

Safeguarding and Child Protection Policy and Procedures

This child protection and safeguarding policy sets out the school's expectations across the whole school. It should be read in conjunction with:

Early Years Policy	Positive Behaviour Policy	Safer Recruitment Policy
Equal Opportunities & Inclusion Policy	Anti-Bullying Policy	Professional development
	Physical Restraint	Visitors Policy
SEND Policy	PSHE and RSE Policy	Staff Code of Conduct
Care and Supervision Policy	Wellbeing & Mental Health Policy	Staff discipline and grievance
Collecting Children Policy	ICT Acceptable Use & eSafety	Health and Safety Policy
Risk assessment Policy	Social Media Policy	Whistle blowing
Trip and Visits Policy	Attendance Policy	Data protection Policy

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

Covid-19 Safeguarding in Schools, Colleges and Other Providers (2020)
Keeping Children Safe in Education (September 2020) (KCSIE)
Equality Act 2010
Education Act 2002 (section 175)
The Children Act 2004
Trafford Safeguarding Children Board Inter-agency Child Protection and Safeguarding Children Procedures
Working Together to Safeguard Children ((March 2015)
Information Sharing Advice for practitioners providing Safeguarding Services (July 2018)
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)
Independent Schools Regulations 2014 (ISSRs)
ISI Commentary on the Independent School Regulations (Sept 2020)
What to do if you are worried a child is being abused – Advice for practitioners (March 2015)
Teaching online Safety in Schools (June 2019)
Sexting in schools and colleges: responding to incidents and safeguarding young people
Children Missing in Education statutory Guidelines for Local Authorities (sept 2016)
Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings' (2019).

Key School Contact Details

Designated Safeguarding Lead (DSL): Mrs Sophie Hughes	shughes@bowdonprep.org.uk
Deputy Designated Safeguarding Lead (DDSL): Mrs Helen Gee	headmistress@bowdonprep.org.uk 07800972770
Deputy Designated Safeguarding Lead (DDSL): Mrs Sara Makepeace-Taylor	smakepeacetaylor@bowdonprep.org.uk
Deputy Designated Safeguarding Lead for Out of School Care (DDSL): Mrs Heather Odiwei	hodeowei@bowdonprep.org.uk
Safeguarding Governor: Mrs Nicola Tighe	bursar@bowdonprep.org.uk

Key External Contact Details

Trafford Children's First Response	0161 912 5125 firstresponse@trafford.gov.uk
Emergency Duty Team (Out of Hours)	0161 912 2020
Greater Manchester Police	101 (non emergency) 999 (emergency)
Trafford Local Authority Designated Officer (LADO): Anita Hopkins	0161 912 5024. email: anita.hopkins@trafford.gov.uk
NSPCC	0808 800 5000
NSPCC Whistle Blowing Advice	0800 0280285 email: help@nspcc.org.uk
Childline	0800 11 11 www.childline.org.uk
Independent Schools Inspectorate	0207 6000100 https://www.isi.net/parents-and-pupils/concerns-about-a-school email: concerns@isi.net
Teaching Regulation Agency	02075935393 https://www.gov.uk/report-teacher-misconduct email: misconductteacher@education.gov.uk
To discuss concerns about a child at risk of radicalisation contact one of the following:	
Trafford Children and Young People Vulnerable to Violent Extremism: Liz Baxter	liz.baxter@trafford.gov.uk
Concerns relating to extremism (DFE)	020 7340 7264 email: counter.extremism@education.gsi.gov.uk
Radicalisation - Channel (Trafford)	0161 856 6362 Ext 66373 email: channel.project@gmp.police.uk
Greater Manchester Police Prevent Team	0161 856 6345. Call anonymously on 0800 789 321.
National Anti-Terrorist Hotline	0800 789321

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Introduction

Bowdon Preparatory School seeks to provide a safe and nurturing academic environment: the school is utterly committed to the welfare of all members of its community such that they might grow and flourish. The principle of safeguarding its pupils is an essential part of the school's very foundation and we encourage everyone to live out those values within the school's environment and beyond it. In particular, all members of the community are expected to be alert to the predicaments and needs of others, as well as being in support of one another at all times. To that end, whilst policies regulate our activities, we expect to work beyond that, so as to contextualise these things within the school's broader ethos.

BPS makes its Safeguarding Policy available to anyone. Members of staff are required to read it and the school ensures that it is fully implemented. The policy is updated annually, or more frequently if required (eg: where there is a change in legislation). It is provided to all staff and published on the staff intranet. The policy is made available to children and parents on the school's website. This policy applies to all individuals working in or for the school including all teaching and nonteaching staff, residential and part-time staff, supply staff, governors, volunteers and contractors. All references to "staff" in this policy should be interpreted as relating to the aforementioned unless otherwise stated. This policy will also apply to parents of pupils, when they are on the school premises or otherwise involved with school business. It also applies to those who are household members and visitors of resident staff who are accommodated in any buildings used to accommodate pupils overnight or who are resident in accommodation that is linked to a school building where pupils may be.

