

## Child Protection and Safeguarding Policy and Procedures

This child protection and safeguarding policy sets out the school's expectations across the whole school including the Early Years and out of school provision and the responsibilities of different staff in contributing to an outstanding learning environment. This forms part of a suite of documents and policies which relate to the safeguarding responsibilities of the school. In particular this policy should be read in conjunction with:

Early Years Policy	Inclusion Policy	Activate Handbook
Curriculum, Teaching & Learning:	Recruitment Policy	Visitors Policy
RSE Policy	PSHEE Policy:	Positive Behaviour Policy:
SEND Policy	British Values	Anti-Bullying Policy
Care and Supervision Policy:	Code of Conduct	Health and Safety Policy
Collecting Children Policy	ICT Acceptable Usage	Social Media Policy

<b>Designated Senior Person</b>	<b>Mrs Sophie Hughes</b>
<b>Deputy Designated Senior Person</b>	<b>Mrs Helen Gee</b>
<b>Deputy Designated Person for Out of School Care</b>	<b>Mrs Heather Odiowei</b>
<b>Deputy Designated Person for Out of School Care</b>	<b>Mrs Sara Makepeace-Taylor</b>
<b>Safeguarding Governor</b>	<b>Dr Tessa Myatt</b>

**Safeguarding children is the responsibility of everyone. If you have concerns you can contact the LADO at MARAT**

Trafford Multi Agency and Referral and Assessment Team (MARAT)	0161 912 5125 MARAT@trafford.gov.uk
Emergency Duty Team (Out of Hours)	0161 912 2020
Police	101
LADO - Trafford: Anita Hopkins	0161 912 5024. anita.hopkins@trafford.gov.uk
Concerns relating to extremism (DFE)	020 7340 7264 counter.extremism@education.gsi.gov.uk
Children and Young People Vulnerable to Violent Extremism – Local Prevent Contacts –Trafford: Liz Baxter	liz.baxter@trafford.gov.uk
Radicalisation - Channel (Trafford)	0161 856 636 Ext 66373 channel.project@gmp.police.uk

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## **Introduction**

This policy applies to the whole school, including Early Years, out of school care, extra-curricular activities and all other activities provided by the school including those outside of regular school hours. Safeguarding is defined as protecting children from maltreatment, preventing impairment of health and/or development, ensuring that children grow up in the provision of safe and effective care and taking action to enable all children to have the best life chances.

**Child protection is one part of the safeguarding policy.**

The safety and welfare of children is the statutory responsibility of all those who come into contact with them in our school. We all have a duty to ask ourselves what more we can do to protect vulnerable children.

This policy complies with the aims of current government legislation and guidance, including working in line with Keeping Children Safe in Education, 2019.

- The governing body will ensure that the School is effective in safeguarding and promoting the welfare of its pupils
- All staff /volunteers in the School will be proactive in trying to identify possible safeguarding issues and will report concerns immediately to one of the School's Designated Persons
- Any deficiencies or weaknesses in child protection arrangements will be remedied without delay
- All procedures in this policy also apply to before and after school care provision.

## **Intended Outcomes**

The child's welfare is paramount. School procedures are designed to work towards fulfilment of two key principles:

- Safeguarding is everyone's responsibility: for services to be effective each professional should play their full part; and
- A child-centred approach: for services to be effective they should be based on a clear understanding of the needs and views of children. Staff members should always act in the best interests of the child.

Bowdon Prep strives to educate all its pupils in a caring environment, where the aim is to foster the values of courtesy and responsibility. We encourage enthusiasm, a genuine love for learning, good work habits and most importantly, a sense of achievement. To achieve these aims we provide highly skilled professional staff to give our children a stable, secure and stimulating environment in which to flourish.

The School is committed to safeguarding our children and fully understand its statutory role in creating and maintaining a safe learning environment.

This policy applies to all staff, governors, volunteers and visitors to the school.

- Establish and maintain an environment where school staff and volunteers feel safe, are encouraged to talk and are listened to when they have concerns about the safety and wellbeing of a child
- Ensure children know that there are adults in the school whom they can approach if they are worried
- Ensure that children who have been abused will be supported in line with a child protection plan where deemed necessary

- Include opportunities in the curriculum for children to develop the skills they need to recognise and stay safe from abuse.

Consider how children may be taught about safeguarding, including online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum. For example in Citizenship / PSHE, ICT, assemblies and outside speakers.

Staff members working with children are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the interests of the child.

### **The Designated Senior Person for Child Protection**

A Senior Designated Person is defined as the member of senior management to whom staff must refer any child protection concerns. The Designated Person [or in her absence, the Deputy Designated Person] has the authority to contact external services on behalf of the school. Any contact considered necessary must take place as quickly as possible so that the needs of the individual child are met. All staff must remember that anyone can report their concerns to MARAT.

The **Designated Senior Person** for Child Protection at the School is: **MRS SOPHIE HUGHES**

A Deputy DSP will act in the absence/unavailability of the DSP.

The **Deputy Designated Person** for Child Protection in this school is: **MRS HELEN GEE & MRS SARA MAKEPEACE-TAYLOR**

**Out of School Care:** The Deputy Designated Person for Child Protection is: **MRS HEATHER ODIOWEI**

**The broad areas of responsibility for the designated safeguarding lead are:**

#### **Managing referrals**

Refer all cases of suspected abuse to Trafford children's social care and:

- the police (cases where a crime may have been committed)
- liaise with the Headmistress, Mrs Gee to inform her of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations
- act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.

## Training

The designated safeguarding lead should receive appropriate training carried out every year in order to:

- understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so
- ensure each member of staff has access to and understands the school's child protection policy and procedures, especially new and part time staff
- be alert to the specific needs of children in need, those with special educational needs and young carers
- be able to keep detailed, accurate, secure written records of concerns and referrals
- obtain access to resources and attend any relevant or refresher training courses
- encourage a culture among all staff of listening to children and taking account of their wishes and feelings in any measures the school may put in place to protect them.

## Raising Awareness

- The designated safeguarding lead ensures the School's policies are known and used appropriately
- Ensure the School's child protection policy is reviewed annually and the procedures and implementation are updated and reviewed regularly and work with the governing body regarding this
- Ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of Bowdon Preparatory School in this
- Link with the local LSCB to make sure staff are aware of training opportunities and the latest local policies on safeguarding
- Where children leave Bowdon Preparatory School, ensure their child protection file is copied for any new school as soon as possible but transferred separately from the main pupil file.

## The Governing Body

**The Governing Body of Bowdon Preparatory School will ensure that there is an effective child protection policy in place, together with a staff behaviour policy (code of conduct). The body will ensure that an appropriate senior member of staff takes lead responsibility for child protection. This person should have the status and authority within the school to carry out the duties of the post, including committing resources and where appropriate, supporting and directing other staff.**

Governing bodies must ensure that they comply with their duties under legislation. They must also have regard to this guidance to ensure that the policies, procedures and training in their schools or colleges are effective and comply with the law at all times.

The Lead Governor responsible for Child Protection/Safeguarding is: **DR TESSA MYATT**

The responsibilities placed on the governing body include:

- their contribution to inter-agency working, which includes providing a coordinated offer of early help when additional needs of children are identified
- ensuring that an effective child protection policy is in place, together with a staff behaviour policy
- appointing a designated safeguarding lead who should undergo child protection training every year
- prioritising the welfare of children and young people and creating a culture where staff are confident to challenge senior leaders over any safeguarding concerns
- making sure that children are taught about how to keep themselves safe.

### **Aims and objectives of safeguarding practice at Bowdon Prep**

No one involved in the school can ignore her/his responsibility for safeguarding children. The Teachers' Standards 2012 state that all teachers should safeguard children's wellbeing. All governors, staff and volunteers must play a part in preventing abuse and neglect through:

- knowing, understanding and complying with the School's policy and procedures on child protection
- being knowledgeable about and alert to the signs and symptoms of abuse in children
- maintaining an attitude of 'it could happen here' where safeguarding is concerned
- monitoring changes in the behaviour of pupils in their care and reporting these concerns to the Designated Person
- monitoring the attendance of their pupils carefully and reporting concerning patterns of absence immediately to the Designated Person
- helping pupils, through the teaching of the curriculum and as positive adult role models, to understand what is and what is not acceptable behaviour towards them and how they can stay safe
- creating and maintaining a safe and secure environment for pupils and staff
- being approachable so that pupils will share their worries and concerns
- taking action as soon as a concern is raised to address risks and prevent issues escalating
- adopting a child-centred approach by giving the pupils the right to participate in some decisions about her safety and welfare, in line with her age and maturity
- monitoring carefully the outcomes for the child, in order to ensure her continued welfare
- challenging inaction and reassessing concerns when situations do not improve
- providing pupils with a range of cultural opportunities which promote the fundamental British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs
- promoting the spiritual, moral, social and cultural development of all pupils
- taking account of the latest advice and guidance provided to help address specific vulnerabilities and forms of exploitation eg Child Sexual Exploitation (CSE) and Extremism
- recognising that children are capable of abusing their peers.

## **Statutory Framework**

In order to safeguard and promote the welfare of children, the school will act in accordance with the following legislation and guidance:

- The Children Act 1989
- The Children Act 2004
- Education Act 2002 (section 175)
- Trafford Safeguarding Children Board Inter-agency Child Protection and Safeguarding Children Procedures
- Keeping Children Safe in Education (September 2019) (KCSIE)
- Working Together to Safeguard Children ((March 2015)
- The Education (Pupil Information) (England) Regulations 2005
- Prevent Duty Guidance: for England and Wales (March 2015) (Prevent)
- The Prevent Duty: Departmental Advice for Schools and Childminders (June 2015)
- The Use of Social Media for On-Line Radicalisation (July 2015)
- ISI Commentary on the Independent School Regulations (January 2017)
- What to do if you are worried a child is being abused – Advice for practitioners (March 2015)
- Sexting in schools and colleges: responding to incidents and safeguarding young people

Bowdon Preparatory School will ensure that appropriate procedures are in place for responding to situations in which they believe that a child has been abused or are at risk of abuse - these procedures should also cover circumstances in which a member of staff is accused of, or suspected of, abuse.

## **Governors, staff (including supply) and volunteers**

### **Objectives**

The School fulfils its aims and its statutory responsibility or 'Duty of Care' as set out by national government, the Trafford Safeguarding Children Board and ISI Regulatory Requirements by:

- ensuring that safer recruitment practices are followed in checking the suitability of staff, governors and volunteers to work with children (see also the School's Recruitment Policy)
- providing a Staff Code of Conduct (incorporating Safer Working Practice) and Whistle Blowing Policy in order to protect staff and pupils (see separate documents)
- ensuring that a policy is in place for handling allegations of abuse against members of staff, volunteers and the Headmistress
- providing an Acceptable Use of ICT policy for both staff and pupils
- creating an ethos in which staff and volunteers feel able to raise concerns about unsafe practice and ensuring that such concerns are addressed sensitively and effectively
- providing and implementing child protection policy and procedures, updated annually, so that staff know how to respond to signs or reports of child protection issues

- raising the awareness of staff, through regular training, about indicators of neglect / abuse in children and possible medical emergencies such as asthma and anaphylactic shock
- emphasising to staff the core skills of a child-centred approach: listening; being able to convey genuine interest; showing empathy, understanding, emotional warmth and respect for the child; the capacity to reflect, distinguishing between facts and opinions; the capacity to manage one's own emotions when dealing with the difficulties of the child
- understanding the importance of identifying children who may benefit from early help ie providing support as soon as a problem emerges at any point in a child's life
- teaching pupils about safeguarding, including online safeguarding, through teaching and learning opportunities
- appointing a designated safeguarding lead who will take lead responsibility for child protection, provide support to staff members in carrying out their safeguarding duties and liaise closely with external services such as children's social care
- allowing access for children's social care or the Local Authority to conduct or consider whether to conduct an assessment of a child in line with the Children Act 1989
- being aware that all staff members may be asked to support social workers to take decisions about individual children.

#### **Visitors**

- ensuring that all visitors are made aware of the safeguarding statement produced on the back of all visitor passes
- producing visitor speaker and peripatetic teacher forms for the Designated Person to check so as to ensure that all external speakers cohere with the School's commitment to the implementation of Keeping Children Safe in Education.

#### **Pupils**

- ensuring staff vigilance so that adults notice when things are troubling them
- establishing a safe and secure environment and a positive, supportive ethos in which children can feel valued and develop academically and personally
- creating an ethos in which children are encouraged to share concerns with an adult, knowing that they will be listened to, respected, supported and consulted before action is taken
- building stable relationships with children, based on trust
- respecting personal privacy by only circulating information to staff who need to know in order to protect the child
- ensuring that explanations are provided concerning decisions made relating to the child's welfare
- raising awareness of safeguarding issues amongst pupils, by including in the PSHE curriculum and assemblies, information on recognising inappropriate behaviour, encouraging responsible attitudes to adult life, teaching assertiveness skills and understanding online dangers.

### **Communication with external agencies and parents**

- Working to develop effective links with relevant external agencies, particularly Children's Social Care services and cooperating with enquiries regarding child protection and family support, including attendance at family group conferences, strategy discussions and child protection conferences, ensuring that parents understand the responsibility placed on the school and staff for child protection by providing the safeguarding and child protection policy on the School's website.

### **Key responsibilities of all governors, staff and volunteers**

- All staff and adults working with children **MUST** read and be familiar Section 1, Keeping Children Safe in Education (September 2019) (KCSIE and Annex A). This includes supply staff and building contractors who are on site at the same time as pupils  
<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>
- Read, understand and comply with the School's Child Safeguarding & Child Protection Policy and Procedures
- Know the signs and symptoms of abuse and be vigilant in noticing such signs in pupils
- Report allegations or suspicions immediately to the appropriate Senior Designated Person or in her absence, to the Deputy Designated Person. If a child is in immediate danger or is at risk of harm, a referral should be made to children's social care and/or the police immediately. In this case, anybody can make a referral
- Attend update training on safeguarding children at least once every year
- Read, understand and comply with the Staff Code of Conduct (incorporating Safe Working Practice)
- Ensure that any visitor for whom the School does not have a DBS check is supervised by a member of staff for the duration of his/her visit
- Exercise due diligence to prevent an organisation or speaker from using the School's facilities to disseminate extremist views or radicalise pupils or pupils
- Raise concerns about poor or unsafe practice and potential failures in the School's safeguarding regime. Such concerns will be taken seriously by the Senior Leadership Team
- Report any person to DBS if they have caused harm or pose a harm to a child.

