



# STRATFORD PREPARATORY

2 - 11 YRS CO-EDUCATIONAL INDEPENDENT DAY SCHOOL

## Child Protection & Safeguarding Policy

This is the primary policy for safeguarding for the whole school, including EYFS.

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## Important contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
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Headteacher	Dan Brewer	<a href="mailto:dbrewer@stratfordprep.co.uk">dbrewer@stratfordprep.co.uk</a>
Designated Safeguarding Lead (DSL) Deputy Head	Scott Powell	<a href="mailto:spowell@stratfordprep.co.uk">spowell@stratfordprep.co.uk</a>
Deputy DSL Deputy Head (Head of Pre-Prep)	Sam Scolah	<a href="mailto:sscorah@stratfordprep.co.uk">sscorah@stratfordprep.co.uk</a>
Executive DSL Head of Seniors (based at SPS)	Laura Sweetman	<a href="mailto:lsweetman@arnoldlodge.com">lsweetman@arnoldlodge.com</a>
Online Safety Coordinator Based at SPS	Rachel Davenport	<a href="mailto:rdavenport@arnoldlodge.com">rdavenport@arnoldlodge.com</a>
Local authority designated officer (LADO)	Lisa Dada	<a href="mailto:lado@warwickshire.gcsx.gov.uk">lado@warwickshire.gcsx.gov.uk</a> 01926 745376
Safeguarding Director (Board) Director	Di Gardiner	<a href="mailto:dgardiner@arnoldlodge.com">dgardiner@arnoldlodge.com</a> 01926 778050
Warwickshire Multi-Agency Safeguarding Hub (MASH) Education Support	Sue Hunt	<a href="mailto:masheducationlead@warwickshire.gov.uk">masheducationlead@warwickshire.gov.uk</a> 01926 418 608 Out of hours: 01926 886 922
Warwickshire Safeguarding Service Manager	Marina Kitchen	<a href="mailto:marinakitchen@warwickshire.gov.uk">marinakitchen@warwickshire.gov.uk</a> 07814 933 764
Channel helpline		020 7340 7264

### I. Policy statement and principles

Stratford Prep School sets out to develop the happiness, confidence and skills of each pupil so they can be successful in their aspirations. Our school values of hard work, honesty and kindness are central to the expectations we have as a school community each day.

This policy is one of a series in the school's integrated safeguarding portfolio, including our Staff Code of Conduct, Safer Recruitment Policy, Allegations against staff, Complaints, Pupil Behaviour and Online Safety.

SPS's safeguarding arrangements are inspected by ISI and work within the Warwickshire Safeguarding Partnership (WS).

This policy is available on SPS website and all staff and volunteers are required to read it and confirm they have done so in writing before commencing work in SPS.

Stratford Prep School has 11 trained Designated Safeguarding Leads (DSLs). As such, if one of the DSLs were to be absent due to illness (potentially COVID 19 at this time) the school is fully equipped to ensure the security of arrangements for ongoing effective safeguarding of its pupils and staff. See section 3 for more information.

SPS gains assurance, from those who let the premises outside of school hours, that they have safeguarding procedures in place.

*\*Please note that Warwickshire has been selected to become a 'Families First for Children Pathfinder'. This will have implications on changes to terminology and processes during 2024-2025.*

### Child protection statement

We recognise our moral and statutory responsibility to safeguard and promote the welfare of all pupils. We endeavour to provide a safe and welcoming environment where children are respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection, and justice.

The procedures contained in this policy apply to all staff, volunteers, contractors and Directors and are consistent with statutory guidance and those of the locally agreed multi-agency safeguarding arrangements put in place by the WS.

## Policy principles

Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child centred. This means that they should consider, at all times, what is in the best interest of the child. (Keeping Children Safe in Education (KCSiE)).

- > Safeguarding is everyone's responsibility. All practitioners, regardless of their role, are professionally accountable for their actions and decision making in relation to keeping children safe. (Early help to Safeguarding)
- > All DSLs should access Warwickshire's Early Help Pathway to Change training
- > SPS's responsibility to safeguard and promote the welfare of children is of paramount importance
- > All children, regardless of age, gender, ability, culture, race, language, religion, or sexual identity, have equal rights to protection
- > Children who are safe and feel safe are better equipped to learn
- > SPS is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. All adults at SPS are required to take all welfare concerns seriously and to encourage children and young people to talk to them about anything that worries them. Staff will always act in the best interests of children
- > Due to their day-to-day contact with pupils, staff in SPS are uniquely placed to observe changes in children's appearance, behaviour, communication and the outward signs of abuse, neglect, exploitation, and radicalisation. Children may also turn to a trusted adult in SPS when they are in distress or at risk. It is vital that all SPS staff are alert to the signs of abuse, are approachable and trusted by pupils, listen actively to children, and understand the procedures for reporting their concerns. SPS will act on identified concerns and will provide early help to prevent concerns from escalating
- > All staff have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm at home, in the community or in SPS
- > All staff members will maintain an attitude of '**It could happen here**' where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the interests of the child
- > If, at any point, there is a risk of immediate serious harm to a child a referral will be made to Children's Social Care and/or the Police immediately. **Anybody can make a referral**. If the child's situation does not appear to be improving, any staff member with concerns should challenge the designated safeguarding lead (DSL) to consider the child's needs and be provided with the escalation process to make sure they are confident in the response to the child's needs
- > If a member of staff remains concerned about a child, they can discuss their concerns with the headteacher, another DSL or contact the Children and Families Front Door for additional advice as necessary (contact details in section 28 below)
- > All staff are professionally accountable and follow the staff code of conduct. Any concerns or allegations of misconduct, including wellbeing concerns for staff are shared swiftly and at the earliest opportunity to maintain a culture of vigilance. All staff are aware of their responsibility to share low level concerns with equal urgency to ensure all children are supported in an environment of openness, trust, and transparency
- > Pupils and staff involved in child protection issues will receive appropriate support
- > This policy will reference online abuse and abuse that will take place in person. Please be aware that they are not mutually exclusive, and children can experience these types of abuse simultaneously
- > This policy will refer to harassment. Harassment is determined legally as behaviour from one person towards at least one other which is intended to cause alarm or distress. Sexual harassment is meant, in the context of this policy, as unwanted conduct of a sexual nature, whether occurring online or offline
- > This policy will be reviewed at least annually unless an incident; new legislation or guidance suggests the need for an interim review. Representatives of the whole SPS community of pupils, parents, staff, volunteers, and governors will be involved in reviewing, shaping, and developing SPS's safeguarding arrangements and child protection policy.

## Policy aims

- > To provide all staff with the necessary information to enable them to meet their safeguarding and child protection responsibilities
- > To ensure consistent good practice, through training, auditing and development
- > To demonstrate SPS's commitment with regard to safeguarding and child protection to pupils, parents, and other partners
- > To contribute to SPS's safeguarding portfolio.
- > SPS commits to acting in accordance with Keeping Children Safe in Education. This policy does not aim to replicate the guidance in full. Therefore, the policy should be read in conjunction with at least Part One and Annex B of Keeping Children Safe in Education.

## Safeguarding and promoting the welfare of children is defined in KCSIE (September 2024) as:

- > providing help and support to meet the needs of children as soon as problems emerge;
- > protecting children from maltreatment, whether that is within or outside the home, including online;
- > preventing impairment of children's mental and physical health or development;
- > ensuring that children grow up in circumstances consistent with the provision of safe and effective care;
- > promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children;
- > taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework.

## Terminology

- > **Safeguarding** and promoting the welfare of children refers to the process of protecting children from maltreatment; preventing the impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.
- > **Child protection** refers to the processes undertaken to protect children who have been identified as suffering or at risk of suffering significant harm.
- > **Staff** refers to all those working for or on behalf of the school, full-time or part-time, temporary or permanent, in either a paid or voluntary capacity.
- > **Child** includes everyone under the age of 18.
- > **Parent** refers to birth parents and other adults who are in a parenting role, for example step-parents, foster carers and adoptive parents.
- > **Child-on-child** the abuse of a child by another child or children. All staff should be aware that children can abuse other children (often referred to as child-on-child abuse), and that it can happen both inside and outside of school or college and online
- > **Victim** is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim, or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.
- > **Alleged perpetrator(s)** and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.
- > **Abuse** is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the **impact of witnessing ill treatment on others**. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place online and in person, please be aware that they are not mutually exclusive, and children can experience these types of abuse simultaneously. Children may be abused by an adult or adults or by another child or children.

## 2. Safeguarding legislation and guidance

This policy is based on the Department for Education's statutory guidance [Keeping Children Safe in Education](#) and [Working Together to Safeguard Children](#), and the [Governance Handbook](#). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

- > Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- > [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- > Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- > [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- > [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- > Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
- > [Statutory guidance on the Prevent duty](#) (updated April 2021), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- > [The Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR)
- > [The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment
- > [The Public Sector Equality Duty \(PSED\)](#), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination
- > The [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the "2018 Childcare Disqualification Regulations") and [Childcare Act 2006](#), which set out who is disqualified from working with children
- > This policy also meets requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#)
- > All staff must read Part One of Keeping Children Safe in Education (KCSiE) 2023. Staff will be given a copy on induction and can find a copy in school. In addition, all staff who work directly with children must read Part Five and Annex B.
- > Staff who do not work directly with children must read Part I Annex A KCSiE if the Board of Directors or proprietor think it will provide a better basis for those staff to promote the welfare and Safeguard children.
- > [What to do if you're worried a child is being abused 2015](#) - Advice for practitioners is non- statutory advice which helps practitioners (everyone who works with children) to identify abuse and neglect and take appropriate action
- > [RSHE 2020](#)

### 3. Roles and responsibilities

Safeguarding and child protection is everyone's responsibility. This policy applies to all staff, volunteers and governors in the school and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment. This will be underpinned by our:

- > Discipline & Behaviour policy
- > Pastoral support system
- > Planned programme of relationships, sex and health education, which is inclusive and delivered regularly tackling issues such as:
  - Healthy and respectful relationships
  - Boundaries and consent
  - Stereotyping, prejudice and equality
  - Body confidence and self-esteem
  - How to recognise an abusive relationship (including coercive and controlling behaviour)
  - The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and female genital mutilation (FGM) and how to access support
  - What constitutes sexual harassment and sexual violence and why they're always unacceptable

#### The Designated Safeguarding Lead (DSL)

- > is a senior member of staff from SPS's leadership team and therefore has the status and authority within SPS to carry out the duties of the post, including committing resources and supporting and directing other staff
- > During Term Time, the DSL will be available during school hours for staff to discuss safeguarding concerns. Out of school hours, the DSL can be contact by email ([scorah@stratfordprep.co.uk](mailto:scorah@stratfordprep.co.uk)) or telephone (07444 215073)
- > takes lead responsibility for safeguarding and child protection (including online safety) at SPS. The role and responsibility are explicit in the role holder's job description and includes online safety and understanding the filtering and monitoring systems and processes in place
- > is appropriately trained (including Prevent training), receives refresher training at two-yearly intervals and regularly (at least annually) updates their knowledge and skills to keep up with any developments relevant to their role
- > acts as a source of advice, support, and expertise to SPS community
- > maintain a forensic understanding of safeguarding data, including data relating to child-on-child abuse;
- > encourages a culture of listening to children and taking account of their wishes and feelings
- > is alert to the specific needs of children in need; those with special educational needs; children who are children in care or were previously children in care; children who have a social worker; and young carers; and oversees the provision of effective pastoral support to all of those children, promoting their educational outcomes by sharing information about their welfare, circumstances and needs with teachers and other staff as appropriate
- > works closely with pastoral support staff; the SENCo; the designated teacher for children who are children in care or were previously children in care; staff with designated responsibility for promoting children's mental health and emotional wellbeing; the ICT lead and any ICT support staff; and school nurses in relation to safeguarding matters (including online and digital safety) and whether to make referrals to relevant partner agencies
- > has a working knowledge of locally agreed multi-agency safeguarding arrangements and procedures put in place by WS



- > has an understanding of the early help process by attending WCC's early help training to ensure effective support, assessment and understanding of children's additional needs to inform appropriate provision of early help and intervention
- > keeps detailed and accurate written records of all concerns, ensuring that such records are stored securely and flagged, but kept separate from, the pupil's general file
- > refers cases of suspected abuse to Children's Social Care or the Police as appropriate; and, where a crime may have been committed, refers cases to the Police
- > refers cases using the prescribed pro forma to Children's Social Care and the Prevent policing team for a joint assessment where there is a concern that a child is at risk of radicalisation; and to the Channel panel if subsequently advised to do so
- > ensures that staff do everything they can to support social workers and contribute to assessments of children when Children's Social Care become involved
- > notifies Children's Social Care if a child with a child protection plan is absent without explanation at intervals as defined in the plan
- > ensures that, when a pupil under the age of 18 years leaves SPS, all child protection records are passed to the new school (separately from the main pupil file and ensuring secure transit) and confirmation of receipt is obtained within 5 days of the start of term or 5 days for an in-year transfer. If the child is the subject of an open case to Children's Social Care, the pupil's social worker is also informed
- > considers whether to share any information about a child leaving the school with the receiving SPS/education provider in advance so that the receiving setting is appropriately informed in order to support the child as effectively as possible and plan for her/his arrival
- > attends and/or contributes to child protection conferences, strategy meetings and multi-agency exploitation meetings
- > co-ordinates SPS's contribution to child protection plans as part of core groups, attending and actively participating in core group meetings
- > develops effective links with relevant statutory and voluntary agencies including Warwickshire Safeguarding
- > ensures that all staff sign to indicate that they have read and understand the child protection and safeguarding policy; the staff behaviour policy (code of conduct); the behaviour policy; SPS's safeguarding response to children who go missing from education; the role of the DSL (including the identity of the DSL and any deputies); and Part 1 of Keeping Children Safe in Education 2023 (and also Part 5 and Annex B of Keeping Children Safe in Education 2023 in relation to staff who work directly with children)
- > ensures that all staff understand that if they have any concerns about a child's welfare, they should act on them immediately, either by speaking to the DSL (or a deputy) or, in exceptional circumstances, taking responsibility to make a referral to Children's Social Care
- > ensures that all staff know how to make a referral as in sections 27-29 of this policy has a working knowledge of relevant national guidance in respect of all specific safeguarding issues highlighted in sections 31-50 (pages 11-16) and Annex B (page 139) of Keeping Children Safe in Education 2023, ensuring that all staff receive necessary training, information and guidance
- > has a working knowledge of relevant national guidance in respect of all specific safeguarding issues highlighted in sections 31-54 (pages 11-16) and Annex B (page 125) of Keeping Children Safe in Education 2023, ensuring that all staff receive necessary training, information and guidance
- > understands the unique risks associated with online safety and ensures that staff are trained to have the requisite knowledge and up to date capability to keep children safe whilst they are online. Online safety is included in the DSL's job description.
- > understands the relevance of data protection legislation and regulations, especially the Data Protection Act 2018 and General Data Protection Regulation (GDPR) in respect of safeguarding children
- > ensures that the child protection and safeguarding policy and procedures are reviewed and updated at least annually, working with the whole SPS community of pupils, parents, staff, volunteers, and Directors and/or proprietors regarding this
- > liaises with the nominated Director and headteacher (where the DSL role is not carried out by the headteacher) as appropriate

- > informs the headteacher of any serious safeguarding enquiries, especially under section 47 of the Children Act 1989 and any Police investigations (where the DSL role is not carried out by the headteacher).
  - The DSL must be aware that children must have an ‘appropriate adult’ to support and help them in the case of a police investigation or search
- > keeps a record of staff attendance at child protection training
- > makes the child protection and safeguarding policy available publicly, i.e. on SPS’s website or by other means
- > ensures parents are aware of SPS’s role in safeguarding and that referrals about suspected abuse and neglect may be made
- > advise on the response to safeguarding concerns, ensuring that all safeguarding concerns raised by staff are properly assessed, categorised, actioned and resolved, **and ensuring that decisions and rationales are clearly recorded;**
- > ensures that SPS holds more than one emergency contact number for every pupil/pupil
- > ensure that all staff can demonstrate an understanding of child abuse, neglect **and exploitation** and their main indicators, including for children in care (looked after children). Staff can also demonstrate an understand of wider safeguarding issues (details in Annex B of KCSIE) and the additional vulnerabilities of children with special educational needs and disabilities or those who identify as **gender questioning.**
- > ensures that the headteacher is aware of the responsibility under Working Together 2018 to refer all allegations that a child has been harmed by or that children may be at risk of harm from a member of staff or volunteer to the Designated Officer (DO) in the Local Authority within one working day prior to any internal investigation; and to the Disclosure and Barring Service (DBS) as appropriate
- > discuss the local response to sexual violence and sexual harassment with police and local authority children’s social care colleagues to prepare the school’s policies
- > be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support

### The Deputy Designated Safeguarding Leads

Are appropriately trained to the same standard as the DSL and supports the DSL with safeguarding matters as appropriate. In the absence of the DSL, carries out those functions necessary to ensure the ongoing safety and protection of pupils. The role and responsibility are explicit in the role holder’s job description. In the event of the long-term absence of the DSL, the role will assume all the functions of the DSL as above.

When the DSL is absent, the Deputy DSLs – [Ms Sam Scolah, Deputy Head; Mrs Louise Maher, Nursery Manager; Mr David Preston, Executive Headteacher; Mrs Laura Sweetman, Executive DSL] – will act as cover. In the instance of extended absence of the DSL, Mr Dai Preston will act as the DSL.

If the DSL and Deputy DSLs are not available, Mrs Sanj Dhadha, Operations Manager, will act as cover (for example, during out-of-hours/out-of-term activities) or if Covid-19 absence causes significant staff absence.

### The Board of Directors

SPS is an independent school with a proprietorial board. The school’s proprietor is Newman Schools LTD. The Board of Directors for Newman Schools LTD is made up of Wynford Dore (Chair of the Board & Proprietor), Gareth Newman (Proprietor), Dai Preston (Headteacher & Director), Sanj Dhadha (Operations Manager & Director), Di Gardiner (Safeguarding Director), Rosie Sayers (Director), Geraint Newman (Director).

The Board of Directors has a specified Safeguarding Director (Di Gardner, [dgardner@arnoldlodge.com](mailto:dgardner@arnoldlodge.com)) to be responsible for liaising with the Local Authority and other agencies in the event of an allegation being made against the Headteacher.

The Board of Directors meet formally 3 times per year. At each Board Meeting, the Headteacher presents the Safeguarding Report for the Board which provides a detailed overview of safeguarding. A short version is completed half-termly by the DSL and scrutinised by the Headteacher and Safeguarding Director. The full report is completed termly.

Each half-term, the Safeguarding Director, as part of the Safeguarding Report for the Board, visits the school and spends time scrutinising safeguarding to ensure proper oversight of safeguarding from the Board.

The Headteacher & Director, working with the Safeguarding Director, takes leadership responsibility for SPS's safeguarding arrangements. The Headteacher will maintain regular contact with the Safeguarding Director and DSL and will ensure that the Board of Directors receives regular reports about safeguarding activity at SPS.

It is the responsibility of the Board of Directors to ensure that the school's safeguarding, recruitment and managing allegations procedures take into account the procedures and practice of the Local Authority, local safeguarding partnership and national guidance.

SPS will submit a response to WVS's annual schools' safeguarding audit and this will be scrutinised at Board level. This will highlight how the Board of Directors' duties have been carried out. An action plan will be drawn up and any weaknesses will be rectified in accordance with that plan.

