



**THE PERSE**  
**SCHOOL**  
CAMBRIDGE

## **Policy on Safeguarding and Child Protection**

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**The Perse School**

January 2024

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KEY SCHOOL CONTACTS				In hours	Out of hours/term activities
<b>Governors</b>					
3-18	Mr Jonathan Scott	Chair of Governors	<a href="mailto:jscott@perse.co.uk">jscott@perse.co.uk</a>	01223 403893 (via Head's PA)	
3-18	Dr Denise Williams	Nominated Governor	<a href="mailto:dwilliams@perse.co.uk">dwilliams@perse.co.uk</a>	01223 4038793 (via Head's PA)	
<b>Designated Safeguarding Leads<sup>1</sup></b>					
Pelican School (incl EYFS setting)	Tim Ankin	Deputy Head	<a href="mailto:teankin@perss.co.uk">teankin@perss.co.uk</a>	01223 403940	01223 403815
Prep School	Tom Knowles	Deputy Head	<a href="mailto:tpknowles@perse.co.uk">tpknowles@perse.co.uk</a>	01223 403925	01223 403814
Upper School	Amy Cockerill	Assistant Head (Safeguarding)	<a href="mailto:arcockerill@perse.co.uk">arcockerill@perse.co.uk</a>	01223 403817	01223 403824
<b>Adult Designated Safeguarding Lead</b>					
Upper School	Ed Wiseman	Deputy Head (Pupil Development and Welfare)	<a href="mailto:ewwiseman@perse.co.uk">ewwiseman@perse.co.uk</a>	01223 403824	01223 403824
<b>Deputy Designated Safeguarding Leads</b>					
Pelican School (incl EYFS setting)	Francesca Heftman	Head	<a href="mailto:fkheftman@perse.co.uk">fkheftman@perse.co.uk</a>	01223 403940	
	Rebecca MacDowell	Pastoral Coordinator	<a href="mailto:rmacdowell@perse.co.uk">rmacdowell@perse.co.uk</a>	01223 403920	
Prep School	Laura Robertson	Assistant Head (Pastoral)	<a href="mailto:lrobertson@perse.co.uk">lrobertson@perse.co.uk</a>	01223 403920	
	Rebecca MacDowell	Pastoral Coordinator	<a href="mailto:rmacdowell@perse.co.uk">rmacdowell@perse.co.uk</a>	01223 403920	
Upper School	Danielle Creese	Assistant Head (Welfare)	<a href="mailto:dcreese@perse.co.uk">dcreese@perse.co.uk</a>	01223 403800	
	Ed Wiseman	Deputy Head (Pupil Development and Welfare)	<a href="mailto:ewwiseman@perse.co.uk">ewwiseman@perse.co.uk</a>	01223 403800	
	Fraser Robertson	Director of ICT	<a href="mailto:directorofICT@perse.co.uk">directorofICT@perse.co.uk</a>	01223 403800	
	Emma Rothwell	Assistant Head (IE&D) and Chaplain	<a href="mailto:erothwell@perse.co.uk">erothwell@perse.co.uk</a>	01223 403800	
<b>Clerk to the Governors</b>					
3-18	Maggie Hastings	Clerk to the Governors	<a href="mailto:mahastings@perse.co.uk">mahastings@perse.co.uk</a>	01223 403800	

<sup>1</sup> When the Designated Safeguarding Lead of each School is not available, a Deputy Designated Safeguarding Lead can be contacted on the same number.

KEY SCHOOL CONTACTS				In hours	Out of hours/term activities
<b>Designated Teacher for Looked After Children</b>					
3-18	Ed Wiseman	Deputy Head (Pupil Development and Welfare)	<a href="mailto:ewwiseman@perse.co.uk">ewwiseman@perse.co.uk</a>	01223 403896	
<b>Prevent Leads</b>					
Pelican School (including EYFS setting)	Tim Ankin	Deputy Head	<a href="mailto:teankin@perse.co.uk">teankin@perse.co.uk</a>	01223 403940	
Prep School	Tom Knowles	Deputy Head	<a href="mailto:tpknowles@perse.co.uk">tpknowles@perse.co.uk</a>	01223 403920	
Upper School	Amy Cockerill	Assistant Head (Safeguarding)	<a href="mailto:arcockerill@perse.co.uk">arcockerill@perse.co.uk</a>	01223 403800	
<b>Domestic Abuse Leads</b>					
Pelican School (inc EYFS setting)	Tim Ankin	Deputy Head	<a href="mailto:teankin@perse.co.uk">teankin@perse.co.uk</a>	01223 403940	
Prep School	Laura Robertson	Assistant Head (Pastoral)	<a href="mailto:lrobertson@perse.co.uk">lrobertson@perse.co.uk</a>	01223 403920	
Upper School	Amy Cockerill	Assistant Head (Safeguarding)	<a href="mailto:arcockerill@perse.co.uk">arcockerill@perse.co.uk</a>	01223 403817	
<b>Mental Health Leads</b>					
Pelican School (inc EYFS setting)	Tim Ankin	Deputy Head	<a href="mailto:teankin@perse.co.uk">teankin@perse.co.uk</a>	01223 403940	
Prep School	Rebecca MacDowell	Pastoral Coordinator	<a href="mailto:rmacdowell@perse.co.uk">rmacdowell@perse.co.uk</a>	01223 403920	
Upper School	Danielle Creese	Assistant Head (Welfare)	<a href="mailto:dcreese@perse.co.uk">dcreese@perse.co.uk</a>	01223 403800	
<b>Online Safety Leads</b>					
Pelican School (incl EYFS setting)	Tim Ankin	Deputy Head	<a href="mailto:teankin@perse.co.uk">teankin@perse.co.uk</a>	01223 403940	
Prep School	Tobias Bown	Assistant Head (Academic)	<a href="mailto:tabown@perse.co.uk">tabown@perse.co.uk</a>	01223 403920	
Upper School	Amy Cockerill	Assistant Head (Safeguarding)	<a href="mailto:arcockerill@perse.co.uk">arcockerill@perse.co.uk</a>	01223 403817	

KEY EXTERNAL CONTACTS		Tel
Education Safeguarding Team	<a href="mailto:ECPS.General@cambridgeshire.gov.uk">ECPS.General@cambridgeshire.gov.uk</a>	
Early Help Hub (EHH)	<a href="mailto:Early.helpub@cambridgeshire.gov.uk">Early.helpub@cambridgeshire.gov.uk</a>	01480 376666
Local Authority Designated Officer	<a href="mailto:LADO@cambridgeshire.gov.uk">LADO@cambridgeshire.gov.uk</a>	01223 727967
<b>Cambridgeshire County Council Social Care Team and Multi Agency Safeguarding Hub (MASH)</b>		
Cambridgeshire Direct Contact Centre	Monday to Friday 9am-5pm (excl. bank holidays)	0345 045 5203
Out of Hours Emergency Duty Team		01733 234724
Referral forms	<a href="https://safeguardingcambspeterborough.org.uk/concerned/">https://safeguardingcambspeterborough.org.uk/concerned/</a>	
<b>Cambridgeshire &amp; Peterborough Safeguarding Partnership Board</b>		
<a href="http://www.safeguardingcambspeterborough.org.uk/children-board">http://www.safeguardingcambspeterborough.org.uk/children-board</a>		
<b>Police</b>		
Emergencies		999
Child Abuse Investigations Unit		101
School's Police Liaison Officer		101
<b>Advice and Support about Extremism</b>		
Police		101
Non-Emergency DfE advice (Monday – Friday 11am – 3pm excl. bank holidays)	<a href="mailto:counter-extremism@education.gsi.gov.uk">counter-extremism@education.gsi.gov.uk</a>	020 7340 7264
<b>Reporting Female Genital Mutilation</b>		
Police Child Abuse Investigation Unit		101
Cambridgeshire County Council (Out of Hours Duty Team)		01733 234724
<b>NSPCC whistleblowing helpline</b>		
National Society for the Prevention of Cruelty to Children (NSPCC) Weston House, 42 Curtain Road London EC2 A 3NH	<a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>	0800 028 0285
<b>NSPCC Report Abuse in Education Helpline</b> – a dedicated helpline for children and young people who have experienced abuse at school, and for worried adults and professionals that need support and guidance, including for non-recent abuse		
<a href="https://www.nspcc.org.uk/about-us/news-opinion/2021/sexual-abuse-victims-schools-helpline/">https://www.nspcc.org.uk/about-us/news-opinion/2021/sexual-abuse-victims-schools-helpline/</a>	help@nspcc.org.uk	0800 136 663
<b>UK Safer Internet Centre</b>		
<a href="https://saferinternet.org.uk/">https://saferinternet.org.uk/</a>	<a href="mailto:helpline@saferinternet.org.uk">helpline@saferinternet.org.uk</a>	0344 381 4772 (Mon-Fri 10am – 4pm)
<b>Reporting Serious Wrongdoing to the Charity Commission</b>		
<b>Further guidance see:</b> <a href="https://www.gov.uk/guidance/report-serious-wrongdoing-at-a-charity-as-a-worker-or-volunteer">https://www.gov.uk/guidance/report-serious-wrongdoing-at-a-charity-as-a-worker-or-volunteer</a>		
	<a href="mailto:Whistleblowing@charitycommission.gsi.gov.uk">Whistleblowing@charitycommission.gsi.gov.uk</a>	
<b>Cambridgeshire and Peterborough Mental Health Crisis Support</b>		
First Response Service		111 (option 2)

## 1 Aims

1.1 This is the *Safeguarding and Child Protection Policy* and procedures of the Perse School (**School**). The School comprises the **Relevant Schools** (the Perse Pelican Nursery and Pre-Preparatory School including the EYFS setting (**Pelican School**), the Perse Preparatory School (**Prep School**) and the Perse Upper School (**Upper School**)).

1.2 The aims of this policy are as follows:

1.2.1 to actively safeguard and promote the welfare of children, staff and others who come into contact with the School and protect them from harm;

1.2.2 to actively promote the well-being of pupils;

1.2.3 to have clear procedures in place for dealing with and referring concerns about the welfare of any individual and allegations of abuse, neglect and/or exploitation;

1.2.4 to raise awareness about how to report concerns and how they will be investigated, whether they are current or historic in nature;

1.2.5 to raise staff awareness about the School's safeguarding expectations;

1.2.6 to raise awareness about how to report concerns and ensure they are appropriately investigated;

1.2.7 to ensure staff are competent to carry out their safeguarding responsibilities and feel supported in this role;

1.2.8 to ensure consistent good safeguarding practice throughout the School to include the promotion of a zero tolerance approach to child-on-child sexual violence and harassment in which pupils are confident to report it and staff are confident to identify and respond to it; and

1.2.9 to promote a whole school culture of safety, equality and protection.

1.3 Every pupil should feel safe and protected from any form of abuse and neglect.

1.4 All staff should understand the indicators of abuse and neglect and specific safeguarding risks so that they can identify them and report any concerns about children. The indicators and key safeguarding risks for the School community are set out in Appendix 1.

1.5 Members of the School community (to include alumni) should also feel able to raise any safeguarding concerns, whether current or non-recent, safe in the knowledge that they will be supported, the matter will be handled sensitively and appropriate action taken.

1.6 Anyone about whom a concern is raised should feel confident that they will be supported and the matter will be handled sensitively and that appropriate action will be taken.

1.7 This policy forms part of the School's whole school approach to promoting child safeguarding and wellbeing, which seeks to involve everyone at the School to ensure that the best interests of pupils underpins and is at the heart of all decisions, systems, processes and policies.

1.8 Although this policy is necessarily detailed, it is important to the School that its safeguarding policies and procedures are transparent, clear and easy to understand for staff, pupils, parents and carers. The School welcomes feedback on how it can improve its policies.

## 2 Scope and application

2.1 This policy applies to the whole School including the Early Years Foundation Stage (**EYFS**).

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

### **3 Regulatory framework**

- 3.1 This policy has been prepared to meet the School's responsibilities under:
- 3.1.1 Education (Independent School Standards) Regulations 2014;
  - 3.1.2 Statutory framework for the Early Years Foundation Stage (DfE, September 2021);
  - 3.1.3 Education and Skills Act 2008;
  - 3.1.4 Childcare Act 2006;
  - 3.1.5 Children and Social Work Act 2017;
  - 3.1.6 Data Protection Act 2018 and UK General Data Protection Regulation (UK GDPR);
  - 3.1.7 Equality Act 2010;
  - 3.1.8 Charities Act 2011; and
  - 3.1.9 Human Rights Act 1998.
- 3.2 This policy has regard to the following guidance and advice:
- 3.2.1 [Keeping children safe in education \(DfE, September 2023\) \(KCSIE\)](#);
  - 3.2.2 [Keeping children safe in out-of-school settings \(DfE, April 2022\)](#);
  - 3.2.3 [Working together to safeguard children \(HM Government, updated July 2022\) \(WTSC\)](#) ;
  - 3.2.4 [Behaviour in schools: advice for headteachers and school staff \(DfE, July 2022\)](#);

- 3.2.5 [Disqualification under the Childcare Act 2006 \(DfE, updated August 2018\);](#)
- 3.2.6 [Revised Prevent duty guidance for England and Wales \(HM Government, updated April 2021\);](#)
- 3.2.7 [Managing the risk of radicalisation in your education setting \(DfE, October 2022\);](#)
- 3.2.8 [Channel duty guidance: protecting vulnerable people from being drawn into terrorism \(HM Government, February 2021\);](#)
- 3.2.9 [Multi-agency statutory guidance on female genital mutilation \(HM Government, updated July 2020\);](#)
- 3.2.10 [Virginity testing and hymenoplasty: multi-agency guidance \(DHCS, July 2022\);](#)
- 3.2.11 [Forced marriage resource pack \(Home Office, May 2023\);](#)
- 3.2.12 [What to do if you're worried a child is being abused: advice for practitioners \(HM Government, March 2015\);](#)
- 3.2.13 [Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers \(HM Government, updated July 2018\);](#)
- 3.2.14 [Sharing nudes and semi-nudes: advice for education settings working with children and young people \(December 2020\);](#)
- 3.2.15 [Children missing education \(DfE, updated September 2016\);](#)
- 3.2.16 [Child sexual exploitation: definition and a guide for practitioners local leaders and decision makers working to protect children from child sexual exploitation \(DfE, February 2017\);](#)
- 3.2.17 [Searching, screening and confiscation: advice for schools \(DfE, July 2022\);](#)
- 3.2.15 [Listening to and involving children and young people \(DfE, January 2014\);](#)
- 3.2.16 [Meeting digital and technology standards in schools and colleges \(DfE, March 2023\);](#)
- 3.2.17 [Safeguarding children \(links to government guidance and resources\);](#)
- 3.2.18 [Teaching online safety in schools \(DfE, June 2023\);](#)
- 3.2.19 [Harmful online challenges and online hoaxes \(DfE, February 2021\);](#)
- 3.2.20 [Safeguarding children and protecting professionals in early years settings: online safety considerations \(UK Council for Internet Safety, February 2019\);](#)
- 3.2.21 [Educate Against Hate \(HM Government\);](#)
- 3.2.22 [Strategy for dealing with safeguarding issues in charities \(Charity Commission, updated December 2017\);](#)
- 3.2.23 [Regulatory alert to charities - safeguarding \(Charity Commission, December 2017\);](#)
- 3.2.24 [Safeguarding and protecting people for charities and trustees \(Charity Commission, June 2022\);](#)
- 3.2.25 [How to report a serious incident in your charity \(Charity Commission, updated June 2019\);](#)