The Governing Body and staff of the school fully recognise that safeguarding is everyone's responsibility: all staff and pupils have a role to play in safeguarding children and providing a safe environment in which children can learn. We do this by promoting the welfare, physical, mental and emotional health and safety of our pupils, and by recognising the importance of the school as a source of stability in the lives of all its pupils, but particularly those children who have suffered or who are at risk of harm. We seek to ensure that issues about safeguarding and child welfare are addressed. The school also works to create an environment where pupils, parents and staff feel able to raise concerns and where staff feel supported in their safeguarding role. The school operates a coordinated and child-centred response to all safeguarding concerns. This means that staff should always consider what is in the best interests of the child.

The school gives primacy to the protection of its pupils, and seeks to provide a caring, safe and positive environment in which each individual child can grow and flourish, develop their own particular talents, and thereby find enjoyment and fulfilment. To this end, the school will support every pupil's development in ways that will foster their sense of security, confidence and independence, and in a manner that has respect for the dignity, privacy and beliefs of all, and which does not discriminate on the basis of gender, ethnicity, beliefs, race, culture, religion, caste, sexual orientation or disability. The school recognises that the welfare of the child is paramount. No child or group of children must be treated any less favourably than others in being able to access services which meet their particular needs; all children without exception have the right to protection from abuse

Definition of Safeguarding

Safeguarding and promoting the welfare of children is defined as:

1. Protecting children from maltreatment
2. Preventing impairment of children's mental and physical health or development
3. Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
4. Taking action to enable all children to have the best outcomes.

Contextual Safeguarding

The school acknowledges that abuse can happen in any organisation and in many different contexts. As such, the school also understands the value of Contextual Safeguarding. Contextual Safeguarding is an approach to understanding, and responding to, children's experiences of significant harm beyond their families and the school setting and / or can occur between children outside of these environments.

It recognises that the different relationships that children form in their communities, clubs and online can feature violence and abuse. As such, children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

Parents and carers sometimes have little control or influence over these contexts, and children's experiences of extra-familial abuse can undermine parent-child relationships. Therefore, we recognise that we need to engage with individuals and sectors who do have influence over or within extra-familial contexts, and recognise that assessment of, and intervention with, these spaces are a critical part of safeguarding practices. Therefore, we seek to expand the objectives of child protection systems in recognition that children are vulnerable to abuse in a range of social contexts beyond school and family

Aims and Objectives of Safeguarding Practice at Bowdon Prep

- To develop and promote effective working relationships with other agencies, especially the Police and Social Care, including Channel in relation to preventing terrorism.
- To ensure that all staff that have access to children have been checked as to their suitability, including verification of their identity. (See Safer Recruitment Policy and Procedures).
- To prevent abuse through the teaching and pastoral support offered to pupils.
- To maintain support for pupils who may have been abused.
- To maintain awareness through ongoing training, to include awareness of child sexual exploitation, sexual violence, child criminal exploitation, radicalisation, forced marriage and female genital mutilation.
- To provide statutory staff training to include a review of the School's Safeguarding and Child Protection Policies and Procedures and to inform them of the identity of the DSL/DDSL, their obligation to read Part 1 and Annexe A and Part 5 of KCSIE.

The Duties of the School

- To 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
- To 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
- To 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, to ensure their child protection file is copied for any new school as soon as possible but transferred separately from the main pupil file.
- The DSL will proactively share information with the new school 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).
- To provide a Staff Code of Conduct (incorporating Safer Working Practice) and Whistle Blowing Policy in order to protect staff and pupils (see separate documents)

- To appoint 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 Trafford Children's First Response, LADO
- To ensure that a policy is in place for handling allegations of abuse against members of staff, volunteers and the Headmistress
- To provide an Acceptable Use of ICT policy for both staff and pupils
- To provide and implement child protection policy and procedures, updated annually, so that staff know how to respond to signs or reports of child protection issues
- To raise the awareness of staff, through regular training, about indicators of neglect / abuse in children and possible medical emergencies such as asthma and anaphylactic shock
- To emphasise 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
- To understand the importance of identifying children who may benefit from early help i.e. providing support as soon as a problem emerges at any point in a child's life
- To teach pupils about safeguarding, including online safeguarding, through teaching and learning opportunities

The Role of Governance

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.

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.