The Board of Directors will:

- > ensure SPS has an appointed Designated Safeguarding Lead who is a member of the senior leadership team and who has undertaken training in inter-agency working, in addition to basic child protection training
- > ensure that the DSL takes responsibility for safeguarding and child protection (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring). This should be explicit in the role holder's job description.
- > be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements
- > ensures that the DSL role is explicit in the role holder's job description (and also the job description of any Deputy Designated Safeguarding Leads) and that safeguarding responsibilities are identified explicitly in the job/role descriptions of every member of staff and volunteer
- > ensures that the DSL or a Deputy DSL is always available during school or college hours for staff to discuss any safeguarding concerns. The DSL or a Deputy DSL will generally be expected to be available in person but in exceptional circumstances availability will be via telephone and/or Skype or other such media
- > ensures that the DSL or a Deputy DSL is always available at least via telephone or other media as above during any out of hours/out of term school activities
- > ensures that SPS has a child protection policy and procedures, including a staff code of conduct, that are consistent with local safeguarding partnership and statutory requirements, reviewed annually and made available publicly on the school's website or by other means
- > ensures that SPS has procedures for dealing with allegations of abuse made against members of staff and volunteers including allegations made against the headteacher and allegations against other children
- > ensures that SPS follows safer recruitment procedures that include statutory checks on the suitability of staff to work with children and disqualification from providing childcare regulations
- > ensure that SPS has an induction strategy that ensures all staff, including the headteacher, and volunteers receive information about the school's safeguarding arrangements, Staff Behaviour Policy (Code of Conduct) and the role of the DSL on induction
- > develops a training strategy that ensures all staff, including the headteacher, and volunteers receive appropriate and regularly updated safeguarding and child protection training (including online safety) and updates as required (at least annually) to provide them with the relevant skills and knowledge to safeguard children effectively in line with any requirements of WVS. The training strategy will also ensure that the DSL receives refresher training and regular updates as defined under the DSL's duties above
- > ensures that all staff, including temporary staff and volunteers, are provided with copies of or access to the school's child protection and safeguarding policy and Staff Behaviour Policy (code of conduct) before they start work at the school
- > appoints a designated teacher to promote the educational achievement of children in care of the Local Authority and who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales; and ensures that the designated teacher has appropriate training
- > ensures that SPS contributes to inter-agency working and plans

- > ensures that SPS provides effective pastoral care and participates in the early help Pathway to Change process for pupils/pupils with additional needs in order to provide a coordinated offer of early help
- > teaches pupils about safeguarding and how to keep themselves safe at all times, including when online, as part of a broad and balanced curriculum
- > ensure the DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
- > ensure online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
- > ensure the leadership team and relevant staff are aware of and understand the IT filters and monitoring systems in place, manage them effectively and know how to escalate concerns
- > ensure the school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Appendix 3 of this policy covers this procedure
- > ensure that this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised

## The Headteacher

- > ensures that the child protection policy and procedures are understood and implemented by all staff
- > allocates sufficient time, training, support, and resources, including cover arrangements when necessary, to enable the DSL and deputy/s to carry out their roles effectively, including the assessment of pupils and attendance at strategy discussions and other necessary meetings
- > supports the designated teacher for children in care to promote the educational achievement of any pupils who are children in care by the Local Authority and who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales
- > ensures that all staff have the skills, knowledge and understanding necessary to keep children in care and children in care safe
- > ensures that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistleblowing procedure and the low level concerns procedure
- > ensures that the culture of SPS supports the provision of effective pastoral care and early help
- > ensures that staff do everything they can to support social workers when Children's Social Care become involved
- > ensures that pupils are provided with opportunities throughout the curriculum to learn about safeguarding and how to keep themselves safe at all times, including when online, as part of a broad and balanced curriculum
- > refers all allegations that a child has been harmed by or that children may be at risk of harm from a member of staff or volunteer to the Designated Officer in the Local Authority within one working day prior to any internal investigation
- > ensures that anyone who has harmed or may pose a risk of harm to a child is referred to the Disclosure and Barring Service, as advised by the Designated Officer
- > as directed by WS, SPS appoints a case officer who will be a member of the senior leadership team to investigate allegations concerning members of staff and volunteers and/or act as a point of contact for the member of staff/volunteer against whom the allegation is made. SPS will not investigate before referral to the LADO.
- > Will make decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this

## Parents

If a parent is concerned that any pupil (including their own child) at SPS, is in immediate danger or at risk of harm they should take emergency action e.g. call 999 and also inform DSL. Parents may also make their own referral to Warwickshire Children and Families Front Door (MASH) 01926 414144. Parents should follow the procedure outlined in this policy if the concern relates to a DSL or any other member of Foundation staff.

#### **4. Good practice guidelines and staff code of conduct**

To meet and maintain our responsibilities towards pupils, we identify standards of good practice and set out our expectations of staff in the staff behaviour policy, which all members of staff and volunteers are required to read and sign before starting work in the school. In summary, our expectations of staff include:

- > treating all pupils with respect
- > setting a good example by conducting ourselves appropriately
- > involving pupils in decisions that affect them
- > encouraging positive, respectful, and safe behaviour among pupils
- > being a good listener
- > being alert to changes in pupils' behaviour and to signs of abuse and neglect and exploitation
- > recognising that challenging behaviour and mental health difficulties may be an indicator of abuse
- > reading and understanding the school's child protection policy, staff behaviour policy (code of conduct) and guidance documents on wider safeguarding issues, for example bullying, behaviour, physical contact, criminal and sexual exploitation, extremism, online safety, and information-sharing
- > asking the pupil's permission before initiating physical contact, such as assisting with dressing, physical support during PE or administering first aid
- > maintaining appropriate standards of conversation and interaction with and between pupils and avoiding the use of sexualised or derogatory language
- > not participating in, tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys"
- > making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- > challenging behaviours (potentially criminal in nature) which constitute sexual harassment, such as grabbing bottoms, breasts, and genitalia, flicking bras, and lifting skirts
- > being aware that the personal and family circumstances and lifestyles of some pupils lead to an increased risk of abuse
- > applying the use of reasonable force and physical intervention only as a last resort and in compliance with school procedures and WVS guidance
- > referring all concerns about a pupil's safety and welfare to the DSL or, if necessary, directly to the Police or Children's Social Care
- > following the school's rules regarding communication and relationships with pupils, including via social media
- > referring all allegations against members of staff, volunteers or other adults that work with children and any concerns about breaches of the Staff Behaviour policy directly to the headteacher; and any similar allegations against or concerns about the headteacher directly to the chair of governors

#### **5. Abuse of position of trust**

All school staff are aware that inappropriate behaviour towards pupils is unacceptable and that their conduct towards pupils must be beyond reproach.

In addition, staff should understand that, under the Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of the school staff and a pupil under 18 may be a criminal offence, even if that pupil is over the age of consent.

## **6. Children who may be particularly vulnerable (including special educational needs, disabilities or health issues)**

Some children are more vulnerable to abuse and neglect than others. Several factors may contribute to that increased vulnerability, including prejudice and discrimination; isolation; social exclusion; communication issues; a reluctance on the part of some adults to accept that abuse can occur; as well as an individual child's personality, behaviour, disability, mental and physical health needs and family circumstances.

To ensure that all our pupils receive equal protection, we will give special consideration to children who are:

- > disabled, have special educational needs or have mental health needs
- > young carers
- > affected by parental substance misuse, domestic abuse and violence or parental mental health needs
- > asylum seekers
- > children in care of the Local Authority, otherwise living away from home or were previously children in care
- > in receipt of support and services from a social worker
- > vulnerable to being bullied, or engaging in bullying behaviours
- > living away from home or in temporary accommodation
- > living transient lifestyles
- > living in chaotic and unsupportive home situations
- > vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability, or sexuality
- > at risk of child sexual exploitation (CSE) and/or child criminal exploitation
- > at risk from or are involved with serious violent crime
- > do not have English as a first language
- > at risk of female genital mutilation (FGM)
- > at risk of forced marriage
- > at risk of being drawn into extremism

This list provides examples of additionally vulnerable groups and is not exhaustive. Staff should be aware that behaviours linked to the likes of drug taking, alcohol abuse, truancy and sexting put children in danger. Safeguarding issues can manifest themselves via child-on-child abuse including but not limited to: bullying (including cyber bullying), gender-based violence/sexual assaults, upskirting, sexual harassment, initiation/hazing type violence/rituals and sexting (or youth produced sexual imagery). Special consideration includes the provision of safeguarding information and resources in community languages and accessible formats for children and parents/carers with communication needs.

We recognise that pupils with special educational needs (SEN) or disabilities or certain health conditions can face additional safeguarding challenges, and are 3 times more likely to be abused than their peers. Additional barriers can exist when recognising abuse and neglect in this group, including:

- > Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- > Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- > The potential for pupils with SEN, disabilities or certain health conditions being disproportionately impacted by behaviors such as bullying, without outwardly showing any signs
- > Communication barriers and difficulties in managing or reporting these challenges

We offer extra pastoral support for these pupils, particularly focused around our Welfare Team.

Any abuse involving pupils with SEND will require close liaison with the DSL (or deputy) and the SENCO.

## 7. Children with special educational needs and disabilities or have mental health needs

Children with special educational needs (SEN), disabilities or who have mental health needs can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group of children, which can include:

- > assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability or mental health issues without further exploration
- > the potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- > communication barriers and difficulties in overcoming those barriers or reporting these challenges
- > cognitive understanding (being able to understand the difference between fact and fiction in online content and then repeating the content/behaviours in school or the consequences of doing so)

Staff are trained to manage these additional barriers to ensure this group of children are appropriately safeguarded; and are aware that mental health difficulties can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff are not expected or trained to diagnose mental health conditions or issues but they will record and report any concerns about a child's mental health to the Designated Safeguarding Lead as with any other safeguarding concern, recognising that mental health concerns may be an outcome and/or indicator of wider safeguarding issues and concerns.

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

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. By being attentive to a child or young person's mood and behaviour, staff can recognise patterns that suggest they need support.

Common warning signs of mental health issues include:

- > sudden mood and behaviour changes
- > self-harming
- > unexplained physical changes, such as weight loss or gain
- > sudden poor academic behaviour or performance
- > sleeping problems
- > changes in social habits, such as withdrawal or avoidance of friends and family

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following the Child Protection and Safeguarding Policy and speaking to the Designated Safeguarding Lead or a deputy.

Staff should always act on a concern they may have and not assume that a colleague or another professional will take action. Early information sharing is vital for effective identification, assessment and allocation of appropriate service provision. Staff should not assume that other professionals will share information that might be critical in keeping children safe.

If a pupil is suspected of having a mental health problem, a graduated response process is followed:

- > an assessment to establish the pupil's needs
- > a plan to set out how the pupil will be supported
- > action to provide that support
- > regular reviews to assess the effectiveness of the provision and lead to changes where necessary

Reasonable steps should be taken immediately to help safeguard the child's mental health, even before any formal diagnosis.

Prevention of mental health issues forms part of PSHEE and pastoral programmes throughout the school.

Early-stage interventions include monitoring, signposting to online sources of help and individual support from the school nurse, counsellor and other pastoral staff.

Higher level in-house interventions include more regular counselling which may include CBT. Parents are advised that their child should visit a doctor to seek medical advice. The Early Help 'Pathway to Change' may be initiated at this stage if appropriate. Where mental health issues are more serious, referrals can be made to the Rise Navigation Hub:

- > RISE (CAMHS/CYPMHS) Navigation Hub telephone helpline 0300 200 2021
- > RISE (CAMHS/CYPMHS) referral via school  
<https://cwrise.com/download.cfm?doc=docm93jjm4n3714.docx&ver=5115>
- > The school counsellor and SENCO can assist with referrals to a clinical psychologist or psychiatrist

The Senior Mental Health lead at SPS is Ms Samantha Scolah, Deputy Head, supported by Laura Sweetman (Executive DSL).

## 8. Early Help and use of the Pathway to Change process

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

The school recognises that providing timely early help is more effective in promoting the welfare of children than reacting later. DSLs are accountable and responsible for ensuring the identified needs of children are acted upon early; without delay and as soon as the problem emerges which may be at any point in a child's life.

Keeping Children Safe in Education 2023 emphasises that **all** staff should be aware of the early help process and understand their role in it. All DSLs should be trained in the Warwickshire Early Help Processes. All SPS staff are therefore trained and required to notice any concerns about children which may help to identify those that would benefit from early help.

SPS will record concerns using MyConcern and concerns will be overseen by the Designated Safeguarding Lead (or a Deputy DSL), who is most likely to have a complete picture and be the most appropriate person to decide how best to respond to any concerns. The DSL may delegate the initiation of the Early Help Pathway to Change process to an appropriate trained member of the school staff.

Early help might be simple pastoral support and something SPS is able to address with parents so that the child's needs are met quickly and easily. SPS will keep a record of any such help to record clear targets, actions for all parties including parents/carers and progress, using WCC Pathway to Change documentation as appropriate. Early Help paperwork is available for schools/settings to use in order to support families prior to the requirement of formalised Early Help being initiated. The Spectrum of Support document 2022 will enable practitioners to understand the level of needs presented by families and what support may be required. The document can be found [here](#).

It will be necessary to take time to understand a child and family's needs and to fully appreciate their circumstances in a more structured way. Children and families may also need support from a range of local agencies beyond SPS, where it has been identified that a multi-agency coordinated response would best meet their needs and support their family, with parental consent.

The Early Help Pathway to Change is a restorative approach which helps to identify what support the family require by working WITH them, through the use of a coordinated assessment. The Early Help Pathway to Change aims to prevent the child's needs escalating to a point where intervention would be required via a statutory assessment under the Children Act 1989. Practitioners should seek to reassure Children and Families that this approach is designed to prevent needs from escalating and should be looked on as a positive and proactive way of addressing needs early in partnership with the family.

SPS is committed to working in partnership with children, parents and other agencies to:

- > identify situations in which children and/or their families would benefit from early help
- > act without delay by signposting to the Family Support Line or Family Information Service for earlier identified needs
- > undertake an assessment of the need for early help when that is appropriate, using the Early Help Pathway to Change process



- > provide targeted early help services to address the assessed needs of a child and their family, developing an action plan that will focus on activity to improve the child's outcomes

SPS will be particularly alert to the potential need for early help for any child who:

- > is disabled and has specific additional needs
- > has special educational needs (whether or not they have a statutory education, health and care plan)
- > is a young carer
- > is showing signs of being drawn into anti-social or criminal behaviour including gang involvement and association with organised crime group
- > is frequently missing/goes missing from care or from home
- > is missing from education
- > is misusing drugs or alcohol themselves
- > is at risk of modern slavery, trafficking or exploitation
- > is in a family whose circumstances present challenges for the child, such as substance abuse, adult mental health issues or domestic abuse
- > has returned home to their family from care
- > is at risk of being radicalised or exploited
- > is a privately fostered child
- > is showing early signs of abuse and/or neglect
- > has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.
- > has a parent or carer in custody, or is affected by parental offending
- > is particularly vulnerable in any of the ways identified in section 6 above

The Early Help process can only be effective if it is undertaken with the agreement of the child's parents/carers. Young people in secondary schools or FE colleges may consent to early help, possibly including an Early Help Pathway to Change process in their own right, subject to *Information sharing - Advice for practitioners providing safeguarding services to children, young people, parents and carers (HMG 2018)*. SPS should seek advice from a Targeted Support Officer or the Integrated Front Door Education Lead in those circumstances. The Early Help Pathway to Change process must involve the child and family as well as all the practitioners who are working with them. The pupil voice is recognised as very important and active listening by staff is essential.

SPS will keep the needs and circumstances of children receiving early help under constant review. If the child's situation does not improve and/or the child's parents and/or the child do not consent to early help, SPS will make a judgement about whether, without help, the needs of the child will escalate. If so, SPS may wish to consult with;

- > Targeted Support Officers
- > Early Help Social Worker
- > MASH Education Lead
- > Early Help Team Leaders
- > Integrated Front Door (MASH)

Consultations are available in the Integrated Front Door (MASH) for practitioners seeking advice about children they are concerned about. If you have a concern that a child or young person may be in need of protection or significant harm the DSL/lead professional should contact the MASH and submit a referral.

## 9. Attendance

We recognise that full attendance at school is important to the well-being of all our pupils and enables them to access the opportunities made available to them at school. Attendance is monitored closely, and we address poor or irregular attendance without delay, working in partnership with the Warwickshire Attendance Service when patterns of absence give rise to concern. Early Help is recommended to support families with attendance concerns at the emergence of an issue to prevent escalation. Our attendance policy is set out in a separate document and is reviewed regularly by the Board of Directors.

## 10. Children Who are Absent from Their Education

Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. It is important the school or college's response to persistently absent pupils and children missing education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging, but also where children are already known to local authority children's social care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community. Further information and support, includes:

- > Guidance on school attendance 'Working together to improve school attendance' including information on how schools should work with local authority children's services where school absence indicates safeguarding concerns
- > Information regarding schools' duties regarding children missing education, including information schools must provide to the local authority when removing a child from the school roll at standard and non-standard transition points, can be found in the department's statutory guidance: Children Missing Education
- > further information for colleges providing education for a child of compulsory school age can be found in: Full-time-Enrolment of 14- to 16-year-olds in Further Education and Sixth Form Colleges
- > general information and advice for schools and colleges can be found in the Government's Missing Children and Adults Strategy

## 11. Children Missing from Education

Situation	Action
Child is missing education and their whereabouts is <b>known</b>	It is the school's responsibility to follow their attendance procedures. They can seek support from the Warwickshire Attendance Service
Child is absent from their education and their whereabouts is <b>unknown</b>	A referral must be made the Children Missing Education Team

All children, regardless of their circumstances, are legally entitled to an efficient, full-time education which is suitable to their age, ability, aptitude and any special educational needs they may have.

For most children, including those that are vulnerable, attendance in school is a protective factor and is essential aspect of keeping them safe. Children who are missing education (CME) have increased vulnerability and can be at more risk of neglect, abuse, exploitation radicalisation and mental health problems. Staff will also be alert to signs of children at risk of travelling to conflict zones, female genital mutilation and forced marriage.

Schools and colleges must have an attendance policy that outlines how they monitor:

- > Attendance
- > Unauthorised absences

> Children who go missing during the school day

SPS follows the DfE legal requirements in respect of recording and reporting those children who leave the school with an unknown future destination. Where a pupil has 10 consecutive school days of unexplained absence, without permission and their whereabouts is unknown, we would take all reasonable steps<sup>1</sup> to establish their whereabouts. If unsuccessful, the school will make an immediate referral to Warwickshire County Council's Children Missing Education Team on 01926 736323 or via email [cme@warwickshire.gov.uk](mailto:cme@warwickshire.gov.uk).

If the Local Authority is able to contact the pupil with the child/children and their parents and carers, arrangements will be made with the school and family for a return to education. This may include a re-integration programme where necessary. If the pupil has registered at a new school, the previous school will delete the child's name from their roll and transfer the child's educational records to the new school in the normal way. Any child protection records will be transferred separately and securely for the attention of the DSL in the new school and a receipt secured.

Visit [www.warwickshire.gov.uk/childrenmissingeducation](http://www.warwickshire.gov.uk/childrenmissingeducation) for more information or to access the referral form.

The school operates in accordance with statutory guidance *Children Missing Education (DfE 2016)*. The school is required by law to have an admission register and, with the exception of schools where all pupils are boarders, an attendance register. All pupils must be placed on both registers.

The school is required to inform the Local Authority when they are about to remove a pupil's name from the school admission register at non-standard transition points irrespective of the reason. The Local Authority may also require the school to provide information about pupils who are going to be removed from the register at standard transition points.

#### **Non-standard transition point**

We will inform the local authority that we plan to take a child off roll when they leave school to be home educated; move away from the school's location; remain medically unfit beyond compulsory school age; are in custody for four months or more (and will not return to school afterwards); or are permanently excluded.

If a parent has informed SPS of their intention to remove their child in order to elective home educate their child, the school should notify the Elective Home Education Team imminently by email ([ehet@warwickshire.gov.uk](mailto:ehet@warwickshire.gov.uk) / tel. 01926 736323). School and colleges are advised to allow the parent or carer a 2-week period of reflection prior to removing their child from the school roll as this is best practice.

The school will also notify the local authority within five days of adding a pupil's name to the admission register at a non-standard transition point. The Local Authority may also require the school to provide information about pupils added to the register at a standard transition point.

It is essential for the school to comply with this duty so that the Local Authority can, as part of its duty to identify children of compulsory school age who are missing education, follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse or neglect. If no confirmation is received the above Children Missing Education procedures will apply.

We will ensure that pupils who are expected to attend the school but fail to take up the place are referred to the Local Authority.

When a pupil leaves the school, we will record the name of the pupil's new school and their expected start date. Deletions from school roll in liaison with the Local Authority will normally be backdated to the first day of absence.

For more information <https://www.gov.uk/government/publications/children-missing-education>

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<sup>1</sup> Reasonable steps include:

- Telephone calls to all known contacts. Parents and carers are asked to provide at least three emergency contacts in the event of children not arriving at school without prior notification and also for other emergencies;
- Letters home (preferably by recorded delivery);
- Contact with other schools where siblings may be registered;
- Home visits where safe to do so;
- Enquiries to friends, neighbours etc. through school contacts;
- Enquiries with any other service known to be involved with the pupil/family;
- Consideration of information about the child in social media;
- All contacts and outcomes will be recorded on the pupil's file.

Pupils leaving SPS for known destinations outside the maintained sector in England and Wales will be updated to the School Database using MMMMMMM in the destination box. This includes private/independent schools, schools in other countries (including Scotland and Northern Ireland) and pupils moving into Elective Home Education. The latter will be formally notified to the Children Missing Education team by the school as soon as written confirmation is received from the parent(s). If no confirmation is received, the above Children Missing Education procedures will apply. SPS will ensure that pupils who are expected to attend the school but fail to take up the place are referred to the Local Authority. When a pupil leaves any of the Schools, the name of the pupil's new school is recorded with their expected start date.

## **12. Children who run away or go missing from home or care**

SPS recognises that children who run away or go missing (particularly repeatedly) and are thus absent from their normal residence are potentially vulnerable to abuse and neglect, which may include sexual abuse or exploitation and child criminal exploitation. It could also indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage.

*Keeping Children Safe in Education 2023* highlights that '[Statutory Guidance on Children who Run Away or go Missing from Home or Care' \(DfE 2014\)](#) requires that every child or young person who runs away or goes missing must be offered a Return Home Interview (RHI). RHIs are intended to ascertain the factors that triggered the young person's absence. Those factors may include difficulties at home, in school and in the community. The short timescale is 72 hours which is imposed in order to ensure that the RHI remains relevant to the young person and enables any required action to be initiated at the earliest opportunity. When necessary and in conjunction with the Local Authority, SPS will facilitate Return Home Interviews, both in terms of releasing the young person from their normal timetable to participate in an interview and in providing an appropriate and safe space on SPS site for the interview to take place.

RHI's are undertaken by practitioners who are independent in order to facilitate a discussion with the young person that is as open as possible. As soon as the Local Authority receives notification that a young person has gone missing from home or care, a letter will be sent to parents/carers seeking their consent. If the Local Authority has been unable to secure consent from parents/carers, the school and college will contact the parent/carer and seek to secure their consent for the RHI.