- 3.2.26 [Report serious wrongdoing at a charity as a worker or volunteer \(Charity Commission, updated June 2019\);](#)
  - 3.2.27 [Reporting a serious incident in your charity when it involves a partner \(Charity Commission, December 2019\);](#)
  - 3.2.28 [Guidance on reporting safeguarding concerns in a charity \(Department for Digital, Culture, Media and Sport, March 2022\);](#)
  - 3.2.29 [Relationships education, relationships and sex education and health education guidance \(DfE, updated September 2021\);](#)
  - 3.2.30 [Multi-agency statutory guidance on FGM \(HM Government, July 2020\);](#)
  - 3.2.31 [Cambridgeshire and Peterborough Safeguarding Partnership Board Threshold Document;](#)
  - 3.2.32 [PACE code C 2019; and](#)
  - 3.2.33 [Equality Act 2010: advice for Schools \(DfE, June 2018\).](#)
- 3.3 The following policies and procedures are relevant to this policy:
- 3.3.1 Code of Conduct
  - 3.3.2 Acceptable Use of ICT Policy for Staff
  - 3.3.3 Social Media Policy
  - 3.3.4 Whistleblowing Policy
  - 3.3.5 Recruitment Selection & Disclosure Policy and Procedure
  - 3.3.6 Online Safety Policy
  - 3.3.7 Behaviour and Discipline Policy
  - 3.3.8 Anti-bullying Policy (Pupils)
  - 3.3.9 Acceptable Use of ICT Policy for Pupils
  - 3.3.10 Visitors and Visiting Speakers Policy
  - 3.3.11 Risk Assessment Policy for Pupil Welfare
  - 3.3.12 Missing Pupil Procedure
  - 3.3.13 Attendance Policy
  - 3.3.14 Learning Difficulties Policy
  - 3.3.15 Disability Policy (Pupils)
  - 3.3.16 Health and Safety Manual - Policy and procedures
  - 3.3.17 Relationships Education and Relationships Sex Education Policy
  - 3.3.18 Administration of Medication Policy
  - 3.3.19 Inclusion, Equality and Diversity Policy (IE&D)

## 4 **Publication and availability**

- 4.1 This policy is published on the School website. It is also accessible to parents on PersePortal.
- 4.2 This policy is available in hard copy on request.
- 4.3 A copy of the policy is available for inspection from the school office during the school day.
- 4.4 This policy can be made available in large print or other accessible format if required.
- 4.5 This policy and all policies referred to in it are also available to staff in the school policy folder on SharePoint.

## 5 **Definitions**

- 5.1 Where the following words or phrases are used in this policy:
  - 5.1.1 References to **working days** mean Monday to Friday, when the School is open during term time. The dates of terms are published on the School's website. If referrals to an external agency are required outside term time, references to **working days** are to the days on which the relevant external agency is working.
  - 5.1.2 **Safeguarding** is the protection of people from harm.
  - 5.1.3 **Safeguarding and promoting the welfare of children** is defined in WTSC and KCSIE as:
    - (a) protecting children from maltreatment;
    - (b) preventing impairment of children's mental and physical health or development;
    - (c) ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
    - (d) taking action to enable all children to have the best outcomes.
  - 5.1.4 References to **Local Safeguarding Partners** means the three safeguarding partners (local authority, Integrated Care Systems ICSs) and the chief officer of police for an area any part of which falls within the local authority area) who make arrangements to work together with appropriate relevant agencies to safeguard and promote the welfare of local children, including identifying and responding to their needs. The local arrangements relevant to the School can be found in Appendix 8
  - 5.1.5 References to **Children's Social Care** includes, depending on the context, the team based in the local authority where the School is located and, where appropriate, the team based in the local authority where the child is resident.
  - 5.1.6 Reference to **Harmful Sexual Behaviour (HSB)** in this policy refer to the DfE's definition: problematic, abusive and violent sexual behaviours expressed by children and young people under the age of 18 years old that are developmentally inappropriate and may cause developmental damage, may be harmful towards self or others, or abusive towards another child, young person or adult.
  - 5.1.7 **DSL** means the Relevant School's Designated Safeguarding Lead. References to the DSL include the Deputy DSL (**DDSL**) where the DSL is unavailable.

- 5.1.8 Reference to **staff** includes reference to all those who work for or on behalf of the School, regardless of their employment status, including supply staff, contractors, volunteers and Governors unless otherwise indicated.
- 5.1.9 **LADO** means designated officer at the local authority. The LADO has overall responsibility for oversight of the procedures for dealing with allegations, for resolving any inter-agency issues, and for liaison with the three safeguarding partners.
- 5.1.10 **References to the senior leadership team** comprises the Upper School Executive Leadership Team (ELT), the Prep School Senior Management Team (SMT) and the Pelican School Senior Leadership Team (SLT).

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

6.1 The Board of Governors has overall responsibility for all matters which are the subject of this policy including:

- 6.1.1 legal responsibility to ensure that arrangements are made to safeguard and promote the welfare of pupils at the school, having regard to relevant guidance issued by the Secretary of State;
- 6.1.2 strategic leadership responsibility for the School's safeguarding arrangements; and
- 6.1.3 specific responsibilities to facilitate a whole school approach to safeguarding, set out in more detail in Part 2 of KCSIE.

### 6.2 **The Board of Governors:**

- 6.2.1 has nominated one of its members (**Nominated Governor**) to take leadership responsibility for the School's safeguarding arrangements. Contact details of the Nominated Governor are set out in the School contacts list at the front of this policy;
- 6.2.2 ensures that appropriate arrangements are in place for the whole Board to discharge their function, including appropriate consideration of safeguarding matters at Board meetings and a holistic annual review of safeguarding; and
- 6.2.3 establishes appropriate delegation arrangements at School level, led by the relevant Head and DSL, to enable the School to discharge its safeguarding duties effectively.
- 6.2.4 ensures that all members of the governing body receive appropriate safeguarding and child protection (including online) training, both on induction and thereafter regularly updated. Training should be consistent with KCSIE and Local Safeguarding Partner guidance.
- 6.2.5 ensures it discharges its legal responsibilities under the Human Rights Act 1998 and the Equality Act 2010, having regard for the implications for safeguarding that such responsibilities can have.

6.3 To ensure the efficient discharge of its responsibilities under this policy, the Board of Governors has allocated the following tasks:

<b>Task</b>	<b>Allocated to</b>	<b>When / frequency of review</b>
Keeping the policy up to date and compliant with the law and best practice	Designated Safeguarding Leads	As required and at least annually
Monitoring the implementation of the policy, relevant risk assessments and any action taken in response and evaluating effectiveness	Designated Safeguarding Leads	As required, and at least termly
Maintaining up to date records of all information created in relation to the policy and its implementation as required by the UK GDPR	Designated Safeguarding Leads	As required, and at least termly
Seeking input from interested groups (such as pupils, staff, parents) to consider improvements to the School's processes under the policy	Designated Safeguarding Leads	As required, and at least annually
Formal annual review of the School's safeguarding policies and procedure and their implementation.	Board of Governors	At least annually
Assessing the adequacy of safeguarding arrangements for those who use or hire premises	Board of Governors	Before commencement of arrangement and thereafter at least annually

#### 6.4 **Head**

- 6.4.1 The relevant Head is responsible for the overall management of the School and for the management of concerns and allegations about staff.
- 6.4.2 The relevant Head ensures that the School's policies and procedures, adopted by the Board of Governors (particularly those concerning referrals of cases of suspected abuse and neglect), are understood, and followed by all staff.

#### 6.5 **Designated Safeguarding Lead**

- 6.5.1 The DSL is a senior member of staff of the School's leadership team with the necessary status and authority to take lead responsibility and overview for all aspects of safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place) throughout the School.
- 6.5.2 The DSL has the appropriate status and authority with the school to carry out the duties of the post, and the time, funding, training, resources and support to enable them to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings (and/or to support other staff to do so) and to contribute to the assessment of children. The name and contact details of the DSL are set out in the School contacts

list at the front of this policy. The main responsibilities of the DSL are set out in Annex C of KCSIE.

- 6.5.4 The DSL will also liaise with the Head to inform them of issues relating to any police investigations and the statutory requirements for children to have an appropriate adult. The role of the appropriate adult is to safeguard the rights, entitlements and welfare of juveniles, and to know the provisions of PACE Code C and other applicable codes of practice.
- 6.5.5 The DSL will take lead responsibility for pupils who are looked after children. Direct support will be delegated to the teacher designated for looked after children.
- 6.5.6 The DSL takes lead responsibility for all aspects of safeguarding throughout their individual School. The DSLs from each school, together with the Nominated Governor will meet at least three times a year in a fully minuted meeting to discuss recent trends and updates (see also section 22).
- 6.5.7 If the DSL is unavailable, the activities of the DSL will be carried out by a nominated Deputy DSL. The Deputy DSL's details are also set out in the School contacts list at the front of this policy.
- 6.5.8 The DSL and DDSL have written job descriptions describing the responsibility and activities related to the role.

## 7 **Safeguarding principles in relation to children**

- 7.1 Safeguarding and promoting the welfare of children is **everyone's** responsibility.
- 7.2 The School is committed to acting in the best interests of the child so as to safeguard and promote the welfare of children and young people. The School requires everyone who comes into contact with children and their families to share this commitment.
- 7.3 The School will:
  - 7.3.1 understand its role in the safeguarding partner arrangements and operate safeguarding procedures in line with locally agreed multi-agency safeguarding arrangements put in place by the Cambridgeshire and Peterborough Safeguarding Partnership Board;
  - 7.3.2 be alert to signs of abuse, whether in school, within the child's family or outside, both in the School and from outside and take steps to protect individuals from any form of abuse or neglect, whether from an adult or another child;
  - 7.3.3 include opportunities within the curriculum for children to develop skills they need to recognise, and stay safe from abuse;
  - 7.3.4 promote the systems in place for children to confidentially report abuse, ensuring they know their concerns will be treated seriously, they can safely express their views and give feedback;
  - 7.3.5 deal appropriately with every suspicion or complaint of abuse and support children who have been abused in accordance with appropriate education, child protection and/or welfare plans;
  - 7.3.6 design and operate procedures which, so far as possible, ensure that staff, pupils and others who are innocent are not prejudiced by malicious, false, unsubstantiated or unfounded allegations;

- 7.3.7 prepare staff to identify children who may benefit from Early Help and encourage them to be particularly alert to the potential need for Early Help for children with the indicators listed in KCSIE or WTSC;
- 7.3.8 be alert to children at potentially greater risk of harm (both online and offline) including children who need a social worker and mental health support;
- 7.3.9 be alert to the needs of pupils with physical or mental health conditions, special educational needs or disabilities, which could be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation and where additional barriers can exist when detecting abuse or neglect;
- 7.3.10 encourage a culture of listening to pupils and victims of abuse and taking account of their wishes and feelings in any measure put in place and actions taken by the School to protect them;
- 7.3.11 operate robust and sensible health and safety procedures and operate clear and supportive policies on drugs, alcohol and substance misuse;
- 7.3.12 assess the risk of pupils being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology, based on an understanding of the potential risk in the local area;
- 7.3.13 identify pupils who may be susceptible to extremist ideology and radicalisation, and know what to do when they are identified;
- 7.3.14 identify pupils who might be vulnerable to being drawn into county lines or other gang activities;
- 7.3.15 consider and develop procedures to deal with any other safeguarding issues which may be specific to individual pupils in the School or in the local area; and
- 7.3.16 allow staff to determine how best to build trusted relationships with pupils which facilitate communication.

#### 7.4 **Extra familial harm**

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

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

## 8 Reporting obligations of staff

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

8.2 Staff should be aware that pupils may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful, eg a child may feel embarrassed, humiliated, or being threatened due to their vulnerability, disability and/or sexual orientation or language barrier. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection.

8.3 All staff have a duty to:

8.3.1 report any concerns they may have about the safety and/or wellbeing of pupils (this includes where there are concerns about children who may be at risk of being drawn into terrorism);

8.3.2 report any concerns they may have about the safety and/or wellbeing of other persons associated with the School;

8.3.3 report any safeguarding concerns about staff or anyone else associated with the School; and

8.3.4 follow up on any such reports about staff to ensure that appropriate action is or has been taken.

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

## 9 What to do if staff have a concern about a pupil's welfare

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

9.1.1 The contact details of the DSL and DDSL are set out in the Key School Contacts section at the beginning of this policy.

9.1.2 See section 23 below and Appendix 2 for guidance about what to do when receiving a disclosure and recording a concern.

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

- 9.3 See also the Cambridgeshire flowchart at Appendix 5 for information about how to report concerns.
- 9.4 If the concern involves an **allegation or concern raised about a member of staff**, supply staff, contractors or volunteer, this must be reported in accordance with the procedures set out in Appendix 4 and parts 1 and 4 of KCSIE.
- 9.5 **What if the DSL is unavailable?**
- 9.5.1 The DSL or the DDSL should always be available during school hours or for activities taking place out of hours or out of term to discuss safeguarding concerns and may be contacted via the number given in the Key School Contacts section above in relation to any safeguarding concerns. As staff availability cannot be guaranteed out of school hours or when a school activity is not taking place, at such times urgent safeguarding matters should be referred direct to children's social care (and copied to the relevant DSL). During these times, non-urgent matters may be emailed to the relevant DSL or communicated through the Upper School reception 01223 403800.
- 9.5.2 If in exceptional circumstances the DSL and DDSL are unavailable, staff must not delay taking action. Staff should speak to their senior line manager or a member of the senior leadership team and/or advice should be taken from children's social care. Their contact details are set out at the front of this policy.
- 9.5.3 Where a child is suffering, or is likely to suffer from harm, a referral to children's social care and/or the police should be made immediately. Staff should be aware of the process for making referrals direct to children's social care and/or the police in these circumstances. See section 12 below for details on making a referral.
- 9.5.4 Any action taken by a member of staff pursuant to this requirement should then be shared with the DSL or DDSL, or a member of the senior leadership team, as soon as is practically possible.

