appropriate.

9 Record keeping

- 9.1 Details of allegations found to be malicious will be removed from personnel records.
- 9.2 For all other allegations, full details will be recorded on the confidential personnel file of the person accused.
- 9.3 An allegation proven to be false, unsubstantiated or malicious will not be referred to in employer references. In accordance with KCSIE, a history of repeated concerns or allegations which have all been found to be false, unfounded, unsubstantiated or malicious will also not be included in any reference. Substantiated allegations should be included in references provided that the information is factual and does not include opinions.
- 9.4 The School will retain all safeguarding records and relevant personnel records for so long as reasonably required.¹⁹

¹⁹ In accordance with the terms of reference of the Independent Inquiry into Child Sexual Abuse all Schools are required to retain information which relates to allegations (substantiated or not) of organisations and individuals who may have been involved in, or have knowledge of child sexual abuse or child sexual exploitation; allegations (substantiated or not) of individuals having engaged in sexual activity with, or having a sexual interest in, children; institutional failures to protect children from sexual abuse or other exploitation.

Appendix 5 Charity Safeguarding procedures

1 Charity Safeguarding duties

- 1.1 As trustees of a charity, the trustees as Governing Body of the School, acknowledge in addition to their statutory duties to safeguard and protect children and adults at risk, they have a duty to take reasonable steps to protect everyone associated with the charity from harm, abuse or mistreatment. This protection of the people involved in the charity is central to its culture. The full extent of these additional Safeguarding duties is set out in the Charity Commission guidance: Safeguarding and Protecting People for Charities and Trustees. This guidance lists risks to be aware of, including discrimination, health and safety, cyber abuse and data breaches.
- 1.2 The contents of the School's Safeguarding and data protection suites of policies, the staff handbook and the Health and safety policy set out how many concerns about these issues will be handled. If anyone has any Safeguarding concerns which have caused or may cause harm to anyone associated with the charity which are not expressly covered by those or other School policies, they should contact the DSL or The Head without delay.
- 1.3 The trustees fulfil these duties by:
 - 1.3.1 leading by example and promoting a fair, inclusive and positive culture, ensuring that everyone involved with the charity feels able to report any concerns they may have, confident that they will be heard and responded to;
 - 1.3.2 setting and regularly (at least annually) reviewing the suitability of policies and procedures as a Board to ensure they remain fit for purpose and that they are followed in practice;
 - 1.3.3 establishing appropriate delegation arrangements for the effective governance and management of safeguarding matters within the charity;
 - 1.3.4 exercising proper oversight of the management of individual Safeguarding matters and a review of the performance of the charity's Safeguarding function, including consultation with stakeholders and appropriate trend analysis;
 - 1.3.5 being quick to respond to concerns, to carry out appropriate investigations and take necessary action;
 - 1.3.6 being open and transparent and not ignoring harm or downplaying failures;
 - 1.3.7 managing conflicts of interest and/or loyalty
 - 1.3.8 ensuring that staff receive training in Safeguarding at a level which is commensurate with their role;
 - 1.3.9 having clear recruitment and contracting processes and ensuring that proper due diligence is undertaken on the suitability of:
 - (a) staff;
 - (b) partner organisations

- (c) contractors;
 - (d) beneficiaries.
- 1.3.10 other third parties (whether those who provide services to the Charity or directly to its beneficiaries (including pupil(s)/student(s)) and enter into appropriate agreements with them covering the relationship, their respective roles and monitoring and reporting requirements;²⁰
- 1.3.11 review its premises and security arrangements and arrangements for third party use to ensure appropriate measures are in place to keep people safe;
- 1.3.12 reviewing any grant-making undertaken to ensure appropriate policies and procedures are in place;
- 1.3.13 implementing suitable reporting and monitoring processes in place for any work overseas;
- 1.3.14 set out risks and how it will manage them in a risk register;
- 1.3.15 allocating sufficient funds for the effective management of Safeguarding and arranging appropriate insurance cover.

Ensuring a sufficient level of oversight of the charity's operations to manage risk and report any incidents which materially affect the charity's operations, finances, people or reputation can be reported to the Charity Commission in line with [How to report a serious incident in your charity](#) (Charity Commission, June 2019).

²⁰ <https://www.gov.uk/government/publications/charities-due-diligence-checks-and-monitoring-end-use-of-funds>