Direct contact will then be made to make arrangements for the interview.

Young people aged 16 and 17 years old are generally considered to be able to consent and withhold consent to their own information being shared and therefore they can choose to participate or not in an RHI. With reference to the Fraser Guidelines, younger children may also be deemed able to give consent. However, if the child/young person is assessed as not being capable of giving their own consent (Fraser Guidelines) or they are withholding informed consent, SPS should seek consent from parents and carers for the RHI to go ahead. Schools and Colleges are advised to seek expert advice if they are unsure as to whether a child or young person has the necessary capacity to make such decisions for themselves.

Parents/carers may also choose to accompany their child/young person in interviews and SPS will facilitate that as appropriate.

Please also see our Child Missing Education Policy which is available upon request.

## **13. Helping children to understand and recognise risk and identify available support**

*Keeping Children Safe in Education 2023* requires governing bodies and proprietors to ensure that children are taught about safeguarding, including online safety, and recognise that a one size fits all approach may not be appropriate for all children, and a more personalised or contextualise approach for more vulnerable children, victims of abuse and some SEND children might be needed as part of providing a 'broad and balanced curriculum.'

Children are taught to understand and manage risk through our personal, social, health and economic education (PSHEE) programme; sex and relationships lessons; and through all aspects of school life. Our approach is designed to help children to think about risks they may encounter, recognise when they are at risk and with the support of staff work out how to get help when they need it and how risks might be reduced or managed. Discussions about risk are empowering and enabling for all children and promote sensible behaviour rather than fear or anxiety. Children are taught how to conduct themselves and how to behave in a responsible manner. Children are also reminded regularly about online safety, the risks of sharing content and images online and tackling bullying, including cyber bullying procedures. The school continually promotes an ethos of respect for children and pupils are encouraged to speak to a member of staff of their choosing about any worries they may have.

Discussions about risk will include talking to children about the risks and issues associated with young people sending, receiving and/or disseminating indecent images of themselves and other young people, which is widely referred to as 'sexting' (please refer to *Youth produced sexual imagery* ['sexting'] in section 30 below).

It is recognised that a young person may choose to share indecent images with another young person in the context of a romantic relationship and that she or he may do so without any intention to cause harm or distress to anybody. Although technically an offence, 'sexting' of that nature is referred to as 'experimental sexting' and it is usually not necessary or appropriate to criminalise young people in those circumstances. However, there are clear risks associated with such behaviour. Staff are trained to be vigilant and to notice and record any concerns about young people sending and receiving indecent images, which includes listening to what young people say to each other and to staff, as they do with any other safeguarding concern.

When concerns are identified, staff will always speak to children and will inform parents about their concerns unless there is good reason to believe that doing so would place the child at increased risk of significant harm. The DSL will also need to consider the Fraser guidelines in making a judgement about whether or not to respect a young person's request not to inform his/her parents/carers.

Children under the age of 13 are unable to consent to sexual activity. Any imagery containing sexual activity involving under 13-year-olds will therefore be referred to the Police.

In Juniors, we have adopted the personal safety programme Taking Care: Protective Behaviours for all junior classes including EYFS. The programme is designed to fit in with the requirements of the PSHEE Curriculum and runs alongside My Feelings, Friends and Family RSE programme. Protective Behaviours is a practical and down to earth approach to personal safety. The aim of the programme is to teach our children about how to feel safe, how to talk about their feelings and how to recognise safe and unsafe feelings. This helps children to feel safe to have an adventurous approach to life that satisfies their desire for fun and excitement without living in fear. Protective Behaviours helps children to recognise and trust their intuitive feelings – early warning signs – and to support them in developing a range of strategies for self-protection.

In Seniors, we have adopted a PSHEE programme from the PSHEE Association and this is taught in PSHEE lessons and through the mentor programme for Years 7-13. Senior Assemblies also reinforce key content. Children are also taught about; online safety, issues of consent and healthy relationships, fundamental British values, grooming, how children can keep themselves safe from all forms of bullying including online bullying, child criminal and sexual exploitation including issues of informed consent, sexting, drugs and alcohol, risks associated with gang activity, risks associated with county lines.

### **Children who are lesbian, gay, bi, or trans (LGBT)**

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

Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff.

LGBT inclusion is part of the statutory Relationships Education, Relationship and Sex Education and Health Education curriculum and there is a range of support available to help schools counter homophobic, biphobic and transphobic bullying and abuse.

In our organisation the named member of staff who leads our Inclusion Group and is named to support LGBT is Mrs Christine Smith.

Their contact information is shared directly with children to encourage them reach out for support and guidance.

### **14. Support for pupils, families and staff involved in a child protection issue**

Child abuse is devastating for the child and can also result in distress and anxiety for staff who become involved.

We will support pupils, their families, and staff by:

- > taking all suspicions and disclosures seriously
- > nominating a link person (usually the DSL) who will keep all parties informed and be the central point of contact
- > Where a member of staff is the subject of an allegation made by a pupil, separate link people will be nominated to avoid any conflict of interest
- > responding sympathetically to any request from pupils or staff for time out to deal with distress or anxiety
- > maintaining confidentiality and sharing information on a need-to-know basis only with relevant individuals and agencies
- > storing records securely
- > offering details of helplines, counselling or other avenues of external support
- > following the procedures laid down in our child protection, whistleblowing, complaints and disciplinary procedures
- > co-operating fully with relevant statutory agencies
- > If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:
  - There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies
  - The DSL will have to balance the victim's wishes against their duty to protect the victim and other children
  - The DSL should consider that:
    - Parents or carers should normally be informed (unless this would put the victim at greater risk)
    - The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
    - Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains
- > Regarding anonymity, all staff will:
  - Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
  - Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved
  - Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities

## 15. Complaints procedure

Our complaints procedure will be followed where a pupil or parent raises a concern about poor practice towards a pupil that initially does not reach the threshold for child protection action. Poor practice examples include unfairly singling out a pupil or attempting to humiliate them, bullying or belittling a pupil or discriminating against them in some way. Complaints are managed by the headteacher, other members of the senior leadership team and governors. An explanation of the complaints procedure is included in the safeguarding information for parents and pupils.

Complaints from staff are dealt with under the school's complaints and disciplinary and grievance procedures. Complaints which escalate into a child protection concern will automatically be managed under the school's child protection procedures.

## Staff reporting concerns about a colleague or other adult who works with children (Whistleblowing)

Staff who are concerned about the conduct of a colleague – including visiting practitioners and volunteers – towards a pupil are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood a situation and they will wonder whether a report could jeopardise a colleague's career. All staff must remember that the welfare of the child is paramount.

The school's whistleblowing policy enables staff to raise concerns or allegations, initially in confidence, and for a sensitive enquiry to take place. If there is a conflict of interest in reporting concerns direct to the head, the concern should go straight to the LSDO.

Staff are expected to report all concerns about poor practice or possible child abuse by colleagues - including what may seem minor contraventions of the school's staff behaviour policy (code of conduct) – to the headteacher; to facilitate proactive and early intervention in order to maintain appropriate boundaries and a safe culture that protect children and reduce the risk of serious abuse in school.

The recommended format for all staff in schools to record any such poor practice or possible child abuse by colleagues or other adults who work with children is the pro-forma 'Logging A Concern about the behaviour of an adult who works with children', also known as the 'Yellow form'. All such forms should be passed directly to the headteacher. Alternatively, staff are free to approach the headteacher directly to discuss their concerns. In the absence of the Headteacher, the Safeguarding Director can be contacted.

Concerns or complaints about the Headteacher should be reported to the Safeguarding Director *without informing the Headteacher*, whose contact details are displayed in the staff room for any member of staff to use in such an instance. The Safeguarding Director will make immediate contact with the DO.

Concerns about the proprietor should be referred directly to the Designated Officer (see below).

Staff may also report concerns about suspected abuse or neglect directly to Children's Social Care or the Police if they believe direct reporting is necessary to secure action to safeguard children.

Staff can also contact the Designated Officer in the Local Authority, who is responsible for the co-ordination of responses to allegations against people who work with children (see contact and referral details in section 16 below). The Designated Officer's contact details are displayed on the safeguarding noticeboard in the staff room.

The NSPCC whistleblowing helpline is also available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 between 8.00a.m. and 8.00p.m., Monday to Friday or e mail [help@nspcc.org.uk](mailto:help@nspcc.org.uk). Information is also available on the NSPCC website at <https://www.nspcc.org.uk/what-you-can-do/report-abuse/dedicated-helplines/whistleblowing-advice-line/>.

The NSPCC whistleblowing helpline and contact numbers for Children's Social Care, the Police and the Designated Officer are all displayed in the staff room.

### 16. Managing allegations against staff that may meet the harms threshold

When an allegation is made against a member of staff, set procedures must be followed. The full procedures for dealing with allegations against staff can be found in Part 4 of Keeping Children Safe in Education 2023 and para [1.14 of WS inter-agency safeguarding procedures Allegations against staff or volunteers](#). Any allegation or suspicion of abuse, from within or outside Stratford Prep School, will be managed in accordance with this policy and, in all proper circumstances, will be referred to an external agency for investigation. Stratford Prep School will not undertake its own investigations of allegations without prior consultation with the LADO(s), or in the most serious cases, the police, so as not to jeopardise statutory investigations. In borderline cases, discussions with the LADO(s) can be held informally and without naming Stratford Prep School or individuals.

In accordance with Keeping Children Safe in Education 2023, the school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

As required by Keeping Children Safe in Education 2023 all allegations in respect of an individual who works at the school, including supply teachers, volunteers and contractors that fulfil any of the following criteria will be reported to the LADO within one working day if they have:

- > Behaved in a way that has harmed a child, or may have harmed a child, and/or
- > Possibly committed a criminal offence against or related to a child, and/or
- > Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, and/or
- > Behaved or may have behaved in a way that indicates they may not be suitable to work with children. This includes behaviour that may have happened outside of school that might make an individual unsuitable to work with children, this is known as transferable risk

We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation. Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress.

A 'case manager' will lead any investigation. This will be the headteacher, or the Chair of the Board (or the Safeguarding Director, if appropriate) where the headteacher is the subject of the allegation. The case manager will be identified at the earliest opportunity.

Our procedures for dealing with allegations will be applied with common sense and judgement.

The LADO contact number is 01926 745376. Referrals to the LADO should be submitted on a Position of Trust (POT) MARF form and sent to [lado@warwickshire.gov.uk](mailto:lado@warwickshire.gov.uk).

It is the Headteachers' responsibility to contact and refer to the Designated Officer when necessary. The only exception is when the allegation is against the Headteacher, in which instance the Safeguarding Director will take responsibility.

### **Suspension of the accused until the case is resolved**

Suspension of the accused will not be the default position, and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- > Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- > Providing an assistant to be present when the individual has contact with children
- > Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- > Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted
- > Temporarily redeploying the individual to another role in a different location

If in doubt, the case manager will seek views from the school's personnel adviser and the designated officer at the local authority, as well as the police and children's social care where they have been involved. In the event of suspension, the school will provide support and a named contact for the member of staff.

### **Definitions for outcomes of allegation investigations**

- > **Substantiated:** there is sufficient evidence to prove the allegation
- > **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation
- > **False:** there is sufficient evidence to disprove the allegation
- > **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- > **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

### **Procedure for dealing with allegations**

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

- > Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below



- > Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- > Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- > Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- > Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care
- > **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- > **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- > **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
- > Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
- > Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- > Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- > Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

We will inform ISI of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.

If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible the school will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

#### **Additional considerations for supply teachers and all contracted staff**

If there are concerns or an allegation is made against someone not directly employed by the school, such as a supply teacher or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures.

- > We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
- > The governing board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation
- > We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required
- > We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

If the school receives an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, we will follow our safeguarding policies and procedures and inform the local authority designated officer (LADO), as we would with any safeguarding allegation.

### **Timescales**

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

- > Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week
- > If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days
- > If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

### **Specific actions**

#### **Action following a criminal investigation or prosecution**

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

#### **Staff resignation prior to outcome**

If the accused person resigns, or ceases to provide their services, this will not prevent an allegation being followed up in accordance with this guidance. It is important that every effort is made to reach a conclusion in all cases of allegations bearing on the safety or welfare of children, including any in which the person concerned refuses to cooperate with the process. Wherever possible, the accused should be given a full opportunity to answer the allegation and make representations about it. However, the process of recording the allegation and any supporting evidence, and reaching a judgement about whether it can be substantiated on the basis of all the information available, should continue even if that cannot be done or the accused does not cooperate. It may be difficult to reach a conclusion in those circumstances, and it may not be possible to apply any disciplinary sanctions if a person's period of notice expires before the process is complete, but it is important to reach and record a conclusion wherever possible.

'Settlement agreements' (previously referred to as compromise agreements), by which a person agrees to resign if the employer agrees not to pursue disciplinary action, and both parties agree a form of words to be used in any future reference, should not be used in cases of refusal to cooperate or resignation before the person's notice period expires.

A referral to the DBS must be made if the criteria are met where the person is deemed to have harmed or poses a risk of harm to a child. Similarly, the school also will consider its legal duties to make a referral to the Teaching Regulation Authority (TRA)

#### **Conclusion of a case where the allegation is substantiated**

If the allegation is substantiated and the person is dismissed, or the Foundation ceases to use the person's services, or the person resigns or otherwise ceases to provide his or her services, the Case Manager will work with the LADO to determine

whether a referral to the DBS for consideration of inclusion on the barred lists is required; and in the case of a member of teaching staff, whether to refer the matter to the Teaching Regulation Authority (TRA) to consider prohibiting the individual from teaching, if the threshold for a referral to the DBS has not been met.

The School acknowledges its legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed a listed offence, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. The DBS will consider whether to bar the person. Referrals will be made as soon as possible after the resignation or removal of the individual. The School will supply any information held to the Disclosure and Barring Service (DBS) when requested.

The School also acknowledges its duty to consider a separate referral to the TRA regarding a teacher who has been dismissed, resigned or their services cease to be used, when the criteria for a referral does not meet the threshold of a referral to the DBS but a prohibition order may be appropriate. The reasons such an order would be considered are: “unacceptable professional conduct”, “conduct that may bring the profession into disrepute” or a “conviction, at any time, for a relevant offence”. Further guidance is published on the TRA website. The school will seek advice if required, about whether the allegation against a teacher is sufficiently serious to refer to the TRA.

Where it is decided on the conclusion of a case that a person who has been suspended can return to work, the Case Manager will consider how best to facilitate that, how the person’s contact with the child or children who made the allegation can best be managed, if they are still a pupil at the school.

### **Individuals returning to work after suspension**

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual’s contact with the child or children who made the allegation, if they are still attending the school.

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

If a report is:

- > Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children’s social care may be appropriate
- > Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

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

If an allegation is:

- > Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children’s social care may be appropriate
- > Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

### **Confidentiality and information sharing**

The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the LADO, police and children’s social care services, as appropriate, to agree:

- > Who needs to know about the allegation and what information can be shared
- > How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- > What, if any, information can be reasonably given to the wider community to reduce speculation
- > How to manage press interest if, and when, it arises

- > When considering whether, or not, to share safeguarding information (especially with other agencies), staff will record who they are sharing that information with and for what reason. If we have taken a decision not to seek consent from the data subject and/or parent that should also be recorded within the safeguarding file.

### Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- > A clear and comprehensive summary of the allegation
- > Details of how the allegation was followed up and resolved
- > Notes of any action taken, decisions reached and the outcome
- > A declaration on whether the information will be referred to in any future reference

In these cases, the school will provide a copy to the individual, in agreement with children's social care or the police as appropriate.

Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

### References

When providing employer references, we will:

- > Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious
- > Include substantiated allegations, provided that the information is factual and does not include opinions

### Learning lessons

After any cases where the allegations are *substantiated*, the case manager will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- > Issues arising from the decision to suspend the member of staff
- > The duration of the suspension
- > Whether or not the suspension was justified
- > The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

### Non-recent allegations

Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the

allegation to the police.

## 17. Managing concerns that do not meet the harm threshold (Low Level Concerns)

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold.

Concerns may arise through, for example:

- > Suspicion
- > Complaint
- > Disclosure made by a child, parent or other adult within or outside the school
- > Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

### Definition of low-level concerns

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the school may have acted in a way that:

- > is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**
- > does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

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

- > Being overly friendly with children
- > Having favourites
- > Taking photographs of children on their mobile phone
- > Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- > Using inappropriate sexualised, intimidating or offensive language
- > Humiliating children

Schools and colleges **should** ensure that their procedure for dealing with low-level concerns contains a process for timely and appropriate information sharing which is confidential, clear, easy to understand and implement. An effective low-level concerns process will simply be a reflection and extension of the school's or college's staff code of conduct and safeguarding and child protection policy.

### Sharing low-level concerns

All low level concerns should be shared with the Headteacher. We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- > Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- > Empowering staff to share any low-level concerns
- > Empowering staff to self-refer
- > Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- > Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- > Helping to identify any weakness in the school's safeguarding system

## Responding to low-level concerns

If the concern is raised via a third party, the headteacher will;

- > collect evidence where necessary by speaking directly to the person who raised the concern, unless it has been raised anonymously
- > collect evidence by speaking to the individual involved and any witnesses

## Actions further to low-level concerns

The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's staff code of conduct, staff planner and staff handbook. If a pattern of behaviour is identified, the school should decide on a course of action. This might be internal disciplinary procedures, or referral to the LADO if the harms threshold is met. SPS will then consider if any wider cultural issues in school enabled such behaviour to occur and if appropriate policies could be revised or extra training delivered to minimize risk of recurrence. **The rationale for all actions taken must be recorded.**

## Record keeping

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- > Kept confidential, held securely and comply with the DPA 2018 and UK GDPR. The name of the person reporting should be noted, respecting wishes to remain anonymous as far as reasonably possible.
- > Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold, we will refer it to the designated officer at the local authority
- > Retained at least until the individual leaves employment at the school

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

## References

We will not include low-level concerns in references unless:

- > The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- > The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

## 18. Staff training

### Training, knowledge and skill: the DSL

The Designated Safeguarding Lead (and deputies) undergo training to provide them with the knowledge and skills required to carry out the role and enables them to maintain their knowledge engaging and sharing training throughout their time in post. This training should be updated at least every two years. The designated safeguarding lead also undertakes Prevent awareness training.

The DSL should attend training for newly appointed DSLs and refresher training every two years. Every DSL should also attend the new Warwickshire's Early Help Pathway to Change training. It is recommended that DSLs access Warwickshire's DSL training as it will include up to date information relevant to Warwickshire procedures and processes. It is recommended that DSLs update their knowledge and skills by accessing training and development relevant to their role and their setting. The Integrated Training Programme has a number of free courses that will support DSLs with their CPD and can be accessed [here](#).

Training provides the designated safeguarding leads with a good understanding of their own role, and the processes, procedures and responsibilities of other agencies, particularly children's social care, so they:

- > understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements
- > have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so
- > ensure each member of staff has access to, and understands, the school's or college's child protection policy and procedures, especially new and part time staff
- > are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers
- > understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation
- > understand the importance of information sharing, both within the school and college, and with the three safeguarding partners, other agencies, organisations and practitioners are able to keep detailed, accurate, secure written records of concerns and referrals. **All safeguarding concerns, discussions and decisions made and the reasons for those decisions must be recorded in writing. If in doubt about recording requirements staff should discuss this with the DSL.**
- > understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation
- > are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college
- > can recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support children with SEND to stay safe online
- > can encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school or college may put in place to protect them
- > be able consider and understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication
- > can work closely with pastoral support staff; the SENCo; the designated teacher for children who are children in care or were previously children in care; staff with designated responsibility for promoting children's mental health and emotional wellbeing; the ICT lead and any ICT support staff; and school nurses in relation to safeguarding matters (including online and digital safety) and whether to make referrals to relevant partner agencies

### Training, knowledge and skill: all staff

It is important that all staff have training to enable them to recognise the possible signs of abuse, neglect, exploitation and radicalisation and to know what to do if they have a concern.

All staff will:

- > Receive appropriate, regularly updated safeguarding and early help and child protection training and thematic updates to include online safety as required (at least annually) during inset days and regular discussions at staff meetings, to provide them with the requisite skills and knowledge to safeguard children effectively in line with statutory guidance and any requirements of the local safeguarding partnership
- > Understands the unique risks associated with online safety and ensures that staff are trained to have the requisite knowledge and up to date capability to keep children safe whilst they are online. This includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring
- > Have training to increase awareness of the increased risk of abuse to certain groups, including children with special educational needs and disabilities, children in care, previously children in care and young carers, as well as risks associated with specific safeguarding issues including child sexual exploitation, child criminal exploitation, county lines activity, child-on-child abuse, sexual harassment and sexual violence in school, extremism, so-called honour based abuse including female genital mutilation and forced marriage; and will receive training in relation to keeping children safe online
- > Read, and understand, Part One of KCSIE and Annex B and review this guidance at least annually
- > Reinforce the importance of online safety when communicating with parents. This includes making parents aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
- > Provide a safe space for pupils who are LGBT to speak out and share their concerns
- > Be aware of our systems which support safeguarding, including this child protection and safeguarding policy, the staff Code of conduct, the role and identity of the designated safeguarding lead (DSL) and Deputies, the behaviour policy and the safeguarding response to children who go missing from education
- > Be trained to manage a report of child-on-child sexual violence and sexual harassment (see section 30)
- > Be aware of their role in the local early help process (see section 12)
- > Be aware of the process for making referrals to children's social care (see section 26)
- > Know what to do if a child tells them they are being abused, exploited or neglected
- > Know to reassure victims that they are being taken seriously and that they will be supported and kept safe so that no victim will be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment and no victim ever be made to feel ashamed for making a report.
- > Know the signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- > If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police.
- > Know the fact that children can be at risk of harm inside and outside of their home, at school and online
- > Know the fact that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBT) can be targeted by other children
- > Know that to look for to identify children who need help or protection
- > In addition, the headteacher (and/or other school leaders as appropriate) and at least one governor (usually the chair) will attend safer recruitment training and the school will ensure that there are at least two school leaders and/or governors that have attended safer recruitment training within the past three years.