#### **Action by the DSL**

- 9.5.5 On receipt of a report of a concern, the DSL (together with the wider DSL/DSL team where necessary) will consider the appropriate course of action in accordance with the Cambridgeshire and Peterborough Safeguarding Children Partnership Board procedures and referral threshold document. Such action may include:
- (a) managing any support for the pupil internally via the School's own pastoral support processes, seeking advice from children's social care where required (see section 10 below);
  - (b) undertaking an Early Help assessment (which generally requires parental consent) (see section 11 below); or
  - (c) making a referral for statutory services (see section 12 below).
- 9.5.6 The views of the child will be taken into account when considering the appropriate course of action but will not be determinative.
- 9.5.7 Where the concern relates to the welfare of a pupil who is aged 18 or over, the DSL will consider whether it is necessary to refer such concerns to the Safeguarding Adults Board rather than, or in addition to, children's social care, using the Good Practice Guide set out in Appendix 7.



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

## **10 Managing support for pupils internally**

- 10.1 The School has a framework for the identification, assessment, management and review of risk to pupil welfare so that appropriate action can be taken to reduce the risks identified. See section 21 and the School's *Risk Assessment Policy for Pupil Welfare*.
- 10.2 The School will ensure that appropriate advice and consultation is sought about the management of safeguarding issues, including advice from children's social care where necessary.
- 10.3 At the Upper School, tutors provide support through one to one conversations with pupils and implement support plans with other school staff to support pupils. More specialist support is provided by other pastoral staff (including senior tutor, Assistant Head (Pupil Welfare), Assistant Head (IE&D and Chaplain), School Counsellors, School nurses). These staff are on hand to support pupils with issues they may have.
- 10.4 At the Prep School, form teachers provide immediate support for pupils. More specialist support is provided by Heads of Year, the Pastoral Coordinator, the Nurse, the Counsellors and the Assistant Head (Pastoral). Specific concerns are discussed at a variety of weekly staff meetings so that everyone is aware and knows how best to support a pupil wherever they are in school.
- 10.5 At the Pelican School, class teachers and teaching assistants lead on supporting pupils, however all staff have input. Pupils and specific needs are discussed at weekly staff meetings so that everyone is aware and knows how to best support a pupil wherever they are in school: classroom, playground, specialist lessons, lunch etc.

## **11 Early help assessment**

- 11.1 Early Help, also known as early intervention, is support given to a family when a problem first emerges. It can be provided at any stage of a child or young person's life to parents, children or whole families, and is generally supported by children's social care in consultation with the family.
- 11.2 The School's safeguarding training includes guidance about Early Help processes and prepares all staff to identify children who may benefit from Early Help. Staff are mindful of specific safeguarding issues and those pupils who may face additional safeguarding challenges. Staff should be particularly alert to the potential need for Early Help for a child who:
- 11.2.1 is disabled or has certain health conditions and has specific additional needs;
  - 11.2.2 has special educational needs (whether or not they have a statutory education, health and care plan);
  - 11.2.3 has a mental health need;
  - 11.2.4 is a young carer;
  - 11.2.5 is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
  - 11.2.6 is frequently missing / goes missing from care or from home;
  - 11.2.7 is at risk of modern slavery, trafficking, sexual or criminal exploitation;

- 11.2.8 is at risk of being radicalised or exploited;
  - 11.2.9 has a family member in prison, or is affected by parental offending;
  - 11.2.10 is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health issues or domestic abuse;
  - 11.2.11 is misusing alcohol or other drugs themselves;
  - 11.2.12 is looked after or has returned home to their family from care;
  - 11.2.13 is at risk of 'honour' based abuse such as Female Genital Mutilation or Forced Marriage;
  - 11.2.14 is a privately fostered child; and
  - 11.2.15 is persistently absent from education including persistent absences for part of the school day.
- 11.3 A member of staff who considers that a pupil may benefit from Early Help should keep a written record of their concerns and in the first instance discuss this with the DSL (see section 23 and Appendix 2). The DSL will consider the appropriate action to take in accordance with the Cambridgeshire and Peterborough Safeguarding Children Partnership Board menu of Early Help services and their referral threshold document and will support staff in liaising with parents and other agencies and setting up an inter-agency assessment as appropriate.
- 11.4 If Early Help is appropriate, staff may be required to support other agencies and professionals in an Early Help assessment and will be supported by the DSL in carrying out this role. In some cases, staff may be required to take a lead role.
- 11.5 The matter will be kept under review and consideration given to a referral to children's social care for assessment for statutory services if the pupil's situation appears to be getting worse, or does not appear to be improving.
- 12 Making a referral**
- 12.1 **Where a child is suffering, or is likely to suffer from harm, a referral to children's social care (and if appropriate the police) should be made immediately.**
- 12.2 "Harm" is the *"ill treatment or impairment of the health or development of a child."* Seeing or hearing the ill-treatment of another person is also a form of harm. It can be determined "significant" by *"comparing a child's health and development with what might be reasonably expected of a similar child."*
- 12.3 The contact details for children's social care, (including the link to the online referral form) are set out at the front of this policy.
- 12.4 Anyone can make contact with children's social care to discuss concerns before a referral is made. This includes professionals as well as a child themselves, family members and members of the public. Parental consent is not required for referrals to statutory agencies.
- 12.5 The child's local safeguarding partnership will have a threshold of need framework and guidance which will provide more information which can support decision making in relation to contacting children's social care.
- 12.6 Normal referral processes are used where there are concerns about children who may be at risk of being drawn into terrorism.

## 12.7 Statutory assessments

12.7.1 Children's social care may undertake a statutory assessment under the Children Act 1989 into the needs of the child. It is likely that the person making the referral will be asked to contribute to this process. Statutory assessments include:

- (a) **Children in need:** A child in need is a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Children in need may be assessed under section 17 of the Children Act 1989.
- (b) **Children suffering or likely to suffer significant harm:** Local authorities have a duty to make enquiries under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm.

12.8 Anybody can make a referral. Staff required to make a direct referral may find the following resources helpful:

12.8.1 Online tool to find the relevant children's social care contact numbers:  
<https://www.gov.uk/report-child-abuse-to-local-council>.

12.8.2 The flowchart set out on page 22 of KCSIE and the flowcharts set out in Chapter 1 of WTSC for information about the likely actions and decisions required.

12.9 Parental consent is not required for referrals to statutory agencies but staff will need to have access to certain information about the child and the safeguarding concern in order to make the referral. In general terms, this information will comprise:

12.9.1 personal details of the child;

12.9.2 detailed information about the concern;

12.9.3 information about the child's family and siblings including the capacity of the child's parents or carers to meet the child's developmental needs and any external factors that may be undermining their capacity to parent.

12.10 If the referral is made by telephone, this should be followed up in writing.

12.11 If the referral is made by someone other than the DSL, the DSL should be informed of the referral as soon as possible.

12.12 Confirmation of the referral and details of the decision as to what course of action will be taken should be received from the local authority within one working day. If this is not received, the DSL (or the person that made the referral) should contact children's social care again.

12.13 Following a referral, if the child's situation does not appear to be improving, the local escalation procedures, [resolving professional differences \(escalation policy\)](#) should be followed to ensure that the concerns have been addressed and that the child's situation improves.

## 13 Allegations against pupils - child on child abuse

13.1 Allegations against pupils should be reported in accordance with the procedures set out in this policy (see Appendix 3). If harmful sexual behaviour is alleged to have occurred, the DSL will have regard to Part 5 of KCSIE and take into account the local response of the police and

children's social care to these issues. The views of the alleged victim will be taken into account but will not be determinative.

- 13.2 All those involved in such allegations, both victim and perpetrator, will be treated as being at risk and in need of support and the safeguarding procedures in accordance with this policy will be followed. Appropriate support will be provided to all pupils involved, including support from external services as necessary.

#### 14 **What to do if staff have a concern about someone else's welfare**

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

#### 15 **Allegations made and/or concerns raised about staff and others in School**

- 15.1 The School has procedures for dealing with allegations made and/or concerns raised about staff or anyone working in the School including supply staff and volunteers and contractors:

15.1.1 The procedures in this policy apply to staff who pose a risk of harm to children, or may behave in a way that indicates that they may be unsuitable to work with children. They also apply to low level concerns that do not meet the harms threshold. The procedures aim to strike a balance between the need to protect children from abuse and the need to protect staff from malicious, false, unsubstantiated or unfounded allegations. These procedures are set out in Appendix 4 and follow the guidance in Parts 1 and 4 of KCSIE.

15.1.2 The School will follow its employment procedures for dealing with any other concern raised about staff, involving external agencies as appropriate.

- 15.2 Detailed guidance is provided to staff to ensure that all staff are clear on the rules of conduct and the expectations of the School in relation to contact with pupils, parents, colleagues and any other person who comes into contact with the School. Specific guidance is given to staff about one-to-one teaching. This guidance is contained in the *Code of Conduct* and includes details of additional safeguarding arrangements where staff engage in one-to-one teaching and meetings with pupils.

#### 16 **Informing parents**

- 16.1 Parents will normally be kept informed as appropriate of any action to be taken under these procedures. However, there may be circumstances when the DSL will need to consult the Head, the LADO, children's social care, the police and/or the pupil before discussing details with parents. In all cases, the DSL will be guided by the Cambridgeshire and Peterborough Safeguarding Children Partnership Board threshold document.
- 16.2 Where a pupil has made a disclosure which relates to a family member, the parents should not be informed unless advised by the safeguarding team at children's social care. See also Appendix 2.
- 16.3 See also Appendix 4 for details about the disclosure of information where an allegation has been made against a member of staff.

## 17 Additional reporting

17.1 In addition to the reporting requirements explained above, the School will consider whether it is required to report safeguarding incidents to any other regulatory body or organisation, including but not limited to:

### 17.1.1 Health and Safety Executive

- (a) The School is legally required under RIDDOR to report certain incidents to the Health and Safety Executive. Please see the School's *Health and Safety Policy and procedures (section C: 2.03 Accident Records and Notification)*.

### 17.1.2 Charity Commission

- (a) The School is a registered charity and is required to report all serious incidents to the Charity Commission in accordance with the guidance *How to report a serious incident in your charity* (Charity Commission, June 2019).

### 17.1.3 Disclosure and Barring Service (DBS)

- (a) A referral to the DBS will be made promptly if the criteria are met. See Appendix 4, paragraphs 9.1 and 9.2 for further details.

### 17.1.4 Teaching Regulation Agency (TRA)

- (a) Separate consideration will be given as to whether a referral to the TRA should be made where a teacher has been dismissed, or would have been dismissed if they had not resigned. See Appendix 4, paragraph 9.2 for more details.

### 17.1.5 Insurers

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

### 17.1.6 UK Visas and Immigration

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

## 18 Safer recruitment and supervision of staff

- 18.1 The School is committed to practising safer recruitment in checking the suitability of staff (including staff employed by another organisation). See the School's separate *Recruitment, Selection & Disclosure Policy and Procedure*.
- 18.2 The School maintains a single central register of appointments for all staff.
- 18.3 Staff connected to the School's early years and later years provisions are under an ongoing duty to inform the School if their circumstances change which would mean they meet any of the criteria for disqualification under the Childcare Act 2006. Staff should refer to the School's *Recruitment, Selection & Disclosure Policy and Procedure* for further information about this duty and to their contract of employment in respect of their ongoing duty to update the School.
- 18.4 The School's protocol for ensuring that visiting speakers are suitable and appropriately supervised is set out in the School's separate *Visitors and Visiting Speakers Policy*.

## 19 Use of mobile technology

- 19.1 The School's policy on the use of mobile technology in the School, including phones and cameras in the EYFS setting, is as follows:
- 19.1.1 the School's *Acceptable Use of ICT Policy for Pupils* sets out the expectations on pupils. In the Pelican School including the EYFS setting, pupils are not permitted to bring mobile phones or any mobile device with a camera facility onto the premises;
- 19.1.2 staff (including staff in the EYFS setting) should use mobile phones and cameras in accordance with the guidance set out in the *Code of Conduct*;
- 19.1.3 parents (including parents of pupils in the EYFS setting) may bring mobile phones onto the premises but may only take photographs during events such as plays, concerts or sporting events for personal use. Parents should be reminded that the publication of such images (including on personal social networking sites even where access to the image may be limited) may be unlawful.
- 19.1.4 visitors may bring mobile phones onto the premises but may not take photographs or videos under any circumstances. The only exception is where a commercial third party is permitted to take photos or videos of pupils with the consent of a senior member of staff and with appropriate supervision.
- 19.2 The School allows access to the internet onsite. Appropriate internet safety measures are taken to manage associated risks, including use of filters and monitoring of usage.
- 19.3 The School's approach to online safety, including the use of mobile technology in School is set out in the School's *Online Safety Policy, Acceptable Use of ICT Policy for Pupils and Acceptable Use of ICT policy for Staff*.

## 20 Training

- 20.1 The School ensures that regular guidance and training is arranged on induction and at regular intervals thereafter so that staff understand what is expected of them by this policy and have the necessary knowledge and skills to carry out their roles.
- 20.2 The level and frequency of training depends on the role of the individual member of staff.
- 20.3 The School maintains written records of all staff training.

20.4 All training will be carried out in accordance with Cambridgeshire and Peterborough Safeguarding Children Partnership Board procedures where possible.

## 20.5 Induction

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

- (a) this policy;
- (b) the *Behaviour and Discipline Policy*;
- (c) the *Anti-Bullying Policy*, which includes details of the School's policy on cyberbullying and prejudice-based and discriminatory bullying;
- (d) the *Code of Conduct* including staff/pupil relationships and communications;
- (e) the *Whistleblowing Policy*;
- (f) the *Social Media Policy*;
- (g) the *Acceptable Use of ICT Policy for Staff*;
- (h) the safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods;
- (i) the role of the DSL and their identity and contact details together with that of their Deputy;
- (j) the School's approach to online safety which includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring;
- (k) safeguarding training in accordance with Cambridgeshire and Peterborough Safeguarding Children Partnership Board procedures including guidance on managing a report of child on child harmful sexual behaviour;
- (l) a copy of a copy of Part 1 and Annex B of KCSIE (whether the member of staff works directly with children or not); and
- (m) appropriate Prevent duty training.