The Designated Safeguarding Lead and Deputies

The school appoints a Designated Safeguarding Lead (DSL) who is a member of the school's Senior Leadership Team and who takes lead responsibility for safeguarding and child protection. The DSL receives full training before taking up the role and attends further training sessions at least every three years, as well as keeping up to date with safeguarding developments regularly, and at least annually. Additionally, the DSL undertakes Prevent awareness training. There are also three Deputy DSLs appointed who are trained to the same level as the DSL and can act appropriately when safeguarding issues arise if the DSL is unavailable. During term time the DSL or a Deputy DSL will always be in school during school hours, or at least immediately contactable. Outside of school hours they will be available by telephone if not in school. The details of all members of this Safeguarding Team are on the first page of this policy. If, in exceptional circumstances, the DSL or a Deputy DSL are not available, this should not delay appropriate action being taken: staff should consider speaking to a member of the Senior Management Committee and / or take advice from Children's Social Services. In these circumstances, any action taken should be shared with the DSL as soon as is practically possible; it is not appropriate to speak to other adults or children about such matters. While the DSL can delegate some safeguarding responsibilities to the deputies, the ultimate responsibility

for safeguarding lies with the DSL. Annex B of KCSIE September 2020 outlines the duties of the DSL (including e-safety), which are also set out in the DSL's job description.

The Role of the Designated Safeguarding Lead

A DSL is defined as the member of senior management to whom staff must refer any child protection concerns. The DSL (or in her absence, the Deputy DSL) 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 Trafford Children's First Response.

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

Managing referrals

Refer all cases of suspected abuse to Trafford Children's First Response 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.

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 inter-agency protocols in Trafford 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.
- promote educational well-being outcomes of pupils open to social care.
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including those with a social worker, are experiencing or have experienced with teachers and the school leadership staff. Furthermore, understand their academic progress/attainment.

The Role of the Staff

All staff and adults working with children MUST read and be familiar Section 1, Keeping Children Safe in Education (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 DSL or in her absence, to the Deputy DSL. If a child is in immediate danger or is at risk of harm, a referral should be made to Trafford Children's First Response and/or the police immediately. 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.

Recruitment Procedures - See Recruitment Policy

The school will comply fully with the government's published policies on safer recruitment. The school ensures that enhanced DBS checks are undertaken in line with government guidance. The school makes the appropriate checks on all staff (including governors, employees, volunteers and contractors), including through the Disclosure and Barring Service (DBS) and by obtaining and following up thorough references. Assurance is obtained that appropriate suitability checks apply to any staff employed by another organisation who might be working onsite (such as building or service contractors) and to any individual working with the school's pupils (such as peripatetic staff) or on an external site (such as on school trips or visits). Any individual working on our own site, and / or off-site with our pupils, for whom an enhanced DBS check with barred list has not been obtained, will not be allowed to work in regulated activity and will be supervised by our staff at all times. The school's safer recruitment procedures are set out in full in the School's Safer Recruitment Policy. These comply with Part 3 of KCSIE (September 2020), the Safeguarding Vulnerable Groups Act 2006, the Protection of Freedoms Act 2012 and other relevant safer recruitment guidance to ensure that no-one is employed within, by or on behalf of the school who is unsuitable to work with children.

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.

Staff Training

The school trains all staff, volunteers and governors, regardless of their role, to be vigilant and watchful for, and aware of, signs that a child may be in need of help, as well as the signs of abuse and neglect (see Appendix A). To this end, all staff members receive appropriate safeguarding and child protection training which is regularly updated in line with guidance. In addition, all staff members receive safeguarding and child protection updates (via email, Phase Group meetings) as required, but at least annually, to provide them with the relevant skills and knowledge to safeguard children effectively. The DSL leads on ensuring that regular safeguarding and child protection updates are circulated to all staff.

As part of their induction programme all newly appointed staff, including part-time, temporary and voluntary staff, receive training in safeguarding issues including:

- this policy
- Keeping Children Safe in Education (September 2020) Part 1 – and Annex A for school leaders and those who work directly with children
- Code of Conduct for Staff
- what to do if you're worried a child is being abused
- Whistleblowing Policy
- Behaviour, Rewards and Sanctions Policy
- safeguarding response to children who go missing from education

- the role of the DSL.

Staff are expected to sign to note they have read and understood the relevant sections of KCSIE; this policy; the Code of Conduct for Staff; the Behaviour, Rewards and Sanctions Policy; and the Whistleblowing by Staff and Volunteers Policy. The training for all staff will cover a number of aspects, including but not limited to:

- Part 1 of KCSIE (and Annex A for adults working directly with children), this policy and the Code of Conduct for Staff
- contact details if they have a concern about the safety or welfare of a child, or a concern about the behaviour of an adult
- the signs that a child may be in need of early help or additional support, at risk of harm or suffering from harm
- indicators of abuse and neglect and specific safeguarding issues
- what to do if a child discloses abuse, including that confidentiality should never be promised and to avoid asking leading questions
- how to escalate concerns about a child and allegations of abuse
- inter-agency working, including in the context of a referral made to Trafford Children's First Response, Children's Social Services and / or the LADO, the statutory assessment process and that the staff member may be asked to contribute to a child protection strategy meeting
- early help
- peer on peer abuse
- online safety
- information sharing
- boundaries and appropriate behaviour, to ensure that their behaviour and actions do not place pupils or themselves at risk of harm or of allegations of harm to a pupil (for example, in one-to-one tuition, sports coaching, engaging in inappropriate electronic communication with a pupil, and so on)
- the existence and whereabouts of this policy, other relevant policies and safeguarding documentation including local authority procedures.