### **Child Protection and Safeguarding concerns – Staff Responsibilities**

If any member of staff is concerned about a child he or she must inform the Designated Senior Person. The member of staff must record information regarding the concerns on the same day. The recording must be a clear, precise, factual account of the observations. Please use the allocated pro-forma, which can be found in the staffroom on the safeguarding noticeboard and on the teachers' shared drive (Welfare, Health & Safety/1.Safeguarding/1.Reference Documents).

The Designated Senior Person will decide whether the concerns should be referred to Children's Services: Safeguarding and Specialist Services. If it is decided to make a referral to Children's Services:

Safeguarding and Specialist Services, this will be discussed with the parents, unless to do so would place the child at further risk of harm.

Particular attention will be paid to the attendance and development of any child about whom the school has concerns, or who has been identified as being the subject of a child protection plan and a written record will be kept.

If a pupil who is/or has been the subject of a child protection plan changes school, the Designated Senior Person will inform the social worker responsible for the case and transfer the appropriate records to the Designated Senior Person at the receiving school, in a secure manner, and separate from the child's academic file.

The Designated Senior Person is responsible for making the senior leadership team aware of trends in behaviour that may affect pupil welfare. If necessary, training will be arranged.

Anyone with safeguarding concerns can make a referral direct to Trafford Children's Services Multi Agency Referral and Assessment Team (MARAT) on 0161 9125125 or out of hours 0161 9122020. If anyone other than the designated safeguarding lead makes the referral, they should inform the designated safeguarding lead as soon as possible. The local authority should make a decision within one working day of a referral being made about what course of action they are taking and should let the referrer know the outcome. Staff should follow up on a referral should that information not be forthcoming.

As a person who works with children, staff have a duty to refer safeguarding concerns to the designated senior person for child protection. If:

- concerns are not taken seriously by an organisation or
- action to safeguard the child is not taken by professionals and
- the child is considered to be at continuing risk of harm

then staff should speak to a DSP in their school or contact Trafford Children's Services Multi Agency Referral and Assessment Team (MARAT) on 0161 9125125 or out of hours 0161 9122020.

If at any point, there is a risk of immediate serious harm to a child, a referral should be made to children's social care immediately.

#### **If staff have concerns about another staff member**

If staff members have concerns about another staff member, then this should be referred to the headmistress. Where there are concerns about the headmistress, this should be referred to the chair of governors, Dr Tessa Myatt. Staff may consider discussing any concerns with the school's designated safeguarding lead and make any referral via them. Full details can be found in Part four of the full KCSIE guidance (Page 53)

#### **When to be Concerned**

All staff and volunteers should be aware that the main categories of abuse are:

- physical abuse
- emotional abuse

- sexual abuse
- neglect.

All staff and volunteers should be concerned about a child if she presents with indicators of possible significant harm – **see Appendix 1 for details**. Generally, in an abusive relationship the child may:

- appear frightened of the parent/s or other household members eg siblings or others outside of the home
- act in a way that is inappropriate to her age and development (full account needs to be taken different patterns of development and different ethnic groups)
- display insufficient sense of 'boundaries', lack stranger awareness
- appear wary of adults and display 'frozen watchfulness'.

### **Dealing with Disclosure**

Act immediately if a child arrives in school needing urgent medical treatment. Take her to the School Office, where the senior medical officer will consult the appropriate medical professionals to arrange treatment. (In the absence of Mrs Sharkey, ask for a First Aider)

If a child discloses that he or she has been abused in some way, the member of staff / volunteer should:

- listen to what is being said without displaying shock or disbelief
- accept what is being said
- allow the child to talk freely
- not interrupt. Do not prompt. Do not over-question. Do not investigate
- be aware of your non-verbal messages
- reassure the child, but not make promises which it might not be possible to keep
- not promise confidentiality – it might be necessary to refer to Children's Services
- Reassure her that what has happened is not his or her fault
- stress that it was the right thing to tell
- listen, only asking questions when necessary to clarify
- not criticise the alleged perpetrator
- explain what has to be done next and who has to be told
- report orally immediately to the Designated Senior Person, Headmistress or in their absence, the Deputy Head

### **Do not tell any other staff, even if a parent or child asks you to.**

(If a child is in immediate danger or is at risk of harm, a referral should be made to children's social care and/or the police immediately. In this case, anybody can make a referral).

- Record in detail the discussion as soon as is practicable, but always within 24 hours
- Use the **child's own words**. Your record should be **handwritten or typed and printed (then immediately deleted), signed and dated**
- Look at Stage 3 Page 12 of this policy of this policy for detail on what to include
- Give this record, in a sealed envelope, to the appropriate Senior Designated Person

Remember that your notes of the discussion may be needed in subsequent court proceedings. You are accountable for their accuracy.

### Stage One:

#### **Interview with a pupil by a member of staff / volunteer / governor**

A girl may tell you that she has been abused OR you may have good reason to suspect that abuse is taking place or the girl is suffering neglect.

**Your role is to listen, not to investigate. This is very important.**

Where a pupil feels able to disclose abuse, it is generally a sign of a strong and trusting relationship. Such a disclosure may, however, come as a great shock to the person concerned. Care must be taken to avoid showing this and to offer reassurance to the pupil. Be aware of the importance of adopting a **supportive role**. Acknowledge how hard it was for the girl to tell you.

Do not prompt or ask questions that could later be interpreted as putting pressure on a girl.

Use only open questions such as "is there anything else you want to tell me?"

The conversation should be held in a **private area** where there are not likely to be any interruptions. (It is highly recommended that a Designated Person should be present, but this is not always possible.)

At the same time, explain the need to involve other adults. **It is essential that you do not promise to keep the information to yourself. If a pupil is in danger, you must report the risk.**

**In the case of disclosure of physical abuse**, you should **not** ask a girl to remove or adjust clothing to be able to observe marks, bruising or injury.

**Where sexual abuse is suspected or alleged**, it is essential not to try to investigate the situation.

It is also important to remember that it is the most difficult subject for children to discuss and in addition they may be afraid of the implications of 'telling' or may be under threat of reprisals.

Let the pupil know about confidential help-lines:

Childline 0800 11 11 [www.childline.org.uk](http://www.childline.org.uk)

NSPCC 0808 800 5000

18001 0808 800 5000 (Textphone / Webcam for deaf or hard of hearing)

88858 (Text)

### **Recording**

During the interview, try to make brief notes using the child's own key words. If this is not possible, make notes **immediately** afterwards. Keep any notes made during the interview and pass these to the Senior Designated Person.

### Stage Two:

#### **Discussion with the Senior Designated Person**

The member of staff/governor/volunteer should next always discuss the matter **immediately** with the appropriate Senior Designated Person. If appropriate, the pupil should be taken to the Senior Designated Person.

### Stage Three:

#### **Written record of the disclosure provided to Senior Designated Person**

It is important to record in detail, all information available, since legal proceedings may arise from the investigation that follows a referral. The person receiving the disclosure may have to appear in court.

Staff /governor/volunteer must:

- provide an accurate, factual record of the conversation **immediately if possible**, and certainly **within 24 hours**, and this must be given to the Senior Designated Person
- record statements and observations rather than interpretations or assumptions
- use the child's actual words, not your interpretation of those words or your assumptions. Don't destroy the original notes in case they are needed by a court
- include the names of any people present at the disclosure; date, time, context, location and sequence of the conversation; a brief outline of what the pupil said has happened, when and to whom and by whom; the non-verbal behaviour and demeanour of the pupil; a brief description of any visible or alleged physical injuries; the pupil's preferred follow-up action
- Any comments made by a parent/guardian should be noted accurately as soon as possible
- Sign and date this record

All records need to be given to the Designated Senior Person promptly. No copies should be retained by the member of staff or volunteer.

**After a referral has been made to the Senior Designated Person, the staff member/ governor/ volunteer takes no further action and must not discuss the referral with others in or outside school.**

#### **Stage Four:**

##### **Follow-up by the Senior Designated Person**

The Designated Person will follow Trafford Safeguarding Children Board procedures.

Initially, the Senior Designated Person will consult the Deputy Designated Person and confer about approaching parents, the local Children's Social Care Services, Medical Services and the Police as appropriate. It is good practice to discuss concerns with the parents and where possible, to seek agreement but this will not be done if it would place the child at increased risk.

If there is an injury and it is so serious that immediate medical treatment is required, the Senior Designated Person will arrange for the child to be taken to hospital, usually accompanied by a member of the SLT. The parent(s) will be informed that this action has been taken.

If a pupil's attendance falls below 85% and parents have not provided a letter from a GP or other medical expert that the absence is due to valid medical reasons, the Senior Designated Person will inform the girl's Local Authority.

The Senior Designated Person will make decisions on sharing information with other agencies and with parents based on professional judgement, experience and training. Although decisions to seek support for a child in need, or about whom there are concerns relating to radicalisation would normally be taken in consultation with parents and pupils, their consent is not required when there are reasonable grounds to believe that a child is at risk of significant harm. The Headmistress will normally be consulted when any external agencies are involved.

The Senior Designated Person is responsible for contacting external agencies on behalf of any pupil of the school. In her absence, the Deputy Designated Person will contact external agencies. Initially, information may be discussed without naming the child, in order to obtain advice about whether a referral is necessary (see Escalation Procedures for exceptions).

The Senior Designated Person will contact external agencies by telephone as soon as possible (or by written referral) a disclosure or suspicion of abuse. A member of the social care team will respond within 24 hours and advice will be followed. However, if the child is considered to be in need or has or may have suffered significant harm, then the referral will take place **immediately**.

In this instance, information may be shared relating to the individual child's development needs and the capacity of the parents to meet them.

1 According to Section 17 of the Children Act (1989), a child 'in need' is considered to be a child *"who is unlikely to achieve or maintain a satisfactory level of health and development will be significantly 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, in relation to their special educational needs, disabilities, or as a carer, or because they have committed a crime. The process for assessment should also be used for children whose parents are in prison and for asylum seeking children."*

The agency contacted will depend on the area in which a pupil lives and the school deals with a range of local authorities. Contact numbers change on a regular basis as local authority services are re-organised and key personnel change however, so the internet will be used to check/obtain current telephone numbers.

At the end of any discussion with Children's Social Care, the Designated Person must be clear about the Local Authority's proposed response, timescales for action and who will be taking the action or if no further action is needed. **Once a referral is made the Designated Lead Person will be the staff member who has contact with external agencies (see escalation procedures for exceptions).**

**Any calls received by another member of staff from external agencies should be transferred to the appropriate Designated Person.**

If a pupil is referred to the Children's Social Care team by the Senior Designated Person:

- The written referral should be acknowledged **within three working days**
- If the DP hears nothing within three days, the DP should contact Children's Services again
- An initial assessment should take place **within seven working days**, seeing and speaking to the child (and family members, as appropriate).

If it seems necessary to the child's welfare, the Senior Designated Person will pass on selected information to the Class or Form Tutor. This information will be on a strictly "need to know" basis.

It is essential that children who are known to be at risk, or about whom there has been concern in the past, are observed closely in school and that the Senior Designated Person is alerted immediately to concerns. She will liaise with the appropriate Children's Social Care personnel.

The Senior Designated Person will notify Children's Services if there is an unexplained absence of more than two days of a pupil who we know is on the Child Protection Register and is presently being monitored closely. It is the responsibility of the Deputy Designated Person to alert the Senior Designated Person of such an absence. The District Team are also notified if a child subject to a child protection plan, is about to be permanently excluded or when it has been agreed as part of any child protection plan or core group plan.

The Designated Persons will store records written by all involved adults and will produce records of the observations, conversations, contact with external agencies and action taken at Stage Four.

Individual pupil records on the MIS will state if confidential information is stored in the safeguarding file by the Senior Designated Person.

At the start of each school year, the Senior Designated Person produces an annual list of current pupils with child protection records. These records are updated and renewed regularly amongst the Deputy Designated Person to ensure that all records match.

The needs of those children who do not meet the threshold of needing intervention from children's social care will be met by universal services and their needs monitored in school, depending on the advice received from the specific authority. Regular monitoring of such children will be carried out by the Designated / Deputy Designated Person together with other members of staff who may have an important role in the life of the child (eg form tutor).

#### **Stage Five:**

##### **Action by external agencies**

##### **Family group meetings, Child Protection conferences and strategy meetings**

The School will provide cover to enable the Designated Senior Person to attend a Child Protection case conference. Where possible, the School will also permit the Deputy Designated Person to accompany them. It will be the responsibility of the member of staff or Designated Person to bring back from the meeting, information about how the School may be required to monitor the situation and support the pupil.

If the child is placed on the local Child Protection Register, a Core Group will be agreed. The School will provide cover to enable the appropriate person to attend monthly regular Core Group meetings.

##### **Support**

Dealing with a disclosure from a child and safeguarding issues can be stressful. The member staff/volunteer should, therefore, consider seeking support for him/herself and discuss this with the Designated Senior Person.

##### **Confidentiality**

Safeguarding children raises issues of confidentiality that must be clearly understood by all staff/volunteers schools.

- All staff in schools, both teaching and non-teaching staff, have a responsibility to share relevant information about the protection of children with other professionals, particularly the investigative agencies (Children's Services: Safeguarding and Specialist Services and the Police)
- If a child confides in a member of staff/volunteer and requests that the information is kept secret, it is important that the member of staff/volunteer tell the child in a manner appropriate to the child's age/stage of development that they cannot promise complete confidentiality – instead they must explain that they may need to pass information to other professionals to help keep the child or other children safe
- Staff/volunteers who receive information about children and their families in the course of their work should share that information only within appropriate professional contexts.

### **Child Protection Records**

Information relating to individual cases is strictly confidential and actual and suspected child abuse records are kept separately from the individual pupil record. The Senior Designated Person keeps child protection records. Such information is stored in a locked cabinet in the school office by the Senior Designated Person for fifty years after the child has left school, according to the requirements of the school's insurance company.

**The Headmistress forwards copies of confidential Child Protection records to the Senior School Designated Person when a child leaves the school and moves to Senior School.**

### **Communication with Parents**

This policy is made available to parents of pupils and parents of prospective pupils via publication on the internet website and a copy is available for inspection on the school premises during the school day. Parents are notified that the Safeguarding and Child Protection Policy is on the website via the Parent Handbook. Parents are also alerted to on-line dangers through twilight information sessions and welcome evenings.

### **One-to-one Teaching**

Many pupils receive one-to-one teaching in the contexts of Music, Performing Arts and, on occasion, Sport. All teachers responsible for such tuition are required to read and understand the School's Child Protection and Safeguarding policy, KCSIE 2019 and Annex A (Part One), the Staff Code of Conduct and Whistle Blowing Policy. Members of the peripatetic Music and Performing Arts staff also receive the usual staff training on safeguarding and child protection every year – alongside the rest of the School staff.