Staff delivering induction training ensure that staff understand the material and have the opportunity to discuss topics in more detail where required.

## 20.6 Safeguarding training

20.6.1 School leaders and all staff will receive a copy of this policy and Part 1 and Annex B of KCSIE (whether they work directly with children or not), and will be required to confirm that they have read and understand these.

20.6.2 Members of the senior leadership team (including the relevant Heads) and the Nominated Governor will receive a copy of this policy and be expected to read all of KCSIE.

20.6.3 The Head and all staff members will undertake appropriate safeguarding training which will be updated at least every three years<sup>2</sup>. In addition, all staff members will

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<sup>2</sup> As required by Cambridgeshire and Peterborough Safeguarding Partnership Board

receive safeguarding and child protection updates including online safety via email and/or staff meetings on a regular basis and at least annually.

20.6.4 Staff development training will also include training on online safety which should, amongst other things, include an understanding of the filtering and monitoring systems and processes in place in the School, searching pupils for prohibited and banned items, and Prevent duty training assessed as appropriate for them by the School.

20.6.5 Additionally, the School will make an assessment of the appropriate level and focus for staff training and responsiveness to specific safeguarding concerns such as radicalisation, child-on-child abuse, harmful sexual behaviour, child criminal and child sexual exploitation, female genital mutilation, cyberbullying, prejudice-based and discriminatory bullying, gangs and mental health, to ensure that staff have the skills, knowledge and understanding to keep looked after children safe.

20.6.6 All Governors receive safeguarding training (including online safety) on induction. This training will equip them with the knowledge to provide strategic challenge to test and assure themselves that the School's safeguarding policies in place are effective and support a robust whole school approach to safeguarding. This training will be regularly updated.

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

## 20.7 **Designated Safeguarding Lead (DSL)**

20.7.1 The DSLs and Deputy DSLs will undertake training to provide them with the knowledge and skills required to carry out the role. This training includes inter-agency working and Prevent awareness training and will be updated at least every two years.

20.7.2 In addition, their knowledge and skills will be refreshed at regular intervals, at least annually, to allow them to understand and keep up with any developments relevant to their role. For further details about the training of the DSL, see Annex C of KCISE.

20.7.3 Prevent duty training will be consistent with the Government's Prevent training for schools. See Educate Against Hate (HM Government, 2018) for further details.

## 20.8 **Teaching pupils about safeguarding**

20.8.1 The School teaches pupils about safeguarding through PSHE, tutorials, assemblies and throughout the curricular and extra-curricular programme. This includes guidance on adjusting behaviour to reduce risks, particularly online, building resilience to protect themselves and their peers, fostering healthy and respectful relationships with others and providing information about who they should turn to for help.

20.8.2 The School recognises that a one size fits all approach may not be appropriate for children, and a more personalised or contextualised approach for more vulnerable children, victims of abuse and some SEND children might be needed.

20.8.3 Pupils are introduced to wellbeing, emotional, physical and mental health in order to develop resilience and self-esteem in an age appropriate manner. Resilience is particularly important in safeguarding to mitigate against the risk of being drawn into



extremism. Parental advice is also offered through the newsletter and parent association talks.

- 20.8.4 Pupils are taught about harmful sexual behaviours, including sexual violence and sexual harassment, through Personal, Social, Health and Economic Education (PSHE), Emotional Wellbeing (EW) Education and Spiritual, Moral, Social and Cultural Education (SMSC) appropriate to their age and stage of development. It will tackle issues such as: healthy and respectful relationships, boundaries and consent, stereotyping, prejudice and equality, body confidence and self-esteem, how to recognise abusive relationships, including coercive and controlling behaviour, concepts and laws relating to sexual consent, sexual exploitation, abuse, grooming, harassment, rape, domestic abuse, so-called “honour-based” violence and how to access support, what constitutes sexual harassment and sexual violence and why these are always unacceptable
- 20.8.5 Pupils are given the opportunity to talk about safeguarding issues within the classroom environment and are made aware of the processes by which any concerns they have can be raised. The Upper and Prep School *Pupil’s Guide to Problems* set out in writing what pupils should do if they have a worry or complaint. In the Pelican School, pupils are encouraged to tell an adult whenever they are worried or upset about anything. This may be their teacher or teaching assistant but may also be any member of staff with whom they feel comfortable or who is on duty e.g. music teacher, playground supervisor, PE coach etc.
- 20.8.6 The safe use of technology is a focus in all areas of the curriculum and key ICT safety messages are reinforced as part of assemblies and tutorial / pastoral activities so that pupils learn how to keep themselves safe online and when accessing remote learning. The Board of Governors has ensured that appropriate filters and monitoring systems are in place and meet the DfE’s [filtering and monitoring standards](#) (see the *Online Safety Policy*) and is mindful that this should not lead to unnecessary restrictions on learning.
- 20.8.7 The School keeps in regular contact with parents and carers to reinforce the importance of pupils being safe online and make them aware of the systems in place to filter and monitor online use and the sites pupils will be expected to access during learning.

## 21 Risk assessment

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

## 22 Monitoring and review

- 22.1 The DSLs will ensure that the procedures set out in this policy and the implementation of these procedures are updated and reviewed regularly, working with the Board of Governors as necessary and seeking contributions from staff. The DSL will update the Senior Management Team regularly on the operation of the School's safeguarding arrangements.
- 22.2 Any serious safeguarding incidents at the School will be followed by a review of these procedures by the DSL and a report made to the Board of Governors. Where an incident involving a member of staff occurs, the LADO will be asked to assist in reviewing the School's procedures to determine whether any improvements can be made. Any shortfalls in regard to safeguarding arrangements at any time will be remedied without delay.
- 22.3 This policy will be updated whenever needed to ensure that it remains up to date with safeguarding issues as they emerge and evolve, including in relation to lessons learnt
- 22.4 The Board of Governors will also undertake an annual review of this policy and the School's safeguarding procedures, including an update and review of the effectiveness of procedures and their implementation and the effectiveness of inter-agency working. It will also undertake an annual review of its approach to online safety and filtering and monitoring provision, supported by an annual risk assessment that considers and reflects the risks its pupils face.
- 22.5 Appropriate training in the oversight of safeguarding is provided to Governors. Governors visit the School and undertake site walks to check the implementation of safeguarding policies. They also talk to staff and pupils to gain an overview of safeguarding matters in School. The Nominated Governor also checks the Single Central Register on a regular basis.
- 22.6 The DSL will report to the relevant Governors' Education Committee to raise any topics of interest and summarise the School's safeguarding practices over the year.
- 22.7 The DSLs from each school meet regularly as outlined in paragraph 6.5.6. During one meeting each year (usually in June) the DSL from each School will propose updates to this policy and report on safeguarding and child protection procedures and summary data to the Nominated Governor. The minutes of this meeting will be sufficiently detailed to demonstrate both the breadth and depth of the review undertaken.
- 22.8 The DSLs will work with the Nominated Governor to prepare a written annual monitoring report commissioned by the Board of Governors. The written report should address how the School ensures that this policy is kept up to date; staff training on safeguarding; referral information; issues and themes which may have emerged in the School and how these have been handled, including lessons learned; and the contribution the School is making to multi-agency working in individual cases or local discussions on safeguarding matters.
- 22.9 The Board of Governors will review the report prepared by the DSLs and Nominated Governor described above. The Board of Governors should also consider independent corroboration, such as:
- 22.9.1 inspection of records or feedback from external agencies including the LADO;
  - 22.9.2 reports of ISI inspections;
  - 22.9.3 the outcome of any relevant complaints, claims or related proceedings; and
  - 22.9.4 press reports.

22.10 In addition to reviewing the report, the Board of Governors will consider the proposed amendments to this policy before giving the revised policy its final approval. Detailed minutes recording the review by the Board of Governors will be made.

## 23 Record keeping

23.1 All records created in accordance with this policy are managed in accordance with the School's *Records Management Policy* and *Records Retention Schedule*.

23.2 All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing. This will also help if/when responding to any complaints about the way a case has been handled by the School. Information should be kept confidential and stored securely. Concerns and referrals will be kept in a separate child protection file for each child. These should include:

23.2.1 a clear and comprehensive summary of the concern;

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

23.2.3 a note of any action taken, decisions reached and the outcome;

23.2.4 open concerns are regularly reviewed by pastoral staff and the DSL/DDSL team and closed once all actions are complete. Pupils with significant historic concerns will be regularly monitored on MyConcern.

23.3 Staff must record all concerns about a pupil's welfare on MyConcern. Staff without internet access must report in person immediately to one of the DSLs or their line manager who will support them in reporting their concern. Guidance on record keeping is set out in Appendix 2.

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

23.5 The information created in connection with this policy may contain personal data. The School's use of this personal data will be in accordance with data protection law. The School has published privacy notices on its website which explain how the School will use personal data. The School's approach to data protection compliance is set out in the School's data protection policies and procedures. In addition, staff must ensure that they follow the School's data protection policies and procedures when handling personal data created in connection with this policy. This includes the School's *Data Protection Policy* and *Information Security and Sharing Data Guidance*.

## 23.6 Information sharing and multi-agency working

23.6.1 The School will treat all safeguarding information with an appropriate level of confidentiality, only involving others where appropriate. The School will always act in order to safeguard and promote the welfare of others. When a child leaves the School before the age of 18 their Child Protection File (should one exist) is transferred securely to the new school.

23.6.2 The School understands that information sharing is essential for effective safeguarding and promoting the welfare of children and young people, including their educational outcomes. Fears about sharing information will not stand in the way of the need to promote the welfare, and protect the safety of pupils which is always the School's paramount concern. Schools have clear powers to share, hold and use

information for these purposes and the UK GDPR and Data Protection Act 2018 provide a framework to ensure that personal information is shared appropriately.

- 23.6.3 When the School receives a request for safeguarding information (e.g. a subject access request from a parent or a request from the police), the School will carefully consider its response to make sure that any disclosure is in accordance with its obligations under the UK GDPR and Data Protection Act 2018. The School will also have regard to its data protection policies. The School's Data Processing Manager (the Director of ICT) will work with the DSL as appropriate to determine what should be disclosed.
- 23.6.4 The School will co-operate with children's social care, and where appropriate the police, to ensure that all relevant information is shared for the purposes of Early Help assessments, and assessments and child protection investigations under the Children Act 1989.
- 23.6.5 Where allegations have been made against staff, the School will consult with the LADO and, where appropriate, the police and children's social care to agree the information that should be disclosed and to whom.
- 23.6.6 While the School will share information with those involved where and when it is appropriate to do so, they may be unable to for reasons of data protection and confidentiality, for example because to do so may pose a risk of harm to others or because it has been prohibited by external agencies.

## 24 Version control

Date of adoption of this policy	3rd January 2024
Date of last review of this policy	August 2023
Date for next review of this policy	August 2024 or earlier as necessary
Policy owner (SLT)	Designated Safeguarding Leads
Authorised by	Jonathan Scott On behalf of the Board of Governors
Circulation	Governors / all staff / volunteers / parents / pupils [on request] Published on the School's website and PersePortal and available from the School Office on request

## Appendix 1      Forms of abuse and neglect and specific safeguarding risks

### 1      Abuse and neglect

- 1.1      Staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label and in most cases, multiple issues will overlap with one another, therefore staff should always be vigilant and always raise any concerns with the DSL (or deputy).
- 1.2      Children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

### 2      Definitions of abuse and neglect

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

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

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

### 3 Signs of abuse

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

## 4 Specific safeguarding issues

- 4.1 Statutory guidance acknowledges the following as specific safeguarding issues:
- 4.1.1 child abduction and community safety incidents;
  - 4.1.2 children and the court system;
  - 4.1.3 children missing from education (see paragraph 4.3 below);
  - 4.1.4 children with family members in prison;
  - 4.1.5 child criminal exploitation and sexual exploitation (see paragraph 4.5 below);
  - 4.1.6 county lines or other gang activities (see paragraph 4.6 below);
  - 4.1.7 modern slavery and the national referral mechanism;
  - 4.1.8 cybercrime;
  - 4.1.9 domestic abuse;
  - 4.1.10 homelessness;
  - 4.1.11 so-called 'honour-based' abuse (including Female Genital Mutilation and Forced Marriage (see paragraph 4.10 below);
  - 4.1.12 preventing radicalisation (see paragraph 4.11 below);
  - 4.1.13 child on child abuse (see paragraph 4.12 below);
  - 4.1.14 upskirting (see section 5 below);
  - 4.1.15 sexual violence and sexual harassment between children in schools and colleges (see Appendix 3, section 3);
  - 4.1.16 mental health; and
  - 4.1.17 serious violence
- 4.2 Further advice and links to guidance on these specific safeguarding issues can be found in Annex B of KCSIE. Staff should be particularly aware of the safeguarding issues set out below.

### 4.3 Children who are absent from education

- 4.3.1 Children being absent from school, particularly repeatedly and/or for prolonged periods and children missing education can act as a vital warning sign of a range of safeguarding issues including neglect, sexual abuse and child sexual and criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM, "honour-based" abuse or risk of forced marriage. School attendance registers are carefully monitored to identify any trends. Action should be taken in accordance with this policy if any absence of a pupil from the School gives rise to a concern about their welfare.
- 4.3.2 Where reasonably possible the School will hold more than one emergency contact for each pupil in order to ascertain whether a child is missing.

4.3.3 The School shall inform the local authority of any pupil who is going to be added to or deleted from the School's admission register at non-standard transition points in accordance with the requirements of the Education (Pupil Registration) (England) Regulations 2006 (as amended).

4.3.4 This will assist the local authority to:

- (a) fulfil its duty to identify children of compulsory school age who are missing from education; and
- (b) follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect or radicalisation or involvement with serious violent crime.

4.3.5 The School shall inform the local authority of any pupil who:

- (a) fails to attend School regularly; or
- (b) has been absent without the School's permission for a continuous period of ten school days or more, at such intervals as are agreed between the School and the local authority (or in default of such agreement, at intervals determined by the Secretary of State).