All staff should re-read and understand at least KCSIE Part 1 (and Annex A for adults working directly with children) each time it is updated by the DfE, and are told of updates by the DSL and Deputy DSLs. Mechanisms to assist colleagues in understanding KCSIE include regular updates at term in INSET sessions, staff meetings, uploads to TEAMS, the issue of the pocket-sized safeguarding cards (see Appendix B below) and short quizzes.

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
- Positive Behaviour Policy
- Bullying including cyber bullying
- Care and Supervision policy
- information on the role of the Designated Safeguarding Lead.

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.

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.

Opportunities to Teach Pupils Safeguarding

The school will raise awareness and train those pupils in a position of pastoral responsibility, e.g.: Year 6 Friendship Mentors in basic safeguarding procedures. They will have clear guidance through their training that their role is to listen and not to "keep secrets" but to refer the matter to a teacher. Within the school's PSHE and Wellbeing programmes, during form periods and assemblies and elsewhere in the curriculum, pupils are taught key safeguarding issues such as safety online (see the E-Safety Policy) and relationships and sex education (in line with the School's Relationships and Sex Education Policy).

Communications

Communications and sharing information internally

The school emphasises the need for good levels of communication between all members of staff to ensure that a structured procedure for the safeguarding of children will be followed in cases of suspected abuse (see Appendix C below.). We recognise the importance of information sharing in protecting children from harm and promoting children's wellbeing (the danger of not sharing information is highlighted in a number of serious case reviews). The school shares information in accordance with the General Data Protection Regulations (May 2018) and the guidance set out in Chapter 1 of Working Together to Safeguard Children (December 2020) and in information sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers (July 2018).

The school recognises that it plays a significant part in the prevention of harm by providing pupils with good lines of communication with trusted adults within an ethos built upon care, support and protection. This is also discussed in PSHE and Wellbeing lessons or tutorials with all new pupils.

The DSL is trained on the above guidance and works with staff to ensure that:

- fears about sharing information do not stand in the way of the need to promote the welfare and protect the safety of children
- they understand and follow this guidance
- they feel confident about the ways in which they share information, including with parents, other staff, and external professionals and agencies.

The School provides a systematic means of identifying and supporting all children who may be in need of early help or additional support, or at risk from harm, and of handling such cases appropriately in line with the procedures set out below. The school will ensure full written records of all child protection procedures are maintained and stored confidentially. All concerns, disclosures or allegations, decisions and subsequent actions will be recorded securely and confidentially.

Communications and sharing information externally

We work with feeder and successor schools, as well as Trafford Children's First Response and any appropriate agencies, so as to act in the best interests of the child and thereby safeguard and promote the welfare of children, including identifying and responding to their needs.

Feeder schools and successor schools

BPS will request safeguarding information from feeder pre-school providers and schools. Where pupils move to new schools, their child protection files will be transferred securely, separately from the main file, and a confirmation of receipt will be requested. The retention and destruction of files will be in accordance with the School's Data Protection Policy.

Multi-agency working

We recognise that we have a pivotal role to play in multi-agency safeguarding arrangements, in line with the statutory guidance published in Working Together to Safeguard Children (December 2020). Information will be shared securely with other professionals and local agencies and contribute to inter-agency plans to provide additional support to children subject to child protection plans.

The School will allow access for local authority children's services to conduct, or to consider whether to conduct, a section 17 or a section 47 assessment.

Data Protection

Written safeguarding records count as "special category personal data" under the General Data Protection Regulation and Data Protection Act (HM Government, 2018): they neither prevent nor limit the sharing of information for the purposes of keeping children and young people safe. We acknowledge that "safeguarding of children and individuals at risk" is a processing condition that allows us to share "special category personal data". This circumstance includes allowing practitioners to share information without consent where there is good reason so to do. Where the sharing of information in a timely manner will enhance the safeguarding of a child, but it is not possible to gain consent, or it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk, then the school may release information if it is considered to be in the best interest of a child.

Where sharing information would result in the serious harm test being met, then the school will withhold providing the data in compliance with schools' obligations. Parents who ask to see records may be allowed access, provided this does not put children at risk and that any questions of the child's consent are satisfied. Ultimately, General Data Protection Regulation and Data Protection Act (HM Government, 2018) does not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information will not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

CHILDREN AT RISK OF SIGNIFICANT HARM ABUSE AND NEGLECT (LEVEL FOUR)

Level Four, the highest level of need, is defined by Section 47 of the Children Act (1989).