### **Allegations Involving School Staff/Volunteers**

An allegation is any information which indicates that a member of staff/volunteer may have:

- behaved in a way that has, or may have harmed a child

- possibly committed a criminal offence against/related to a child
- behaved towards a child or children in a way which indicates s/he would pose a risk of harm if they work regularly or closely with children.

This applies to any child that the member of staff/volunteer has contact with in their personal, professional or community life.

To reduce the risk of allegations, all staff should be aware of safer working practice and should be familiar with the guidance contained in the staff handbook, school code of conduct or Government document REVISED '*Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings*' (2019).

The person to whom an allegation is first reported should take the matter seriously and keep an open mind. S/he should not investigate or ask leading questions if seeking clarification; it is important not to make assumptions. Confidentiality should not be promised and the person should be advised that the concern will be shared on a 'need to know' basis only. Staff have many opportunities throughout the year to have a Supervision meeting with a member of SLT, where they can discuss any safeguarding concerns they may have. This is in addition to our open door policy, where staff can speak to SLT at any time about any safeguarding issues or concerns.

Actions to be taken include making an immediate written record of the allegation using the informant's words - including time, date and place where the alleged incident took place, brief details of what happened, what was said and who was present. This record should be signed, dated and immediately passed on to the Headmistress.

If the concerns are about the Headmistress, then the Chair of Governors should be contacted.

The **Chair of Governors** in this school is: **Dr Tessa Myatt**

Contact: The Clerk to the Governors – 0161 928 0678

In the absence of the Chair of Governors, the Vice Chair should be contacted. The Vice Chair in this school is: **Mrs Jennie Duschenes & Mr Ian Pinnington**

Contact: The Clerk to the Governors – 0161 928 0678

The recipient of an allegation must **not** unilaterally determine its validity, and failure to report it in accordance with procedures is a potential disciplinary matter.

The Headmistress will not investigate the allegation itself, or take written or detailed statements, but will assess whether it is necessary to refer the concern to the Local Authority Designated Officer:

MARAT 0161 912 5125

If the allegation meets any of the three criteria set out at the start of this section, contact should always be made with the Local Authority Designated Officer without delay.

The Headmistress should, as soon as possible, **following briefing** from the Local Authority Designated Officer, inform the subject of the allegation.

**For further information see:**

Trafford Inter-agency Child Protection and Safeguarding Children Procedures (Electronic).

**Online safeguarding**

Any online incidents that raise safeguarding concerns should be handled by the Designated Senior Person and reports made to Children's Services and the Police as appropriate.

The following online incidents must always be reported to the Police.

- Discovery of indecent images of children and young people
- Behaviour considered to be 'grooming'; whether it be perpetrated by those intending to groom for extremist or sexual purposes
- Sending of obscene materials.

On discovery of illegal content, the equipment or materials found should not be tampered with and advice should be sought from the Police. Computers or other devices should not be switched off unless instructed to do so by the Police. Further access to the illegal content should be prevented by keeping other people out of the area. If necessary, the monitor itself can be turned off but the computer should remain as you have found it (DO NOT shut the machine down). No attempt should be made to download, print or send any materials found.

All illegal content must be reported to the Police and the Internet Watch Foundation ([www.iwf.org.uk](http://www.iwf.org.uk)).

If an incident involving youth produced sexual imagery (often referred to as sexting) comes to the school's attention, the incident should be referred to the DSL as soon as possible and they will hold an initial review meeting with appropriate staff. There will be subsequent interviews with the young people involved if appropriate. Parents will be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm. At any point in the process if there is a concern a young person has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

See the ICT, Cyber Bullying and E-Safety Policy for further information.

**Child abuse within the School**

**Corporal punishment is against the law and will not be used by anyone in this school.** There will be no physical contact by a member of staff that is deliberately intended to punish a pupil or cause pain, injury or humiliation.

There may be rare instances of suspected abuse being reported where a member of the teaching or support staff or a volunteer or a governor is implicated as the abuser. Any suspicions should be reported at once to the Headmistress who will follow the *Allegations of Abuse against Adults who Work with Children and Young People policy* and will consult the Chair of Governors to discuss further action.

If the allegation involves the Headmistress, suspicions will be reported to the Senior Designated Person and by her directly to the Chair of Governors. In such situations, the Headmistress will not be informed at this stage.

### **Peer on Peer Abuse**

The school recognises that children are capable of abusing their peers and abuse should never be tolerated or passed off as “banter” or “part of growing up”. Such abuse can be physical, emotional, sexual and exploitative.

“Children can abuse other children. This is generally referred to as peer on peer abuse and can take many forms. This can include (but is not limited to): bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiation/hazing type violence and rituals.” – *Keeping Children Safe in Education 2019*

Older pupils may attempt to recruit younger pupils and young people suffering from sexual exploitation themselves can be forced to recruit other young pupils under the threat of violence. When one or more pupil abuses another pupil and when there is reasonable cause to suspect a child is suffering, or likely to suffer significant harm, then this abuse will warrant a response under Child Protection procedures rather than under the School’s Anti-Bullying policy. In the event of disclosures about pupil on pupil abuse, all children involved – whether perpetrator or victim – are treated as being at risk. Such cases will be referred to the Designated Safeguarding Lead who will contact local agencies (Police / Children’s Services) and will follow the outcomes of this discussion; making a referral where appropriate. In order to manage situations where a safeguarding risk is present, a risk assessment will be prepared along with a preventative supervision plan to minimise future risks.

### **Upskirting**

This typically involves taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is important that all staff are vigilant regarding upskirting, in case they hear of any such cases happening outside of school. Upskirting is now classed as a *criminal offence*.

### **Sexting**

Sexting can be seen as harmless, but creating or sharing explicit images of a minor is illegal, even if the person doing it is under 18. There are several reasons why children engage in sexting ranging from peer

pressure, a need to test and explore their sexual identity and feelings, getting more attention on social media through to an inability to say no to persistent demands for sexually explicit images.

Sexting can potentially open up young people to unsolicited online abuse and attention, blackmail and cyber bullying. It can also cause a lot of emotional distress. Educators play a pivotal role here. It is important for adults to gauge their relationship with a child and begin discussions accordingly. As teachers, we discuss the dos and don'ts when it comes to navigating content online and help children understand that it is okay to say no to sharing content they are uncomfortable with. Adults should make children understand that trust and consent are extremely important in a healthy relationship and nobody can pressurise them into doing things they are not comfortable with.

### **Preventing Radicalisation and Violent Extremism**

Prevent is part of the Government's counter terrorism strategy and aims to stop people becoming terrorists or supporting terrorism. Bowdon Prep is clear that exploitation and radicalisation will be viewed as a safeguarding concern and will be referred to the appropriate safeguarding authorities.

At Bowdon Prep, we build pupils' resilience to radicalisation by promoting fundamental British values and enabling our pupils to challenge extremist views. We value the fundamental rights of freedom of speech, expression of beliefs and ideology and tolerance of others which are the core values of our democratic society. However, all rights come with responsibilities and free speech or beliefs designed to manipulate the vulnerable or which advocate harm or hatred towards others will not be tolerated. Bowdon Prep seeks to protect its pupils and staff from all messages and forms of violent extremism and ideologies including those linked to, but not restricted to the following: Far Right/Neo Nazi, White Supremacy ideology, extremist Islamic ideology, Irish Nationalist and Loyalist paramilitary groups and extremist Animal Rights groups.

The school has an important role to play in supporting the Government's Prevent Strategy. Prevent aims to protect those who are vulnerable to exploitation from those who seek to get people to support or commit acts of violence. This could be staff and parents as well as pupils. Staff are well placed to recognise individuals, whether parents, pupils or staff, who may be vulnerable and therefore more susceptible to radicalisation by violent extremists or terrorists. It is fundamental to our 'duty of care' and falls within our statutory safeguarding responsibilities. Every member of staff has a role to play in protecting and supporting vulnerable individuals.

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

If a member of staff in a school has a concern about a particular pupil they should follow the school's normal safeguarding procedures, including discussing with the school's Designated Person and where deemed necessary, with children's social care. You can also contact your local police force or dial 101 (the non-emergency number). They can talk to you in confidence about your concerns and help you gain access to support and advice.

The Department for Education has dedicated a telephone helpline (020 7340 7264) to enable staff and governors to raise concerns relating to extremism directly. Concerns can also be raised by email to [counter.extremism@education.gsi.gov.uk](mailto:counter.extremism@education.gsi.gov.uk).

Please note that the helpline is not intended for use in emergency situations, such as a child being at immediate risk of harm or a security incident, in which case the normal emergency procedures should be followed.

In Manchester, vulnerable individuals being targeted for radicalisation/recruitment into violent extremism is being viewed as a safeguarding issue. Subsequently Greater Manchester Police are leading on Channel. Channel is a mechanism for ensuring that individuals identified as vulnerable to violent extremism are supported through existing multi-agency safeguarding frameworks. This ensures professionals from relevant partner agencies are brought together to share information and decide upon the most appropriate support for that person.

**Forced Marriage** became a criminal offence in June 2014. It is a form of child, adult and domestic abuse and in line with statutory guidance, is treated by such at this school. The School is sensitive to differing family patterns and lifestyles and child-rearing patterns that vary across different racial, ethnic and cultural groups. However, child abuse cannot be condoned for religious or cultural reasons. The School's Safeguarding and Child Protection Policies will be used to protect a victim or potential victim of forced marriage. If a case of forced marriage is suspected, it will be viewed as a safeguarding concern. Parents and carers will not be approached or involved about a referral to any other agencies.

**Female Genital Mutilation (FGM)** is illegal in the UK and is a violation of the human rights of girls and women. It comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is a legal duty for teachers with any concerns that a young person may be at risk of FGM that they refer it to the police immediately (telephone 101 for local Police) as well as to the Designated Senior Person and appropriate safeguarding agencies and healthcare professionals.

### **Domestic Abuse**

**Operation Encompass** The purpose of Operation Encompass is to safeguard and support children and young people who have been involved in, heard or been witness to a domestic abuse incident. If a domestic violence incident has been reported to the police, the school will be informed the following morning. Being involved or witnessing such an incident at home, children will often arrive at school distressed, upset and unprepared for the day. Greater Manchester Police, Trafford Social Care and our Designated Safeguarding Lead and Deputy will work together in partnership to allow opportunities to engage with the child. We will also provide access to silent or overt support that allows them to remain in

a safe and secure familiar environment following early reporting to school of a domestic abuse incident. School will follow the advice from the police.

### **Attendance / Missing From Education**

Monitoring the attendance of pupils in the School forms part of the safeguarding responsibilities of all members of staff. Indeed, a child going missing from education is a potential indicator of abuse or neglect. If a pupil's attendance falls below 85% and parents have not provided a letter from a GP or other medical expert that the absence is due to valid medical reasons, then the pupil's Local Authority will be informed. The Local Authority will also be informed if any pupil fails to attend school regularly or has been absent without the School's permission for a continuous period of ten school days or more. A Pupil's name may be deleted from the admission register on certain grounds. These are:

- (i) when the pupil has been taken out of school to be home educated
- (ii) when the family has apparently moved away
- (iii) when the pupil has been certified as medically unfit to attend
- (iv) when the pupil is in custody for more than four months
- (v) when the pupil has been permanently excluded.

A class register is taken at the start of the day and at the beginning of the session after lunch to monitor the attendance of all pupils. If it is judged that a pupil is at risk of leaving school during the day without permission, then a risk assessment will be put in place to ensure that the Senior Designated Person and/or Deputy Designated Person is/are informed as soon as the pupil is known to be missing so that appropriate searches can take place. The Senior Designated Person will liaise with parents / external services as appropriate to ensure the on-going safety of the pupil.

### **Leavers / Withdrawal from the School**

In the case of a child who is leaving this school to attend an alternative school or college and for whom there has been a child protection concern:

- Copies of official child protection records will be passed on by the Senior Designated Person to the Designated Person at the receiving school. A receipt stating that these records have been received is requested when such records are passed on
- If the pupil is on the Child Protection Register, the Senior Designated Person will contact her Social Worker
- To promote the welfare and protect the safety of the child, it may be necessary for information to be shared with future schools.

In the case of any child of compulsory school age for whom parents have given notice, the school secretary will:

- find out the name and address of the receiving school and check that the girl has started at the new school
- inform the local authority of the destination school, or a parent's intention to home-educate their daughter or if there is no known destination school
- inform the local authority if a child is due to start at this school and does not turn up
- check, if parents have said that they are moving abroad, with the school to which they are moving

- keep a summary log of children who have left the school.

In the case of a child who has to leave due to non-payment of fees, the school will inform the child's local authority to check that the child has been enrolled at another school. The school secretary will keep the Senior Designated Person informed at each stage of the procedures outlined above.

### Staff Training

The school has a commitment to training its staff on how to protect children.