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

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

#### 4.5 **Child sexual exploitation (CSE) and child criminal exploitation (CCE)**

4.5.1 Both CSE and CCE are forms of abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity:

- (a) in exchange for something the victim needs or wants e.g. money, gifts or affection; and/or
- (b) for the financial advantage or increased status of the perpetrator or facilitator; and/or
- (c) through violence or threat of violence to victims (and their families).

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

4.5.3 CSE and CCE can affect children of any sex and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

4.5.4 The victim may have been exploited even if the activity appears consensual.



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

#### 4.6 County lines

- 4.6.1 County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas within the UK, using dedicated mobile phone lines or other form of "deal line". They are likely to exploit children and vulnerable adults to move, store and sell drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons.
- 4.6.2 Children are increasingly being targeted and recruited online using social media Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.
- 4.6.3 A number of the indicators for CSE and CCE as detailed above (and in Annex B of KCSIE) may also be applicable to children involved in county lines
- 4.6.4 Additional reporting duties:

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

#### **4.7 Serious violence**

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

- (a) Increased absence from school;
- (b) a change in friendships or relationships with older individuals or groups;
- (c) a significant decline in performance;
- (d) signs of self-harm or a significant change in wellbeing;
- (e) signs of assault or unexplained injuries; and
- (f) unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

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

#### **4.8 Cybercrime**

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

4.8.2 Cyber-dependent crimes include:

- (a) Unauthorised access to computers (illegal hacking) e.g. accessing a school's computer network to look for test papers or change grades awarded;
- (b) Denial of Service (Dos or DDos) attacks or 'booting' - attempts to make a computer, network or website unavailable by overwhelming it with internet traffic;

- (c) Making, supplying or obtaining malware e.g. viruses, spyware, ransomware, botnets and Remote Access Trojans with intent to commit further offence.

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

4.8.4 The DSL (or deputy) should consider referring into the Cyber Choices programme if they have concerns. This is a nationwide programme which intervenes when young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

#### 4.9 Domestic Abuse

4.9.1 Domestic abuse can encompass a wide range of behaviours and may be a single incident or pattern of incidents. That abuse can be, but is not limited to: psychological, physical, sexual, financial or emotional.

4.9.2 Children can be victims of domestic abuse. They may see, hear or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of this can have a detrimental and long-term impact on their health, well-being, development and ability to learn.

4.9.3 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.

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

#### 4.10 So called Honour-based abuse

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

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

##### 4.10.3 Female genital mutilation (FGM)

- (a) FGM is a form of honour-based violence. It comprises all procedures involving partial or total removal of the external female genitalia or

other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

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

#### 4.10.4 Forced marriage

- (a) Since February 2023 it has been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applied to non-binding, unofficial 'marriages' as well as legal marriages.
- (b) Forced marriage is also a form of honour-based violence. Forcing a person into marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form or coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage.
- (c) Guidance on the warning signs that forced marriage may be about to take place, or may have already taken place, can be found on pages - 39-44 of the [Multi-agency guidelines: handling cases of forced marriage \(HM Government, April 2023\)](#).

- (d) Staff should speak to the DSL if they have any concerns. Pages 79-84 of the [Multi-agency guidelines: handling cases of forced marriage \(HM Government, April 2023\)](#) focus on the role of schools in detecting and reporting forced marriage and the [Forced Marriage Unit](#) can be contacted on 020 7008 0151 or [fm@fcdo.gov.uk](mailto:fm@fcdo.gov.uk) for advice and information.

#### 4.11 Radicalisation and the Prevent duty

4.11.1 The School has a legal duty to have due regard to the need to prevent people from being drawn into terrorism.

4.11.2 The School aims to build pupils' resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views. Being drawn into terrorism includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit. The School is committed to providing a safe space in which children, young people and staff can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments.

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

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

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

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

4.11.4 There is no single way of identifying an individual who is likely to be susceptible an extremist ideology there are possible indicators that should be taken into consideration alongside other factors and contexts. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Radicalisation can occur through many different methods (such as social media) and settings (such as the internet).

4.11.5 It is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the DSL making a Prevent referral.

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

#### 4.12 **Child on child abuse**

- 4.12.1 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 online
- 4.12.2 The School's policy and procedures for dealing with child-on-child abuse can be found in Appendix 3 below.

#### 4.13 **Online safety**

- 4.13.1 All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life.
- 4.13.2 It is essential that children are safeguarded from potentially harmful and inappropriate online material. An effective, whole school approach to online safety empowers a school to protect and educate pupils, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.
- 4.13.3 The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:
  - (a) **content:** being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
  - (b) **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.
  - (c) **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and

- (d) **commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams. If pupils, students or staff are at risk, it should be reported to the Anti-Phishing Working Group (<https://apwg.org/>).

#### 4.14 **Sharing nude and semi-nude images and videos**

- 4.14.1 Consensual and non-consensual sharing of nudes and semi-nude images and/or videos can be signs that children are at risk.
- 4.14.2 "Sharing nudes and semi-nudes" means the taking and sending or posting of nude or semi-nude images, videos or live streams by young people under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. It can also involve sharing between devices offline e.g. via Apple's AirDrop. This is also known as sexting or youth produced sexual imagery. The School treats all incidences of sharing nudes and semi-nude images as safeguarding matters to be actioned in accordance with this policy.
- 4.14.3 Members of staff should not view any nude or semi-nude images which is reported to them, or copy, print or share the images under any circumstances. In referring any incident of sharing images, members of staff should describe the content of the images as reported to them.
- 4.14.4 The DSL may in exceptional circumstances view images with the prior approval of the Head and only where:
  - (a) it is the only way to make a decision whether to involve other agencies, as there is insufficient information available as to its contents;
  - (b) it is necessary to report the image to a website, app or suitable reporting agency to have it taken down or to support the pupils or parents in making a report; or
  - (c) a pupil has reported the image directly to a member of staff in circumstances where viewing the image is unavoidable or images have been found on the school's devices or network.
- 4.14.5 Where viewing an image is unavoidable:
  - (a) viewing should take place on School premises wherever possible;
  - (b) the image should be viewed by a person of the same sex as the person alleged to be shown in the image (where this is known);
  - (c) a senior member of staff should be present to monitor and support the person viewing the image. This member of staff should not view the image;
  - (d) full details of the viewing must be recorded in the School's safeguarding records, including who was present, the date and time, the nature of the image and the reasons for viewing it;
  - (e) any member of staff who views an indecent image should be given appropriate support.

- 4.14.6 If any devices need to be confiscated (whether in order to view the image(s) or to pass evidence to the appropriate authority), they should be turned off and locked away securely until they are required.
- 4.14.7 If an electronic device that is prohibited by the school rules has been seized and the member of staff has reasonable grounds to suspect that it contains evidence in relation to an offence, or that it contains a pornographic image of a child or an extreme pornographic image, the device will be given to the police.
- 4.14.8 If external agencies do not need to be involved, the School must consider the deletion of any images. Pupils should be asked to delete images themselves and to confirm that this is done. Members of staff should not search devices to delete images.
- 4.14.9 If images have been shared online and cannot now be deleted by the person who shared them, the School should consider reporting the images to the relevant web host or service provider (if an option is provided), or contacting the Internet Watch Foundation or ChildLine (if the website does not provide this option).
- 4.14.10 Where a pupil receives unwanted images, the School should advise the pupil and their parents of options that may be available to block the sender or to change the pupil's mobile phone number or email address.
- 4.14.11 The UK Council for Child Internet Safety's advice note [Sharing nudes and semi-nudes: advice for education settings working with children and young people \(December 2020\)](#) contains details of support agencies and provides further information for schools on how to responding to incidents of sexting.
- 4.14.12 Advice for pupils is available at:
- <http://www.thinkuknow.co.uk>
- <https://www.childline.org.uk/explore/onlinesafety/pages/sexting.aspx>
- 4.14.13 Advice for parents is available at:
- <http://www.nspcc.org.uk/preventing-abuse/keeping-children-safe/sexting/>

## 5 Upskirting

- 5.1 Upskirting typically involves taking a picture under a person's clothing without their permission or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear), to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Anyone of any gender can be a victim.
- 5.2 Upskirting is a criminal offence. Attempting to commit an act of upskirting may also be a criminal offence e.g. if actions are taken to do something that is more than merely preparatory to committing the offence such as attempting to take a photograph on a telephone or camera but failing to do so because of lack of storage space or battery.
- 5.3 The School will treat incidences of upskirting as a breach of discipline and also as a safeguarding matter under the School's child protection procedures



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

## **6 Special educational needs and disabilities or physical health issues**

- 6.1 The School welcomes pupils with special educational needs and disabilities and will do all that is reasonable to ensure that the School's curriculum, ethos, culture, policies, procedures and premises are made accessible to everyone. See the School's policies on special educational needs, learning difficulties and learning support, and disability (pupils).
- 6.2 Additional barriers can exist when detecting the abuse or neglect of pupils with SEND or certain medical or physical health conditions that can create additional safeguarding challenges for those involved in safeguarding and promoting the welfare of this group of children. The School is mindful in particular that:
- 6.2.1 assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the pupil's special educational need or disability without further exploration;
  - 6.2.2 pupils with a special education need or disability or certain health conditions may be more prone to peer group pressure and isolation and can be disproportionately impacted by bullying (including prejudice-based and discriminatory bullying) without outwardly showing any signs;
  - 6.2.3 some pupils may be unable to understand the difference between fact and fiction in online content and can repeat the content/behaviour in school without understanding the consequences; and
  - 6.2.4 there may be communication barriers which are difficult to overcome to identify whether action under this policy is required.
- 6.3 The School should consider providing extra pastoral support and attention for these pupils, along with ensuring any appropriate support for communication is in place.

## **7 Looked after children and previously looked after children**

- 7.1 The Board of Governors ensures that staff have the skills, knowledge and understanding to keep looked after children safe and that appropriate staff have the information they need in relation to a child's looked after legal status, for example:
- 7.1.1 whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order;
  - 7.1.2 contact arrangements with birth parents or those with parental responsibility;
  - 7.1.3 information about a child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her.
- 7.2 The DSL maintains these details, including contact details of the child's social worker. See paragraph 6.5.5 of the main policy for the DSL's role in relation to pupils who are looked after children.
- 7.3 The Board of Governors have appointed a designated teacher to work with local authorities and promote the educational achievement of looked after children.

## 8 Care leavers

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

## 9 Mental health

- 9.1 The contact details of the Mental Health Leads are set out in the Key School Contacts section at the beginning of this policy. Mental Health Leads meet regularly with other pastoral staff and check MyConcern for mental health related concerns.

- 9.2 A number of staff have been trained in mental Health First Aid by Mental Health England. The School is committed to promoting wellbeing and resilience alongside raising awareness of and eliminating the stigma attached to mental illness. Incidences of depression, self-harm and eating disorders have all risen in recent years in the UK and are all linked to poor mental health.

- 9.3 The principles used by the school are:

- **Prevention:** creating a safe and calm environment where mental health problems are less likely, improving the mental health and wellbeing of the whole school population, and equipping pupils to be resilient so that they can manage the normal stress of life effectively. This will include teaching pupils about mental wellbeing through the curriculum and reinforcing this teaching through school activities and ethos;
- **Identification:** recognising emerging issues as early and accurately as possible;
- **Early support:** helping pupils to access evidence based early support and interventions; and
- **Access to specialist support:** working effectively with external agencies to provide swift access or referrals to specialist support and treatment.

- 9.4 Pupils may be identified as in need of further assessment through

- Data tracking - so that changes in pupils' patterns of attainment, attendance or behaviour are noticed and can be acted upon
- the pastoral system where at least one member of staff (e.g. a form tutor or class teacher) knows every pupil well and has received training to spot where bad or unusual behaviour may have a root cause that needs addressing

- 9.5 Staff consider mental health and other factors in all cases of poor or changed behaviour.

- 9.6 Staff are regularly trained in topics related to mental health and are expected to escalate concerns through MyConcern. This allows the Safeguarding Leads, Mental Health Leads and relevant staff to decide upon the next steps.

- 9.7 When staff suspect that a pupil is having mental health difficulties, they should not delay putting support in place, using the graduated response process:

- an assessment to establish a clear analysis of the pupil's needs;
- a plan to set out how the pupil will be supported;

- action to provide that support; and
- regular reviews to assess the effectiveness of the provision and lead to changes where necessary.

9.8 Mental Health Leads make referrals (with consent) as appropriate to CAMHS via [younited](#) and GP as well as referrals to children's Social Care, where appropriate.

9.9 Advice for pupils and parents is available at:

<http://www.youngminds.org.uk/>

<https://www.mentalhealth.org.uk/explore-mental-health/a-z-topics/eating-disorders>

<https://www.mentalhealth.org.uk/explore-mental-health/a-z-topics/depression>

<https://www.mentalhealth.org.uk/explore-mental-health/a-z-topics/self-harm>

## 10 **Children who are lesbian, gay, bi, trans, queer or questioning (LGBTQ+)**

10.1 The School recognises that pupils who are or perceived to be LGBTQ+ are vulnerable to being targeted by other children.

10.2 LGBTQ+ inclusion is taught as part of the statutory relations education / RSE / PSHE curriculum.

10.3 All staff are aware of these vulnerabilities and the School endeavours to provide a safe space to speak out or share concerns.

## **Appendix 2            Concerns about a child - guidance for staff**

### **1            Receiving a disclosure**

- 1.1       Listen carefully and keep an open mind. Do not take a decision as to whether or not the abuse has taken place.
- 1.2       Do not ask leading questions, i.e. a question which suggests its own answer. Use 'tell me, explain to me, describe to me' (TED) questioning. It is particularly important not to continue questioning a pupil if they disclose something which suggests that a criminal offence may have been committed – the Police will need to take the lead on investigating and continued questioning might compromise possible criminal proceedings.
- 1.3       Reassure the pupil they are being taken seriously and they will be supported and kept safe.
- 1.4       Do not give a guarantee of absolute confidentiality. Explain the need to pass on the information in accordance with this policy so that the correct action can be taken. This will involve professional judgement, but where doubt exists, the information must be passed on in accordance with this policy.
- 1.5       Keep a sufficient written record of the conversation completed at the earliest possible time (see 2 below). All other evidence, for example, scribbled notes, mobile phones containing text messages, clothing, computers, must be kept securely with the written record.
- 1.6       Pass on the record when reporting the concern in accordance with this policy.
- 1.7       Where a pupil makes a disclosure relating to a family member, parents should not be informed unless advised to do so by the safeguarding team at children's social care (see section 16 of the main policy).