At this level, children are either suffering, or at risk of suffering, significant harm. Significant harm is caused when a child's health or development is seriously or permanently altered or damaged. Inflicting significant harm on a child, or failing to act to prevent it, is a definition of child abuse and neglect. All staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (for example, via the internet). They may be abused by an adult or adults, or another child or children.

Detailed symptoms, indicators and behaviours associated with child abuse can be found in *Child Maltreatment: When to Suspect Maltreatment in Under-18s* (NICE, 2017) and a broader treatment is available in *What to do if you're worried a child is being abused: advice for practitioners* (HM Government, 2015).

Physical abuse

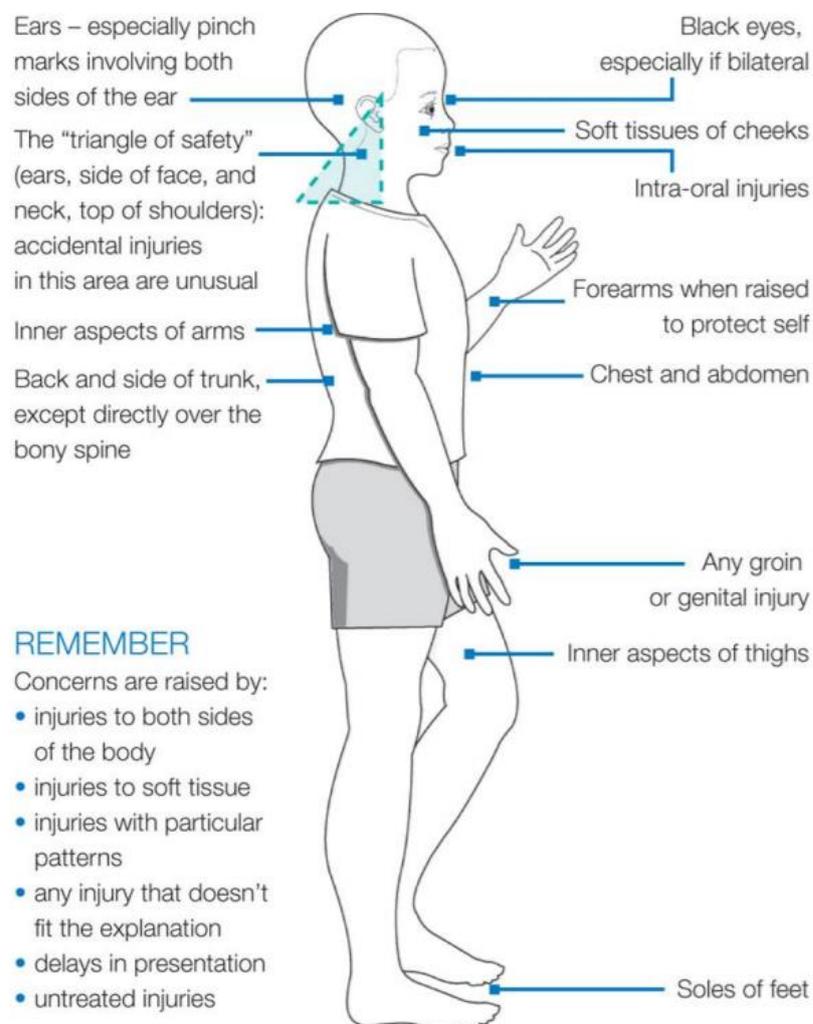
Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

INDICATORS

Children with frequent injuries

- Children with unexplained or unusual fractures or broken bones
- Children with unexplained bruises or cuts, burns or scalds, bite marks.

Typical accidental injuries involve knees, shins, elbows, palms of the hands, chin and forehead. They are in keeping with any explanation given and the development of the child. The body map shows injuries that are less likely to have been caused accidentally and are therefore possible indicators of physical abuse.



Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views,

deliberately silencing them or mocking what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as over-protection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

INDICATORS

Children

- Children who are excessively withdrawn, fearful, or anxious about doing something wrong
- Lack of confidence / self-esteem
- Sudden speech disorders
- Self-harming
- Extremes of passivity and / or aggression
- Compulsive stealing
- Drug, alcohol, solvent abuse
- Fear of parents being contacted
- Unwillingness or inability to play
- Excessive need for approval, attention and affection.
- Parents or carers who withdraw their attention from their child, giving the child the "cold shoulder"
- Blaming their problems on their child
- Humiliating their child, for example, by name-calling or making negative comparisons.

Sexual Abuse and Child Sexual Exploitation (CSE)

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

- Children who display knowledge or interest in sexual acts inappropriate to their age
- Children who use sexual language or have sexual knowledge that you would not expect them to have
- Children who ask others to behave sexually or play sexual games
- Children with physical sexual health problems, including soreness in the genital and anal areas, sexually transmitted infections or underage pregnancy
- Children who have sudden changes in behaviour and school performance
- Children who self-harm, self-mutilation or attempts at suicide
- Children who allude to secrets which they cannot reveal
- Children who have a tendency to cling or need constant reassurance
- Children with a fear of undressing for gym activities.