- The School will ensure that at least one member of every interview panel has been accredited by DfE / NSPCC safer recruitment training
- Staff will receive update training as required and at least once every year. This will normally take place in the termly staff INSET sessions led by the DSL. This training will include basic safeguarding information about the school's policies and procedures, signs and symptoms of abuse (emotional and physical), indicators of vulnerability to radicalisation and how to manage a disclosure from a child as well as when and how to record a concern about the welfare of a child (last training took place in September 2018; Prevent Online training took place in October 2015)
- In the staff meeting at the start of each year, staff / volunteers are reminded about the names of the Designated Persons to whom they should take allegations or suspicions. (Last update September 2018) along with updated regulations and information relating to safeguarding/child protection. They are also reminded of the:
  - school's overarching safeguarding procedures
  - Safeguarding and Child Protection Policy
  - Staff Code of Conduct,
  - E-Safety Policy
  - Whistle Blowing Policy
  - Acceptable Use of ICT
  - behaviour strategy and related policies
  - bullying including cyber bullying
  - Care and Supervision policy
  - Information on the role of the Designated Safeguarding Person.
- The statutory guidance refers to the importance of *Prevent* awareness training to equip staff to identify children at risk of being drawn into terrorism and to challenge extremist ideas. The Home Office has developed a core training product for this purpose – Workshop to Raise Awareness of Prevent (WRAP). All our staff have received WRAP training sessions in house on what *Prevent* is about and how to deal with any issues they may see inside or outside school. In order to fulfil the requirements of the Prevent Duty the School will:
  - Ensure the Designated Safeguarding Lead (DSL) undertakes Prevent awareness training and is able to provide advice and support to other members of staff on protecting children from the risk of radicalisation
  - Ensure staff are trained to be vigilant in spotting signs of extremist views and behaviours and that they always report anything to the DSL which may suggest a pupil, another staff member or a visitor is expressing opinions which may cause concern. Staff should follow

the usual reporting procedures as for any other safeguarding concern as laid out in the School's Safeguarding (Child Protection) Policy

- Ensure staff understand the importance of monitoring pupil absences and promptly address concerns about irregular absence with parents and / or carers
- Ensure staff and governors are aware of how to identify and respond to risks to children from extreme or radical views.
- The Designated Safeguarding Person makes staff aware of the early help process and their role in identifying emerging problems, sharing information and, in some cases, acting as the lead professional in undertaking an early help assessment. Staff are also made aware of the process for making referrals to children's social care and for statutory assessments under the Children Act 1989 that may follow a referral, along with the role they might be expected to play in such assessments
- The Designated Senior Person for Child Protection and the Headmistress will undergo training in inter-agency working and updates regularly but at least annually. Training should be provided by, or to the standards set by, the Trafford Safeguarding Children Board
- The Senior Designated Person meets with the Governor who oversees child protection practices on a termly basis so that arrangements can be monitored and, if necessary, reviewed
- Staff are trained on how to keep children safe on-line by being adequately equipped to understand, identify and mitigate the risks of new technology. **(Last e-safety training for all staff: January 2015)**
- All staff / volunteers sign to record their acknowledgement that they have read and **understood** the School's child protection and safeguarding procedures and Policy and Part 1 and Annex A of *Keeping Children Safe in Education* (KCSIE) each year. All staff are issued with updates of KCSIE when they are published and sign to say that they have read and understood the updates. (Last update September 2019). This is filed in staff folders.
- The Child Protection and Safeguarding Policy & Procedures are updated annually and sent to all staff / volunteers via e-mail (or by hand to any other staff involved in regulated activity who are not contactable via e-mail). All staff / volunteers are expected to sign a memorandum indicating that they have read and understood the policy. These records are stored in individual personnel files.

### **New Staff/Volunteers**

- New staff are asked to complete the NSPCC Level 1 Introduction to Child Protection online course or equivalent or receive face-to-face training from the Designated Safeguarding Lead.
- Where possible new staff / volunteers are given an induction prior to taking up their post at the school which includes familiarisation with the School's Child Protection and Safeguarding policy (including the identities of the Senior Designated Persons and the Deputy Designated Person), KCSIE 2018 (Part 1 and Annex A) along with all related safeguarding Policies and documents as listed above. If this is not possible staff / volunteers joining the School at different points throughout the year receive undergo induction upon taking up the post including details and written documentation on related Child Protection policies, procedures and responsibilities,

**Recruitment procedures** - See Recruitment Policy

When recruiting new members of staff the school follows the government guidance 'Safeguarding Children: Safer Recruitment in Education' 2007 and Safer Recruitment principles, and has due regard to the Safeguarding Vulnerable Groups Act 2006 and The Protection of Freedoms Act 2012.

The school ensures that enhanced DBS checks are undertaken in line with government guidance, that appropriate references are obtained and that qualifications are verified. Accredited Safer Recruitment training has been undertaken by the Headmistress and other staff members, in accordance with statutory guidance. Newly appointed staff and volunteers will have a robust induction into the child protection procedures when they join the school. They will be made aware of the Trafford Safeguarding Children Board procedures as part of that induction programme, and be given a copy of the school Safeguarding Policy. They will also attend training appropriate to their role.

Any staff member, volunteer or governor who becomes the subject of a police investigation in relation to physical or sexual offences against adults or children, or are charged with such a criminal offence, must inform the headmistress. Staff must disclose any convictions, cautions, court orders, reprimands and warnings which may affect their suitability to work with children whether received before, or during their employment at school.

The Headmistress will discuss any potential safeguarding matters with the LADO and any required action will be agreed. Any staff member, volunteer or governor whose own children become subject to child protection investigations must inform the Headmistress. The Headmistress will discuss with the Local Authority Designated Officer (LADO) in regard to procedures for dealing with allegations against persons who work in a position of trust with children. Appropriate action will be agreed. The Single Central Record is kept by the Headmistress.

All staff complete disqualification declaration prior to appointment and subsequently each year in line with the performance management process to safeguard against members of staff being disqualified through:

- having certain orders or other restrictions placed upon them
- having committed certain offences

### **Monitoring the effectiveness of the policy and procedures**

The following checklist will be used by the School:

- Is there a policy in place?
- Has the policy been reviewed by the Governors annually?
- Has the Headmistress reviewed, in writing, the School's safeguarding policy and procedures annually?
- Has the Headmistress made arrangements for independent scrutiny and challenge of the School's policy and practices, for example by the nominated governor or an independent safeguarding visit?
- Has the written report of the review been signed by the independent scrutiniser?

- Have the School's recruitment policy and procedures been checked by the Headmistress against current statutory guidance on an annual basis? (Keeping Children Safe in Education, September 2016)
- Is the central record of recruitment checks in place, in line with current regulations and up to date?
- Are individual employment records in order?
- Is the staff training record for child protection up to date?
- Is there evidence of collaboration with Trafford Children's Safeguarding Board?
- Are pupils able to tell you what they should do if they are suffering abuse or neglect?
- Are staff/ volunteers able to tell you accurately what they should do if they suspect abuse / neglect and whom they should tell?
- Are staff able to tell you accurately what they should do if a pupil alleges abuse by a member of staff?
- Are staff following the guidance for safe working practice / staff code of conduct?

### Review of policy

All members of staff and Governors will receive a copy of this policy. Copies may be reviewed by parents. This policy will be reviewed, evaluated and updated as required and formally on an annual basis to assess its relevance and effectiveness.

Booklet Part 1 Annex A (KCSIE 2019) issued to staff by email in September 2019 and hard copy made available

Date of update	(U) Updated (R) Reviewed by	How was updated disseminated	Parents informed	Policy on website
May	Governors (R)	email	No	Yes
April 2016	SH (U)	Staff meeting	No	Yes
Sept 2016	HG (U)	Staff briefing – email – all staff to familiarise and action	Yes	Yes
Jan 2017	Governors (R)			
Feb 2017	H Gee (U)	Staff briefing –email to Governors	Yes	Yes
Sept 2017	S Hughes (R)		Yes	Yes
Jan 2018	Governors (R)			
Sept 2018	S Hughes (R)	Staff INSET	Yes	Yes
Oct 2018	S Hughes (U)	Staff training (CPD)		
Nov 2018	Governors (R)			
Sept 2019	S Hughes (U)	Staff training – INSET		

## APPENDIX 1 - INDICATORS OF HARM

### ***PHYSICAL ABUSE***

*Physical abuse 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.*

#### **Indicators in the child**

##### **Bruising**

It is often possible to differentiate between accidental and inflicted bruises. The following must be considered as non-accidental unless there is evidence or an adequate explanation provided:

- Bruising in or around the mouth
- Two simultaneous bruised eyes, without bruising to the forehead, (rarely accidental, though a single bruised eye can be accidental or abusive)
- Repeated or multiple bruising on the head or on sites unlikely to be injured accidentally, for example the back, mouth, cheek, ear, stomach, chest, under the arm, neck, genital and rectal areas
- Variation in colour, possibly indicating injuries caused at different times
- The outline of an object used e.g. belt marks, hand prints or a hair brush
- Linear bruising at any site, particularly on the buttocks, back or face
- Bruising or tears around, or behind, the earlobe/s indicating injury by pulling or twisting
- Bruising around the face
- Grasp marks to the upper arms, forearms or leg
- Petechial haemorrhage (pinpoint blood spots under the skin.) Commonly associated with slapping, smothering/suffocation, strangling and squeezing

##### **Fractures**

Fractures may cause pain, swelling and discolouration over a bone or joint. It is unlikely that a child will have had a fracture without the carers being aware of the child's distress.

If the child is not using a limb, has pain on movement and/or swelling of the limb, there may be a fracture.

There are grounds for concern if:

- the history provided is vague, non-existent or inconsistent
- there are associated old fractures
- medical attention is sought after a period of delay when the fracture has caused symptoms such as swelling, pain or loss of movement
- Rib fractures are only caused in major trauma such as in a road traffic accident, a severe shaking injury or a direct injury such as a kick
- Skull fractures are uncommon in ordinary falls ie from three feet or less. The injury is usually witnessed, the child will cry and if there is a fracture, there is likely to be swelling on the skull developing over 2 to 3 hours. All fractures of the skull should be taken seriously
- Mouth Injuries
- Tears to the frenulum (tissue attaching upper lip to gum) often indicates force feeding of a baby or a child with a disability. There is often finger bruising to the cheeks and around the mouth. Rarely, there may also be grazing on the palate

## **Poisoning**

Ingestion of tablets or domestic poisoning in children under 5 is usually due to the carelessness of a parent or carer, but it may be self-harm, even in young children.

## **Fabricated or Induced Illness**

Professionals may be concerned at the possibility of a child suffering significant harm as a result of having illness fabricated or induced by their carer. Possible concerns are:

- discrepancies between reported and observed medical conditions, such as the incidence of fits
- attendance at various hospitals, in different geographical areas
- development of feeding / eating disorders, as a result of unpleasant feeding interactions
- the child developing abnormal attitudes to their own health
- non organic failure to thrive - a child does not put on weight and grow and there is no underlying medical cause
- speech, language or motor developmental delays
- dislike of close physical contact
- attachment disorders
- low self esteem
- poor quality or no relationships with peers because social interactions are restricted
- poor attendance at school and under-achievement

## **Bite Marks**

Bite marks can leave clear impressions of the teeth when seen shortly after the injury has been inflicted. The shape then becomes a more defused ring bruise or oval or crescent shaped. Those over 3cm in diameter are more likely to have been caused by an adult or older child.

A medical/dental opinion, preferably within the first 24 hours, should be sought where there is any doubt over the origin of the bite.

## **Burns and Scalds**

It can be difficult to distinguish between accidental and non-accidental burns and scalds. Scalds are the most common intentional burn injury recorded.

- Any burn with a clear outline may be suspicious eg circular burns from cigarettes, linear burns from hot metal rods or electrical fire elements, burns of uniform depth over a large area, scalds that have a line indicating immersion or poured liquid
- Old scars indicating previous burns/scalds which did not have appropriate treatment or adequate explanation. Scalds to the buttocks of a child, particularly in the absence of burns to the feet, are indicative of dipping into a hot liquid or bath

The following points are also worth remembering:

- A responsible adult checks the temperature of the bath before the child gets in
- A child is unlikely to sit down voluntarily in a hot bath and cannot accidentally scald its bottom without also scalding his or her feet
- A child getting into too hot water of his or her own accord will struggle to get out and there will be splash marks

## **Scars**

A large number of scars or scars of different sizes or ages or on different parts of the body or unusually shaped, may suggest abuse.

## **Emotional/Behavioural Presentation**

- Refusal to discuss injuries
- Admission of punishment which appears excessive
- Fear of parents being contacted and fear of returning home
- Withdrawal from physical contact
- Arms and legs kept covered in hot weather
- Fear of medical help
- Aggression towards others
- Frequently absent from school
- An explanation which is inconsistent with an injury
- Several different explanations provided for an injury

## **Indicators in the parent**

- May have injuries themselves that suggest domestic violence
- Not seeking medical help/unexplained delay in seeking treatment
- Reluctant to give information or mention previous injuries
- Absent without good reason when their child is presented for treatment
- Disinterested or undisturbed by accident or injury
- Aggressive towards child or others
- Unauthorised attempts to administer medication
- Tries to draw the child into their own illness
- Past history of childhood abuse, self-harm, somatization disorder or false allegations of physical or sexual assault
- Parent/carer may be over involved in participating in medical tests, taking temperatures and measuring bodily fluids
- Observed to be intensely involved with their children, never taking a much needed break nor allowing anyone else to undertake their child's care
- May appear unusually concerned about the results of investigations which may indicate physical illness in the child
- Wider parenting difficulties may (or may not) be associated with this form of abuse
- Parent/carer has convictions for violent crimes

## **Indicators in the family/environment**

- Marginalised or isolated by the community
- History of mental health, alcohol or drug misuse or domestic violence
- History of unexplained death, illness or multiple surgery in parents and/or siblings of the family
- Past history of childhood abuse, self-harm, somatization disorder or false allegations of physical or sexual assault or a culture of physical chastisement

## **EMOTIONAL ABUSE**

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children 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 the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction.

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

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

### **Indicators in the child**

- Developmental delay
- Abnormal attachment between a child and parent/carer eg anxious, indiscriminate or no attachment
- Aggressive behaviour towards others
- Child scapegoated within the family
- Frozen watchfulness, particularly in pre-school children
- Low self-esteem and lack of confidence
- Withdrawn or seen as a 'loner' - difficulty relating to others
- Over-reaction to mistakes
- Fear of new situations
- Inappropriate emotional responses to painful situations
- Neurotic behaviour (eg rocking, hair twisting, thumb sucking)
- Self-harm
- Fear of parents being contacted
- Extremes of passivity or aggression
- Drug/solvent abuse
- Chronic running away
- Compulsive stealing
- Low self-esteem
- Air of detachment – 'don't care' attitude
- Social isolation – does not join in and has few friends
- Depression, withdrawal
- Behavioural problems eg aggression, attention seeking, hyperactivity, poor attention
- Low self-esteem, lack of confidence, fearful, distressed, anxious
- Poor peer relationships including withdrawn or isolated behaviour

### **Indicators in the parent**

- Domestic abuse, adult mental health problems and parental substance misuse may be features in families where children are exposed to abuse

- Abnormal attachment to child eg overly anxious or disinterest in the child
- Scapegoats one child in the family
- Imposes inappropriate expectations on the child eg prevents the child's developmental exploration or learning, or normal social interaction through overprotection
- Wider parenting difficulties may (or may not) be associated with this form of abuse.

#### **Indicators of in the family/environment**

- Lack of support from family or social network.
- Marginalised or isolated by the community.
- History of mental health, alcohol or drug misuse or domestic violence.
- History of unexplained death, illness or multiple surgery in parents and/or siblings of the family
- Past history of childhood abuse, self-harm, somatization disorder or false allegations of physical or sexual assault or a culture of physical chastisement.