### **2            Recording a concern**

- 2.1       Staff must record all concerns in writing.
- 2.2       Records should be factual and signed and dated, with the name of the signatory clearly printed in writing. Records should include:
  - 2.2.1     the pupil's details: name and date of birth;
  - 2.2.2     date and time of the event / concern / conversation;
  - 2.2.3     a clear and comprehensive summary of the event /concern / conversation;
  - 2.2.4     details of how the concern was followed up and resolved;
  - 2.2.5     the action taken and by whom with reasons for decisions made and the outcome;
  - 2.2.6     the name and position of the person making the record.
- 2.3       The School has a Child Protection Logging system on MyConcern which should be used when reporting the matter in accordance with this policy. Staff without internet access must report in person immediately to one of the DSLs, or their line manager who will support them in reporting their concern. The formal written

record can be completed after an initial discussion with the DSL and completed with the DSL where appropriate.

- 2.4 Where the allegation or complaint is made by an adult, the DSL will ask for a written and signed statement from that person and inform them that their evidence may be passed on to a third party. If, after due consideration, the DSL decides to pass the information on to an outside agency in accordance with this policy, the DSL will contact the disclosing party (unless the DSL is advised otherwise by that agency) to inform them of this and that they should expect further contact from the agency.

### **3 Use of reasonable force**

- 3.1 There are exceptional circumstances when it would be appropriate for staff to use reasonable force to safeguard pupils. 'Reasonable' in these circumstances means using no more force than is needed.
- 3.2 Staff should refer to the School's *Behaviour and Discipline Policy* and the *Code of Conduct* for more detailed guidance about the use of reasonable force.

## **Appendix 3 Dealing with allegations of child on child abuse**

### **1. Child on child abuse**

- 1.1. Children of any age can abuse other children (often referred to as child-on-child abuse) and this can happen inside and/or outside school and/or online. This includes, but is not limited to:
  - 1.1.1. bullying (including cyber-bullying and prejudice-based and discriminatory bullying);
  - 1.1.2. abuse within intimate personal relationships between children (teenage relationship abuse);
  - 1.1.3. physical abuse such as hitting, kicking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates and/or encourages physical abuse);
  - 1.1.4. sexual violence, such as rape, assault by penetration and sexual assault (including grabbing bottoms, breasts and genitalia under or over clothes, flicking bra, unwanted kisses or embraces) possibly with an online element which encourages sexual violence;
  - 1.1.5. sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
  - 1.1.6. causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
  - 1.1.7. consensual and non-consensual sharing of nude and semi-nude images (also known as 'sexting' or 'youth produced sexual imagery') means the taking and sending or posting of nude or semi-nude images, videos or lives streams by young people under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. It can also involve sharing between devices offline, for example via Apple's AirDrop;
  - 1.1.8. upskirting, typically involving taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
  - 1.1.9. initiation / hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may include an online element).

### **2. The School's approach to child-on-child abuse**

- 2.1. Staff understand that, even if there are no reports of child-on-child abuse at the School, it does not mean it is not happening; it may be the case that it is just not being reported. Staff understand the importance of reporting any concerns regarding child-on-child abuse to the DSL (or the DDSL in the DSL's absence).
- 2.2. Such behaviour is never accepted and should be considered as both a safeguarding issue and potentially a disciplinary one. The School will adopt a zero-tolerance approach to abuse. Downplaying certain behaviours (by, for example, dismissing sexual harassment as "banter", "having a laugh" or "part of growing up" can lead to a culture of unacceptable behaviours, an unsafe environment for children and at its worst, to a culture that normalises abuse.

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

### **3. Sexual violence and sexual harassment (SVSH)**

- 3.1. Where the misconduct may constitute sexual violence<sup>3</sup> (rape, assault by penetration, sexual assault<sup>4</sup> or causing someone to engage in sexual activity without consent) or sexual harassment (unwanted conduct of a sexual nature), it should be reported to the DSL and will be managed in accordance with this policy. SVSH is never acceptable.
- 3.2. Whilst any report of sexual violence or sexual harassment should be taken seriously, staff are aware that it is more likely that girls will be the victims of SVSH and more likely it will be perpetrated by boys.
- 3.3. The School recognises that LGBTQ+ and SEND pupils may be at greater risk of sexual violence or sexual harassment.
- 3.4. SVSH can occur between two or more children of any age or sex from primary to secondary stage. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. SVSH exists on a continuum and may overlap. Addressing inappropriate behaviour (even where it seems to be relatively innocuous) can be an important intervention which helps to prevent problematic or abusive behaviour in the future by setting and enforcing clear expectations of behaviour, supporting victims and encouraging them and others to speak out and facilitating targeted support for those demonstrating harmful sexual behaviour.
- 3.5. The 2021 Ofsted report concluded that whether or not schools are aware of reported instances of SVSH in their community, it is likely to be occurring. The School acknowledges this and that children are likely to report such matters, if at all, to people they trust. All staff are therefore trained to identify signs of abuse and on how to respond to a report.

### **4. Management of allegations of child on child SVSH**

#### **4.1. The initial report**

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

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<sup>3</sup> When referring to sexual violence the statutory guidance refers to sexual offences under the Sexual Offences Act 2003 as described above

<sup>4</sup> Sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault).

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

4.1.3. They should:

- 4.1.3.1. listen carefully and respectfully, reassuring the person making the report that they are being taken seriously and offer support without promising confidentiality or making a judgement about its veracity;
- 4.1.3.2. where possible they should ask open questions about whether pupil(s) have been harmed, the nature of the harm or if they may be at risk of harm;
- 4.1.3.3. where there is an online element, considering the searching, screening and/or confiscation of devices and the UKCIS [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#). The key consideration is for staff not to view or forward illegal images of a child<sup>5</sup>;
- 4.1.3.4. explain the next steps and how the report will be progressed;
- 4.1.3.5. make a written record of the report (recording the facts as the child has presented them);
- 4.1.3.6. inform the DSL (or deputy) as soon as practically possible, if they are not involved in the initial report and then only share the report with those necessary in order to progress it.

## 4.2. DSL's considerations

4.2.1. Reports of SVSH are often complex and require difficult professional decisions to be made. Further disclosures may follow and the facts may be difficult to establish. These decisions are made on a case by case basis taking all of the circumstances into account, in the best interest of the pupils involved. The School's response is led by the DSL who will always have regard to Part 5 of KCSIE in the management of the issue.

## 4.3. School's considerations

4.3.1. The School will consider:

- 4.3.1.1. the victim's wishes in terms of how they want to proceed. Victims should be given as much control as is reasonably possible over decisions made about investigation and support, but their wishes will not always be determinative as the School may have to take action to protect other children;
- 4.3.1.2. the nature of the alleged incident (including whether it was a one-off or sustained pattern), whether a crime may have been committed and whether harmful sexual behaviour<sup>6</sup> has been displayed;
- 4.3.1.3. the ages and developmental stages of the children involved and any imbalance between them;

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<sup>5</sup> School staff can search pupils with their consent for any item. Staff can search pupils without consent if they have reasonable grounds for suspecting a pupil is in possession of a prohibited item or one that is likely to be used to commit an offence or cause personal injury or damage to property, see Searching, screening and confiscation: advice for schools for further information.

<sup>6</sup> Hackett's sexual behaviours across a continuum table - which helps to identify whether sexual behaviours are normal, inappropriate, problematic, abusive or violent may be helpful here.



- 4.3.1.4. if there is an intimate personal relationship between the children;
- 4.3.1.5. whether there are any ongoing risks to those involved;
- 4.3.1.6. the time and location of any incident, and any action required to make the location safer; and
- 4.3.1.7. the wider context.

4.3.2. Before deciding how best to support and protect those involved, this will involve:

- 4.3.2.1. carrying out immediate risk and needs assessments - these will be undertaken in cases of sexual violence and considered otherwise. Where appropriate, they will be discussed with those involved and their parents. This may involve exclusion pending investigation. Risk and needs assessments will be recorded and kept under review in the knowledge that police investigation and criminal proceedings can take several months to conclude.
- 4.3.2.2. Considering what, if any, further action is appropriate such as involvement of Police and/or other agencies. The School will make a proportionate response to these matters in light of the circumstances and the factors identified above.

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

## **5. Investigations and findings**

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

## Appendix 4 Raising allegations and low level concerns

### 1 Key contact information

1.1 Below is the key contact information you may need to raise an allegation or low level concern under this policy.

DSL	Upper School - Amy Cockerill Tel: 01223 403817 Email: <a href="mailto:arcockerill@perse.co.uk">arcockerill@perse.co.uk</a>  Prep School – Tom Knowles Tel: 01223 403925 Email: <a href="mailto:tpknowles@perse.co.uk">tpknowles@perse.co.uk</a>  Pelican School – Tim Ankin Tel: 01223 403947 Email: <a href="mailto:teankin@perse.co.uk">teankin@perse.co.uk</a>
Head	Upper School Tel: 01223 403893 Email: <a href="mailto:ecelliott@perse.co.uk">ecelliott@perse.co.uk</a>  Prep School Tel: 01223 403922 Email: <a href="mailto:jwpiper@perse.co.uk">jwpiper@perse.co.uk</a>  Pelican School Tel: 01223 403943 Email: <a href="mailto:fkheftman@perse.co.uk">fkheftman@perse.co.uk</a>
Chair of Governors	Tel: Via Clerk to the Governors, <a href="mailto:mahastings@perse.co.uk">mahastings@perse.co.uk</a>  Or direct to: <a href="mailto:jscott@perse.co.uk">jscott@perse.co.uk</a>
Nominated Safeguarding Governor	Tel: Via Clerk to the Governors, <a href="mailto:mahastings@perse.co.uk">mahastings@perse.co.uk</a>  Or direct to: <a href="mailto:dwilliams@perse.co.uk">dwilliams@perse.co.uk</a>
LADO	01223 727967  <a href="mailto:LADO@cambridgeshire.gov.uk">LADO@cambridgeshire.gov.uk</a>

### 2 Purpose and application

2.1 **Purpose:** the School takes safeguarding extremely seriously. It is of paramount importance that we maintain an open and transparent culture in which all concerns about adults are shared promptly, responsibly and with the right person. We recognise the importance of ensuring adults who work with, or otherwise come into contact with children, do so in a way that is consistent with our values, culture and expected standards of behaviour. We also recognise that concerns may arise in several ways and from a number of sources. The purpose

of this policy is to provide a framework for all concerns to be raised, recorded and dealt with effectively by the School.

2.2 **Application:** the Policy applies to all adults working in or on behalf of the School (whether on a paid or unpaid basis), including governors, supply staff, volunteers and contractors (**Staff**).

2.3 **Other adults:** although this policy directly relates to those who work for the School, the School recognises that its safeguarding role extends to the protection of everyone associated with it, including adults who do not work for the School. Should concerns be raised about people who are not Staff or pupils, then they should be reported to the Head or DSL who will take appropriate action and co-operate with the relevant agencies as appropriate.

2.4 **Statutory guidance:** this policy has regard to the following statutory guidance:

2.4.1 *Keeping children safe in education* (September 2023) (**KCSIE**). Part Four of KCSIE deals with allegations made and concerns raised about staff, supply staff, volunteers and contractors (**Staff**), who are all adults working for, or on behalf of, the School. It distinguishes between two categories of concerns / allegations that can be raised about Staff. These are:

(a) concerns that do not meet the harm threshold, otherwise known as "low level concerns"; and

(b) allegations that may meet the harm threshold.

2.4.2 *Working together to safeguard children* (July 2018, updated July 2022) (**WT**), which requires policies to be put in place setting out the process, including timescales for investigation and what support and advice will be available to individuals against whom allegations have been made. WT requires schools to have regard to KCSIE in order to fulfil their duties in respect of safeguarding and promoting the welfare of children.

### 3 **Key Staff duties**

3.1 **Staff behaviour:** all Staff must comply with the School's *Code of Conduct* which sets out appropriate and expected standards of behaviour.

3.2 **Duty to report:** as a member of Staff, you must immediately follow this policy to report **any** concerns you have about the conduct of a member of Staff or any other adult (which could include adults not employed by the School). This includes any concern however it arises, for example behaviour you have witnessed, a concern raised with you by a colleague, pupil, parent or another adult, or as result of checks or information brought to your attention.

3.3 **Duty to self-refer:** you must refer yourself to the Head where, for example, you have found yourself in a situation which could be misinterpreted, which might appear compromising to others, and / or on reflection if you believe you have behaved in such a way that may fall below the standards expected of you.

3.4 **A culture of sharing:** all Staff have a positive obligation to support the School's culture of openness and sharing without fear of reprisal.

### 4 **What needs to be reported?**

4.1 **Reporting all concerns:** all concerns must be raised whether they are considered to be "low level" concerns or conduct which may meet the harm threshold. Please see the Cambridgeshire County Council flowchart *Dealing with Allegations or Concerns about an Adult Working With Children* at the end of this appendix.

- 4.2 **Low level concerns:** a low level concern is any concern, no matter how small, and even if no more than a sense of unease or a "nagging doubt", that a member of Staff may have acted in a way that is inconsistent with expected professional standards and / or the staff *Code of Conduct*, whether inside or outside work. No concern is too small or minor to raise under this policy.
- 4.3 **Concerns that meet the harm threshold:** allegations that may meet the harm threshold are those that might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children, for example where the individual has:
- 4.3.1 behaved in a way that has harmed a child, or may have harmed a child; and / or
  - 4.3.2 possibly committed a criminal offence against or related to a child; and / or
  - 4.3.3 behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children; and / or
  - 4.3.4 behaved or may have behaved in a way that indicates they may not be suitable to work with children. This includes behaviour that may have happened outside the School which creates a transferable risk.
- 4.4 **Definition of Harm:** it is important to understand the types of conduct that may be harmful to children, and to recognise that harm may not be limited to the most obvious types of physical abuse. There is no single legal definition of harm but to assist your understanding of what may amount to "harm" you should consider the following:
- 4.4.1 the Safeguarding Vulnerable Groups Act 2006 which does not give a definition of harm, encouraging people to apply a "normal, everyday meaning";
  - 4.4.2 the Children Act 1989 defines:
    - (a) "harm" as "ill-treatment or the impairment of health or development [including, for example, impairment suffered from seeing or hearing the ill-treatment of another]";
    - (b) "ill-treatment" as including "sexual abuse and forms of ill treatment which are not physical";
    - (c) "health" as "physical or mental health".