Child Sexual Exploitation

Child Sexual Exploitation (CSE) 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 does not 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.

INDICATORS

- Children who appear with unexplained gifts, money 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 do not take part in education
- Children who present with depression or are withdrawn.

Members of staff need to be aware that, under the Sexual Offences Act (2003), it is an “abuse of a position of trust”, and thus a criminal offence, for someone working in a school to “groom” or engage in sexual activity with a pupil aged under 18. The consent of the pupil (or the agreement of his or her parents) is irrelevant. Staff should also note that, under the Serious Crime Act (2015), it is now a criminal offence for an adult to communicate with a child under 16 if the communication is sexual or intended to elicit a response that is sexual

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

- Children who are living in a home that is indisputably dirty or unsafe
- Children who are left hungry or dirty
- Children who are left without adequate clothing, e.g.: not having a winter coat
- Children who are living in dangerous conditions, i.e.: around drugs, alcohol or violence
- Children who are often angry, aggressive or self-harm
- Children who fail to receive basic health care
- Parents who fail to seek medical treatment when their children are ill or are injured
- Children who have poor personal hygiene
- Children who are frequently tired
- Children who are frequently late / non-attendance at school
- Children who have a poor relationship with peers
- Children who are compulsively stealing and scavenging
- Children who run away
- Children with a loss of weight / being constantly underweight

- Children who have low self esteem
- Children with poor dental hygiene

Wider Safeguarding Issues

Behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education and sexting (also known as youth produced sexual imagery) put children in danger.

Children Missing from Education (CME)

The School understands its duty, as explained in KCSIE, in relation to the risks posed by Children Missing from Education. All children, regardless of their circumstances, are entitled to a full-time education that is suitable to their age, ability, aptitude and any Special Educational Needs they may have. A child going missing from education is a potential indicator of a range of safeguarding risks, including abuse and neglect, and other issues.

The school will report to the Local Authority, instances of prolonged unauthorised absence or a pupil being removed from the school's list under the circumstances outlined in KCSIE. All staff must also be aware of their role to prevent children from going missing from education. In the short-term, the school will take appropriate action to find any pupil who is discovered to be missing from the school during the registration process; the Phase Leader should normally be informed in the first instance and will coordinate the action taken. A written record is made of any incident of a pupil missing from the School, the action taken, and any reasons given by the pupil for being missing. For longer term absence, the school will ensure that any pupil currently on the Child Protection Register who is absent without explanation for two days is referred to Children's Social Services.

Domestic Abuse and Violence

Domestic abuse and violence is a safeguarding issue; children and young people are at risk and also vulnerable in terms of keeping themselves safe from others. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and / or violence can have a serious, long-lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Members of staff with information about this matter must bring it to the attention of the DSL, who will consult with the local authority.

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 follow the advice from the police. It is important to understand that there is likely to be an increase in the reporting of domestic abuse incidents during the COVID crisis.

Gangs and Child Criminal Exploitation (CCE) / County Lines

Criminal exploitation of children is a geographically widespread form of harm: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns (County Lines); forced labour; forced to shoplift or pickpocket; or threaten others.

Key to identifying potential involvement in CCE are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism (January 2020) will be considered. This can affect any child or young person (male or female) under the age of 18 years. It

- can still be exploitation even if the activity appears consensual;
- can involve force and / or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults
- is typified by some form of power imbalance in favour of those perpetrating the exploitation

Members of staff with information about this matter must bring it to the attention of the DSL, who will consult with the local authority.

Honour-based Abuse (HBA) Including Female Genital Mutilation (FGM) and Forced Marriage

Honour-based abuse (HBA) encompasses crimes that have been committed to protect or defend the honour of the family and / or community. Female Genital Mutilation (FGM) and forced marriage are examples of such. All forms of HBA are abuse (regardless of motivation) and should be handled and escalated as such. It should be noted that such abuse can often involve a wider network of family and community that can include multiple perpetrators.

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

Whilst all staff should speak to the DSL with regard to any concerns about FGM, there is a specific legal duty on teachers. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the Police. Those failing to report such cases to the Police will face disciplinary sanctions. Unless the teacher has good reason not to, they should still consider and discuss the case with the DSL to involve Children's Social Services as appropriate. This duty does not apply where a teacher merely suspects that an act of FGM may have been carried out or that a girl may be at risk of FGM. In all at risk or suspected cases and in cases relating to girls aged 18 or over, teachers should discuss their concerns with the DSL immediately. Any non-teaching staff with concerns about FGM should also report their concerns to the DSL immediately.

Forced Marriage

This 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.