#### **NEGLECT**

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- 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

#### **Indicators in the child**

- Physical presentation
- Failure to thrive or, in older children, short stature
- Underweight
- Frequent hunger
- Dirty, unkempt condition
- Inadequately clothed, clothing in a poor state of repair
- Red/purple mottled skin, particularly on the hands and feet, seen in the winter due to cold
- Swollen limbs with sores that are slow to heal, usually associated with cold injury
- Abnormal voracious appetite
- Dry, sparse hair
- Recurrent / untreated infections or skin conditions e.g. severe nappy rash, eczema or persistent head lice / scabies/ diarrhoea
- Unmanaged / untreated health / medical conditions including poor dental health
- Frequent accidents or injuries
- Development
- General delay, especially speech and language delay
- Inadequate social skills and poor socialization

- Emotional/behavioural presentation
- Attachment disorders
- Absence of normal social responsiveness
- Indiscriminate behaviour in relationships with adults
- Emotionally needy
- Compulsive stealing
- Constant tiredness
- Frequently absent or late at school
- Poor self esteem
- Destructive tendencies
- Thrives away from home environment
- Aggressive and impulsive behaviour
- Disturbed peer relationships
- Self-harming behaviour

#### **Indicators in the parent**

- Dirty, unkempt presentation
- Inadequately clothed
- Inadequate social skills and poor socialisation
- Abnormal attachment to the child eg anxious
- Low self-esteem and lack of confidence
- Failure to meet the basic essential needs eg adequate food, clothes, warmth, hygiene
- Failure to meet the child's health and medical needs eg poor dental health; failure to attend or keep appointments with health visitor, GP or hospital; lack of GP registration; failure to seek or comply with appropriate medical treatment; failure to address parental substance misuse during pregnancy
- Child left with adults who are intoxicated or violent
- Child abandoned or left alone for excessive periods
- Wider parenting difficulties, may (or may not) be associated with this form of abuse

#### **Indicators in the family/environment**

- History of neglect in the family
- Family marginalised or isolated by the community
- Family has history of mental health, alcohol or drug misuse or domestic violence
- History of unexplained death, illness or multiple surgery in parents and/or siblings of the family
- Family has a past history of childhood abuse, self-harm, somatization disorder or false allegations of physical or sexual assault or a culture of physical chastisement
- Dangerous or hazardous home environment including failure to use home safety equipment; risk from animals
- Poor state of home environment eg unhygienic facilities, lack of appropriate sleeping arrangements, inadequate ventilation (including passive smoking) and lack of adequate heating
- Lack of opportunities for child to play and learn

## **SEXUAL ABUSE**

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 (including via the internet).

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

### **Indicators in the child**

- Physical presentation
- Urinary infections, bleeding or soreness in the genital or anal areas
- Recurrent pain on passing urine or faeces
- Blood on underclothes
- Sexually transmitted infections
- Vaginal soreness or bleeding
- Pregnancy in a younger girl where the identity of the father is not disclosed and/or there is secrecy or vagueness about the identity of the father
- Physical symptoms such as injuries to the genital or anal area, bruising to buttocks, abdomen and thighs, sexually transmitted disease, presence of semen on vagina, anus, external genitalia or clothing
- Emotional/behavioural presentation
- Makes a disclosure
- Demonstrates sexual knowledge or behaviour inappropriate to age/stage of development, or that is unusually explicit
- Inexplicable changes in behaviour, such as becoming aggressive or withdrawn
- Self-harm - eating disorders, self-mutilation and suicide attempts
- Poor self-image, self-harm, self-hatred
- Reluctant to undress for PE
- Running away from home
- Poor attention/concentration (world of their own)
- Sudden changes in school work habits, become truant
- Withdrawal, isolation or excessive worrying
- Inappropriate sexualised conduct
- Sexually exploited or indiscriminate choice of sexual partners
- Wetting or other regressive behaviours eg thumb sucking
- Draws sexually explicit pictures
- Depression

### **Indicators in the parents**

- Comments made by the parent/carer about the child.
- Lack of sexual boundaries

- Wider parenting difficulties or vulnerabilities
- Grooming behaviour
- Parent is a sex offender

### **Indicators in the family/environment**

- Marginalised or isolated by the community.
- History of mental health, alcohol or drug misuse or domestic violence.
- History of unexplained death, illness or multiple surgery in parents and/or siblings of the family
- Past history of childhood abuse, self-harm, somatization disorder or false allegations of physical or sexual assault or a culture of physical chastisement
- Family member is a sex offender

**Child sexual exploitation** is a form of sexual abuse where children are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation doesn't always involve physical contact and can happen online. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point.

The following vulnerabilities have been seen in children prior to child sexual exploitation abuse:

- Living in a chaotic or dysfunctional household (including parental substance use, domestic violence, parental mental health issues, parental criminality)
- History of abuse (including familial child sexual abuse, risk of forced marriage, risk of honour based violence, physical and emotional abuse and neglect)
- Recent bereavement or loss
- Gang association either through relatives, peers or intimate relationships (in cases of gang associated CSE only)
- Attending school with young people who are sexually exploited
- Learning disabilities
- Unsure about their sexual orientation or unable to disclose sexual orientation to their families
- Friends with young people who are sexually exploited
- Homelessness
- Lacking friends from the same age group
- Living in a gang neighbourhood
- Living in residential care
- Living in hostel, bed and breakfast accommodation or a foyer
- Low self-esteem or self-confidence
- Young carers

### **Some of the following signs may be indicators of sexual exploitation**

- Children who appear with unexplained gifts or new possessions
- Children who associate with other young people involved in exploitation

- Children who have older boyfriends or girlfriends
- Children who suffer from sexually transmitted infections or become pregnant
- Children who suffer from changes in emotional well-being
- Children who misuse drugs and alcohol
- Children who go missing for periods of time or regularly come home late
- Children who regularly miss school or education or don't take part in education.

## **FEMALE GENITAL MUTILATION**

### **The following may be indicators of risk:**

- The family comes from a community that is known to practice FGM
- Any female child born to a woman who has been subjected to FGM must be considered to be at risk, as must other female children in the extended family
- Any female who has a relative who has already undergone FGM must be considered to be at risk
- The socio-economic position of the family and the level of integration within UK society can increase risk

### **Indicators that FGM may soon take place:**

- Parents state that they or a relative will take the child out of the country for a prolonged period
- A child may talk about a long holiday (usually within the school summer holiday) to her country of origin or another country where the practice is prevalent
- A child may confide to a professional that she is to have a 'special procedure' or to attend a special occasion
- A professional hears reference to FGM in conversation, for example, a child may tell other children about it

### **The following may be short-term indicators that FGM has taken place:**

- Prolonged absence from school with noticeable behaviour changes on the girl's return
- Longer/frequent visits to the toilet, particularly after a holiday abroad or at any time
- Some girls may find it difficult to sit still and appear uncomfortable or may complain of pain between their legs
- Some girls may speak about 'something somebody did to them, that they are not allowed to talk about'
- A professional overhears a conversation amongst children about a 'special procedure' that took place when on holiday
- Young girls refusing to participate in PE regularly without a medical note
- Recurrent Urinary Tract Infections (UTI) or complaints of abdominal pain
- Intense pain and/or haemorrhage that can lead to shock during and after the procedure
- Occasionally death
- Haemorrhage that can also lead to anaemia
- Wound infection, including tetanus. Tetanus is fatal in 50 to 60 percent of all cases
- Urine retention from swelling and/or blockage of the urethra
- Injury to adjacent tissues
- Fracture or dislocation as a result of restraint

- Damage to other organs

**In the UK, girls and women affected by FGM will manifest some of these long term health complications. They may range from mild to severe or chronic.**

- Excessive damage to the reproductive system
- Uterine, vaginal and pelvic infections
- Infertility
- Cysts
- Complications with menstruation
- Psychological damage including a number of mental health and psychosexual problems, eg depression, anxiety, post-traumatic stress, fear of sexual activity. Many children exhibit behavioural changes after FGM but problems may not be evident until adulthood
- Abscesses
- Sexual dysfunction
- Difficulty in passing urine
- Increased risk of HIV transmission/hepatitis B/C – using same instruments on several girls

**E-Safety** is a safeguarding issue and Bowdon Prep has a duty to ensure that every pupil in its care is safe. This applies equally to the 'virtual' or digital world. Bowdon Prep will ensure that appropriate filtering methods are in place to ensure that pupils are safe from all types of inappropriate and unacceptable materials, including terrorist and extremist material. (See ICT & E-Safety Policy).

**Mobile phones, tablets and cameras are allowed in Early Years Unit under strict guidelines. Staff owned mobile phones are not to be switched on in the classrooms and where possible should be kept locked in secure classroom cupboards throughout the School day. The use of personal cameras, videos and iPads by all adults and / or children is also absolutely prohibited in Early Years. A mobile phone is used in After School club to receive emergency calls from parents but this phone does not have camera capability. School cameras, video recording equipment and iPads are used by staff and children to record evidence for the Learning Journey and profile. Mrs S Hughes has permission to use her phone for Twitter purposes and to take to sporting fixtures in case of emergency.**

### **Radicalisation**

**Research shows that indicators that may make an individual vulnerable to radicalisation can include:**

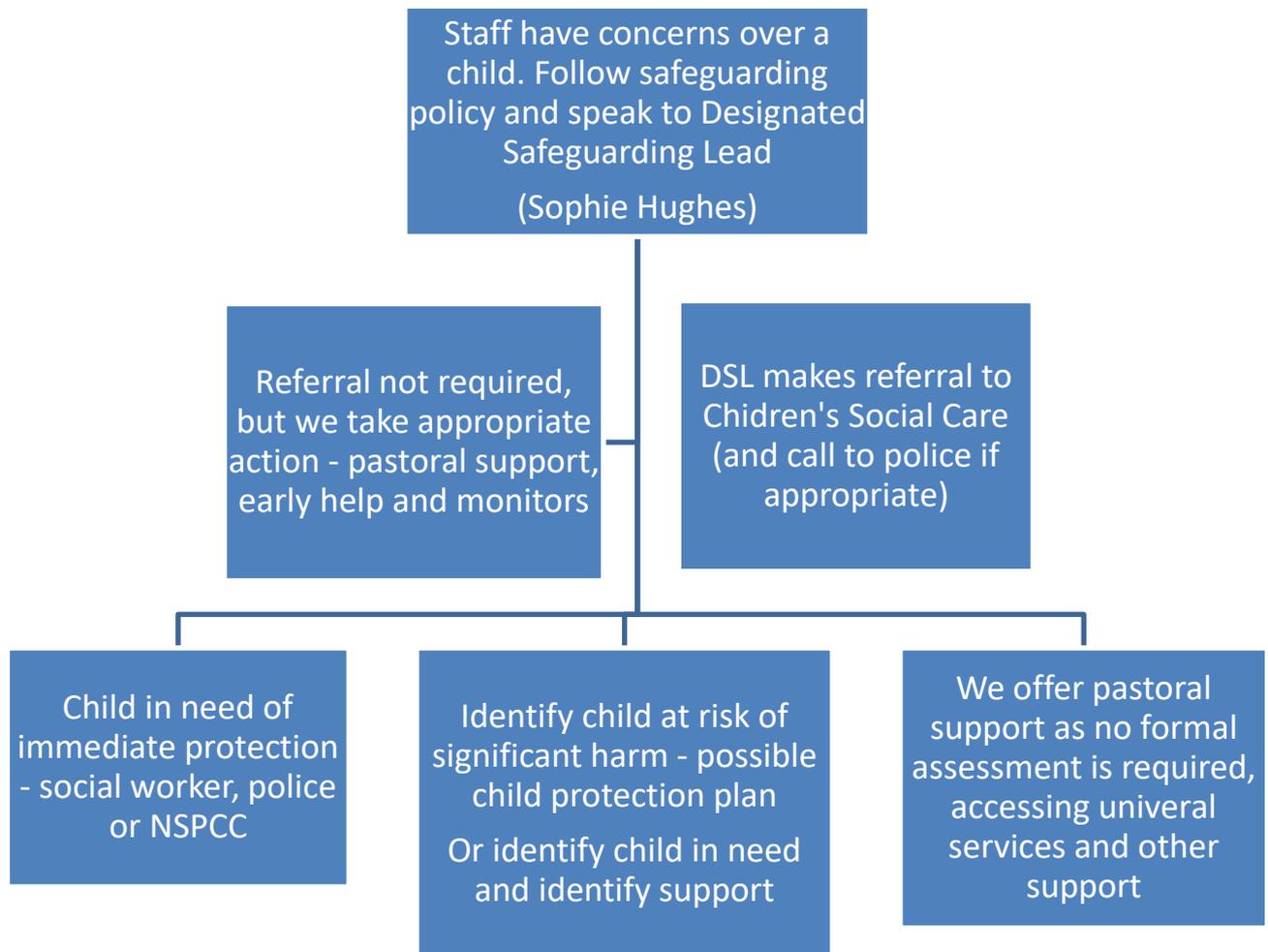
- Identity Crisis - Distance from cultural / religious heritage and uncomfortable with their place in the society around them
- Personal Crisis - Family tensions; sense of isolation; adolescence; low self-esteem; disassociating from existing friendship group and becoming involved with a new and different group of friends; searching for answers to questions about identity, faith and belonging
- Personal Circumstances - Migration; local community tensions; events affecting country or region of origin; alienation from UK values; having a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy
- Unmet Aspirations - Perceptions of injustice; feeling of failure; rejection of civic life

- Criminality - Experiences of imprisonment; poor resettlement/reintegration; previous involvement with criminal groups

**More critical risk factors could include:**

- Being in contact with known extremists or extremist recruiters
- Articulating support for violent extremist causes or leaders
- Accessing violent extremist websites, especially those with a social networking element;
- Possessing or accessing violent extremist literature
- Using inappropriate language, extremist narratives and a global ideology to explain personal disadvantage
- Justifying the use of violence to solve societal issues
- Joining or seeking to join extremist organisations
- Seeking to recruit others into extremist ideology
- Significant changes to appearance and/or behaviour
- Changes in friends and mode of dress.

Staff should also be mindful of other specific safeguarding issues such as domestic violence, drugs, gangs and youth violence, gender based violence, teenage relationship abuse, trafficking, mental health issues, body image issues, self-harm, children missing in education etc. (Further information on these safeguarding issues can be found at [www.nspcc.org.uk](http://www.nspcc.org.uk) and in the Mental Health Policy). If staff do have concerns, they can e-mail NSPCC at [help@nspcc.org.uk](mailto:help@nspcc.org.uk) or call them on 0800 028 0285.



## Appendix 3 - MANAGING ALLEGATIONS OF ABUSE MADE AGAINST ADULTS WHO WORK WITH CHILDREN AND YOUNG PEOPLE

(The School's staff code of conduct / Whistle Blowing procedures are separate to this policy).