### Induction

New staff and Directors who will have direct contact with children and volunteers will receive an explanation during their induction which will include:

- > SPS' Child Protection and Safeguarding Policy including Early Help support
- > SPS' Online Safety Policy
- > Part One of KCSIE to be read and understood
- > KCSIE Annex B to be read and understood



- > Pupil Discipline & Behaviour Policy
- > SPS' Anti-bullying Policy
- > signs and symptoms of abuse and neglect
- > responding to disclosure of abuse or neglect by a child
- > reporting and recording arrangements
- > the staff behaviour policy (code of conduct) including staff/pupil relationships, policy on low level concerns and comms including the use of social media
- > SPS' Whistleblowing policy
- > the identity and role of the DSL and all Deputy DSLs
- > the school's safeguarding response to children who go missing from education.

All of the above will be explained **before** a new member of staff, governor or volunteer has direct contact with children in school. The school's child protection policy and staff behaviour policy (code of conduct) will be sent with the letter confirming an appointment with a written requirement that the individual reads the two policies in advance of starting work at the school. The individual will be given an opportunity to clarify any issues on their first day at work and then asked to sign to confirm that they have read and understood both policies and undertake to comply with them.

Supply staff and other visiting staff will be given the school's Visiting Staff Leaflet.

All Directors receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:

- > Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge
- > Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding

As the Safeguarding Director may be required to act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, they receive training in managing allegations for this purpose.

## 19. Safer recruitment

Our school endeavours to ensure that we do our utmost to employ only 'suitable' staff and allow only 'suitable' volunteers to work with children by complying with the requirements of *Keeping Children Safe in Education 2023* together with the school's and the WVS *Safer Recruitment* policies.

Safer recruitment means that all applicants will;

- > complete an application form which includes their employment history and explains any gaps in that history
- > provide two referees, including at least one who can comment on the applicant's suitability to work with children
- > provide evidence of identity and qualifications
- > if offered employment, be checked in accordance with the Disclosure and Barring Service (DBS) regulations as appropriate to their role. This will include:
  - an enhanced DBS check and a barred list check for those including unsupervised volunteers engaged in Regulated Activity
  - an enhanced DBS check without a barred list check for all volunteers not involved in Regulated Activity but who have the opportunity of regular contact with children
  - an enhanced DBS check for all Directors (not including associate members), which will only include a barred list check for governors involved in Regulated Activity
- > if offered employment, provide evidence of their right to work in the UK
- > be interviewed by a panel of at least two school leaders/governors, if shortlisted

- > Schools are 'specified places' which means that the majority of staff and volunteers will be engaged in Regulated Activity. A fuller explanation of Regulated Activity can be found in Part 3 of Keeping Children Safe in Education 2023 and in Annex F
- > Check that individuals are not disqualified under the 2018 Childcare disqualification Regulations and Childcare Act 2006

The school will also;

- > ensure that every job description and person specification for roles in school includes a description of the role holder's responsibility for safeguarding
- > ask at least one value-based question at interview for every role in school about the candidate's attitude to safeguarding and motivation for working with children
- > verify the preferred candidate's mental and physical fitness to carry out their work responsibilities
- > obtain references for all shortlisted candidates, including internal candidates
- > consider carrying out an online search as part of their due diligence on the shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which the school or college might want to explore with the applicant at interview. Schools and colleges should inform shortlisted candidates that online searches may be done as part of due diligence checks
- > carry out additional or alternative checks for applicants who have lived or worked outside the UK
- > ensure that applicants for teaching posts are not subject to a prohibition order issued by the Secretary of State
- > check that an applicant for a management position is not the subject of a section 128 direction made by the secretary of state prohibiting or restricting her/him from taking part in the management of an independent school, academy or free school

At least one member of each recruitment panel will have attended safer recruitment training.

All new members of staff and volunteers will undergo an induction that includes familiarisation with the school's child protection and safeguarding policy, staff behaviour policy (code of conduct), other issues as in section 17 of this policy and identification of their child protection training needs.

All staff are required to sign to confirm they have received a copy of the child protection and safeguarding policy and Staff Behaviour Policy (code of conduct).

All relevant staff (teachers, teaching assistants, other classroom-based staff, lunchtime supervisors and members of the senior leadership team, and all those who work in before or after school care for children under eight) are made aware of the disqualification from providing childcare legislation (*state how awareness is raised e.g. with a staff/volunteer briefing, a clause in employment contracts for new staff etc.*).

The school obtains written confirmation from supply agencies and third-party organisations that they have satisfactorily undertaken all appropriate checks in respect of individuals they provide to work in the school that the school would have undertaken if they were employing the individual directly; and that those individuals are suitable to work with children.

Trainee teachers will be checked either by the school or by the training provider, from whom written confirmation will be obtained confirming their suitability to work with children.

The school maintains a single central record of recruitment checks undertaken and ensures that the record is maintained in accordance with Part 3 of Keeping Children Safe in Education 2023 and guidance issued by Warwickshire County Council.

### **Volunteers**

Volunteers will undergo checks commensurate with their work in the school and contact with pupils. Under no circumstances will a volunteer who has not been appropriately checked be left unsupervised or be allowed to engage in Regulated Activity.

### **Supervised volunteers**

Volunteers who work only in a supervised capacity and are not in Regulated Activity will undergo the safer recruitment checks appropriate to their role, in accordance with the school's risk assessment process and statutory guidance.

### Contractors

SPS checks the identity of all contractors and their staff on arrival at SPS and requests DBS checks where appropriate. As required by statutory guidance, where contractors and/or their staff are engaged in Regulated Activity, barred list checks are also requested. Contractors and any of their staff who have not undergone checks will not be allowed to work unsupervised or in Regulated Activity.

### Visitors

All visitors are expected to observe safeguarding procedures (see 20 Site Security). Where visiting speakers are invited into the School by staff, the School will ensure that they are suitable and appropriately supervised. The School will ensure that appropriate vetting has been undertaken, which will at least include an internet search to ascertain the speaker's suitability. Appropriate details of all visiting speakers will be logged on the SCR, in line with 'Prevent' guidance. All staff will be made aware of the need to ensure that the Prevent guidance with respect to visiting speakers is carried out.

### Existing staff

In certain circumstances we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:

- > There are concerns about an existing member of staff's suitability to work with children; or
- > An individual moves from a post that is not regulated activity to one that is; or
- > There has been a break in service of 12 weeks or more

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- > We believe the individual has engaged in [relevant conduct](#); or
- > We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or
- > We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- > The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

## 20. Site security

Visitors to SPS, including contractors, are asked to sign in and are given an identity badge, which confirms they have permission to be on site. Parents who are simply delivering or collecting their children do not need to sign in. All visitors are expected to observe the school/ college's safeguarding and health and safety regulations to ensure children in SPS are kept safe. The headteacher will exercise professional judgement in determining whether any visitor should be escorted or supervised while on site.

### Use of school or college premises for non-school/college activities

Where governing bodies or proprietors hire or rent out school or college facilities/premises to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) they should ensure that appropriate arrangements are in place to keep children safe.

When services or activities are provided by the governing body or proprietor, under the direct supervision or management of their school or college staff, their arrangements for child protection will apply. However, where services or activities are provided separately by another body this is not necessarily the case. The governing body or proprietor should therefore seek assurance that the provider concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place for the provider to liaise with the school or college on these matters where appropriate. This applies regardless of whether or not the children who attend any of these services or activities are children on the school roll or attend the college. The governing body or proprietor should also ensure safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement. The guidance on Keeping children safe in out-of-school settings details the safeguarding arrangements that

schools and colleges should expect these providers to have in place.

## 21. Behaviour Management

Our behaviour policy is set out in a separate document and is reviewed regularly by the Board of Directors. It is shared with all staff before they start working with children as part of their induction. The policy is transparent to staff, parents and pupils.

Keeping Children Safe in Education 2023 highlights that there are circumstances when it is appropriate for staff in schools and colleges to use reasonable force to safeguard children and young people. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of the classroom.

The school operates in accordance with Warwickshire County Council's *Guidance on the Use of Force and Physical Intervention*, which highlights that staff should deploy every possible strategy to prevent the need for physical intervention. Those strategies would include de-escalation whenever there is a threat of violence or aggression towards an individual or property; communicating calmly with children; using non-threatening verbal and body language; helping children to recognise their own 'triggers' and 'early warning signs', and distracting or helping children to see a positive way out of a difficult situation.

However, the school supports staff to intervene physically and to use reasonable force when all of those strategies are unsuccessful in calming a situation; and a risk of physical harm to other children, adults or the child her/himself, serious damage to property or serious disruption to the school remains. Staff should always be able to demonstrate that any such intervention is reasonable, proportionate and necessary in the circumstances, is used for the shortest possible period of time, deploys the minimum force that is necessary and is never used as a sanction.

### Searching, screening, confiscation, and the role of the Appropriate Adult

We will make sure a child or young person's wishes and feelings are known and **focus on the safeguarding needs of the child/children.**

The DSL will liaise with the headteacher or principal to inform them of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This will include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance - PACE Code C 2019.

In accordance with DfE guidance [Searching, screening and confiscation - Advice for headteachers, school staff and governing bodies](#) school staff can search a pupil for any item if the pupil agrees. The headteacher and any member of staff authorised by the headteacher also has a statutory power to search pupils or their possessions, without consent, where they have reasonable grounds for suspecting that the pupil may have one or more of the following prohibited items in their possession: knives or weapons; alcohol; illegal drugs; stolen items; tobacco and cigarette papers; fireworks; pornographic images; indecent images of children; any article that a member of staff reasonably suspects has been, or is likely to be, used to commit an offence or to cause personal injury to or damage to the property of any person (including the pupil).

The headteacher and authorised staff can also search for any item banned by the school rules which has been identified in the rules as an item which may be searched for.

School staff can confiscate any prohibited item found as a result of a search. They can also confiscate any item they consider harmful or detrimental to school discipline.

In the event that a member of staff suspects that a confiscated device contains indecent images of children, they will pass the device to the DSL and will not examine the device themselves. The DSL will take advice from the Police and/or the Integrated Front Door (MASH) before examining the device – see 'Viewing the Imagery' on page 50 below.

### Record Keeping

The school will maintain safeguarding (including early help) and child protection records in accordance with the guidance document Child Protection Record Keeping Guidance.

The school will:

- > keep clear detailed written records of concerns about children (noting the date, event and action taken), even where there is no need to refer the matter to Children’s Social Care immediately
- > keep records in a meticulous chronological order, either on paper or electronically
- > ensure all records are kept secure and in locked locations
- > ensure all safeguarding records are transferred - separately from the child’s main pupil file – to the receiving school, college or other education establishment when a pupil moves
- > If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main pupil file. To allow the new school/college to have support in place when the child arrives, this should be within:
  - 5 days for an in-year transfer, or within
  - The first 5 days of the start of a new term
- > the DSL will also consider whether it is appropriate to share any information with a child’s receiving school/setting in advance of the child leaving so that the receiving school/setting is able to support the child as effectively as possible and plan for their arrival;
- > ensure that incoming safeguarding records are brought to the attention of the DSL, Deputy DSLs and other key staff such as the SENCO when a child transfers in from another school/setting.

Safeguarding and child protection records will be maintained independently from the pupil’s school file and the school file will be ‘tagged’ to indicate that separate information is held. Such records will only be accessible to the Designated Safeguarding Lead and school leaders who need to be aware.

The format for all staff at SPS to record any safeguarding or child protection observations or concerns about a child is the MyConcern electronic recording system. Should staff, visitors, or contractors that do not have access to MyConcern need to raise a safeguarding concern, they can record this on a ‘green form’ (situated in the staffroom) and this will be uploaded to the recording system by the DSL to allow for effective recording and auditing.

Such records will include, in addition to the name, address and age of the child, timed and dated observations describing the child’s behaviour, appearance, statements/remarks made to staff or other children and observations of interactions between the child, other children, members of staff and/or parents/carers that give rise to concern. Where possible and without interpretation, the exact words spoken by the child or parent/carer will be recorded. The contextual location should also be recorded. Records will be signed, dated and timed by the member of staff making the record. Records will also include **a note of any action taken, decisions reached and the outcome.**

Child protection records form a part of a child’s pupil record, which parents ordinarily have a right to see. Any pupil or parent wishing to access the pupil’s child protection records will need to submit a request to the school for consideration. Access to the record will then be arranged but records may be redacted in line with the requirements of the General Data Protection Regulation (GDPR) if releasing information would place the child, or any other person, at risk of significant harm.

The Data Protection Act 2018 and GDPR do not prevent school staff from sharing information with relevant agencies without the consent of parents, where that information may help to protect a child.

## **22. Confidentiality and Information Sharing**

The school will manage and share confidential information about children in line with *Information sharing – Advice for practitioners providing safeguarding services to children, young people, parents and carers (HMG 2018)* - [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/721581/Information\\_sharing\\_advice\\_practitioners\\_safeguarding\\_services.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/721581/Information_sharing_advice_practitioners_safeguarding_services.pdf)

All staff will understand that child protection issues warrant a high level of confidentiality, not only out of respect for the pupil, family and staff involved but also to ensure that information being released into the public domain does not compromise evidence.

The Data Protection Act 2018 (DPA) and the GDPR places duties on the school and individual staff to process personal

information fairly and lawfully and to keep the information they hold safe and secure.

However, neither the DPA nor the GDPR prevent or limit the sharing of information for the purposes of keeping children safe. *Keeping Children Safe in Education (DfE 2023)* states clearly that “Fears about sharing information **must not** be allowed to stand in the way of the need to safeguard and promote the welfare of children”.

Staff will ensure confidentiality protocols are adhered to and information is shared appropriately. If in any doubt about confidentiality, staff will seek advice from the DSL, another SLT member or outside agency as required (e.g. Integrated Front Door (MASH) Education Lead).

It is reasonable for staff to discuss day-to-day concerns about pupils with colleagues in order to ensure that children’s general needs are met in school. However, staff should report all child protection and safeguarding concerns to the DSL or headteacher or – in the case of concerns about the headteacher – to the chair of governors. The person receiving the referral will then decide who else needs to have the information and they will disseminate it on a ‘need-to-know’ basis.

*Keeping Children Safe in Education 2023* emphasises that the DSL or a deputy DSL should always be available to discuss safeguarding concerns but in exceptional circumstances where neither the DSL nor any appointed deputy DSL are available, that should not delay appropriate action being taken and staff should speak to a member of SLT or take advice from Children’s Social Care if they are concerned about a child.

The GDPR and the Data Protection Act 2018 do not prevent school staff from sharing information with relevant agencies, where that information may help to protect a child. All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children.

Where children leave the school, the DSL will ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term to allow the new school or college to have support in place for when the child arrives. The DSL will ensure secure transit, and confirmation of receipt should be obtained. For schools, this should be transferred separately from the main pupil file. Receiving schools and colleges should ensure key staff such as designated safeguarding leads and special educational needs co-ordinators (SENCO’s) or the named persons with oversight for special educational needs and disability (SEND) in a college, are aware as required.

In addition to the child protection file, the DSL should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse, or those who are currently receiving support through the ‘Channel’ programme and can have that support in place for when the child arrives. More information on the child protection file is in Annex C of KCSiE 2023.

The DSL will normally obtain consent from the pupil and/or parents to share sensitive information within the school or with outside agencies. Where there is good reason to do so, the DSL may share information *without* consent, and will record the reason for not obtaining consent.

If any member of staff receives a request from a pupil or parent to see child protection records, they will refer the request to the DSL and data protection officer.

Information sharing will take place in a timely and secure manner and where:

- > it is necessary and proportionate to do so; and
- > the information to be shared is relevant, adequate and accurate

Information sharing decisions will be recorded, whether or not the decision is taken to share.

All staff must be aware that they cannot promise a child/parent to keep secrets.

All safeguarding and child protection information will be handled in line with the principles of the Data Protection Act 2018, which require that sensitive information is:

- > processed for limited purposes
- > adequate, relevant and not excessive

- > accurate
- > kept no longer than necessary
- > processed in accordance with the data subject's rights
- > secure

Record of concern forms (Form C – Green forms) and other written information will be stored in a locked facility and any electronic information will be password protected and only made available to relevant individuals. SPS uses MyConcern.

Every effort will be made to prevent unauthorised access to sensitive information. Any sensitive information that needs to be stored on portable devices such as laptop computers or tablets or on portable media such as a CD or flash drive will be password protected or encrypted and kept in locked storage.

The school's policy on confidentiality and information-sharing is available to parents and pupils on request.

### **23. Extended school and off-site arrangements**

All extended and offsite activities are subject to a risk assessment to satisfy health and safety and safeguarding requirements. When our pupils attend off-site activities, including day and residential visits and work-related activities, we will check that effective child protection and whistleblowing arrangements are in place.

Where extended school activities are provided by and managed by the school, the school's child protection policy and procedures apply. If other organisations provide services or activities on the school site, the school will check that those organisations have appropriate procedures in place, including safer recruitment procedures.

The DSL will also take responsibility for ensuring that robust procedures are in place to confirm attendance and swift reporting of non-attendance and children going missing from ExEn at any time when they should be there. The DSL will also ensure that effective quality assurance arrangements are in place in order to monitor the ongoing effectiveness of all safeguarding arrangements for ExEn is in place.

When school pupils attend off-site activities, including day and residential visits and work-related activities, the School will check that effective child protection arrangements are in place, and that necessary vetting has been undertaken, where appropriate.

### **24. Photography and images**

In EYFS, devices with cameras should not be used and should be stored securely away. For more on this, please see 'EYFS Mobile Phone Policy'.

The vast majority of people who take or view photographs or videos of children do so for entirely innocent, understandable and acceptable reasons. Sadly, some people abuse children through taking or using images, so we must ensure that we have some safeguards in place.

To protect pupils, we will:

- > seek their consent for photographs or video images to be taken
- > seek parental consent
- > ensure pupils are appropriately dressed; and
- > encourage pupils to tell us if they are worried about any photographs/images that are taken of them

Furthermore, when using images for publicity purposes (e.g. on our website or in newspapers or publications), we will:

- > avoid naming children when possible
- > if it is necessary to name children, use first names rather than surnames

- > if children are named, avoid using their image
- > establish whether the image will be retained for further use, where and for how long
- > ensure that images are stored securely and used only by those authorised to do so

For the protection of pupils and staff, only school owned equipment will be used to record and store images taken by staff or volunteers on the school site or during offsite school activities including residential visits. Staff are not to use their phones when in presence of children of any ages and should store their personal devices securely.

Parents may still take photographs of their **own children only** during school activities, subject to other restrictions notified to parents in advance in writing or verbally (e.g. parents may be asked not to take photographs during concerts/performances in order not to distract children who are performing or other audience members). **Parents must never take photographs of groups of children in EYFS.** Parents must not publish (including on social media) photographs of other children inadvertently captured during school events without the express permission of the parents of those children.

Parents are welcome to video record their **own children only** during school activities, subject to the same terms and conditions as for photographs above. **Parents must never take videos of groups of children in EYFS.**

Staff, visitors, volunteers and students are **not permitted** to use their own cameras or mobile phones to take or record any images of EYFS pupils for their own records. In the EYFS, children may have their photographs taken by staff **using school equipment only** during indoor and outdoor activities, to provide evidence of achievements for developmental records. These are displayed in albums or a child's development records for children and parents to look through in the presence of a member of staff in the school. Photographs may contain other children in the background. Any photographs that are taken on EYFS School equipment and stored on the School's computers or network are password protected. They are printed in the setting by staff and images are then removed from each iPad or camera's memory. Where photographs or recordings are made by staff or parents, these are always in full view of those attending.

Visiting practitioners who work directly with children are subject to the same restrictions as school staff and volunteers in respect of recording and storing images of children. However, some visiting professionals are permitted to record images of the premises only specifically for professional purposes and in order to support the school, e.g. professionals providing advice or preparing quotations for work such as maintenance, health and safety and building.

## 25. Online Safety

Please also see **SPS' Online Safety Policy.**

Children commonly use electronic equipment including mobile phones, tablets and computers on a daily basis to access the internet and share content and images via social networking sites such as Facebook, Twitter, TikTok, Snapchat and Instagram. Refer to KCSiE 2023 Para 134-147.

Those technologies and the internet are a source of fun, entertainment, communication and education. Unfortunately, however, some adults and young people will use those technologies to harm children and the use of technology has become a significant component of many safeguarding issues. Technology often provides the platform that facilitates harm through child criminal and sexual exploitation; county lines activity; radicalisation; sexual predation and cyber bullying.