Mental Health

Mental health issues can sometimes be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. That said, staff are extremely well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. Those who support pupils' mental health, whilst bearing in mind patient confidentiality, will seek to ensure that key staff (such as Phase Leaders) are aware of how these children's experiences, can impact on their mental health, behaviour and education. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken.

Online Safety (eSafety)

Safeguarding of children extends to the online environment (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.

All Staff should be aware of the risks posed to children by technology and the internet, and should understand their role in preventing, identifying and responding to harm caused by its use. Abuse can take place wholly online or technology may be used to facilitate offline abuse.

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

- Content: being exposed to illegal, inappropriate or harmful material; for example, pornography, fake news, racist or radical and extremist views;
- Contact: being subjected to harmful online interaction with other users; for example, commercial advertising as well as adults posing as children or young adults; and
- Conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, or online bullying.

There is a separate eSafety Policy. BPS has adopted a whole-school approach to online safety which captures the range and complexity of the risks and of children's experiences of those risks; seeks to mitigate those risks as far as possible without depriving children of the significant benefits provided by technology and the internet; and handles all cases of online harm appropriately and with sensitivity. In particular, this policy sets out the risks posed to children by the internet and technology, the indicators that a child may be at risk of such harm, and the measures taken by the school to mitigate these risks, including pupil and parent education, staff training, and limiting the risk of harm caused by the school's IT systems (eg, appropriate filters). Further to this, it includes reference to the use of mobile technologies, including the management of access to 3G / 4G / 5G through mobile devices.

Any online incidents that raise safeguarding concerns should be handled by the DSL 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).

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 Trafford Children's First Response and/or the police immediately.

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

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 prohibited. 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.

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 2020*

Staff should not develop high thresholds before taking action: it must be taken as seriously as abuse by adults and be subject to the same safeguarding procedures. In the event of disclosures about pupil on pupil abuse, all children involved – whether perpetrator or victim – are treated as being at risk.

Members of staff must not attempt to deal with peer on peer abuse as a pastoral, classroom or disciplinary issue, and should not impose their own thresholds before consulting the DSL. It is true that there will sometimes be a grey area between, on the one hand, incidents which should be regarded as abusive, and on the other, incidents which are more properly dealt with in schools such as (for example) children fighting or experimenting sexually. The DSL can advise staff on the thresholds which pertain to different definitions of peer on peer abuse, and in some cases may seek further clarification from pupils.

Staff should be aware that safeguarding issues can manifest themselves via peer on peer abuse.

This is most likely to include, but may not be limited to:

- bullying (including cyberbullying)
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- sexual violence and sexual harassment
- sexting (also known as youth produced sexual imagery)
- upskirting (either for sexual gratification of the perpetrator or to cause upset to the victim)
- initiation / hazing type violence and rituals.

If there is reasonable cause to suspect that a child is suffering or likely to suffer harm at the hands of another child, the DSL will refer the matter to the Local Authority or the Police, whose directions the school will then follow. Allegations against pupils who have left the school but remain under 18 will be passed to the Police and / or the Local Authority in the area in which the pupil is currently living. Generally speaking, the School will always quickly inform the parents of victim(s) and perpetrator(s) of potential peer on peer abuse, unless (a) it has reason to believe that a child is at risk of significant harm, and by doing so would make the situation worse or (b) it has been told not to by the Police or Local Authority.

A victim of peer on peer abuse is likely to need considerable support. In addition, the perpetrator is likely to have unmet needs (the evidence suggests such children have often suffered disruption in their own lives) as well as posing a significant risk of

harm to other children. As such, a pupil against whom an allegation of abuse has been made may be suspended from the school during an investigation. After the immediate issues have been addressed, and depending on the severity of those issues, the Local Authority may decide to oversee risk assessments and care plans for the victim and / or the perpetrator, in which case the school will cooperate fully; the local authority may decide to hand the matter back to the school, in which case the needs of the victim and / or perpetrator will be addressed as appropriate.

The school actively seeks to prevent all forms of peer on peer abuse by educating pupils and staff, challenging the attitudes that underlie such abuse, encouraging a culture of tolerance and respect amongst all members of the School community, and responding to all cases of peer on peer abuse and any cases of bullying (no matter how trivial) promptly and appropriately. Pupils are educated about the nature and prevalence of peer on peer abuse through PSHE and Wellbeing lessons: they are told what to do if they witness or are victims of such abuse, the effect that it can have on the victims and the possible reasons for it, including the vulnerability of the perpetrator. Pupils are regularly informed about the school's approach to such issues, including its zero tolerance policy towards all forms of bullying and peer on peer abuse. Staff are trained on the nature, prevalence and effect of peer on peer abuse, how to prevent, identify and respond to it.