### Introduction

This policy has been written in line with government guidance from the following documents:

- The Children Act 1989
- Section 175 of the Education Act 2002 (local authorities, governing bodies of maintained schools and institutions in the further education sector).
- Section 157 of the Education Act 2002 and the Education (Independent School Standards) (England) Regulations 2010.
- The Children Act 2004.
- Section 11 of the Children At 2004 (other agencies).
- Keeping Children Safe in Education (September 2019)
- ISI Regulations (February 2019)

*The term statutory guidance means that the School must have regard to it when carrying out duties relating to handling allegations of abuse against teachers and other staff.*

This policy applies to all adults who work with children and young people in Bowdon Preparatory School for Girls, whether paid employees or volunteers.

This guidance is about managing cases of allegations that might indicate a person would pose a risk of harm if they continue to work in regular or close contact with children in their present position, or in any capacity. It should be used in respect of all cases in which it is alleged that a teacher or member of staff (including volunteers) in a school or FE college that provides education for children under 18 years of age:

- Behaved in a way that has harmed a child, or may have harmed a child
- Possibly committed a criminal offence against or related to a child
- Behaved towards a child or children in a way that indicated he or she would pose a risk of harm if they work regularly or closely with children.

These behaviours should be considered within the context of the four categories of abuse:

- Physical
- Sexual
- Emotional abuse
- Neglect.

It is essential that any allegation of abuse made against a teacher or other member of staff or volunteer at Bowdon Prep School is dealt with very quickly, in a fair and consistent way that provides effective protection for the child and at the same time supports the person who is the subject of the allegation.

An **adult** is defined in this policy as a permanent or temporary member of the School staff, employment agency supply staff, volunteer, self-employed person and staff employed by a contractor or services provider. According to this definition, an adult may not necessarily be 18 years of age or over.

All adults working in Bowdon Prep are expected to comply with the School's Code of Conduct to ensure safe working practice.

### **Underlying principles**

- The welfare of the child is paramount
- It is the responsibility of all adults in the School to safeguard and promote the welfare of children and young people and to support a child who has allegedly been harmed by an adult
- The School also has a duty of care for those adults employed, commissioned or contracted to work with children and young people in the School
- Adults about whom there are allegations of abuse will be treated fairly, consistently and quickly, in line with employment law, and will be provided with support, including a named contact if he / she is suspended
- Quick resolution of an allegation is to the benefit of all involved and will be given priority
- The School will not undertake its own investigation of allegations without prior consultation with the LADO, (referred to in KCSIE as 'designated officer' or 'team of officers') or in the most serious cases, the Police, so as not to jeopardise investigations
- Allegations against a teacher who is no longer teaching at the School will be referred to the Police
- The School has a staff code of conduct (separate to this policy) which provides clear guidance about behaviour and actions so as not to place pupils or staff at risk of harm or of allegations of harm to a pupil

### **Timescale**

- (i) It is expected by the DfE that, where it is clear immediately that the allegation is unfounded, it will be resolved within one week.
- (ii) If the initial evaluation finds that the allegation does not involve a criminal offence or child protection concerns, and there is no requirement for formal disciplinary action, the Nominated Senior Manager should institute appropriate action within three working days.
- (iii) If a disciplinary hearing is required, and can be held without further investigation, the hearing should be held within fifteen working days (see the later section on Disciplinary Hearings).

### **Definitions**

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

- Substantiated: there is sufficient evidence to prove the allegation.
- Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive.
- False: there is sufficient evidence to disprove the allegation.

### **Strands in the consideration of an allegation**

The order of action will depend on the nature and seriousness of the allegation and will not necessarily follow the order below.

1. Support to the child or young person, with immediate treatment if the child is injured

2. Provision of information to the parents of the child
3. Consultation with the Manchester Local Authority Designated Officer (LADO) which may lead to:
  - Referral to the Police in the case of a possible criminal offence
  - Consultation with Children's Social Care Services if the child is in need of protection or other services
  - Internal action and consideration by the School of whether disciplinary action is warranted
4. Provision of information to the person against whom the abuse is alleged

#### **Nominated Senior Manager within the School**

- The Nominated Senior Manager within the School, that is, the person who undertakes the internal investigation and liaises with the Local Authority Designated Officer (LADO), Police and Children's Social Care Services as appropriate, is the Headmistress
- In the event of the absence of the Headmistress, the Nominated Senior Manager will be the Senior Designated Person for Child Protection
- In the event of allegations of abuse against the Headmistress, the Nominated Senior Manager within the School will be the Chair of Governors who will be contacted by the Senior Designated Person for Child Protection

#### **PROCEDURES TO BE FOLLOWED**

##### **Initial reporting of an allegation**

##### **Initial Action by Person Receiving or Identifying an Allegation or Concern**

The person to whom an allegation or concern is first reported should treat the matter seriously and keep an open mind. They should not:

- Investigate or ask leading questions if seeking clarification
- Make assumptions or offer alternative explanations
- Promise confidentiality, but they can give assurance that the information will only be shared on a 'need to know basis'

They should:

- Make a written record of the information (where possible in the child's own words), including the time, date and place of incident/s, persons present and what was said.
- Sign and date the written record and immediately report the matter to the Headmistress.

If allegations of abuse are made about the Headmistress, the matter should be reported to the Senior Designated Person for Child Protection who will **immediately** inform the Chair of Governors and the Local Authority Designated Officer. The Headmistress will not be informed at this stage.

If the allegation meets any of the criteria (i), (ii) or (iii) outlined on page 36 in the introduction of this policy and requires immediate intervention by the LADO and/or the Police, the Nominated Senior Manager will contact the LADO or team of officers. In the most serious cases, the Police will also be informed. The LADO will be informed within one working day of all allegations. All interviews will be conducted by the LADO. (See procedures below.) School personnel must not interview/question the person alleging abuse.

## Confidentiality

It is extremely important that when an allegation is made, the school makes every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

All employees of the School will:

- (i) make every effort to maintain complete confidentiality and avoid discussing the situation within or outside school, except when interviewed as part of the official investigation
- (ii) guard against publicity / media interest during an investigation. No material should be published that may lead to the identification of a teacher who has been accused by, or on behalf of, a pupil. This includes on social media. Such restrictions apply until the point that an accused person is charged with an offence, until the Secretary of State publishes information relating to the case or until the individual goes public or gives written consent for another to do so

Bowdon Prep School should take advice from the LADO, police and local authority social care services to agree the following:

- Who needs to know and, importantly, exactly what information can be shared
- How to manage speculation, leaks and gossip
- What if any information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if and when it should arise.

From 1st October 2012 the Education Act 2011 introduced reporting restrictions preventing the publication of any material that may lead to the identification of a teacher who has been accused by, or on behalf of, a pupil from the same school. Basically the reporting restrictions apply until the point that the accused person is charged with an offence.

The case manager should take advice from the LADO, police and children's social care services to agree the following:

- Who needs to know and, importantly, exactly what information can be shared
- How to manage speculation, leaks and gossip
- What, if any information can be reasonably given to the wider community to reduce speculation.
- How to manage press interest if and when it should arise.

The Nominated Senior Manager will agree with the LADO, Police (if necessary) and Children's Social Care Services the following:

- What information can be shared and with whom
- What, if any, information can be given to the wider community to reduce speculation
- How to manage speculation, leaks and gossip
- How to manage press interest, if it should arise

The Police will not normally provide any information to the press or media that might identify an individual who is under investigation, unless and until the person is charged with a criminal offence. In exceptional cases where the Police might depart from that rule, the School should expect to be consulted beforehand.

## Recording

The person receiving the initial allegation of abuse will produce a written, signed and dated account of the allegations, immediately if possible and certainly within 24 hours. This will be hand-delivered to the Nominated Senior Manager who will read, sign and date it. Communication with the individual and the parents of the child / children will be agreed.

- Comprehensive minutes will be produced of all meetings, preferably by a person not involved in the investigation
- The Nominated Senior Manager will keep records of all documents submitted, together with:
  - A summary of events leading to the allegation or concern about an adult's behaviour
  - The circumstances and context of the allegation
  - Professional opinions
  - Decisions made and the reasons for them
  - Action that is taken
  - Final outcome
  - A copy will be given to the individual against whom the allegation was made
  - A copy will be kept in this individual's confidential personnel file and must be retained indefinitely in case of legal action at any time in the future. This applies even if the individual leaves the organisation

The purpose of the record is to enable accurate information to be given in response to any future request for a reference. It will provide information where future DBS disclosures reveal information from the police about an allegation that did not result in a criminal conviction. Allegations that are found to have been malicious will be removed from personnel records.

Allegations that are not substantiated are unfounded or malicious will not be referred to in references, even if there is a history of repeated concerns or allegations which have been found to be unsubstantiated or malicious.

The School will make every effort to maintain confidentiality and guard against unwanted publicity. These restrictions apply up to the point where the accused person is charged with an offence, or the DfE/NCTL publish information about an investigation or decision in a disciplinary case.

## **ACTION BY THE NOMINATED SENIOR MANAGER**

### **2. Initial evaluation**

The Nominated Senior Manager will make a decision on whether it is necessary to contact the Local Authority Designated Officer (LADO) on **0161 912 5125 (MARAT)** for advice. Emergency out of hours number 0161 912 2020

The LADO should be consulted if there is any doubt as to whether the allegation meets the criteria set out on page 1 of this policy.

The purpose of an initial discussion with the LADO is for the LADO and the Nominated Senior Manager to consider the nature, content and context of the allegation and agree a course of action.

The LADO may ask the Nominated Senior Manager to provide or obtain any additional information which may be relevant, such as previous history, whether the child/family have made similar allegations and the individual's current contact with children.

The discussion will include deciding whether the information meets agreed thresholds to hold a **strategy meeting** under child protection procedures and whether the police and/or Children's Social Care Services need to be involved.

Discussions will be recorded in writing and any communication with both the individual and the parents of the child/children agreed.

### **3. Procedure if no further action involving external agencies is required**

This initial sharing and evaluation of information may lead to a decision that no further action is to be taken in regard to the individual facing the allegation or concern. This assumes that no strategy discussion is needed and no involvement of the Police or Children's Social Care Services is required.

- In this case, the decision and a justification for the decision will be recorded in writing by the Nominated Senior Manager and the LADO
- The Nominated Senior Manager and the LADO will agree what information should be put in writing to the individual concerned and by whom
- The Nominated Senior Manager will inform the accused person about the allegation as soon as possible after consulting the LADO and will give as much information as possible at the time
- The Nominated Senior Manager and the LADO will consider what action should follow in respect of:
  - 1) the individual who is the subject of the allegation / concern
  - 2) the person(s) who made the initial allegation

The investigation must be concluded even if the individual facing the allegation resigns or stops providing their services.

If the decision is made that an allegation has been deliberately invented or malicious, the Headmistress will make a decision about disciplinary action against the person making the allegation. The Headmistress may ask the police whether any action might be appropriate with respect to the Protection from Harassment Act 1997.

### **Situation where referral to Police / Children's Services is not normally required**

- a) Where it is clear that reasonable force has been used to control / restrain a pupil in accordance with the School's behaviour policy and the law, for example where dealing with disruptive behaviour
- b) Where the immediate facts indicate that it would not be possible for the allegation to be true. In this case, further investigation will be carried out by the Senior Designated Person for Child Protection to ascertain the child's reasons for the allegation and to eliminate the possibility of abuse by others
- c) Where the allegation represents inappropriate or poor practice by an adult that needs to be dealt with internally under the School's disciplinary or competency procedures, rather than this policy
- d) Where the nature of the allegation does not require formal disciplinary action, but some school action is needed; this should be instituted **within three working days**

#### **4. Procedure if further action involving external agencies may be required**

For all other cases, that is if the allegation is not demonstrably false or unfounded and there is cause to suspect that a child is suffering or is likely to suffer significant harm, a **strategy discussion** will be convened by the LADO.

In this case, the Nominated Senior Manager will not provide information to the accused person until the appropriate external agencies have been consulted, and have agreed what information can be disclosed to the person.

The LADO will canvas the views of the Police and/or children's services as to whether the member of staff should be suspended from contact with children. The power to suspend rests with the Nominated Senior Manager alone and it cannot be required by another agency, although the Nominated Senior Manager will have regard to the views of investigative agencies if involved. (See section on Suspension). An individual should only be suspended if there is no reasonable alternative.

If the strategy discussion decides that an investigation by police or Children's Social Care Services is not necessary, the LADO and Nominated Senior Manager will discuss next steps. This may include:

- No further action
- Summary dismissal
- A decision not to use the person's services in future
- Further enquiries by a senior manager of the School or an investigator independent of the School
- Report to the DBS
- Referral to the NCTL

#### **Resignations and compromise agreements**

The School will follow the procedures outlined above, including referring the individual to the DBS, even if a person against whom an allegation has been made tenders her/his resignation or withdraws the provision of a service. The findings will be recorded.

The School will not make a compromise agreement in the case of allegations of abuse or when the criterion are met to make a DBS referral. A compromise agreement will also not be made in cases of refusal to cooperate or resignation before the member of staff's notice period expires.

#### **Support to the person against whom the allegation is made**

The School will make every effort to manage and minimise the stress arising from the allegations and ensuing processes.

An individual will be informed of an allegation as soon as possible and the likely course of action explained, unless there is an objection from the LADO, Children's Social Care Services or the police.

Any member of staff subject to an allegation will be offered support throughout the process. S/he will be encouraged to seek advice and support at the earliest opportunity from a professional association or trade union if s/he is a member, or from a colleague. Wherever possible, the member of staff will be given a full opportunity to answer the allegation and make representations about it.

The member of staff, or her/his representative, will be given the name of a named representative who will then keep her/him up to date regarding the progress of the case and consider what other support is appropriate. This named representative would normally be the Deputy Head.

Social contact with colleagues will not be prevented unless there is evidence to suggest that such contact is likely to prejudice the collection of evidence.

The need for help and support is equally applicable when considering a suspended person's return to work. A phased return and the provision of a mentor to provide assistance and support in the short term will be provided, if appropriate.

### **Support to the child or children involved and their parents**

If the child has suffered injury, emergency assistance will be provided if required. The Senior Designated Person will accompany the child to hospital to ensure professional assessment and immediate treatment of the injury. In this case, parents will be informed immediately. There will be no communication about the alleged abuse with the child who is the subject of the allegation.

Parents will be informed about the allegation as soon as possible unless a strategy discussion is required or police and/or Children's Social Care are involved. In this case, there will be discussion and agreement on what can be disclosed.