The following resources, plus many more listed in Annex B (KCSiE 2023) may also help schools and colleges understand and teach about safeguarding:

- > DfE advice for schools: teaching online safety in schools
- > UK Council for Internet Safety (UKCIS) guidance: Education for a connected world
- > UKCIS guidance: Sharing nudes and semi-nudes: advice for education settings working with children and young people
- > The UKCIS external visitors guidance will help schools and colleges to ensure the maximum impact of any online safety sessions delivered by external visitors
- > National Crime Agency's CEOP education programme: Thinkuknow
- > Public Health England: Every Mind Matters



- > Harmful online challenges and online hoaxes - this includes advice on preparing for any online challenges and hoaxes, sharing information with parents and carers and where to get help and support.

KCSiE 2023, p 34

It is essential that children are safeguarded from potentially harmful and inappropriate online material. Online safety should include appropriate filtering and monitoring on school devices and school networks. School/college is directly responsible for ensuring the appropriate level of security protection procedures in place in order to safeguard the systems, including reference to the cyber security standards.

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

- > **content:** being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism
- > **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
- > **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
- > **commerce** - risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, pupils or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>)

Chatrooms and social networking sites are the more obvious sources of inappropriate and harmful behaviour and pupils are not allowed to access those sites in school. Many pupils own or have access to hand held devices and parents are encouraged to consider measures to keep their children safe when using the internet and social media at home and in the community. Parents may find it useful to refer to <https://www.internetmatters.org/blog/parental-controls/broadband-mobile/> for guidance on putting some restrictions in place to keep children safe online when using 3/4/5G.

SPS will reinforce the importance of children being safe online and parents and carers are likely to find it helpful to understand what systems schools and colleges use to filter and monitor online use. It will be especially important for parents and carers to be aware of what their children are being asked to do online, including the sites they will be asked to access and be clear who from the school or college (if anyone) their child is going to be interacting with online.

Pupils using personal devices in school (e.g. through the BYOD programmes) can access the internet via a dedicated Wifi network. Only authenticated school users can access the network. This network is currently supported by Barracuda and secured by the School's web filtering Censornet which also manages user authentication to access the school internet and the web filtering. The networks and web filtering is monitored regularly so that inappropriate content, of a radicalised or sexualised nature for example, and inappropriate websites are blocked from pupils on site. Further technology also prevents pupils from using VPNs on the School's network to prevent the ability to bypass the web filtering systems.

Mobile devices are prohibited at SPS. For devices where pupils may have access to the internet outside of the Wifi network (such as pupils using a 3/4/5G enabled device content cannot be filtered) or to support pupils' awareness when outside of school, there are pastoral programmes in place (through, for example, PSHEE programmes, visiting speakers, assemblies and pastoral time) to help educate pupils in online safety and responsible use. The risks of using social media to abuse and/or sexually harass their peers, be at the receiving end of such behaviours, share indecent images consensually and non-consensually and view and share pornography and other harmful content are understood. All staff receive online safety training and know to report any concerns about risk to children online in the same way that they notice and report offline concerns. SPS will ensure that online learning tools and systems are used in line with privacy and data protection/GDPR requirements.

SPS' Acceptable Use of ICT Policy and the Procedures for the Safe and Efficient use of BYOD in the Senior School provide safety guidelines for pupils including the need to report suspicious behaviour, including suspected extremism and terrorism.

All staff receive online safety training and are trained to be vigilant about and to report any concerns about risk to children online in the same way that they notice and report offline concerns. The school's **online safety policy** explains how we try to keep pupils safe in school, learning remotely and protect and educate pupils in the safe use of technology. The school has appropriate filters and monitoring systems in place to protect children from potentially harmful online material and the IT team regularly review their effectiveness. The Directors ensure that the leadership team and relevant staff have an awareness of the provision in place and manage them effectively and know how to escalate concerns.

Online bullying and sexting by pupils will be treated as seriously as any other type of bullying and will be managed through our anti-bullying procedures (see 'Youth produced sexual imagery ('sexting') in section 31 below). Serious incidents may be managed in line with our sexual exploitation policy or child protection procedures.

The school's online safety co-ordinator is Mrs Rachel Davenport ([rdavenport@arnoldlodge.com](mailto:rdavenport@arnoldlodge.com)).

### **Safeguarding pupils in online learning and communication between staff and pupils**

Where school staff are delivering lessons online or virtually (e.g. to children unable to attend school due to COVID-19 or ill health), all such lessons will be delivered in accordance with the school's safeguarding and child protection, staff behaviour (code of conduct) and acceptable use of ICT policies. This will ensure that the school's filtering and monitoring software is enabled.

The school will take account of guidance from DfE in relation to the planning and delivery of online learning when it is issued; as well as nationally recognised guidance including [guidance from the UK Safer Internet Centre on safe remote learning](#) and [London Grid for Learning on the use of videos and livestreaming](#).

Staff will always use school owned devices and accounts for the delivery of online/virtual lessons/tutorials. Where possible, applications that facilitate the recording of lessons will be used subject to data protection and retention/storage guidelines. School leaders will randomly sample recorded lessons in order to safeguard pupils/pupils and staff and to ensure that policies are being followed.

Parents will always be informed if remote teaching needs to take place and how it will operate safely for each year group. In addition, if staff need to deliver lessons/tutorials on a one-to-one basis or communicate with vulnerable children who are not attending school via video chat, they are required to notify a Senior Manager in school.

When delivering online/virtual lessons on a one-to-one basis or communicating with vulnerable children who are not attending school via video chat, staff will speak to parents/carers before lessons/conversations commence and when they finish before logging off.

The school will request and obtain written consent from parents/carers including consent to record lessons and video conversations before staff communicate with children online.

It is important that all staff who interact with children online continue to look out for signs that a child may be at risk, distressed for some reason or vulnerable in some other way; and report and record any concerns to the DSL in the normal way. The DSL will respond to any such concern as they would any other safeguarding concern.

The school will ensure that online learning tools and systems are used in line with privacy and data protection/GDPR requirements.

Online/virtual lessons should be timetabled and the headteacher or DSL will be able to drop into any virtual lesson at any time – the online version of entering a classroom for pupil/pupil welfare and safeguarding purposes. Staff delivering online/virtual teaching will be expected to display the same standards of dress and conduct that they would when working face to face in school, modelling appropriate behaviour and presentation to pupils/pupils and parents.

Below are other issues that staff need to take into account when delivering online/virtual lessons or communicating with children online, particularly where webcams are used:

- > Staff and children must be fully dressed and wear suitable clothing, as should anyone else in the household
- > Any computers used should be in appropriate areas, for example not in bedrooms; and the background should be blurred. If it is not possible to blur the background, staff must consider what children can see in the background and whether it would be appropriate in a classroom. This includes photographs, artwork, identifying features, mirrors etc
- > Staff will ensure that resources and videos used are age appropriate – the child may not have support immediately to hand at home if they feel distressed or anxious about content
- > Live classes should be recorded so that if any issues were to arise, the video can be reviewed
- > Live classes will be kept to a reasonable length of time so that children do not have too much screen time and in order to minimise disruption for the family
- > Language must be professional and appropriate, including that used by any family members in the background

- > Staff must only use platforms specified by senior managers and approved by the school's ICT manager/co-ordinator for communication with pupils/pupils
- > Staff should record the length, time, date and attendance of any sessions held

Staff members delivering lessons or communicating with children online/virtually will raise any issues in respect of inappropriate dress, setting, behaviour etc with the child and/or parent immediately and will end the online interaction if necessary. Any such incident will be recorded and reported to the DSL.

If a staff member believes that a child or parent is recording a lesson or conversation without prior consent, the lesson will be brought to an end or the child will be logged out immediately.

In **rare and exceptional circumstances** where staff urgently need to contact a pupil or parent by telephone and do not have access to a school-owned device, they will discuss this with a senior member of staff. If it is agreed there is no alternative to using a personally owned device, staff members will always use 'caller withheld' to ensure the pupil and/or parent is not able to identify the staff member's personal contact details.

Staff also receive advice regarding their personal online activity, use of social networking and electronic communication with pupils, about which there are strict rules. Staff found to be in breach of these rules may be the subject of a referral to the Designated Officer in the Local Authority and/or may be subject to disciplinary action.

### Filtering and monitoring

Considering Stratford Prep's responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn, we will do all that we reasonably can to limit children's exposure to the above risks from the school's IT system.

As part of this process, we will ensure the school has appropriate filters and monitoring systems in place and regularly review their effectiveness. We will ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified. Governing bodies and proprietors should consider the age range of their children, the number of children, how often they access the IT system and the proportionality of costs verses safeguarding risks.

The appropriateness of any filters and monitoring systems has been agreed by the schools and colleges and is informed in part, by the risk assessment required by the Prevent Duty.

To meet this duty, in reference to the Department for Education filtering and monitoring standards our schools and colleges will endeavour to:

- > identify and assign roles and responsibilities to manage filtering and monitoring systems.
- > review filtering and monitoring provision at least annually.
- > block harmful and inappropriate content without unreasonably impacting teaching and learning.
- > have effective monitoring strategies in place that meet their safeguarding needs

Governing bodies and proprietors will review the standards and discuss with IT staff and service providers what more needs to be done to support schools and colleges in meeting this standard.

## 26. Child protection procedures

### Recognising abuse

To ensure that our pupils are protected from harm, we need to understand what types of behaviour constitute abuse and neglect. Abuse and neglect are forms of maltreatment of children. Somebody may abuse or neglect a child by inflicting harm, for example by hitting them, or by failing to act to prevent harm, for example by leaving a small child home alone.

Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by adult men or women or by other children or young people. Staff are trained to understand and recognise indicators of all

four categories of abuse as defined below.

## Abuse

Abuse is form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others.

They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

All staff, but especially the designated safeguarding lead (and deputies), should have the awareness to consider whether children are at risk of abuse or exploitation in situations outside of their families. Extra-familial (also known as contextual safeguarding) harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious violence, county lines, and radicalisation.

**There are four categories of abuse: physical abuse, emotional abuse, sexual abuse and neglect**

### Physical abuse

A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child (this used to be called Munchausen's Syndrome by Proxy, but is now more usually referred to as fabricated or induced illness).

### Emotional abuse

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

### Sexual abuse

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education (see section 31).

### Neglect

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

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

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

Definitions taken from Keeping Children Safe in Education (DfE 2023).

### Indicators of abuse

Physical signs define some types of abuse, for example bruising, bleeding or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The identification of physical signs is complicated, as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or trauma if they 'tell'. It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty. For those reasons it is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the Designated Safeguarding Lead.

**It is the responsibility of staff to report their concerns. It is not their responsibility to investigate or decide whether a child has been abused.**

A child who is being abused or neglected may:

- > have bruises, bleeding, burns, fractures or other injuries
- > show signs of pain or discomfort
- > keep arms and legs covered, even in warm weather
- > be concerned about changing for PE or swimming
- > look unkempt and uncared for
- > change their eating habits
- > have difficulty in making or sustaining friendships
- > appear fearful
- > be reckless with regard to their own or other's safety
- > self-harm
- > frequently miss school or arrive late
- > show signs of not wanting to go home
- > display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn
- > challenge authority
- > become disinterested in their school work
- > be constantly tired or preoccupied
- > be wary of physical contact
- > be involved in, or particularly knowledgeable about drugs or alcohol
- > display sexual knowledge or behaviour beyond that normally expected for their age and/or stage of development; and/or
- > acquire gifts such as money or a mobile phone from new 'friends' or adults recently acquainted with the child's family

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw and each small piece of information will help the DSL to decide how to proceed.

**It is very important that staff report all of their concerns, however minor or insignificant they may think they are – they do not need 'absolute proof' that the child is at risk.**

### Impact of abuse

The impact of child abuse, neglect and exploitation should not be underestimated. Many children do recover well and go on to lead healthy, happy and productive lives, although most adult survivors agree that the emotional scars remain, however well buried. For some children, full recovery is beyond their reach and the rest of their childhood and their adulthood may be characterised by one or more of the following: anxiety, depression or other mental health difficulties, self-harm, eating

disorders, alcohol and substance misuse, unequal and destructive relationships, unfulfilled potential and long-term physical health difficulties.

### **Taking action & Reporting Concerns**

**Any child in any family in any school could become a victim of abuse. Staff should always maintain an attitude of “It could happen here”.**

If a child is suffering or likely to suffer harm or in immediate danger, make a referral to children’s social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or is in immediate danger. **Anyone can make a referral.** Tell the DSL as soon as possible if you make a referral directly.

Key points for staff to remember when taking action are:

- > in an emergency take the action necessary to help the child, for example, call 999
- > report your concern to the DSL as quickly as possible – immediately when there is evidence of physical or sexual abuse and certainly by the end of the day
- > do not start your own investigation; share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family
- > Complete a record of concern, using MyConcern and seek support for yourself if you are distressed or need to debrief
- > Anybody can make a referral (see sections 27 and 28)
- > Referrals to statutory agencies do not require parental consent (see sections 27 and 28)

### **If a member of staff or volunteer is concerned about a pupil’s welfare**

There will be occasions when staff may suspect that a pupil may be at risk without unequivocal evidence. The pupil’s behaviour may have changed, their artwork could be unusual or bizarre, they may write stories or poetry that reveal confusion or distress or physical but inconclusive signs may have been noticed. In these circumstances, staff will try to give the pupil the opportunity to talk. The signs they have noticed may be due to a variety of factors, for example a parent has moved out, a pet has died, a grandparent is very ill or an accident has occurred. Staff are encouraged and supported to ask pupils if they are OK, if there is anything the child would like to talk to them about and if they can help in any way. Staff are trained to do this by asking appropriate open questions which do not lead the child in any particular direction but invite the child to talk about anything if they wish to.

Staff should use MyConcern to record these early concerns (marking them as urgent if necessary). If the pupil does begin to reveal that they are being harmed, staff should follow the advice below. Following an initial conversation with the pupil, if the member of staff remains concerned, they should discuss their concerns with the DSL.

Concerns which do not meet the threshold for child protection intervention will be managed through the Early Help process as in section 8 of this policy.

### **If a child makes a disclosure to a member of staff**

It takes a lot of courage for a child to disclose that they are being abused. They may feel ashamed, particularly if the abuse is sexual. Their abuser may have threatened what will happen if they tell. They may have lost all trust in adults. Or they may believe, or have been told, that the abuse is their own fault. Sometimes they may not be aware that what is happening is abusive.

If a pupil talks to a member of staff about any risks to their safety or wellbeing, **the staff member will need to let the pupil know that they must pass the information on** – staff are not allowed to keep unsafe secrets. The point at which they tell the pupil this is a matter for professional judgement. If they jump in immediately the pupil may think that they do not want to listen but if left until the very end of the conversation, the pupil may feel that they have been misled into revealing more than they would have otherwise.

Pupils are taught about confidentiality and will generally understand the concept of safe and unsafe secrets. They should have a good knowledge and understanding of why staff cannot keep some information confidential but also know that information is passed on to specific people on a ‘need to know’ basis only.

DSLs and Senior Leadership teams should appraise themselves of Part 5 of KCSIE 2023 alongside the further departmental advice titled [Sexual Violence and Sexual Harassment Between Children in Schools and Colleges](#).

During their conversations with pupils, staff will:

- > Allow the child to speak freely
- > Stay calm and do not show that you are shocked or upset
- > Give reassuring nods or words of comfort – ‘I’m glad you told me’/‘Thank you for telling me’; ‘You’re doing very well’; ‘I believe you’; ‘What happened to you is not your fault’/‘This isn’t your fault’; ‘I’m going to do what I can to help you’;
- > Not be afraid of silences – staff must remember how hard this must be for the pupil
- > Listen to and believe them. Allow them time to talk freely and do not ask leading questions (however, it is reasonable to ask questions to clarify understanding and to support a meaningful referral if that is required, e.g. ‘when did this happen’, ‘where did this happen?’)
- > Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- > not automatically offer any physical touch as comfort. It may be anything but comforting to a child who has been abused
- > Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- > Tell the pupil what will happen next
- > Let the pupil know that someone (either the member of staff or another named person, e.g. the DSL) will come to see them before the end of the day
- > Report verbally to the DSL (or headteacher if the child has made an allegation against a member of staff)
- > Seek support if they feel distressed or need to debrief
- > Write up your conversation as soon as possible in the child’s own words. Stick to the facts, and do not put your own judgement on it
- > Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to children’s social care and/or the police directly, and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process
- > reassure the student that they are being taken seriously and that they will be supported and kept safe so that they will not be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment and will not ever be made to feel ashamed for making a report

Bear in mind that some children may:

- Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
- Not recognise their experiences as harmful
- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

None of this should stop you from having a ‘professional curiosity’ and speaking to the DSL if you have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

SPS carefully considers any report of sexual violence and/or sexual harassment. The designated safeguarding lead (or deputy) is likely to have a complete safeguarding picture and be the most appropriate person to advise on the initial response. Important considerations will include:

- > the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however need to be balanced with the school’s or college’s duty and responsibilities to protect other children
- > the nature of the alleged incident(s), including whether a crime may have been committed and consideration of harmful sexual behaviour
- > the ages of the children involved
- > the developmental stages of the children involved
- > any power imbalance between the children. For example, is the alleged perpetrator(s) significantly older, more

- > mature or more confident? Does the victim have a disability or learning difficulty?
- > if the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature)
- > that sexual violence and sexual harassment can take place within intimate personal relationships between peers;
- > are there ongoing risks to the victim, other children, adult pupils or school or college staff; and
- > other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation

## Notifying parents

The school will normally seek to discuss any concerns about a pupil with their parents. This must be handled sensitively and the DSL will make contact with the parent in the event of a concern, suspicion or disclosure.

Our focus is the safety and wellbeing of the pupil. Therefore, if the school believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will be sought first from Children's Social Care.

**The School can make a referral without having parental consent.** Any member of staff or parent can make a direct referral themselves but the DSL usually has the most complete picture of the circumstances so should be consulted if possible.

## 27. Making a referral to Children's Social Care

Keeping Children Safe in Education 2023 emphasises that the DSL (and any deputies) are most likely to have a complete safeguarding picture and be the most appropriate person to advise on the response to safeguarding concerns. The DSL will make a referral to Children's Social Care (and if appropriate the Police) if it is believed that a pupil is suffering or is likely to suffer significant harm.

The pupil (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child or create undue delay. Keeping Children Safe in Education 2023 also emphasises that **all** staff should be aware of the process for making referrals to Children's Social Care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.

## Statutory Assessments

### Children in need

A child in need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989.

### Children suffering or likely to suffer significant harm

Local authorities, with the help of other organisations as appropriate, 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. In addition, children and young people may be at risk of significant harm from outside of their home environment (extra familial harm), this too could constitute that the child may suffer significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare (child protection or MASE) and must be initiated where there are concerns about maltreatment, including all forms of abuse and neglect, female genital mutilation or other so-called honour-based violence, and extra-familial threats like radicalisation and sexual exploitation.

## 28. Submitting child protection referrals

All child protection referrals should be made by completing the Multi Agency Contact form (MAC) and submitting it to the Integrated Front Door (formerly known as MASH) at [triagehub@warwickshire.gov.uk](mailto:triagehub@warwickshire.gov.uk). The form can also be completed online.

All urgent child protection referrals, i.e. where there is an immediate concern about a child's safety should be made in the



first instance by telephoning the Integrated Front Door on 01926 414144. This should be followed by submission of a MAC as above.

If a child is already the subject of an open case to Children's Social Care, the DSL will have the name and contact details of the allocated social worker. Further child protection concerns about any child in those circumstances must be referred directly to the allocated social worker, **not** to the Integrated Front Door. Again, where there is a concern about a child, the DSL should contact the social worker by telephone in the first instance. Any difficulties in contacting the social worker must be escalated to their line manager, **not** to the Integrated Front Door.

Outside of office hours, immediate concerns about a child should be referred to the Emergency Duty Team on telephone number 01926 886922.

If staff are ever concerned that a child is in immediate danger, they will contact the Police by dialling 999.

Staff may seek support directly from the Integrated Front Door Education Lead via 01926 418608 should they consider that necessary.

## **29. Staff reporting directly to child protection agencies**

Staff should ordinarily follow the reporting procedures outlined in this policy.

However, as highlighted above, **all** staff should be aware of the early help process and understand their role in it; and **all** staff should be aware of the process for making referrals to Children's Social Care and for statutory assessments under the Children Act 1989. **Any member of staff may therefore refer their concerns directly to Children's Social Care and/or the Police if:**

- > the situation is an emergency and the DSL, the deputy DSL, the headteacher and/or the chair of governors are all unavailable
- > they are convinced that a direct report is the only way to ensure the child's safety; or
- > for any other reason they make a judgement that a direct referral is in the best interests of the child

In any of those circumstances, staff may make direct child protection referrals and share information without being subject of censure or disciplinary action. However, staff should inform the DSL and/or headteacher at the earliest opportunity that they have made a direct referral unless in their judgement doing so would increase the risk of harm to the child.

If in any doubt, members of staff may consult or seek support from the Integrated Front Door and / or Education Lead via 01926 418608

## **30. What will Children's Social Care do?**

Children's Social Care should make a decision about the type of response that is required within one working day of a referral being made; and should let the referrer know the outcome. This will include determining whether:

- > the child requires immediate protection and urgent action is required
- > whether the child is in need, and should be assessed under section 17
- > there is reasonable cause to suspect the child is suffering, or likely to suffer, significant harm, and whether enquiries must be made and the child assessed under section 47; (Chapter one of Working Together to Safeguard Children provides details of the assessment process
- > any services are required by the child and family and what type of services; and
- > further specialist assessments are required in order to help the local authority to decide what further action to take

The school will follow up if this information is not forthcoming and if, after a referral, the child's situation does not appear to be improving, the school will consider following the VWS escalation procedure to ensure the referred concerns have been addressed and, most importantly, that the child's situation improves.