## 5 How to raise concerns and allegations

- 5.1 **Raising low level concerns:** where you have a low level concern in respect of any member of Staff, you must report the matter immediately. You can raise this with the Head or with the DSL. Please also see the School's *Low Level Concerns Policy*.
- 5.2 **Duty of the DSL to refer concerns to the Head:** The Head remains the ultimate decision-maker in respect of all low level concerns. Save for in cases involving the Head, the DSL must therefore promptly report any concern raised with them to the Head. Wherever possible the DSL must speak to the Head in person about the concern as soon as possible after the concern is raised, and always on the same day the concern is raised. If it is not possible to speak to the Head in person about the concern, the DSL must email the Head with a summary of the concern on the same day the concern is raised.
- 5.3 **Concerns about Staff:** Where you have a concern about the conduct of a member of Staff (other than the Head) that may meet the harm threshold you must raise this immediately with the Head.

- 5.4 **Concerns involving the Head:** where you identify a concern about the Head, you must report the matter immediately to the Chair of Governors without first notifying the Head.
- 5.5 **Conflicts of interest:** where there is a conflict of interest in raising the concern with the Head (e.g. concerns raised in connection with an individual who is related to or personally connected with the Head) you must report the concern directly to the Local Authority Designated Officer (**LADO**), without first notifying the Head. Details of the LADO can be found at the start of this policy.
- 5.6 **Concerns involving Governors:** where you identify a concern about a Governor, you must report the matter immediately to the Chair of Governors or the Nominated Safeguarding Governor. If either the Chair of Governors or the Nominated Safeguarding Governor is the subject of an allegation, you must report the matter to the other.
- 5.7 **Concerns involving individuals/organisations using School premises:** the School will follow its own safeguarding policies and procedures, including informing the LADO, where it receives an allegation relating to an incident that happened when an individual or third party organisation was using the premises for the purposes of running activities for children (e.g. community groups, sports associations, or service providers that run extra-curricular activities).
- 5.8 **Reports to the DSL:** If it is not possible for you to make a report to the Head or Chair of Governors or Nominated Safeguarding Governor, you must instead immediately make a report to the DSL. The DSL will take action in accordance with these procedures and will as soon as possible inform the Head or, where appropriate, the Chair of Governors and the Nominated Safeguarding Governor.
- 6 **The School's response to concerns and allegations**
- 6.1 **Appropriate action:** the School will ensure that appropriate action is taken to address concerns that are raised under this policy.
- 6.2 **Assessing concerns:** the Head (or, if the concern relates to the Head, the Chair of Governors or the Nominated Safeguarding Governor) will determine whether the concerns raised are low level or potentially meet the harm threshold. The DSL, the Head, the Chair of Governors and the Nominated Safeguarding Governor have all been trained to assess concerns, and to record and address them appropriately.
- 6.3 **Low level concerns:** if the School determines the concern is a low level concern, then the School will address the concern as appropriate and in accordance with the School's *Low Level Concerns Policy*. This will usually involve making the individual aware of the concern against them, undertaking any investigation that may be required and may include giving management guidance and advice or invoking the School's capability or disciplinary procedures.
- 6.4 **Borderline cases:** the Head (or, if the concern relates to the Head, the Chair of Governors or the Nominated Safeguarding Governor) may take advice from the LADO in borderline cases in order to establish whether the concern is a low level concern or an allegation that potentially meets the harm threshold. This may include conducting an initial "no names" conversation with the LADO about whether the harm threshold is met.
- 6.5 **Referral:** where the Head (or, if the concern relates to the Head, the Chair of Governors) considers the concerns raised potentially meet the harm threshold, the Head (or, if the concern relates to the Head, the Chair of Governors) will make a report to the LADO before further action is taken. The Head (or, if the concern relates to the Head, the Chair of Governors) may also seek advice from the LADO as appropriate. Where a LADO referral is

appropriate, this will be made within one working day of the allegation being reported in accordance with this policy.

6.6 **Responding to an allegation that may meet the harm threshold:** where an allegation is made that may meet the harm threshold, the School will take advice from and co-operate with the LADO, the police, and any other external body that may be involved in the response to the allegation. The School will follow its internal procedures in order to investigate and respond to the allegation when it is appropriate to do so, and will keep the LADO informed of the action it is taking.

6.7 **Case Manager:** where an investigation is deemed necessary into an allegation of conduct that may meet the harm threshold, a "Case Manager" will be appointed by the School to lead the investigation. The Case Manager will be either the Head or a person with appropriate authority appointed by the Head. Where the Head is the subject of an allegation, the Case Manager will usually be either the Chair of Governors or Nominated Safeguarding Governor.

## 7 **Disclosure of information about concerns and allegations**

7.1 **Informing the individual of a concern:** the School will in most cases inform the individual concerned about any low level concern that is raised about them.

7.2 **Informing the individual of an allegation where appropriate:** the Case Manager will consult with the LADO in order to agree if and when it is appropriate to inform the individual of the allegation.

7.3 **Communication and support for the individual subject to an allegation:** if and when it is appropriate to inform the individual of the allegation against them, the Case Manager will also offer appropriate pastoral support and will keep the individual informed of the timescales for the investigation under this procedure and the factors which may affect it. In all cases, the investigation will be concluded as soon as reasonably practicable.

7.4 **Informing the child's parents / carers where appropriate:** the Case Manager will agree with the LADO when and how the parents or carers of the child / children involved will be informed of the allegation if they do not already know of it. The Case Manager will also agree with the LADO what information shall be shared with the parents / carers of the child / children as the case progresses. The timing and extent of disclosures, and the terms on which they are made, will be dependent upon and subject to the laws on confidence and data protection and the advice of external agencies.

7.5 **Reporting restrictions:** the School is mindful of and will comply with the reporting restrictions under section 141 Education Act 2002 which prevent the identification of a teacher who is the subject of such an allegation in certain circumstances.

7.6 **Involvement of external agencies:** where the LADO(s) advises that a strategy discussion is needed, or the police or children's social care need to be involved, the Case Manager will not inform the individual subject to the allegation, or the parents or carers until these agencies have been consulted and it has been agreed what information can be disclosed.

7.7 **Concerns about supply staff and contractors:** where a concern / allegation has been made in respect of a member of supply staff or a contractor, the concern / allegation may be notified to their employer. Where a Case Manager has been appointed to investigate an allegation, the Case Manager will consult with the LADO before sharing any information with the individual's employer.

## 8 Early Years Foundation Stage (EYFS)

- 8.1 **Report to Ofsted:** the School will inform Ofsted of any allegations of serious harm or abuse by any person living, working or looking after children on the premises of the EYFS provision (whether that allegation relates to harm or abuse committed on the premises or elsewhere), and will provide details of the action taken in respect of those allegations.
- 8.2 **Timescale for Ofsted report:** these notifications will be made as soon as reasonably practicable, but in any event within 14 days of the allegations being made. A registered provider who, without reasonable excuse, fails to comply with this requirement, commits an offence.

## 9 Referrals to the Disclosure and Barring Service (DBS) and Teaching Regulation Agency

- 9.1 **Report to the DBS:** the School is under a legal duty to make a referral to the DBS where a member of Staff is removed by the School from working in regulated activity (whether paid or unpaid), or has resigned prior to being removed, because they have harmed, or pose a risk of harm to, a child. The DBS will then consider whether to impose sanctions which may restrict or prevent that person from working with children in future.
- 9.2 **Report to the Teaching Regulation Agency:** if a teacher is dismissed because they are found to have committed serious misconduct or because their conduct has breached the Teachers' Standards, or they resign prior to dismissal on such grounds, the School will also make a referral to the Teaching Regulation Agency. The Teaching Regulation Agency will consider whether to impose a prohibition order on that person which prevents them from undertaking teaching work in future.

## 10 Record keeping

- 10.1 **Records of low level concerns:** low level concerns will be recorded in writing. The record of the concern will be retained so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and addressed. Records of low level concerns that have been addressed with an individual will usually be kept on the individual's personnel file. In addition all low level concerns, including those that have not been addressed formally under the School's procedures, will also be stored securely in a central file (**Concerns and Allegations Record**).
- 10.2 **Recording low level concerns:** the Concerns and Allegations Record will set out the name of the individual involved (if an individual is named), a brief description of the concern and the context in which it arose, any investigation that has been carried out, and the outcome / result of the investigation into the concern. The name of the individual who has raised the concern should also be noted. Where that individual wishes to remain anonymous the School will try to accommodate this as far as reasonably possible, but cannot guarantee anonymity in all circumstances.
- 10.3 **Records of allegations that may meet the harm threshold:** details of allegations that may meet the harm threshold will be recorded both on the individual's personnel file and the Concerns and Allegations Record. The individual's personnel file and the Concerns and Allegations Record will include a summary of the allegation, details of how the allegation was followed up and resolved, a note of any action taken in response to the allegation.
- 10.4 **Storage and security of Concerns and Allegations Record:** the Concerns and Allegations Record will be stored in the Head's Office at the Relevant School and will be accessible by the Head, the Chair of Governors, the Nominated Safeguarding Governor, the DSL and the Director of ICT only.

10.5 **Malicious or false low level concerns and allegations:** details of low level concerns and allegations found to be malicious or false will be removed from personnel records and the Concerns and Allegations Record.

10.6 **Retention of records:** information stored on staff personnel files about low level concerns and allegations that may meet the harm threshold, and the Concerns and Allegations Record, will be retained by the School indefinitely. The School may in future be required to produce this information if it is notified of an allegation of historic abuse relating to a current or former member of staff, if a former member of staff is accused of committing safeguarding offences elsewhere or if a former member of staff is the subject of safeguarding allegations arising elsewhere.

## 11 **References**

11.1 **Low level concerns:** low level concerns will not be disclosed in a reference unless they were addressed formally and resulted in a sanction under the School's disciplinary or capability policies and procedures and it is otherwise appropriate to disclose them.

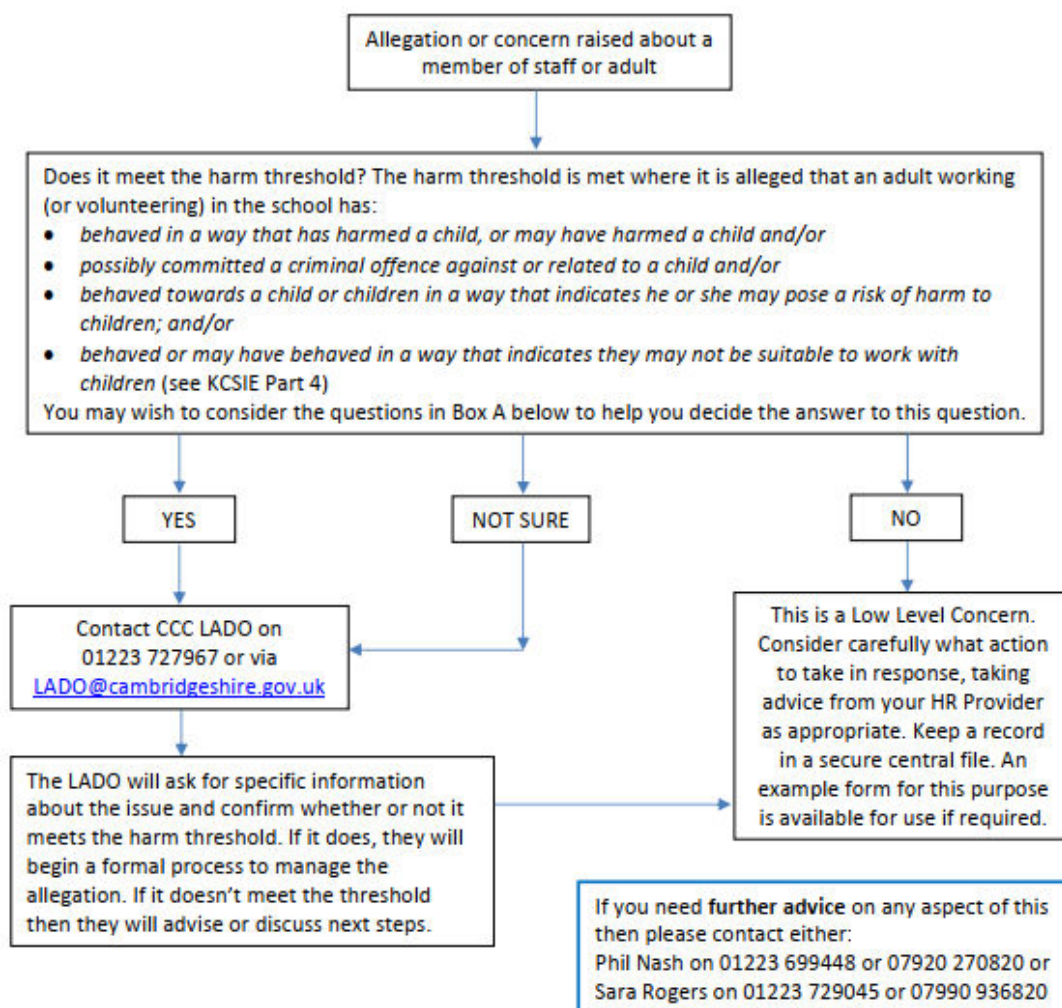
11.2 **Allegations that meet the harm threshold:** allegations that meet the harm threshold will be disclosed in a reference if the allegation was found to be substantiated (including any cases in which any disciplinary sanction has expired). The School will not disclose information about allegations that were found to be false, unfounded, unsubstantiated, or malicious.

## 12 **Questions**

12.1 **Contact:** please contact the DSL if you have any questions about this policy.