Unless there is a criminal prosecution, parents will be informed about the progress of a case (though not any details of a disciplinary hearing) and the outcome, in confidence.

Parents will also be informed of the prohibition on reporting or publishing allegations against teachers in section 141F of the Education Act 2002.

### **Disciplinary hearings**

If the Nominated Senior Manager, in consultation with the LADO, feels that an internal disciplinary investigation and/or hearing is needed, she will comply with the School's disciplinary policy in terms of the timescales for the investigation.

- If a disciplinary hearing is required and can be held without further investigation, the hearing will be held **within 15 working days**
- Where further investigation is required to inform consideration of disciplinary action, the Nominated Senior Manager will discuss who will undertake that investigation with the LADO. In some circumstances, it may be appropriate for the disciplinary investigation to be conducted by a person who is independent of the School or the person's line management, to ensure objectivity

The investigating officer should aim to provide a report to the Nominated Senior Manager **within 10 working days**.

- On receipt of the report of the disciplinary investigation, the Nominated Senior Manager should decide **within two working days** whether a disciplinary hearing is needed
- If a disciplinary hearing is needed, it must then be held **within 15 working days of the decision**.

The Nominated Senior Manager will continue to liaise with the LADO, who should monitor progress of the case and provide advice/support when required or requested

### **Case subject to police investigation: Information for the Nominated Senior Manager**

If a criminal investigation is required, the Police will aim to complete their enquiries as quickly as possible, consistent with a fair and thorough investigation, and will keep the progress of the case under review.

The Police should, at the outset, set a target date for reviewing progress of the investigation and consulting the Crime Prosecution Service (CPS) about whether to proceed with the investigation, charge the individual with an offence, or close the case. Wherever possible, that review should take place **no later than four weeks** after the initial evaluation meeting.

If the decision is to continue to investigate the allegation, dates for subsequent reviews at fortnightly or monthly intervals should be set at that point. (It is open to the police to consult the CPS about the evidence that will need to be obtained in order to charge a person with an offence at any stage.)

If the Police and/or CPS decide not to charge the individual with an offence, or decide to administer a caution, or the person is acquitted by a court, the police should pass all information they have which may be relevant to a disciplinary case to the Nominated Senior Manager without delay.

If the person is convicted of an offence, the Police should also inform the Nominated Senior Manager straightaway so that appropriate action can be taken.

### **Suspension**

Suspension will be considered by the Nominated Senior Manager in discussion with the LADO in any case where there is cause to suspect that:

- (i) a child is at risk of significant harm
- (ii) the allegation warrants investigation by the Police
- (iii) the allegation is so serious that it might be considered grounds for dismissal

DfE guidance states that a person must not be suspended automatically or without careful thought and that the Nominated Senior Manager must consider carefully whether the circumstances of a case warrant a person being suspended from contact with children until the allegation or concern is resolved. An individual should be suspended only if there is no reasonable alternative and, when it is deemed appropriate to suspend, written confirmation should be given within one working day. This written confirmation should give as much detail as appropriate for the reasons for the suspension. The individual should also be provided with a named contact within school who will provide support and information as appropriate.

### **Alternatives to suspension for staff employed by the school**

- the individual could undertake duties which do not involve direct contact with the child concerned or other children, for example administrative work
- an assistant or colleague could be present when the employee has contact with children
- the child / children involved could be moved to classes where they will not come into contact with the member of staff, making it clear that this is not a punishment and parents have been consulted

It may be appropriate to use an alternative to suspension when an allegation is first made. This would allow time for an informed decision regarding suspension to be made and possibly reduce the initial impact of the allegation. This will depend upon the nature/ seriousness of the allegation.

### **An interview to consider suspension**

Where suspension is being considered, an interview with the member of staff will be arranged. Where the Police are involved in a criminal investigation, this interview will not be conducted without prior consultation with the Police Officer in charge of the case.

The member of staff will be advised to seek the advice and assistance of his/her trade union, or a friend if s/he is not a member, and offered the opportunity of a brief meeting with the representative or friend before the interview.

The member of staff will be given as much information, including the reasons for any proposed suspension, as is consistent with not interfering with an investigation about the allegation. If it is considered that suspension is necessary, the individual will be advised that he or she is suspended from duty. Written confirmation will be dispatched **within one working day**, giving the reasons for the suspension.

### **Action on conclusion of a case**

If the allegation is substantiated and the person (whether employed, contracted, a volunteer or pupil) is dismissed or the School has ceased to use the person's services, the Nominated Senior Manager will make a prompt referral to the DBS. It is a statutory duty to report the person to the DBS if the School believes that the person has engaged in conduct that harmed or is likely to harm a child. This will be done immediately. This will apply even if the person resigns or withdraws their voluntary services before a disciplinary process has been completed. 'Compromise agreements' will not be used to prevent a referral being made to the DBS when it is legally required nor will an individual's refusal to cooperate with an investigation. The Nominated Senior Manager will respond to requests from the DBS for information and reports will include as much evidence as possible about the circumstances of the case.

A referral to the National College for Teaching and Leadership (NCTL) may also be made where a teacher has been dismissed (or would have been dismissed had she/he not resigned). In such cases, a prohibition order may be appropriate when there is evidence of unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction, at any time, for a relevant offence.

If the allegations were unsubstantiated or malicious and the member of staff was suspended as a result of the allegation, appropriate support should be offered so that he/she can return to school. A phased return may be considered in this situation. In these situations, the LADO may also decide to refer the child / children concerned to external agencies. The Headmistress will also decide whether any disciplinary action is appropriate against the pupil who made the allegation.

The Headmistress will review whether any improvements to the School's procedures would help to prevent similar events in the future. This will also include issues arising from suspension of a member of staff.

## **Appendix 4**

**Guidance to safeguard children and education staff with regard to situations which may lend themselves to allegations of abuse** (Physical contact, first aid, showers/ changing clothes, out of school activities).

### **Physical Contact**

All staff engaged in the care and education of children and young people need to exercise caution in the use of physical contact.

The expectation is that staff will work in 'limited touch' cultures and that when physical contact is made with pupils this will be in response to the pupil's needs at the time, will be of limited duration and will be appropriate given their age, stage of development and background.

Staff should be aware that even well intentioned physical contact might be misconstrued directly by the child, an observer or by anyone the action is described to. Staff must therefore always be prepared to justify actions and accept that all physical contact be open to scrutiny.

Physical contact which is repeated with an individual child or young person is likely to raise questions unless the justification for this is formally agreed by the child, the organisation and those with parental responsibility.

Children with special needs may require more physical contact to assist their everyday learning. The general culture of 'limited touch' will be adapted where appropriate to the individual requirements of each child. The arrangements must be understood and agreed by all concerned, justified in terms of the child's needs, consistently applied and open to scrutiny. Wherever possible, consultation with colleagues should take place where any deviation from the arrangements is anticipated. Any deviation and the justification for it should be documented and reported.

Extra caution may be required where a child has suffered previous abuse or neglect. In the child's view, physical contact might be associated with such experiences and lead to staff being vulnerable to allegations of abuse. Additionally, many such children are extremely needy and seek out inappropriate physical contact. In such circumstances staff should deter the child without causing them a negative experience. Ensuring that a witness is present will help to protect staff from such allegations.

### **Providing comfort or support to a child**

There are situations and circumstances where children seek physical comfort from staff (particularly children in Early Years). Where this happens staff need to be aware that any physical contact must be kept to a minimum. When comforting a child or giving reassurance, staff must ensure that at no time can the act be considered intimate. If physical contact is deemed to be appropriate, staff must provide care which is professionally appropriate to the age and context and at all times ensure that their contact is not threatening, intrusive or subject to misinterpretation. If a child touches a member of staff in a way that makes him/her feel uncomfortable this can be gently but firmly discouraged in a way which communicates that the touch, rather than the child, is

unacceptable. If a child touches a member of staff, as noted above, this should be discussed, in confidence with the Designated Safeguarding Lead (DSL).

Where a member of staff has a particular concern about the need to provide this type of care and reassurance they should seek further advice, from the Pastoral and Welfare Leader.

### **Restraint**

There may be occasions where it is necessary for staff to restrain children physically to prevent them from inflicting damage on either themselves, others or property.

In such cases only the minimum force necessary should be used for the minimum length of time required for the child to regain self- control.

In all cases of restraint the incident must be documented and reported. Staff must be fully aware of the school's/organisation's Physical Intervention/Positive Handling Policy, which should comply with statutory practices.

Under no circumstances would it be permissible to use physical force as a form of punishment, to modify behaviour, or to make a pupil comply with an instruction. Physical force of this nature can, and is likely to, constitute a criminal offence.



In October 2014, the Department for Education (DfE) issued an update to its Statutory Guidance "Keeping Children Safe".

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/362919/Keeping\\_children\\_safe\\_in\\_education\\_childcare\\_disqualification\\_requirements\\_-\\_supplementary\\_advice.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/362919/Keeping_children_safe_in_education_childcare_disqualification_requirements_-_supplementary_advice.pdf)

This update requires schools which provide care for pupils under the age of 8, to ensure that staff and volunteers working in these settings are not disqualified from doing so under the Childcare (Disqualification) Regulations 2009.

Reference: <http://www.legislation.gov.uk/ukxi/2009/1547/schedule/3/made>

A person may be disqualified through

- having certain orders or other restrictions placed upon them
- having committed certain offences
- living in the same household as someone who is disqualified by virtue of 1 or 2 above (this is known as disqualification by association)

**You are required therefore to sign the declaration below confirming that you are not disqualified under those Regulations from working in this school.**

If you fail to complete and return the form, this will be regarded as a disciplinary matter for staff, which may result in dismissal and in the case of volunteers, will mean that you can no longer work at the school.

A disqualified person is not permitted to continue to work in a setting providing care for children under age 8, unless they apply for and are granted a waiver from OFSTED.

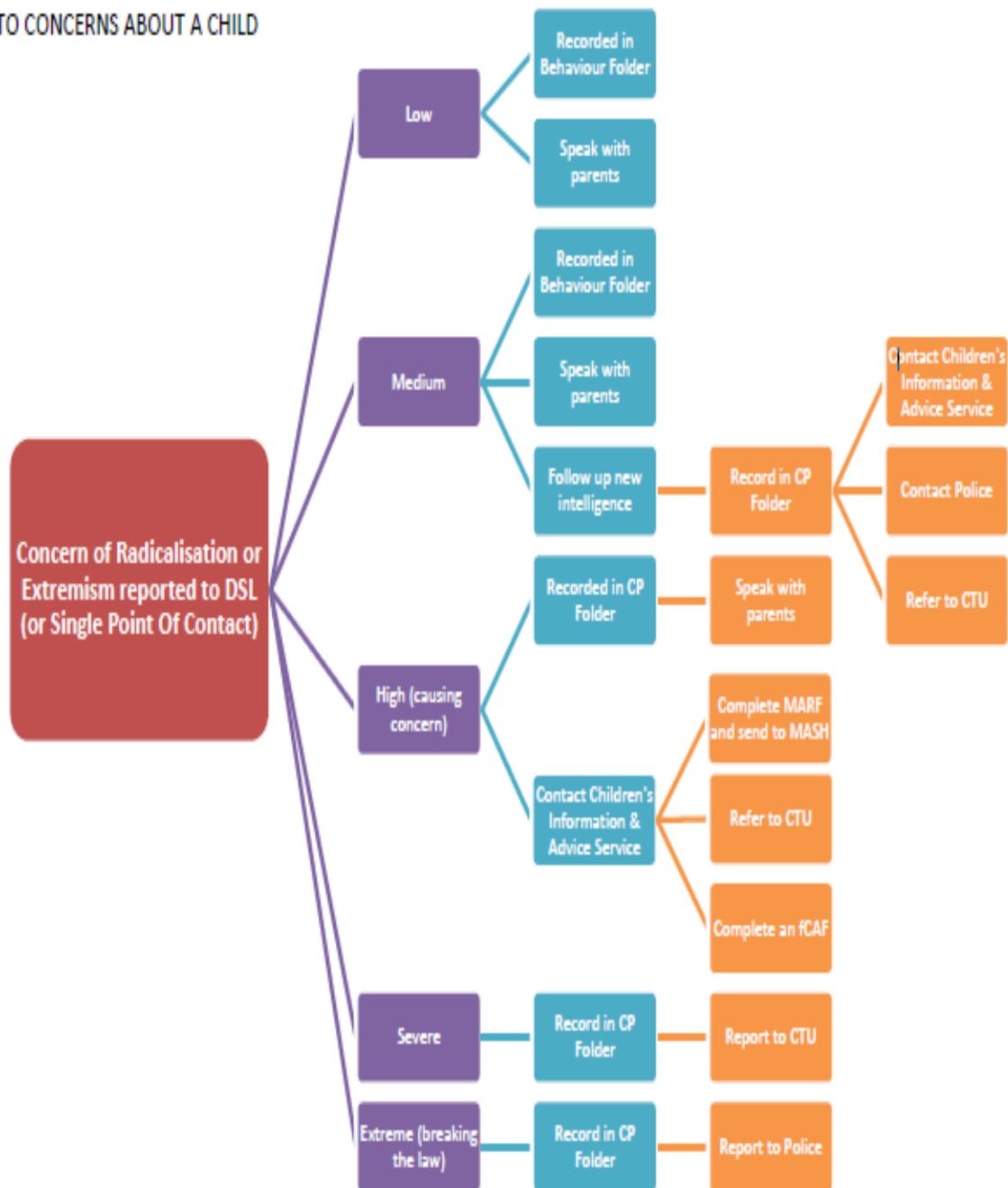
Reference: <http://www.ofsted.gov.uk/resources/applying-waive-disqualification-early-years-and-childcare-providers>.