If Children's Social Care decide to carry out a statutory assessment, school staff will do everything they can to support that assessment, led and supported by the DSL (or deputy) as required.

### 31. Bullying, child-on-child abuse and harmful sexual behaviour

SPS believes that all children have a right to attend school and learn in a safe environment. Children should be free from harm, both from adults and other pupils in the school. Members of staff must report any concern about child-on-child abuse to the DSL. Even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and staff should always maintain vigilance and assume “it could happen here”.

SPS has appropriate systems to allow pupils to report abuse, knowing their concerns will be treated seriously. Pupils are actively encouraged to reach out to any safe adult in school to report abuse, knowing that this will be reported and taken seriously, with their wishes taken into account as part of the process. This is reiterated at the start of every weekly assembly. SPS also has an anonymous reporting tool on the school website, and encourages pupils to use this to report anything of concern to them.

Pupils also have a list of relevant helpline numbers and websites within their Pupil Information Booklet, the most significant being the NSPCC helpline ‘Report Abuse in Education’ (Tel: 0800 136 663). Pupils are encouraged to access this to support them in reporting incidents of child-on-child abuse to trusted adults within the school setting and to the police.

Part 5 of KCSiE 2023 sees the integration of guidance on sexual violence and sexual harassment: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/719902/Sexual\\_violence\\_and\\_sexual\\_harassment\\_between\\_children\\_in\\_schools\\_and\\_colleges.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/719902/Sexual_violence_and_sexual_harassment_between_children_in_schools_and_colleges.pdf)

Children may be harmed by other children or young people. All staff recognise that children can abuse other children and are trained to understand and implement the school’s policy and procedures regarding child-on-child abuse. All child-on-child abuse is unacceptable and will be taken seriously. It is most likely to include, but is not limited to:

- > bullying (including online bullying prejudice-based and discriminatory bullying)
- > abuse in intimate personal relationships between peers
- > physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- > sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- > sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse
- > Consensual and non-consensual sharing of nudes and semi-nude images and or videos (also known as sexting or youth produced sexual imagery)
- > upskirting, which typically involves taking a picture under a person’s clothing (not necessarily a skirt) without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm (upskirting is a criminal offence and may constitute sexual harassment). Anyone of any gender can be a victim
- > teenage relationship abuse – defined as a pattern of actual or threatened acts of physical, sexual or emotional abuse, perpetrated against a current or former partner
- > initiation/hazing - (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element. For example, can be used to induct newcomers into an organisation such as sports team or school groups by subjecting them to a series of potentially humiliating embarrassing or abusing trials which promote a bond between them; and
- > prejudiced behaviour – a range of behaviours which causes someone to feel powerless, worthless or excluded and which relates to prejudices around belonging, identity and equality, in particular prejudices linked to disabilities, special educational needs, ethnic, cultural and religious backgrounds, gender and sexual identity

Bullying is a very serious issue that can cause children considerable anxiety and distress. At its most serious level, bullying can have a disastrous effect on a child’s well-being and in very rare cases has been a feature in the suicide of some young people.

All incidences of bullying, including cyber-bullying and prejudice-based bullying should be reported and will be managed through SPS’s anti-bullying procedures which can be accessed within the SPS Anti-Bullying Policy found on the school website. All pupils and parents receive a copy of the procedures on joining the school and the subject of bullying is addressed at regular intervals in PSHEE education. All members of staff receive a copy of the school’s behaviour policy, which contains the anti-bullying procedures, as part of their induction and are trained to be aware of the harm caused by

bullying and to respond to all incidents of bullying and child-on-child abuse proactively.

SPS takes a zero tolerance approach to abuse. Abuse is abuse and will not be tolerated, minimised or dismissed as ‘banter’; ‘just having a laugh’; ‘part of growing up’; ‘boys being boys’; or ‘girls being girls’. Different gender issues can be prevalent when dealing with child-on-child abuse, for example girls being sexually touched/assaulted or boys being subject to initiation/hazing type violence. Abuse also includes 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).

We recognise that it is more likely that girls will be victims and boys perpetrators. Whilst mindful of the particular vulnerability of women and girls to violence, it is also recognised that boys as well as girls can be abused by members of the opposite as well as the same gender group. Staff will always challenge such abusive behaviours and language.

We recognise that some pupils will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the school’s behaviour policy. However, there will be occasions when a pupil’s behaviour warrants a response under child protection rather than anti-bullying procedures. In particular, research suggests that up to 30 per cent of child sexual abuse is committed by someone under the age of 18.

Occasionally, allegations may be made against pupils by others in the school, which are of a safeguarding nature. Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse and sexual exploitation. Members of staff to whom such allegations are made and/or who become concerned about a pupil’s sexualised behaviour, including any known online sexualised behaviour, should record their concerns in the usual way using MyConcern and report them to the DSL as soon as possible, as with any other safeguarding concern.

It is likely that for an allegation or concern to be addressed under child protection procedures, some of the following features will be found. The allegation or concern:

- > is made against an older pupil and refers to their behaviour towards a younger pupil or a more vulnerable pupil
- > is of a serious nature, possibly including a criminal offence
- > raises risk factors for other pupils in the school
- > indicates that other pupils may have been affected by this pupil
- > indicates that young people outside the school may be affected by this pupil

It is important for SPS to consider the wider environmental factors and context within which child-on-child abuse occurs (please also see *Contextual Safeguarding* below). Such factors may include the potential for bullying and child-on-child abuse to take place across a number of social media platforms and services; and for things to move from platform to platform online. SPS will also consider the potential for the impact of the incident to extend further than SPS’s local community (e.g., for images or content to be shared around neighbouring schools/colleges) and for a victim (or alleged perpetrator(s)) to become marginalised and excluded by both online and offline communities. There is also the strong potential for repeat victimisation in the future if abusive content continues to exist somewhere online. Online concerns can be especially complicated. Support is available from **The UK Safer Internet Centre** at 0344 381 4772 and [helpline@saferinternet.org.uk](mailto:helpline@saferinternet.org.uk) and the **Internet Watch Foundation** at <https://www.iwf.org.uk/>.

### **Child-on-child sexual violence and sexual harassment**

Sexual violence and sexual harassment can occur between two children of any age and gender and between children of the opposite or the same gender from primary through to secondary stage and into colleges. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. As set out in Part one of KCSiE 2023, all staff working with children are advised to maintain an attitude of ‘it could happen here’.

Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physically and verbally) and are never acceptable. While it is important that **all** victims are taken seriously and offered appropriate support, staff are trained to be aware that it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys. All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

This policy largely refers to sexual violence and sexual harassment between pupils/pupils at SPS. However, there may be occasions when pupils/pupils report sexual violence and/or harassment perpetrated by other young people who attend a

different educational provision. In that situation, the DSL will liaise with the DSL at the alleged perpetrator(s) SPS as well as the victim's parents, the Police and Children's Social Care. Support for the victim will be provided as described below, irrespective of which educational provision the alleged perpetrator(s) attends.

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

When referring to sexual violence, this policy uses the definitions of sexual offences in the Sexual Offences Act 2003 as follows:

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

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

**Sexual Assault:** A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

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

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

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

Online sexual harassment may happen on its own or as part of a wider pattern of sexual harassment and/or sexual violence.

Sexual harassment creates an atmosphere that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence. SPS therefore recognises the importance of recognising the nature of, identifying and challenging sexual violence and sexual harassment in its wider approach to safeguarding and promoting the welfare of children; through policies and through the curriculum.

#### **Minimising the risk of sexual violence and sexual harassment at SPS through a mandatory planned curriculum**

SPS recognises its responsibility for the delivery of relationships and sex education through our PSHEE programmes; discipline and behaviour policy; pastoral support system; and staff behaviour policy (code of conduct).

SPS is mindful children of all ages need to learn about respect, consent, body autonomy and healthy relationships; and that children can harm other children. This is delivered through the PSHEE program following the PSHE Association Guidelines, teaching of Protective Behaviours in the Juniors, Mentor time discussions in Seniors, the Girls on Board programme, and by drawing on external expertise. The teaching of this is also embedded in the curriculum and in assemblies. Education includes the themes below (although others may be addressed in line with current affairs):

- > healthy and respectful relationships
- > what respectful behaviour looks like
- > consent
- > gender roles, stereotyping, equality
- > body confidence and self-esteem
- > prejudiced behaviour
- > making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- > not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys"
- > challenging cultures of sexual harassment including behaviour (potentially criminal in nature), such as grabbing

bottoms, breasts and genitalia and flicking bras and lifting up skirts - dismissing or tolerating such behaviours risks normalising them

- > how to raise concerns about themselves or a friend, how to make a report and how any report will be handled

SPS' ethos is central to the school and our inherent values and standards are demonstrated, modelled and promoted throughout all aspects of school life. Staff are made aware, through regular training, that there may be additional barriers to minimising the risk of sexual violence and harassment and how these are addressed, for example by not assuming that indicators of possible abuse such as behaviour, mood and injury relate to a child's disability or special needs. Further exploration would be necessary.

Staff recognise that, in some cases, a child who is perceived by their peers to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

### How SPS will respond to reports of sexual violence and sexual harassment

Schools are advised to refer to specific guidance on sexual violence and sexual harassment;

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/719902/Sexual\\_violence\\_and\\_sexual\\_harassment\\_between\\_children\\_in\\_schools\\_and\\_colleges.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/719902/Sexual_violence_and_sexual_harassment_between_children_in_schools_and_colleges.pdf)

Please refer to annex for further documentation.

SPS will respond to reports in accordance with Part 5 of Keeping Children Safe in Education 2023. Schools may also find it useful to refer to the child-on-child abuse toolkit available at <https://www.farrer.co.uk/globalassets/clients-and-sectors/safeguarding/farrer--co-safeguarding-child-on-child-abuse-toolkit-2019.pdf>.

It is not possible to anticipate every particular set of circumstances and therefore what the SPS's response will be to every case. This policy sets out a set of principles which SPS will consider in responding on a case-by-case basis.

All responses to reports of sexual violence will be subject to an immediate risk and needs assessment undertaken by the DSL (or a deputy), using her/his professional judgement and supported by other agencies, such as Children's Social Care and the Police. The need for a risk and needs assessment in relation to reports of sexual harassment will be considered on a case-by-case basis.

Advice may also be sought from the Integrated Front Door Education Lead.

It is essential that **all** victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the school or college should not be downplayed and should be treated equally seriously. A victim **should** never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor **should** a victim ever be made to feel ashamed for making a report. **It is important to explain that the law is in place to protect children and young people rather than criminalise them**, and this should be explained in such a way that avoids alarming or distressing them.

### Risk assessment

The risk and needs assessment will consider:

- the victim, especially their protection and support;
- the alleged perpetrator(s) (if she/he/they attend the same SPS); and
- all the other children (and, if appropriate, adult pupils and staff) at the school or college, especially any actions that are appropriate to protect them.

The DSL (or a deputy) should ensure they are engaging with Children's Social Care and specialist services as required. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required. SPS's risk assessment should not replace the detailed assessments of expert professionals. Any such professional assessments should be used to inform SPS's approach to supporting and protecting pupils and updating our own risk assessment.

### Action following a report of sexual violence and/or sexual harassment - what to consider

The DSL (or deputy) is likely to have a complete safeguarding picture and will therefore be the most appropriate person to lead SPS's initial response. Important considerations will include:

- > the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims will be given as much control as is reasonably possible over decisions

regarding how any investigation will be progressed and any support that they will be offered. However, if the victim asks SPS not to tell anyone about the sexual violence or sexual harassment, the DSL (or a deputy) will have to balance the victim's wishes against their duty to protect the victim and other children. It is likely to be justified and lawful to share the information if doing so is in the public interest, e.g. to protect the victim and other young people from harm and to promote the welfare of children

- > the nature of the alleged incident(s), including: whether a crime may have been committed and consideration of harmful sexual behaviour
- > the ages of the children involved
- > the developmental stages of the children involved
- > any power imbalance between the children. For example, is the alleged perpetrator(s) /significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?
- > if the alleged incident is a one-off or a sustained pattern of abuse
- > that sexual violence and sexual harassment can take place within intimate personal relationships between children
- > importance of understanding intra familial harms and any necessary support for siblings following incidents
- > whether there are ongoing risks to the victim, other children, adult pupils or SPS staff
- > informing parents/carers (unless this would put the victim at greater risk)
- > only sharing information with those staff who need to know in order to support the children involved and/or be involved in any investigation. For instance, teachers may be asked to monitor the victim's welfare without needing to know that they are a victim of sexual violence or harassment

### **Children sharing a classroom – initial considerations following a report of sexual violence**

Any report of sexual violence is likely to be traumatic for the victim. However, reports of rape and assault by penetration are likely to be especially difficult for the victim and close proximity with the alleged perpetrator(s) is/are likely to be especially distressing. Whilst SPS establishes the facts of the case and starts the process of liaising with Children's Social Care and the Police, the alleged perpetrator(s) will usually be removed from any classes they share with the victim. Consideration will also be given to how best to keep the victim and alleged perpetrator(s) a reasonable distance apart on SPS premises and on transport to and from SPS, where appropriate. These actions are in the best interests of both children and should not be perceived to be a judgment on the guilt of the alleged perpetrator(s).

For other reports of sexual violence and sexual harassment, the proximity of the victim and alleged perpetrator(s) and considerations regarding shared classes, sharing SPS premises and transport, will be considered immediately.

In all cases, the initial report should be carefully evaluated, reflecting the consideration set out at paragraph 470 KCSIE, the wishes of the victim, the nature of the allegations and the protection of all children in the school or college will be especially important when considering any immediate actions.

Consideration also needs to be given to the fact that the alleged perpetrator may also be a victim of exploitation and may be in a position of coercion and control.

### **Responding to the report**

If an offence has been committed, the Police will be informed. It is the prerogative of parents and victims to make complaints to the Police directly but SPS will also speak to the Police in order to ensure effective action is taken to safeguard other young people as well as the victim.

If a child has suffered significant harm, a referral will be made to Children's Social Care via the Front Door in order to ensure that the needs of both the victim and perpetrator(s)/s are the subject of professional risk assessments by social workers. Similarly, any instance of sexual activity between pupils on the school site will always be referred to Children's Social Care.

Responses to all incidents of both sexual violence and sexual harassment will be underpinned by the principles of:

- zero tolerance of sexual violence and sexual harassment
- support for both the victim and alleged perpetrator(s), particularly pending the outcome of investigations
- all parties have an ongoing right to an education and are safest if they remain in SPS subject to appropriate risk assessments and risk management
- exclusion will be avoided unless that is the only realistic option to keep one or more parties safe

In principle, there are four possible responses to an allegation or concern about sexual violence or harassment on the part of a pupil/pupil:

#### **1. Manage internally**

In some cases of sexual harassment, e.g. one-off incidents, the school or college may take the view that the children

concerned are not in need of early help or statutory intervention and that it would be appropriate to handle the incident internally, perhaps through utilising the behaviour policy and anti-bullying procedures, speaking to the child and her/his parents, making expectations of future behaviour clear (in writing where appropriate) and by providing pastoral support. Careful consideration will be given to the need to separate the victim and alleged perpetrator(s) in lessons (as with sexual assaults) pending investigation.

## 2. Early help

The school or college may decide that the child/ren involved do not require statutory interventions but may benefit from early help, which can be particularly useful to address non-violent harmful sexual behaviour and may prevent escalation of sexual violence.

A safeguarding record will be maintained of all concerns, discussions, decisions and reasons for decisions for all responses as in 1. And 2.

SPS will be part of discussions with statutory safeguarding partners to agree the levels for the different types of assessment and services to be commissioned and delivered, as part of the local arrangements. SPS refers to and follows the Warwickshire safeguarding partners local threshold document (Spectrum of Support) which includes the process for the local early help assessment and the type and level of early help services to be provided, and DSLs (and their deputies) are familiar with this document.

## 3. Referrals to Children's Social Care

Where a child has been harmed, is at risk of harm, or is in immediate danger, SPS will make a referral to Children's Social Care. All instances of sexual activity between pupils/pupils on the school premises will be referred to Children's Social Care. All instances of sexual violence perpetrated by a child under ten years of age will be referred to Children's Social Care. This will facilitate a consultation about the role of the Police. Whilst the age of criminal responsibility is 10 years, the starting principle of reporting to the Police via the Integrated Front Door remains. The Police will take a welfare, rather than a criminal justice, approach.

SPS will generally inform parents or carers, unless there are compelling reasons not to (i.e. if informing a parent or carer is going to put the child at additional risk or create undue delay). Any such decision should be made with the support of Children's Social Care.

Collaborative working will help ensure that the best possible package of co-ordinated support is implemented for the victim and, where appropriate, the alleged perpetrator(s) and any other children that require support.

However, SPS will not wait for the outcome (or even the start) of a Children's Social Care investigation before protecting the victim and other children in SPS. The DSL (or a deputy) will work closely with Children's Social Care (and other agencies as required) to ensure any actions SPS takes do not jeopardise a statutory investigation. The risk assessment as above will help inform any decision. Consideration of safeguarding the victim, alleged perpetrator(s), any other children directly involved in the safeguarding report and all children at the school or college should be **immediate**.

In some cases, Children's Social Care will review the evidence and decide a statutory intervention is not appropriate. SPS (generally led by the DSL or a deputy) will refer again if we believe the child remains in immediate danger or at risk of harm. If a statutory assessment is not appropriate, the DSL (or a deputy) will consider other support mechanisms such as early help, specialist support and pastoral support.

## 4. Reporting to the Police

Any report to the Police will generally be in parallel with a referral to Children's Social Care (as above).

Where SPS receives a report of rape, assault by penetration or sexual assault, the starting point is this should be passed on to the Police. It is the prerogative of victims and their parents/carers to make direct complaints to the Police. However, the school should also be very clear with victims and parents/carers that the school has a duty to ensure the Police are informed when an alleged crime has been committed in order to safeguard other young people.

Where a serious crime is reported, SPS can report directly to the local Police station. However, in most circumstances, SPS will consult with the Integrated Front Door in the first instance in order to ensure that both the Police and Children's Social Care are informed.

Where a report has been made to the Police, SPS should consult the Police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator(s) and their parents or carers. They should also discuss the best way to protect the victim and their anonymity.

In some cases, it may become clear very quickly, that the Police (for whatever reason) will not take further action. In such circumstances, it is important that the school or college continue to engage with specialist support for the victim as required.

The school will also be informed by the Police or Children's Social Care about referrals made directly to those agencies from other sources (e.g. family members, family friends, parents of other children) in relation to alleged sexual offences or harmful sexual behaviours displayed by pupils/pupils inside and/or outside school.

In all such circumstances, the school may be required to attend a strategy meeting under VWS inter-agency child protection procedures in order to facilitate risk management and planning with other agencies.

The school is committed to participating in plans both to provide pupils who are at risk from other children and those pupils who may present a risk to other children with appropriate services to address any concerns and, wherever possible, to facilitate ongoing access to education in school for all children concerned, subject to appropriate risk assessments and risk management plans.

### **Subsequent considerations**

The needs and wishes of the victim should continue to be paramount (along with protecting the child) as the case progresses. Wherever possible, the victim, if they wish, should be able to continue in their normal routine. Overall, the priority should be to make the victim's daily experience as normal as possible, so that the school or college is a safe space for them.

Similarly, the alleged perpetrator(s) has an ongoing right to an education and should be able to continue in their normal routine subject to the ongoing risk assessment and the needs of the victim.

Where a pupil is subject of bail conditions, SPS will work with Children's Social Care and the Police to manage any implications and safeguard all pupils/pupils concerned without jeopardising the Police investigation. If a pupil is convicted or receives a caution for a sexual offence, SPS will update its risk assessment, ensure relevant protections are in place for all pupils and consider any suitable action in light of the behaviour policy. If the perpetrator(s) remains at SPS along with the victim, SPS will meet with the pupil and her/his parents/carers to revisit and reiterate in writing expectations of the perpetrator(s) in terms of future behaviour and complying with any restrictions and arrangements put in place to safeguard the victim and other pupils.

In the light of possible publicity, speculation and interest within the pupil and parent body, the school will consider any other measures necessary to safeguard both the victim and perpetrator(s), especially from any bullying or harassment (including online).

In respect of a not guilty verdict or a decision not to progress with a criminal prosecution, SPS recognises that this will likely be traumatic for the victim and will continue to offer support. The alleged perpetrator(s) is also likely to require ongoing support for what will have likely been a difficult experience.

Support will be tailored on a case-by-case basis. Support can include emotional and practical support for victims from Children and Young People's Independent Sexual Violence Advisors in the specialist sexual violence sector; and/or provision of a designated trusted adult in SPS of the pupil's choice to talk to about their needs. Every effort will be made to avoid isolating the victim, in particular from supportive peer groups, but it is recognised that there may be times when a victim finds it difficult to maintain a full-time timetable and may express a wish to withdraw from lessons and activities. SPS will provide a physical space for the victim to withdraw.

Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, SPS will consider any suitable sanctions in light of the behaviour policy, including consideration of permanent exclusion. In all but the most exceptional of circumstances, the rape or assault will constitute a serious breach of discipline and lead to the view that allowing the perpetrator(s) to remain in SPS would seriously harm the education or welfare of the victim (and potentially other pupils or pupils).

Where the perpetrator(s) is/are going to remain at SPS, the principle would be to continue keeping the victim and perpetrator(s) in separate classes and continue to consider the most appropriate way to manage potential contact on school and college premises and transport. The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases.

SPS will have a difficult balancing act to consider. On one hand it needs to safeguard the victim (and the wider pupil/pupil body) and on the other hand provide the alleged perpetrator(s) with an education, safeguarding support as appropriate and implement any disciplinary sanctions. Support (and sanctions) will be considered on a case-by-case basis. An alleged perpetrator(s) may potentially have unmet needs (in some cases these may be considerable) as well as potentially posing a risk of harm to other children. Harmful sexual behaviours in young children may be (and often are) a symptom of either



their own abuse or exposure to abusive practices and or materials. Advice will be taken, as appropriate, from Children's Social Care, specialist sexual violence services and the Police.

If a perpetrator(s) (alleged or convicted) does move to another educational institution (for any reason), SPS will make the new educational institution aware of any ongoing support needs and where appropriate, potential risks to other children and staff. The DSL will take responsibility to ensure this happens as well as transferring the child protection file.

### **Youth produced sexual imagery ('sexting')**

The school will act in accordance with advice endorsed by DfE '*Sexting in schools and colleges: responding to incidents and safeguarding young people*' (UK Council for Child Internet Safety 2017) – [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/609874/6\\_2939\\_SP\\_NCA\\_Sexting\\_In\\_Schools\\_FINAL\\_Update\\_Jan17.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/609874/6_2939_SP_NCA_Sexting_In_Schools_FINAL_Update_Jan17.pdf)

All incidents of youth produced sexual imagery (YPSI) will be dealt with as safeguarding concerns. The primary concern at all times will be the welfare and protection of the young people involved. [UKCIS](#)

Young people who share sexual imagery of themselves or their peers are breaking the law. However, as highlighted in national guidance, it is important to avoid criminalising young people unnecessarily. The school will therefore work in partnership with external agencies with a view to responding proportionately to the circumstances of any incident.

All incidents of YPSI should be reported to the DSL as with all other safeguarding issues and concerns. Staff will not make their own judgements about whether an issue relating to YPSI is serious enough to warrant a report to the DSL. What may seem like less serious concerns to individual members of staff may be more significant when considered in the light of other information known to the DSL, which the member of staff may not be aware of.

If staff become concerned about a YPSI issue in relation to a device in the possession of a pupil (e.g. mobile phone, tablet, digital camera), the member of staff will secure the device (i.e. it should be confiscated). This is consistent with DfE advice *Searching, Screening and Confiscation – Advice for headteachers, school staff and governing bodies (DfE 2018)*, page 11 'After the search'.

Staff will not look at or print any indecent images. The confiscated device will be passed immediately to the DSL (see 'Viewing the imagery' below).

The DSL will discuss the concerns with appropriate staff and speak to young people involved as appropriate. Parents/carers will be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm.

If, at any point in the process, there is concern that a young person has been harmed or is at risk of harm a referral will be made to Children's Social Care and/or the Police via the Integrated Front Door immediately.

The Police will always be informed when there is reason to believe that indecent images involve sexual acts and/or any child in the imagery is under 13 years of age.

The DSL will make a judgement about whether a reported YPSI incident is 'experimental' as in section 12 above or 'aggravated'. Aggravated incidents involve criminal or abusive elements beyond the creation, sending or possession of sexual images created by young people. These include possible adult involvement; criminal or abusive behaviour by young people such as sexual abuse, extortion or threats; malicious conduct arising from personal conflicts; coercion; an imbalance of power, e.g. an older pupil pressurising a younger or vulnerable pupil to create and share an indecent image; or creation or sending or showing of images without the knowledge or against the will of a young person who is pictured.

Aggravated incidents of sexting will usually be referred to Warwickshire's Integrated Front Door for advice about whether or not a response by the Police and/or Children's Social Care is required. This will facilitate consideration of whether:

- > there are any offences that warrant a Police investigation
- > child protection procedures need to be invoked
- > parents/carers require support in order to safeguard their children
- > a Multi-Agency Child Exploitation (MACE) meeting is required

- > any of the perpetrator(s) and/or victims require additional support. This may require the initiation of an Early Help Pathway to Change

Examples of aggravated incidents include:

- > evidence of adult involvement in acquiring, creating or disseminating indecent images of young people (possibly by an adult pretending to be a young person known to the victim)
- > evidence of coercing, intimidating, bullying, threatening and/or extortion of pupils by one or more other pupils to create and share indecent images of themselves
- > pressure applied to several pupils (e.g. all female pupils in a class or year group) to create and share indecent images of themselves
- > pressuring a pupil who does not have the capacity to consent (e.g. due to their age, level of understanding or special educational needs) or with additional vulnerability to create and share indecent images of themselves
- > dissemination of indecent images of young people to a significant number of others with an intention to cause harm or distress (possibly as an act of so-called 'revenge porn', bullying or exploitation)
- > what is known about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage or are violent
- > sharing of indecent images places a young person is at immediate risk of harm, for example the young person is presenting as suicidal or self-harming

The DSL will make a judgement about whether or not a situation in which indecent images have been shared with a small number of others in a known friendship group with no previous concerns constitutes an aggravated incident; or whether the school is able to contain the situation in partnership with all parents of the pupils involved, arrange for the parents to ensure that all indecent images are deleted and that the young people involved learn from the incident in order to keep themselves safe in future.

In the latter instance, the DSL will usually consult with the Police and/or Children's Social Care through the Integrated Front Door to check that no other relevant information is held by those agencies and to ensure an agreed response is documented before proceeding.

**Viewing the imagery** – adults should **not** view youth produced sexual imagery unless there is good and clear reason to do so. Wherever possible, the DSL's responses to incidents will be based on what they have been told about the content of the imagery.

Any decision to view imagery will be based on the DSL's professional judgement. Imagery will never be viewed if the act of viewing will cause significant distress or harm to a pupil.

If a decision is made to view potentially indecent images, the DSL will be satisfied that viewing:

- > is the only way to make a decision about whether to involve other agencies (i.e. it is not possible to establish the facts from the young people involved)
- > is necessary to report the image to a website, app or suitable reporting agency to have it taken down, or to support the young person or parent in making a report
- > is unavoidable because a young person has presented an image directly to a staff member or the
- > imagery has been found on a school device or network

If it is necessary to view the imagery then the DSL will:

- > discuss and agree the decision to do so beforehand with the headteacher, Children's Social Care or the MASH Education Lead
- > ensure viewing is undertaken by the DSL or Deputy DSL with delegated authority from the headteacher
- > ensure viewing takes place with another member of staff present in the room, ideally the headteacher, another DSL or a member of the senior leadership team. The other staff member
- > does not need to view the images
- > wherever possible ensure viewing takes place on school or college premises, ideally in the headteacher or DSL's office
- > ensure wherever possible that images are viewed by a staff member of the same sex as the young person in the imagery
- > record the viewing of the imagery in the pupil's safeguarding record, including who was present, why the image was viewed and any subsequent actions; and ensure this is signed and dated and meets the wider standards set out by Ofsted for recording safeguarding incidents

**Deletion of images** – if the school has decided that other agencies do not need to be involved, then consideration will be given to deleting imagery from devices and online services to limit any further sharing of the imagery.

Stratford Prep has committed to participating in Operation Guarding, insert the following:  
*The school/college works in partnership with Warwickshire Police and Warwickshire Children’s Services to support pupils who are affected by **self-generated indecent imagery of themselves in an online space.***

*This scheme is called Operation Guarding.*

When the Police become aware of an indecent image linked to a pupil, the headteacher and the Designated Safeguarding Lead will receive a confidential and secure Email, notifying them simply that there has been an incident and that the child may need support.

On receipt of any such notification, the headteacher and/or DSL will ensure that teachers and other staff directly in contact with affected children support them with due kindness, care and sensitivity. In addition to supporting children, the process means that the school will also be able to offer parents and carers support as appropriate, if they reach out.

The information will be managed and stored with the utmost sensitivity and discretion consistent with all other confidential safeguarding records.

### **32. Serious violence**

All staff are made aware of indicators that children are at risk from or are involved with serious violent crime; and are trained to record and report any concern about children at risk of or involved in perpetrating serious violence as with any other safeguarding concern. Indicators may include increased absence, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts could also indicate that children have been approached by or are involved with individuals associated with criminal gangs and/or criminal exploitation.

### **33. Contextual safeguarding**

Safeguarding incidents and/or behaviours can be associated with factors both outside children’s home environments and outside school and/or can occur between children outside the school. The DSL, deputy DSLs and all staff will consider the context within which such incidents and/or behaviours occur. Contextual safeguarding means that assessments of children should consider wider environmental factors present in a child’s life that are a threat to their safety and/or welfare. Staff will listen to children and be vigilant about any signs or indicators that would suggest children may be at risk in the community and will share intelligence with the Police in order to prevent children suffering harm. SPS will provide as much information as possible when asked to do so as part of a police investigation and/or when making referrals to Children’s Social Care, thus allowing any investigation or assessment to consider all the available evidence and the full context of any abuse.

### **34. Child sexual exploitation and child criminal exploitation**

**Child sexual exploitation (CSE)** is a form of child sexual abuse. **Child criminal exploitation (CCE)** is a form of child abuse. Both occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual and/or criminal activity:

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

The victim may have been sexually and/or criminally exploited even if the sexual/criminal activity appears consensual. CSE and CCE do not always involve physical contact; they can also occur through the use of technology.

CSE and CCE can affect any child or young person, female or male, under the age of 18 years, including

16 and 17-year olds who can legally give consent to have sex.

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

CSE is a serious crime and can have a long-lasting adverse impact on a child's physical and emotional health.

It may also be linked to other criminal activity including trafficking and illegal drugs. Drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns.

Criminal exploitation of children can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence. It can be perpetrated by individuals or groups; males or females; and young people or adults. It is typified by some form of power imbalance in favour of those perpetrating the exploitation. As well as age, the power imbalance can also be due to other factors including gender, cognitive ability, physical strength, status and access to economic or other resources.

Children and young people are often unwittingly drawn into sexual and/or criminal exploitation through grooming which may present as the offer of friendship and care, gifts, drugs, alcohol and sometimes accommodation.

Child criminal exploitation may include activities such as:

- > a child travelling outside the area in which she/he lives in order to transport, distribute or sell drugs or money for others by whom they are being exploited. This form of criminal activity and exploitation is referred to as **county lines** (see below)
- > a child committing crimes on behalf of or at the behest of others because they, their friends or relatives have been threatened, deceived or manipulated
- > a child being forced to shoplift or pickpocket
- > a child being forced to threaten other young people
- > a child being forced to work in a cannabis factory
- > a child being forced or manipulated into committing vehicle crime or threatening/committing serious violence
- > a child can be threatened (and their families) with violence or entrap and coerce them into debt
- > a child being coerced into carrying weapons or begin to carry a knife for protection
- > a child being forced to commit crime in order to settle actual or fabricated debts
- > gang membership, which may lead to the child being exploited to do something illegal or dangerous in return for kudos/status in the gang
- > a child being encouraged or manipulated to commit crime via social media
- > a child receiving food, money, kudos or status in return for storing a weapon or drugs for others

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

All staff are trained to be vigilant about and report indicators of CSE and CCE including:

- > children appearing with money, clothes, mobile phones, etc. without plausible explanation
- > children who associate with other young people involved in exploitation
- > children in relationships with controlling or significantly older individuals or groups
- > children frequenting areas known for sex work and/or criminal activity
- > children who associate with gangs and/or become isolated from their peers/social networks
- > children receiving excessive texts/phone calls
- > multiple callers (unknown adults or peers) to children
- > concerning use of internet or other social media by children
- > increasing secretiveness around children's behaviours
- > children presenting inappropriate sexualised behaviour for their age and/or with sexually transmitted infections and/or becoming pregnant
- > children self-harming or presenting with significant changes in their emotional well-being
- > children who misuse drugs and alcohol
- > children who go missing for periods of time or regularly come home late;

- > children who regularly miss school or education, have unexplained absences or do not take part in education;
- > children being exposed to or perpetrating serious levels of violence; and/or being manipulated or forced into violence towards others by somebody who is exploiting them (for further information see Preventing youth Violence and Gang Involvement (2015))
- > evidence of/suspicions of children suffering physical or sexual assault

Although the following vulnerabilities increase the risk of child sexual and/or criminal exploitation, not all children with these indicators will be exploited and child sexual and criminal exploitation can occur without any of these issues:

- > having a prior experience of neglect, physical and/or sexual abuse
- > lack of a safe/stable home environment, now or in the past (domestic violence or parental substance misuse, mental health issues or criminality, for example)
- > recent bereavement or loss
- > social isolation or social difficulties
- > absence of a safe environment to explore sexuality
- > economic vulnerability
- > homelessness or insecure accommodation status
- > connections with other children and young people who are being sexually and/or criminally exploited
- > family members or other connections involved in adult sex work and/or other criminal activity
- > having a physical or learning disability
- > being children in care (particularly those in residential care and those with interrupted care histories)
- > issues/anxieties about sexual identity

The school teaches children about consent and the risks of sexual and criminal exploitation in the PSHEE and SRE curriculum. A common feature of sexual and criminal exploitation is that the child often does not recognise the coercive nature of the relationship and does not see her/himself as a victim. The child may initially resent what she/he perceives as interference by staff but staff must act on their concerns, as they would for any other type of abuse.

All staff are trained to report all concerns about CSE and CCE to the DSL immediately. The DSL will consider the need to make a referral to Children's Social Care via the MASH (see sections 27 and 28 above) as with any other child protection concern and with particular reference to WS procedures. Parents will be consulted and notified as above.

Following a referral to Children's Social Care, a Multi-Agency Child Exploitation (MACE) meeting may be convened under WS inter-agency safeguarding procedures. The school will attend and share information at MACE meetings as required. Parents and young people will be invited to attend MACE meetings by Children's Social Care as appropriate.

### **County Lines**

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other forms of "deal line".

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

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

For further information see: [County Line Guidance 2018](#) and County Lines Toolkit for Professionals - The Children's Society in partnership with Victim Support and National Police Chiefs' Council

### **35. So-called 'honour based' abuse**

So-called 'honour-based' abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of a family and/or community. Such crimes include Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrator(s). It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take.

Staff will be alert to the possibility of a child being at risk of HBA or already having suffered HBA.

All forms of so-called HBA are abuse (regardless of the motivation) and staff will record and report any concerns about a child who might be at risk of HBA to the Designated Safeguarding Lead as with any other safeguarding concern. The DSL will consider the need to make a referral to the Police and/or Children's Social Care as with any other child protection concern; and may also contact the Forced Marriage Unit on 020 7008 0151 or via email at [fmf@fco.gov.uk](mailto:fmf@fco.gov.uk) for advice as necessary.

Multi-agency statutory guidance for dealing with forced marriage, which can both be found at The right to choose: government guidance on forced marriage - GOV.UK ([www.gov.uk](http://www.gov.uk))

### **Female genital mutilation**

Female genital mutilation (FGM) is a form of child abuse. It is the collective name given to a range of procedures involving the partial or total removal of the external female genitalia for non-medical reasons or other injury to the female genital organs. It has no health benefits and harms girls and women in many ways. The practice, which is most commonly carried out without anaesthetic, can cause intense pain and distress with long-lasting harmful consequences, including difficulties in childbirth.

FGM is carried out on girls of any age, from young babies to older teenagers and adult women, so school staff are trained to be aware of risk indicators. Many such procedures are carried out abroad and staff will be particularly alert to suspicions or concerns expressed by female pupils about going on a long holiday during the summer vacation period.

In England, Wales and Northern Ireland, the practice is illegal under the Female Genital Mutilation Act 2003. Any person found guilty of an offence under the Female Genital Mutilation Act 2003 is liable to a maximum penalty of 14 years imprisonment or a fine, or both.

(See <https://www.gov.uk/government/publications/female-genital-mutilation-guidelines> for further information).

If staff have a concern that a girl may be at risk of FGM, they will record their concern and inform the DSL as they would any other safeguarding concern. The DSL will discuss the concern with Children's Social Care with a view to making a referral and will inform the Police directly as appropriate.

Indications that FGM may already have taken place may include a child:

- > having difficulty or looking uncomfortable when walking, sitting or standing
- > spending longer than normal in the bathroom or toilet due to difficulties urinating
- > spending long periods of time away from a classroom during the day with bladder or menstrual problems
- > having frequent urinary, menstrual or stomach problems
- > having prolonged or repeated absences from school or college, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return
- > being reluctant to undergo normal medical examinations
- > confiding in a member of staff without being explicit about the problem due to embarrassment or fear
- > talking about pain or discomfort between her legs

Teachers are subject to a statutory duty defined by Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) to report to the Police personally where they discover (e.g. by means of a disclosure) that an act of FGM appears to have been carried out on a girl who is aged under 18. This is known as mandatory reporting. Information on when and how to make a report can be found at:

<https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information>.

Teachers in that situation will record their concerns and inform the DSL, who will support the teacher in making a direct report to the Police. A referral will also be made to Children's Social Care. To report FGM directly, please visit <https://www.warwickshire.police.uk/advice/advice-and-information/caa/child-abuse/female-genital-mutilation-fgm/> or call the national FGM helpline on 0800 028 3550.

### **Forced Marriage**

A forced marriage is a marriage in which a female (and sometimes a male) does not consent to the marriage but is coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse.

A forced marriage is not the same as an arranged marriage. In an arranged marriage, which is common in several cultures, the families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the

arrangement remains with the prospective spouses.

In a forced marriage situation, children may be married at a very young age, and well below the age of consent in England. School staff will be particularly alert to suspicions or concerns raised by a pupil about being taken abroad and not being allowed to return to England.

Since June 2014 forcing someone to marry has become a criminal offence in England and Wales under s.121 of the Anti-Social Behaviour, Crime and Policing Act 2014, 2023 – see <https://www.gov.uk/forced-marriage> for further information).

### 36. Protecting Children from Radicalisation and Extremism

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

Some children are vulnerable to extremist ideology and radicalisation. Protecting children from the risk of radicalisation is part of the school's wider safeguarding duties and is similar in nature to protecting children from other forms of harm and abuse. As such, the Designated Safeguarding Lead is responsible for the school's strategy for protecting children from those risks and the school identifies those who may be at risk of radicalisation.

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. Extremism is the vocal or active opposition to fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces. Even very young children have been exposed, in rare circumstances, to extremism at home and elsewhere including online.

As children get older, they look for adventure and excitement and they may start to ask questions about their identity and belonging. During that stage of their development, they are vulnerable to extremist groups that may claim to offer answers, identity and a social network apparently providing a sense of belonging. Many of those extremist groups make sophisticated use of the internet and social media to target young people and spread their ideology, making young people more vulnerable to being influenced by extremist ideas. Young people who feel isolated or disaffected in some way are particularly vulnerable to radicalisation as they are other forms of abuse and exploitation.

The school has defined responsibilities to ensure that children are safe from terrorist and extremist material when accessing the internet in school.

During the process of radicalisation, it is possible to intervene to prevent vulnerable people being radicalised. The school is committed to preventing pupils from being radicalised and drawn into any form of extremism or terrorism. The school promotes the values of democracy, the rule of law, individual liberty, mutual respect and tolerance of those with different faiths and beliefs by providing pupils with opportunities through the curriculum to discuss issues of religion, ethnicity and culture and learn how to discuss and debate points of view; and by ensuring that all pupils are valued and listened to within school.

School staff receive training that provides them with both the information they need to understand the risks affecting children and young people in this area; and a specific understanding of how to identify individual children who may be at risk of radicalisation and how to support them. Staff are trained to report all concerns about possible radicalisation and extremism to the DSL immediately as they would any other safeguarding concern, identifying early indicators of possible radicalisation including changes in behaviour and attitudes to learning; and expressions of interest in extremist ideas along with a tolerance towards potential violence to certain members of society.

The school recognises the importance of providing a safe space for children to discuss controversial issues; and building their resilience and the critical thinking skills they need in order to challenge extremist perspectives. However, the DSL (or deputy) will make appropriate referrals to the Police PREVENT team and Channel programme in respect of any pupil whose behaviour or comments suggest that they are vulnerable to being radicalised and drawn into extremism and terrorism in order to ensure that children receive appropriate support.

Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages.

As a Channel partner, the school or college may be asked to attend a Channel panel to discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support.

The school will discuss any concerns about possible radicalisation identified in school with a child's parents/carers as with any other safeguarding or child protection issue unless there is reason to believe that doing so would place the child at risk; and will also support parents/carers who raise concerns about their children being vulnerable to radicalisation. Subject to consultation with the Police PREVENT team and in the interests of making proportionate responses, the school may offer support to children and their families through the provision of early help as appropriate.

The school expects all staff, volunteers, governors, visiting practitioners, contractors and individuals or agencies that hire school premises to behave in accordance with the school's Staff Behaviour Policy (code of conduct), will challenge the expression and/or promotion of extremist views and ideas by any adult on school premises or at school events and, when necessary, will make appropriate referrals in respect of any such adult.