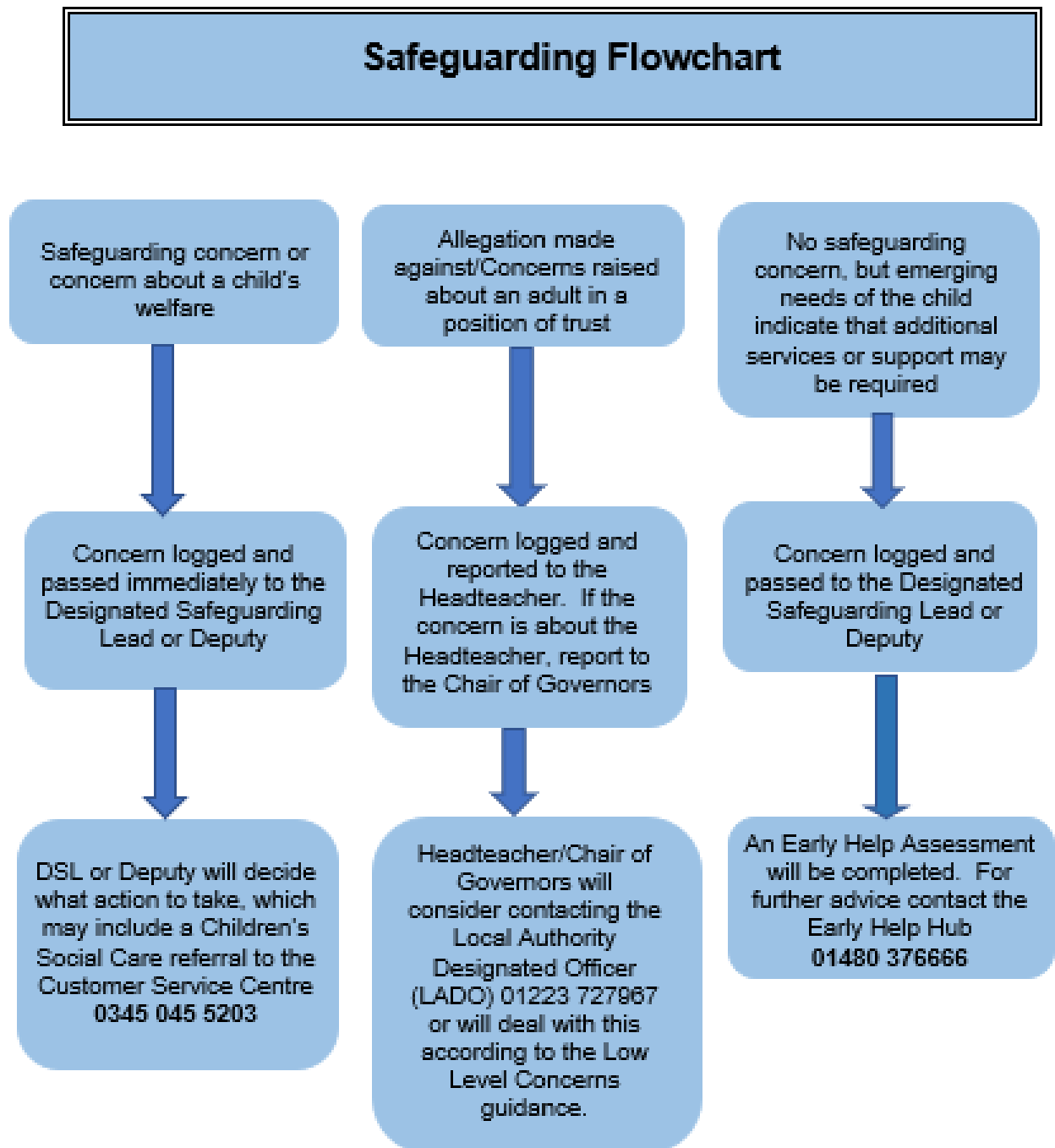


## Dealing with Allegations or Concerns about an Adult Working with Children



### Box A:

- How long has the adult or member of staff worked for you?
- Have there been any previous concerns raised?
- Is this a one-off or part of a pattern of behaviour?
- Has the member of staff previously been given advice in this area?
- Would an associated pattern of behaviour (if it exists) be seen by others? (How closely do they work with other colleagues?)
- Might this have been a planned action or event?
- Could this behaviour be inadvertent? What is the likelihood of this?
- Could this be the precursor to more concerning behaviour?
- Did it occur in a 'public' or 'private' place? Was this in school or out of school?
- If electronic devices are involved, have any relevant files been deleted and is there any evidence of this?
- If this relates to inappropriate language, what is the precise nature of the language used? How inappropriate is it? What was the context – where was this, and who were the listeners? Could this be seen as 'banter' or might it have more serious undertones?



## Appendix 6 Charity safeguarding procedures

### 1. Charity Safeguarding Duties

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

- (c) contractors
- (d) beneficiaries

- 1.4.11. entering into appropriate agreements with other third parties<sup>7</sup> (whether those who provide services to the Charity or directly to its beneficiaries (including pupils)) covering the relationship, their respective roles and monitoring and reporting requirements;
- 1.4.12. review its premises and security arrangements and arrangements for third party use to ensure appropriate measures are in place to keep people safe;
- 1.4.13. reviewing any grant-making undertaken to ensure appropriate policies and procedures are in place;
- 1.4.14. implementing suitable reporting and monitoring processes are in place for any work overseas;
- 1.4.15. exercising proper oversight of the Charity's online operations, adequately managing risk and ensuring that online services are suitable for users;
- 1.4.16. set out risks and how it will manage them in a risk register;
- 1.4.17. allocating sufficient funds for the effective management of safeguarding and arranging appropriate insurance cover;
- 1.4.18. Ensuring a sufficient level of oversight of the charity's operations to manage risk, and reporting any incidents which materially affect the charity's operations, finances, people or reputation to the Charity Commission in line with How to report a serious incident in your charity (Charity Commission, June 2019).

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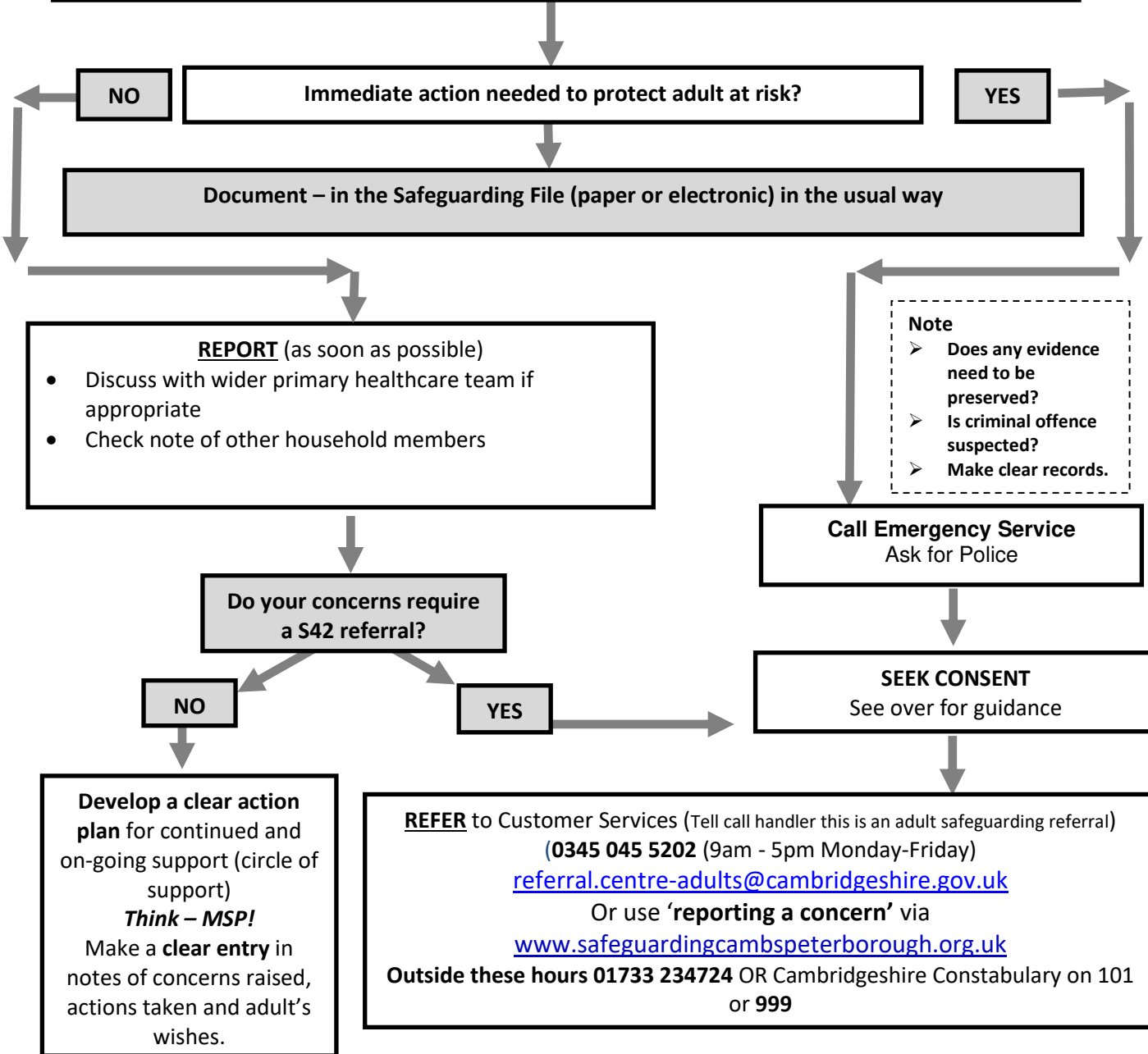
<sup>7</sup> <https://www.gov.uk/government/publications/charities-due-diligence-checks-and-monitoring-end-use-of-funds>

<p><b>What is Safeguarding Adults at Risk?</b></p>	<p>The <b>Care Act 2014 (S42-46)</b> states that everyone, including those working in education, has a duty to promote <b>wellbeing</b> when carrying out any care and support functions and has a duty to protect and support adults with care and support needs. This includes <b><i>recognising, recording, reporting and referring</i></b> concerns about abuse. It is vital to listen and to take <b>all</b> concerns seriously. The Care &amp; Support Statutory Guidance defines safeguarding as <i>‘protecting an adult’s right to live in safety, free from abuse and neglect’</i> – to safeguard adults in a way that supports them in making choices and having control about how they want to live.</p> <p><b>An Adult at Risk: (criteria for a Section 42 Enquiry)</b></p> <p>Local Authorities have safeguarding duties which will apply to an adult, aged 18 or over who:</p> <ul style="list-style-type: none"> <li>• Has needs for care and support (whether or not the local authority is meeting any of those needs); <i>and</i></li> <li>• Is experiencing, or at risk of, abuse or neglect; <i>and</i></li> <li>• As a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of, abuse or neglect</li> </ul> <p><b>Abuse</b> – The Care Act does not give a definition of abuse and is clear that it should not limit our view of what constitutes abuse or neglect. Instead it categorises types of behaviours, which could indicate that an adult is at risk of abuse and neglect. The Care Act recognises 10 types of abuse:- physical, sexual, psychological, financial or material, neglect or acts of omission, discriminatory, organisational, domestic abuse, self-neglect and modern slavery.</p>
<p><b>How do we need to respond? – by Making Safeguarding Personal</b></p>	<p><b><u>Recognise:</u></b> Know what to look for; recognise the signs and symptoms and listen to concerns of those working with adults with care and support needs. Train everyone in the practice (including reception and admin staff) to know how to <b>respond</b> by <b><i>Making Safeguarding Personal</i></b> (MSP) – <i>if safe to do so, engaging the adult in a conversation to find out how they want to deal with their concern.</i></p> <p>Use the <b>6 Safeguarding Principles</b> to enable MSP – Empowerment, Protection, Prevention, Proportionate response, Partnership, Accountability. Seek help and discuss early in the course of your concerns.</p> <p><b><u>Record:</u></b> Record concerns clearly in the Safeguarding File (paper or electronic). <i>Have you asked the adult what they would like to happen now? Do you have their consent to share the concern with adult safeguarding?</i></p> <p><b><u>Report:</u></b> Know where to get help and who to talk to – do you have a designated Safeguarding Adults lead, preferably someone with additional knowledge and training.</p> <p>➤ <b><i>Does the situation meet the criteria for a S42 Enquiry? (See above)</i></b></p>

	<p><b><u>Refer:</u></b> Know where to refer and what to do to get more help</p> <p><b><u>Remember:</u></b> this is a common problem, but is often hidden by both the victim (fear of reprisals) and the perpetrator (commonly someone caring for the adult).</p>
<p><b>What about confidentiality?</b></p>	<p><b>Confidentiality:</b> Consent to refer should be sought. If the adult with capacity does not give consent, it may be necessary to disclose if:</p> <ul style="list-style-type: none"> <li>• The adult is being subjected to abuse on a continuous basis</li> <li>• Where they lack the capacity to consent to the referral</li> <li>• A crime has or could take place</li> <li>• There is suspicion of domestic abuse, are there children or other adults at risk involved?</li> <li>• Degree of influence/power over the adult – is coercion involved?</li> <li>• Other adults/children/community as a whole are at risk or are being placed at risk</li> <li>• Staff are implicated</li> </ul> <p><b>Always</b> record any decision to override consent, or reason for not reporting your concern – <i>have you explored why the adult is saying no?</i></p> <p>The Mental Capacity Act 2005 provides statutory framework to empower and protect people who lack capacity and are not able to make their own decisions. If you work with, or care for, someone aged 16 or over who is unable to make some decisions for themselves, you must comply with the <b>Mental Capacity Act 2005</b> principles: <a href="http://www.legislation.gov.uk/ukpga/2005/9/contents">http://www.legislation.gov.uk/ukpga/2005/9/contents</a></p>
<p><b>Where can I get more information?</b></p>	<p><b>Summary Practice guidelines and Procedure</b> can be found here: <a href="http://www.safeguardingcambspeterborough.org.uk">www.safeguardingcambspeterborough.org.uk</a></p> <p><b>Learning and Development:</b></p> <p>Information on Safeguarding Adult training courses can be found on the Safeguarding Adult Board link above.</p> <p>Or email: <a href="mailto:ECPS.General@cambridgeshire.gov.uk">ECPS.General@cambridgeshire.gov.uk</a> or <a href="mailto:Christine.jones@cambridgeshire.gov.uk">Christine.jones@cambridgeshire.gov.uk</a> Training &amp; Development Manager for Safeguarding Adults Cambridgeshire County Council</p>
<p><b>Date:</b></p>	<p>January 2021</p>

## Safeguarding of Adults at Risk Process

**Safeguarding concern RECOGNISED by a member of staff**  
*(Remember – Safely applying Making Safeguarding Personal and wellbeing)*  
**Adult Safeguarding Designated Lead – Ed Wiseman** (see page 3 of this policy for the relevant contact details):



**Contacts**

**Adult Social Care**  
 Peterborough Direct ( 01733 747474  
 Out of Hours ( 01733 234724

**Cambridgeshire Police**  
 24 hour non-emergencies ( 101  
 Emergencies ( 999

**The Care Quality Commission (Regulator)**  
 ( 0300 616161

Seek advice at any stage from your Designated Safeguarding Lead or  
**ECPS.General@cambridgeshire.gov.uk**