Name	Post
Please circle one option for every question	
<b>Section 1 – Orders or other restrictions</b>	
Have any orders or other determinations related to childcare been made in respect of you?	YES / NO
Have any orders or other determinations related to childcare been made in respect of a child in your care?	YES / NO
Have any orders or other determinations been made which prevents you from being registered in relation to child care, children's homes or fostering?	YES / NO
Are there any other relevant orders, restrictions or prohibitions in respect of you as set out in the Schedule 1 of the Regulations? Available from the school office or at the link below: <a href="http://www.legislation.gov.uk/ukxi/2009/1547/schedule/1/made">http://www.legislation.gov.uk/ukxi/2009/1547/schedule/1/made</a>	YES / NO
Are you barred from working with Children (Disclosure and Barring (DBS))?	YES / NO
Are you prohibited from Teaching?	YES / NO
<b>Section 2 – Specified and Statutory Offences</b>	
Have you ever been cautioned, reprimanded, given a warning for or convicted of:	
Any offence against or involving a child? (A child is a person under the age of 18)?	YES / NO

Any violent or sexual offence against an adult?	YES / NO
Any offence under the Sexual Offences Act?	YES / NO
Any other relevant offence? Available from the school office or at the links below: <a href="http://www.legislation.gov.uk/ukxi/2009/1547/schedule/2/made">http://www.legislation.gov.uk/ukxi/2009/1547/schedule/2/made</a> <a href="http://www.legislation.gov.uk/ukxi/2009/1547/schedule/3/made">http://www.legislation.gov.uk/ukxi/2009/1547/schedule/3/made</a>	YES / NO
Have you ever been cautioned, reprimanded, given a warning for or convicted of any similar offence in another country?	YES / NO
<b>Section 3 – Provision of Information</b>	
If you have answered YES to any of the questions above you should provide details below in respect of yourself, or where relevant the member of your household. You may supply this information separately if you so wish, but you must do so without delay.	
Details of the order, restriction, conviction, caution etc	
The date(s) of these	
The relevant court(s) or body(ies)	
You should also provide a copy of the relevant order, caution, conviction etc. In relation to cautions/convictions a DBS Certificate may be provided.	
<b>Section 4 - Declaration</b>	
In signing this form, I confirm that the information provided is true to the best of my knowledge and that:	
I understand my responsibilities to safeguard children.	
I have read and understood Part 1 of KCSIE and Annex A	
I understand that I will speak to Sophie Hughes regarding any areas which require further clarification	
I understand that I must notify my headmistress immediately of anything that affects my suitability including any cautions, warnings, convictions, orders or other determinations made in respect of me or a member of my household that would render me disqualified from working with children	
Signed	
Print Name	Date

# Anti-Radicalisation & Anti-Extremism Flow Chart

RESPONDING TO CONCERNS ABOUT A CHILD



## Appendix 6

### Sexting

When considering appropriate action regarding youth produced sexual imagery, Designated Safeguarding Leads (DSLs) will need to take the age of the children and young people involved and the context into account, as this will influence decision making and may determine the most appropriate action required.

Children under 13 are given extra protection from sexual abuse under the Sexual Offences Act 2003. This law makes it clear that sexual activity with a child under 13 is never acceptable, and that children of this age can never legally give consent to engage in sexual activity. This applies to children who have not yet reached their 13th birthday i.e. children who are aged 12 and under. Any situations involving children under 13 and youth produced sexual imagery must be taken seriously as potentially being indicative of a wider safeguarding or child protection concern or as being problematic sexual behaviour.

### Initial response

All incidents involving youth produced sexual imagery should be responded to in line with the school's safeguarding and child protection policy.

When an incident involving youth produced sexual imagery comes to a school attention:

- The incident should be referred to the DSL as soon as possible
- The DSL should hold an initial review meeting with appropriate school staff
- There should be subsequent interviews with the young people involved (if appropriate)
- Parents should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm
- At any point in the process if there is a concern a young person has been harmed or is at risk of harm a referral should be made to children's social care and/or the police immediately.

### Disclosure

Disclosures about youth produced sexual imagery can happen in a variety of ways. The young person affected may inform a class teacher, the DSL in school, or any member of the school or college staff. They may report through an existing reporting structure, or a friend or parent may inform someone in school or college, or inform the police directly.

All members of staff (including non-teaching) should be made aware of how to recognise and refer any disclosures of incidents involving youth produced sexual imagery. This should be covered within staff training and within the school child protection policy.

Any direct disclosure by a young person should be taken very seriously. A young person who discloses they are the subject of sexual imagery is likely to be embarrassed and worried about the consequences. It is likely that disclosure in school is a last resort and they may have already tried to resolve the issue themselves.

### Initial review meeting

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

- Whether there is an immediate risk to a young person or young people

- If a referral should be made to the police and/or children's social care
- If it is necessary to view the imagery in order to safeguard the young person – in most cases, imagery should not be viewed
- What further information is required to decide on the best response
- Whether the imagery has been shared widely and via what services and/or platforms. This may be unknown.
- Whether immediate action should be taken to delete or remove images from devices or online services
- Any relevant facts about the young people involved which would influence risk assessment
- If there is a need to contact another school, setting or individual
- Whether to contact parents or carers of the pupils involved - in most cases parents should be involved

An immediate referral to police and/or children's social care should be made if at this initial stage:

1. The incident involves an adult
2. There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
3. What you know about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
4. The imagery involves sexual acts and any pupil in the imagery is under 13
5. You have reason to believe a pupil or pupil is at immediate risk of harm owing to the sharing of the imagery, for example, the young person is presenting as suicidal or self-harming

If none of the above apply then a school may decide to respond to the incident without involving the police or children's social care (a school can choose to escalate the incident at any time if further information/concerns come to light).

The decision to respond to the incident without involving the police or children's social care would be made in cases when the DSL is confident that they have enough information to assess the risks to pupils involved and the risks can be managed within the school's pastoral support and disciplinary framework and if appropriate local network of support.

If the school's local area has a Multi-Agency Safeguarding Hub then this may be the most appropriate first point of contact

The decision should be made by the DSL with input from the Headteacher and input from other members of staff if appropriate. The decision should be recorded in line with school policy.

The decision should be in line with the school's child protection procedures and should be based on consideration of the best interests of the young people involved. This should take into account proportionality as well as the welfare and protection of the young people. The decision should be reviewed throughout the process of responding to the incident.

If a young person has shared imagery consensually, such as when in a romantic relationship, or as a joke, and there is no intended malice, it is usually appropriate for the school to manage the incident directly. In contrast any incidents with aggravating factors, for example, a young person sharing someone else's imagery without consent and with malicious intent, should generally be referred to police and/or children's social care.

If you have any doubts about whether to involve other agencies, you should make a referral to the police.

## **Assessing the risks**

The circumstances of incidents can vary widely. If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL should conduct a further review (including an interview with the young people involved) to establish the facts and assess the risks.

When assessing the risks the following should be considered:

- Why was the imagery shared? Was the young person coerced or put under pressure to produce the imagery?
- Who has shared the imagery? Where has the imagery been shared? Was it shared and received with the knowledge of the pupil in the imagery?
- Are there any adults involved in the sharing of imagery?
- What is the impact on the pupils involved?
- Do the pupils involved have additional vulnerabilities?
- Does the young person understand consent?
- Has the young person taken part in this kind of activity before?

DSLs should always use their professional judgement in conjunction with their colleagues to assess incidents.

## **Informing parents (or carers)**

Parents (or carers) should be informed and involved in the process at an early stage unless informing the parent will put the young person at risk of harm. Any decision not to inform the parents would generally be made in conjunction with other services such as children's social care and/or the police, who would take the lead in deciding when the parents should be informed.

DSLs may work with the young people involved to decide on the best approach for informing parents. In some cases DSLs may work to support the young people to inform their parents themselves.

## **Reporting incidents to the police**

If it is necessary to refer to the police, contact should be made through existing arrangements. This may be through a safer schools officer, a PCSO (Police Community Security Officer), local neighbourhood police or by dialling 101.

Once a report is made to the police, the report has to be recorded and the police will conduct an investigation. This may include seizure of devices and interviews with the young people involved.

Things to be aware of when making reports to the police:

- Be aware that the police are not able to offer general advice on incidents. If the children involved are named or specifics are provided they are duty-bound to record and investigate all criminal activity reported.
- When making a report through the 101 service, be aware that the person answering the call is a call handler who deals with a wide variety of crimes and may not have specialist knowledge in this area.
- Ensure any crime reference numbers provided are recorded.
- Safer Schools Officers (where available) are able to offer direct support to schools on prevention and advice on management of incidents.

### **Securing and handing over devices to the police**

If any devices need to be seized and passed onto the police then the device(s) should be confiscated<sup>18</sup> and the police should be called. The device should be turned off and placed under lock and key until the police are able to come and retrieve it.

### **Children's social care contact and referrals**

If the DSL is aware that children's social care are currently involved with a young person involved in an incident of youth produced sexual imagery then they should contact children's social care. They should also contact children's social care if they believe they may be involved, or have been involved with a young person in the past.

If as a result of the investigation the DSL believes there are wider issues which meet the threshold for children's social care involvement then they should make a referral in line with their child protection procedures. DSLs should ensure that they are aware of, and familiar with, any relevant local policies, procedures and contact points/names which are available to support schools in responding to youth produced sexual imagery.

If a local area has a Multi-Agency Safeguarding Hub (MASH) then this may be the most appropriate place for schools to initially make a referral.

### **Searching devices, viewing and deleting imagery**

#### **Viewing the imagery**

Adults should not view youth produced sexual imagery unless there is good and clear reason to do so.

Wherever possible responses to incidents should be based on what DSLs have been told about the content of the imagery.

The decision to view imagery should be based on the professional judgement of the DSL and should always comply with the child protection policy and procedures of the school or college. Imagery should never be viewed if the act of viewing will cause significant distress or harm to the pupil.

If a decision is made to view imagery the DSL would need to be satisfied that viewing:

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

Screening and Confiscation advice: <https://www.gov.uk/government/publications/searching-screening-and-confiscation>

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

- Never copy, print or share the imagery; this is illegal.
- Discuss the decision with the Headteacher.

- Ensure viewing is undertaken by the DSL or another member of the safeguarding team with delegated authority from the Headteacher.
- Ensure viewing takes place with another member of staff present in the room, ideally the Headteacher or a member of the senior leadership team. This staff member does not need to view the images.
- Wherever possible ensure viewing takes place on school or college premises, ideally in the Headteacher or a member of the senior leadership team's office.
- Ensure wherever possible that images are viewed by a staff member of the same sex as the young person in the imagery.
- Record the viewing of the imagery in the school's safeguarding records including who was present, why the image was viewed and any subsequent actions. Ensure this is signed and dated and meets the wider standards set out by Ofsted for recording safeguarding incidents.

Further details on searching, deleting and confiscating devices can be found in the DfE Searching, Screening and Confiscation advice (note this advice is for schools only).

If youth produced sexual imagery has been unavoidably viewed by a member of staff either following a disclosure from a young person or as a result of a member of staff undertaking their daily role (such as IT staff monitoring school systems) then DSLs should ensure that the staff member is provided with appropriate support.

Viewing youth produced sexual imagery can be distressing for both young people and adults and appropriate emotional support may be required.

### **Deletion of images**

If the school has decided that other agencies do not need to be involved, then consideration should be given to deleting imagery from devices and online services to limit any further sharing of the imagery. The Searching, Screening and Confiscation advice highlights that schools have the power to search pupils for devices, search data on devices and delete youth produced sexual imagery. The Education Act 2011 amended the power in the Education Act 1996 to provide that when an electronic device, such as a mobile phone, has been seized, a teacher who has been formally authorised by the headteacher can examine data or files, and delete these, where there is good reason to do so. This power applies to all schools and there is no need to have parental consent to search through a young person's mobile phone. If during a search a teacher finds material which concerns them and they reasonably suspect the material has been or could be used to cause harm or commit an offence, they can decide whether they should delete the material or retain it as evidence of a criminal offence or a breach of school discipline. They can also decide whether the material is of such seriousness that the police need to be involved. However, just as in most circumstances it is not recommended that school staff view imagery, it is recommended that schools should not search through devices and delete imagery unless there is good and clear reason to do so.

It is recommended that in most cases young people are asked to delete imagery and to confirm that they have deleted the imagery. Young people should be given a deadline for deletion across all devices, online storage or social media sites. Young people should be reminded that possession of youth produced sexual imagery is illegal. They should be informed that if they refuse or it is later discovered they did not delete the image they are committing a criminal offence and the police may become involved. All of these decisions need to be

recorded, including times, dates and reasons for decisions made and logged in the safeguarding records. Parents and carers should also be informed unless this presents a further risk to the young person. At this point schools and colleges may want to invoke their own disciplinary measures to discourage young people from sharing, creating or receiving images but this is at the discretion of the school or college and should be in line with its own behaviour policies.

### **Interviewing and talking to the young person/people involved**

Once a school has assessed a young person as not at immediate risk, it may be necessary to have a conversation with them and decide the best course of action. If possible, the DSL should carry out this conversation. However, if the young person feels more comfortable talking to a different teacher, this should be facilitated where possible. When discussing the sharing of youth produced sexual imagery, it is important that the DSL:

- Recognises the pressures that young people can be under to take part in sharing such imagery and, if relevant, supports the young person's parents to understand the wider issues and motivations around this.
- Remains solution-focused and avoids questions such as 'why have you done this?' as this may prevent the young person from talking about what has happened.
- Reassures the young person that they are not alone and the school will do everything that they can to help and support them.
- Helps the young person to understand what has happened by discussing the wider pressures that they may face and the motivations of the person that sent on the imagery.
- Discusses issues of consent and trust within healthy relationships. Explain that it is not ok for someone to make them feel uncomfortable, to pressure them into doing things that they don't want to do, or to show them things that they are unhappy about. Let them know that they can speak to the DSL if this ever happens.

Young people may need support to report images to social media services. The purpose of the conversation is to:

- Identify, without looking, what the image contains and whether anyone else has been involved.
- Find out who has seen or shared the image and how further distribution can be prevented.

### **Recording incidents**

All incidents relating to youth produced sexual imagery need to be recorded in school or college. This includes incidents that have been referred to external agencies and those that have not.

Ofsted highlight that when inspecting schools in relation to safeguarding they look for the following:

- Are records up to date and complete?
- Do records demonstrate both effective identification and management of the risk of harm?
- Do records demonstrate sound decision-making, appropriate responses to concerns and evidence of relevant referrals made in a timely manner?
- Do they indicate that appropriate action is taken in response to concerns and allegations in a timely manner?
- Do they show evidence of tenacity in following up concerns with relevant agencies?
- Do they provide evidence of effective partnership working and sharing of information?
- Is there evidence of attendance at or contribution to inter-agency meetings and conferences?

- Is there clarity about the school's policy relating to the sharing of information
- Internally, safe keeping of records, and transfer when a pupil leaves the school?
- In cases that relate to youth produced sexual imagery it is important that schools reflect all of the areas above when they are recording incidents.

In addition, where schools do not refer incidents out to police or children's social care they should record their reason for doing so and ensure that this is signed off by the Headteacher.

### **Reporting youth produced sexual imagery online**

Young people may need help and support with the removal of content (imagery and videos) from devices and social media, especially if they are distressed. Most online service providers offer a reporting function for account holders and some offer a public reporting function to enable a third party to make a report on behalf of the young person.