Parents and staff may find the website [www.educateagainsthate.com](http://www.educateagainsthate.com) informative and useful. The website is designed to equip school and college leaders, teachers and parents with the information, tools and resources they need to recognise and address extremism and radicalisation in young people and how best to support them. The website provides information on training resources for teachers, staff and school and college leaders.

The DfE telephone helpline and mailbox can be used by school staff and governors seeking no-urgent advice: [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk) 020 7340 7264.

As part of the school's overall safeguarding arrangements and ongoing action plan for improvement, the DSL will consider identified local issues; intelligence from pupils, parents, staff and partner agencies; and new information from national issues and learning to review practice and procedures in order to keep pupils safe.

### **37. Children who are children in care, were previously children in care or who have a social worker**

The most common reason for children becoming children in care is as a result of abuse or neglect. Children who were previously children in care potentially remain vulnerable. Schools should consider extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place. The school ensures that staff have the necessary skills and understanding to keep children who are children in care and children who were previously children in care safe and ensures that appropriate staff have information about a child's children in care status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child. The designated teacher for children who are children in care and previously children in care and the DSL hold details of the social workers for all children who are children in care or were previously children in care; and the name and contact details of the Local Authority's virtual head for children who are children in care.

#### **Children with a social worker & Care Leavers**

The school/setting recognises that when a child has a social worker, that is an indicator that she/he may be more vulnerable to harm than other children as well as facing barriers to educational attainment in relation to attendance, learning, behaviour and poor mental health issues.

The school/setting will take those issues and needs into account when making plans to support children who have a social worker.

Local authorities have ongoing responsibilities to young people who cease to be children in care and become care leavers. That includes keeping in touch with them, preparing an assessment of their needs and appointing a Personal Advisor who develops a pathway plan with the young person. This plan describes how the local authority will support the care leaver to participate in education or training. The DSL will have details of the local authority Personal Advisor appointed to guide and support all care leavers; and should liaise with them as necessary regarding any issues of concern affecting a care leaver.



### 38. Private fostering arrangements

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (*under 18 if the child has a disability*) by someone other than a parent or close relative\*, in their own home, with the intention that it should last for 28 days or more. Children in care by the local authority or who are placed in a residential school, children's home or hospital are not considered to be privately fostered.

\*A close relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.

On admission to the school, we will take steps to verify who has parental responsibility for the child and the relationship of the adults accompanying the child who is being registered. Private fostering occurs in all cultures including British culture and a private fostering arrangement may start at any age.

Whilst most privately fostered children are appropriately supported, children in care and remain safe and well, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases, privately fostered children are affected by abuse and neglect; have been trafficked; are sexually or criminally exploited; or suffer modern-day slavery.

Parents and private foster carers both have a legal duty to inform Children's Social Care in the relevant local authority at least six weeks before the arrangement is due to start. Not to do so is a criminal offence.

Schools have a mandatory duty to report to Children's Social Care in the local authority where they are aware or suspect that a child is subject to a private fostering arrangement.

School staff should notify the designated safeguarding lead when they become aware of or suspect private fostering arrangements. The designated safeguarding lead will speak to the family of the child involved to check that they are aware of their duty to inform the LA. The school will also fulfil its duty to inform the local authority of the private fostering arrangement.

### 39. Related safeguarding portfolio policies

- > Behaviour
- > Staff Code of Conduct, Handbook and Planner
- > Children Missing Education
- > Safer Recruitment
- > Complaints
- > Health and safety
- > Attendance
- > Online safety
- > Mobile phone use
- > Equality
- > Relationships and sex education
- > First aid
- > Curriculum
- > Designated teacher for looked-after and previously looked-after children
- > Privacy notices
- > Whistleblowing Procedure
- > Anti-bullying Policy
- > Discipline and Behaviour Policy

- > IT Acceptable Use Policy

#### 40. Domestic abuse

The Act creates a statutory definition of domestic abuse based on the [existing cross-government definition](#).

'**Abusive behaviour**' is defined in the act as any of the following:

- > physical or sexual abuse
- > violent or threatening behaviour
- > controlling or coercive behaviour
- > economic abuse
- > psychological, emotional or other abuse

For the definition to apply, both parties must be aged 16 or over and 'personally connected'.

'**Personally connected**' is defined in the act as parties who:

- > are married to each other
- > are civil partners of each other
- > have agreed to marry one another (whether or not the agreement has been terminated)
- > have entered into a civil partnership agreement (whether or not the agreement has been terminated)
- > are or have been in an intimate personal relationship with each other have, or there has been a time when they each have had, a parental relationship in relation to the same child are relatives

The Act recognises children as victims of domestic abuse in their own right, statutory obligations to victims of domestic abuse are afforded to children too.

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. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

All concerns about children being affected by domestic abuse will be reported to the DSL as with any other safeguarding concern. The DSL will respond to the report by consulting Children's Social Care in order to establish whether a referral is required or the situation should be managed by discussion with parents/carers and possibly the offer of early help.

The school works in partnership with Warwickshire Police and Warwickshire Children's Services to support pupils who are affected by incidents of domestic violence and abuse. This scheme is called Operation Encompass.

When the Police attend any incident of domestic violence or abuse in any household in which a pupil of the school lives, the headteacher and the Designated Safeguarding Lead will receive a confidential and secure Email on the morning of the next school day, notifying them simply that there has been an incident and that the child may need support. On receipt of any such notification, the headteacher and/or DSL will ensure that teachers and other staff directly in contact with affected children support them with due kindness, care and sensitivity. In addition to supporting children, the process means that the school will also be able to offer parents and carers support as appropriate **if they reach out**.

*The information will be managed and stored with the utmost sensitivity and discretion consistent with all other confidential safeguarding records.*

#### 41. Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL (and any deputies) refer any concerns to the *Local Housing Authority* so they can raise/progress concerns at the earliest opportunity. Indicators

that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and or discussion with the Local Housing Authority should be progressed as appropriate, this does not, and should not, replace a referral into Children's Social Care where a child has been harmed or is at risk of harm.

In most cases school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised that in some cases 16 and 17-year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's services will be the lead agency for these young people and the DSL (or a deputy) will ensure appropriate referrals are made based on the child's circumstances.

## **42. Special Circumstances**

### **Work experience**

The school has detailed procedures to safeguard pupils undertaking work experience, including arrangements for checking people who provide placements and supervising pupils on work experience which are in accordance with the guidance in Keeping Children Safe in Education 2023.

### **Children staying with host families**

The school may arrange for pupils to stay with a host family during a foreign exchange trip or sports tour. In such circumstances the school follows the guidance in Keeping Children Safe in Education 2023, Annex D to ensure that hosting arrangements are as safe as possible.

Some overseas pupils may reside with host families during school terms and we will work with the Local Authority to check that such arrangements are safe and suitable.

It is not possible for schools to obtain criminal record information from the DBS about adults abroad. Where pupils stay with families abroad, we will agree with partner schools a shared understanding of the arrangements in place. Staff will use their professional judgement to satisfy themselves that the arrangements are appropriate to safeguard the pupils, which will include ensuring pupils understand who to contact should an emergency occur, or a situation arise which makes them feel uncomfortable. We will also make parents aware of these arrangements.

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

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. SPS will access guidance highlighted in Keeping Children Safe in Education 2023, which explain each step of the process and support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

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

Approximately 200,000 children have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. SPS will seek to support pupils/pupils in this position through pastoral care, early help and discussions with parents/carers and other family members as appropriate.

### **Local issues**

Insert information about any issues that may be specific to the school's local area or population, for example gang activity, youth violence or any active extremist groups from which children may need to be safeguarded.

## **43. What to do if you have a concern about safeguarding practices – escalation**

All staff should feel able to raise concerns about poor or unsafe practices and potential failures within the safeguarding regime. You have a responsibility to speak up if you have a concern and initially should discuss this with the DSL.

If you need further assistance, the following steps should be followed allowing for resolution at each stage:

1. Discuss your concerns with a DDSL and ask them to discuss your concerns with the DSL and report back to you
2. If you remain concerned, follow the Whistleblowing Policy – see above
3. Call the NSPCC whistleblowing helpline 0800 0280285 or email their helpline on [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

## Appendix I

### Standards for Effective Child Protection Practice in Schools

*The school's child protection and safeguarding responsibilities are inspected under the 'Leadership and Management' judgement in Ofsted inspections. The following standards may assist schools in evaluating their practice. They should be used jointly by the Designated Safeguarding Lead and the Designated Governor for Safeguarding to ensure the school is effective in safeguarding and child protection matters.*

In best practice, schools:

1. Have an ethos in which children feel secure, their viewpoints are valued, and they are encouraged to talk and are listened to
2. Provide suitable support and guidance so that pupils have a range of appropriate adults to whom they can turn if they are worried or in difficulties
3. Work with parents to build an understanding of the school's responsibilities to safeguard and promote the welfare of all children and a recognition that this may occasionally require children to be referred to investigative agencies as a constructive and helpful measure
4. Ensure all staff are able to identify children who may benefit from early help; provide co-ordinated offers of early help; and ensure that children receive the right help at the right time to address concerns and risks and prevent issues escalating
5. Are vigilant in cases of suspected child abuse, recognising the signs and symptoms, have clear procedures whereby all members of staff report such cases to the Designated Safeguarding Lead or – in her/his absence – the deputy Designated Safeguarding Lead, and are aware of Local Authority and WS procedures so that information is passed on

effectively to the relevant professionals

6. Monitor children who have been identified as in need of early help or at risk; maintain clear records of pupils' progress and welfare *in a secure place*; maintain sound policies on confidentiality; provide appropriate information to other professionals; and submit reports to and attend child protection conferences
7. Provide and support regular child protection training and updates for **all** school staff and ensure that Designated Safeguarding Leads attend update training every two years to ensure their skills and expertise are up to date; and ensure that targeted funding for this work is used solely for this purpose
8. Contribute to an inter-agency approach to safeguarding and child protection by developing effective and supportive liaison with other agencies
9. Use the curriculum to teach children about safeguarding and raise their awareness and build confidence so that pupils have a range of contacts and strategies to identify risk, know who they can talk to about anything causes them concern and understand the importance of protecting others
10. Provide clear policy statements for parents, staff and children and young people on this and on both positive behaviour policies and the school's approach to bullying
11. Have a clear understanding of the various types of bullying and child-on-child abuse – face to face, online, physical, verbal, sexual, prejudice based and indirect – and act promptly and firmly to combat it, making sure that pupils are aware of the school's position on this issue and who they can contact for support
12. Have a clear understanding of the signs and impact of racist, disability, homophobic, transphobic and teenage relationship abuse; and a clear commitment to identifying and challenging those forms of abuse in order to safeguard children and maintain the safeguarding culture of the school
13. Take particular care that pupils with SEN, disabilities and/or mental health difficulties in mainstream and special schools, who may be especially vulnerable to abuse, are supported effectively with particular attention paid to ensuring that those with communication difficulties are enabled to express themselves to a member of staff with appropriate communication skills
14. Have a clear policy about the handling of allegations of abuse by members of staff, ensuring that all staff are fully aware of the procedures and that they are followed correctly at all times, using the guidance set out in Keeping Children Safe in Education 2023 and WS inter-agency child protection procedures;
15. Have a written whole school safeguarding policy, which is produced, owned and regularly reviewed by all school staff, taking into account the views of children, parents/carers and governors, and which clearly outlines the school's position and positive action in respect of the aforementioned standards;
16. Ensure that specified information is passed on in a timely manner to the Local Authority and WS for monitoring purposes;
17. Have a Single Central Record in place that fully complies with the guidance in Keeping Children Safe in Education 2023.

## **Reference Documents**

Keeping Children Safe in Education (DfE 2023)

Working Together to Safeguard Children (DfE 2018)

Warwickshire Safeguarding (WS) inter-agency safeguarding procedures –

<https://www.safeguardingwarwickshire.co.uk/safeguarding-children/i-work-with-children-and-young-people/interagency-safeguarding-procedures>

Child Protection Record Keeping Guidance (WCC Education Safeguarding Service)

What to do if You're Worried a Child is being Abused 2015 – Advice for Practitioners (HMG 2015)

Children missing education – Statutory guidance for local authorities (DfE 2016)

Sexting in schools and colleges: responding to incidents and safeguarding young people (UK Council for Child Internet Safety 2017)

## Further Information, Advice and Support

For advice and support about any safeguarding matter in school, please contact:  
Education Lead on 01926 418608 or email [MASHeducationlead@warwickshire.gov.uk](mailto:MASHeducationlead@warwickshire.gov.uk)

For strategic advice and support about safeguarding matters in school, please contact:  
The Headteacher Coach on 01926 413625 or email: [carllewis@warwickshire.gov.uk](mailto:carllewis@warwickshire.gov.uk)  
(This email is not monitored)

## Integrated Safeguarding Training

For information about a range of integrated safeguarding training courses, please contact:  
Heidi Saunders (Targeted Support Officer and Training Lead)  
07879113776  
[heidisaunders@warwickshire.gov.uk](mailto:heidisaunders@warwickshire.gov.uk)

Sophie Morley (Training Administrator)  
01926 742601  
[sophiemorley@warwickshire.gov.uk](mailto:sophiemorley@warwickshire.gov.uk)

## Appendix II: Helpful Information

This section is designed to provide information that facilitates understanding of key terminology and indicators:

### Child Sexual Exploitation

In February 2017 the DfE published updated guidance on Child Sexual Exploitation, in the form of an update to Working Together 2018. The updated guidance includes the following definition:

*Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.*

Children may receive something in exchange for performing sexual activities. This can include food, accommodation, drugs, alcohol, cigarettes, affection, gifts, or money. Children rarely report child sexual exploitation, so it is important that staff are aware of the potential indicators. These include;

- > Acquisition of money, clothes, mobile phones etc. without plausible explanation
- > Gang-association and/or isolation from peers/social networks
- > Exclusion or unexplained absences from school, college or work
- > Leaving home/care without explanation and persistently going missing or returning late
- > Excessive receipt of texts/phone calls

- > Returning home under the influence of drugs/alcohol
- > Inappropriate sexualised behaviour for age/sexually transmitted infections
- > Evidence of/suspicions of physical or sexual assault
- > Relationships with controlling or significantly older individuals or groups
- > Multiple callers (unknown adults or peers)
- > Frequenting areas known for sex work
- > Concerning use of internet or other social media
- > Increasing secretiveness around behaviours; and
- > Self-harm or significant changes in emotional well-being

Staff have been made aware of the updated guidance and recognise that no school, community or social group is immune to the risk of child sexual exploitation, including online, and it can affect both boys and girls. Children can be perpetrators as well as victims, and victims may not realise that they have been exploited

Although the following vulnerabilities increase the risk of child sexual exploitation, it must be remembered that not all children with these indicators will be exploited. Child sexual exploitation can occur without any of these issues.

- > Having a prior experience of neglect, physical and/or sexual abuse
- > Lack of a safe/stable home environment, now or in the past (domestic abuse or parental substance misuse, mental health issues or criminality, for example)
- > Recent bereavement or loss
- > Social isolation or social difficulties
- > Absence of a safe environment to explore sexuality
- > Economic vulnerability
- > Homelessness or insecure accommodation status
- > Connections with other children and young people who are being sexually exploited
- > Family members or other connections involved in adult sex work
- > Having a physical or learning disability
- > Being in care (particularly those in residential care and those with interrupted care histories); and
- > Sexual identity

More information can be found in: Child sexual exploitation: Definition and a guide for practitioners (DfE 2017)

### **Child Criminal Exploitation (CCE)**

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact: it can occur through the use of technology. CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (**known as ‘county lines’**) forced to shoplift or pickpocket, or to threaten other young people. It can also include vehicle crime and threatening or committing serious violence. Children may become trapped as they or their families may be threatened with violence and they may be coerced or entrapped into debt or into carrying weapons. They may carry weapons as a form of protection. Children involved in CCE need to be treated as victims themselves. Whilst the majority of children involved in CCE are boys, girls are at risk too.

Some of the following can be indicators of CCE:

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

### **County lines (see section 34: CSE and CCE)**

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily

crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of “deal line”.

### **FGM (Female Genital Mutilation) (see section 35: So called “honour-based” abuse)**

FGM is a crime committed usually within the scope of honour-based violence. FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs for non-medical reasons. It has no health benefits and harms girls and women in many ways. It involves removing and damaging healthy and normal female genital tissue, and hence interferes with the natural function of girls’ and women’s bodies. The age at which girls undergo FGM varies enormously according to the community. The procedure may be carried out when the girl is new born, during childhood or adolescence, just before marriage or during the first pregnancy. However, the majority of cases of FGM are thought to take place between the ages of 5 and 8 and, therefore, girls within that age bracket are at a higher risk. FGM is illegal in the UK. On the 31 October 2015, it became mandatory for teachers to personally report known cases of FGM to the police.

### **So called “Honour-Based Violence (HBV)” (see section 35)**

Honour-based violence is a violent crime or incident which may have been committed to protect or defend the honour of the family or community, including FGM, forced marriage, and practices such as breast ironing. It is often linked to family or community members who believe someone has brought shame to their family or community by doing something that is not in keeping with their unwritten rule of conduct. Abuse committed in the context of preserving “honour” often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take

### **Children Missing From Education (see section 10: CME)**

Please also see our CME Policy which is available on request.

### **Elective Home Education**

The DfE (and Stratford Prep School) recognise that many home educated children have an overwhelmingly positive learning experience. However, it can also mean some children are less visible to the services that are there to keep them safe and supported in line with their needs.

Where a parent/carer has expressed their intention to remove a child from Stratford Prep School with a view to educating at home, we ensure that the key professionals work together to coordinate a meeting with parents/carers where possible. Ideally, this would be before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child. This is particularly important where a child has SEND, is vulnerable, and/or has a social worker.

### **Forced Marriage (see section 35)**

In the case of children: ‘a forced marriage is a marriage in which one or both spouses cannot consent to the marriage and duress is involved. Duress can include physical, psychological, financial, sexual and emotional pressure.’ In developing countries 11% of girls are married before the age of 15. One in 3 victims of forced marriage in the U.K. are under 18. It is important that all members of staff recognise the presenting symptoms, how to respond if there are concerns and where to turn for advice.

### **Definition of harm & significant harm - adoption & children act 2002 (section 10)**

- > “Ill treatment or the impairment of health or development (impairment suffered from seeing or hearing the ill treatment of another).”
- > ‘Development’ means physical, intellectual, emotional, social or behavioural development
- > ‘Health’ means physical or mental health
- > ‘Ill treatment’ includes sexual abuse and forms of ill treatment which are not physical
- > NB: The Adoption & Children Act 2002 s120 amended the definition of harm to include those instances where a child may witness domestic violence

### **Recognition of significant harm.**

Significant harm includes an allegation of a sexual nature or parents whose behaviour may present risk because of:

- > Domestic violence, drug and alcohol abuse and mental health problems
- > Any physical injury caused by assault or neglect which requires medical attention



- > Repeated incidents of physical harm
- > Any contact with a person assessed as presenting a risk to children
- > Children who live in low emotional warmth, high criticism environments
- > Children who suffer from persistent neglect
- > Children who may be involved in prostitution
- > Other circumstances where professional judgement and/or evidence suggest a child's health, development or welfare may be significantly harmed.

### **The symptoms of stress and distress**

An abused child will usually show signs of stress and distress. Possible signs of abuse include, but are not limited to, those listed below. Many of these may, of course, have nothing to do with abuse, but are worth consideration in trying to understand the child's behaviour:

- > A drop in school performance
- > Aggressive or hostile behaviour
- > Difficulties in relationships with peers
- > Excessively affectionate or sexual behaviour towards adults or other children
- > Regression to more immature forms of behaviour
- > Self-harming or suicidal behaviour
- > No reasonable or consistent explanation for a pupil's injuries, or a pattern of injuries
- > Disturbed sleep

In addition to the information provided in Section 15 on Radicalisation and Extremism and in this section on Abuse, staff can refer to Annex A of KCSIE 2023 for information on further specific areas of concern about vulnerability, including:

- > Children and the court system
- > Children with family members in prison
- > Child criminal exploitation
- > Domestic abuse
- > Homelessness

Staff should ensure that they are familiar with the information provided within Annex B of KCSIE 2023 and if they have any concerns report them to the DSL.

### **Private Fostering (see section 38)**

### **Cyber Crime**

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

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

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the DSL will consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests. (Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety). Additional advice can be found at: Cyber Choices, 'NPCC- When to call the Police' and National Cyber Security Centre [www.ncsc.gov.uk/](http://www.ncsc.gov.uk/).

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

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

National Referral Mechanism is the UK's framework for identifying and supporting victims of modern slavery. There are some common myths about modern slavery, such as misconceptions that UK nationals cannot be victims and that a person cannot be a victim if they reject offers of help. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance. Modern slavery: how to identify and support victims (2021)

### **Child abduction and community safety incidents**

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for a child. Child abduction can be committed by a parent or by other family members, by people known but not related to the victim, or by strangers. Stratford Prep School is therefore aware of such eventualities and be vigilant around this, particularly at the start and the end of the school day.

Other community safety incidents in the vicinity of the school can also raise concerns from children and parents, such as people loitering nearby or unknown adults engaging children in conversation. Stratford Prep School ensures that staff on duty are aware of these risks and the school encourages an open culture of reporting such concerns, however minor or insignificant the issue may seem.