INDICATORS

- Failing to attend school, disengaging from classes or struggling to carry out school related tasks to the standard you would ordinarily expect
- Physical injuries
- Having difficulties with mental health and / or emotional wellbeing
- Becoming withdrawn, shy, experiencing headaches, stomach aches, anxiety, panic attacks, suffering from nightmares or lack of sleep or sleeping too much
- Drugs and / or alcohol use
- Changes in appearance and/or starting to act in a way that is not appropriate for the child's age
- Children who have:
 - witnessed or experienced abuse or violence themselves
 - suffered from the loss of a close family member or friend
 - experienced considerable disruption in their lives

If a member of staff thinks for whatever reason that a child may be at risk of abuse from another child or young person, or that a child may be abusing others, the member of staff should report their concern to the DSL without delay in accordance with the Safeguarding policy. If a child is in immediate danger or at risk of harm, a referral to Children's Social Services and / or the Police should be made immediately.

Serious Bullying

Bullying can take many forms. Broadly, it is unkind and usually persistent behaviour intended to assert the power of one person over another, usually by frightening or humiliating the victim. It may take the form of verbal, physical or emotional abuse or harassment. A victim may be picked on because of gender, race, religion, culture, physical appearance, sexual orientation, a special educational need or disability – or for no obvious reason at all. The Anti-Bullying Policy contains further details on the school's approach.

Members of staff with information about this matter must bring it to the attention of the DSL, who will consult with the local authority.

Child on Child Sexual Violence and Sexual Harassment

These matters are often complex and will require support from the LADO and Police, as necessary. Victims should be immediately reassured that they have acted appropriately in reporting the matter and they must not be given the impression that they are creating a problem by making such a report, nor should they be made to feel ashamed. Reports should be

managed in accordance with good practice. Staff should always discuss concerns about sexually harmful behaviour involving pupils with the DSL. It is important that sexual violence and sexual harassment are shown to be unacceptable, and not passed off as “banter” or “part of growing up”. Where an incident between two pupils takes place away from the school, the school’s safeguarding duties remain the same.

The school will take reasonable measure to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, including considering the impact of social media. Where there is a report of sexual violence, the DSL should make an immediate risk and needs assessment, then keep those assessments under review. This must consider:

- the victim, especially their protection and support
- the alleged perpetrator; and
- all the other children (and, if appropriate, staff) at the School, especially any actions that are appropriate to protect them.

Engagement with specialist services will then be required. Careful consideration will be given to:

- the wishes of the victim in terms of how they want to proceed
- Any investigation will be progressed and any support that they might need will be offered
- The nature of the alleged incident(s), including: whether a crime may have been committed and consideration of harmful sexual behaviour
- The ages of the children involved
- The developmental stages of the children involved
- Any power imbalance between the children. For example, is the alleged perpetrator significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?
- If the alleged incident is a one-off or a sustained pattern of abuse
- Are there ongoing risks to the victim, other children staff; and
- Other related issues and wider context.

Sexting (Youth Produced Sexual Imagery [YPSI])

Sexting is defined here as “sending or posting sexually suggestive images, including nude or semi-nude photographs, via mobiles or over the Internet”. Creating and sharing sexual photos and videos of under-18s is illegal.

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.

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. We teach and reinforce online safety 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.

In the case that an incident involving sexting came to the school’s attention, the incident should be referred to the DSL as soon as possible such that an initial review meeting with appropriate school staff can be held before subsequent interviews with the child/children 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. The UKCCIS guidance will be followed. In particular, members of staff who suspect that a sexualised image of a child is contained on an

electronic device should not ask to view the image. At any point in the process, if there is a concern a young person is in need or at risk of harm, a referral should be made to Children's Social Services and / or the Police immediately, in accordance with the procedures set out in this policy.

Upskirting/Voyeurism Act

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* and does not discriminate against boys or girls.

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.

Imbalance of Power

An individual or group taking advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity is of itself abusive. Both Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) are both examples of this. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be:

- in exchange for something the victim needs or wants
- for the financial or other advantage of the perpetrator or facilitator and / or
- through violence or the threat of violence.

The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can involve force and / or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and / or take place online.

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. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism.

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.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer to their psychological or emotional problems. The internet and the use of social media in particular has become a major factor in the radicalisation of young people.

As with other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately.

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 DSL 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**. 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.

The referral procedures set out below also apply where there are concerns about children who may be at risk of being drawn into terrorism. The DSL is the designated Prevent duty person responsible for coordinating action within the school and liaising with other agencies, including the Prevent Lead. The school has assessed the risk of radicalisation posed to the School's pupils and it considers the current risk to be low. The risk is reviewed annually as part of this policy's review procedure.

- The School will work in partnership with parents and with other agencies, including Police, LSCP and the Manchester Prevent and Channel teams.
- The DSL will attend Prevent awareness training and provide advice to other members of staff.
- The School will help young people stay safe online through appropriate filters (see the eSafety Policy).
- Any visiting speakers to the school will be vetted to prevent extremist views being expressed.
- The School will work more generally to ensure the Fundamental British Values of democracy, rule of law and acceptance of others are celebrated, modelled and are not undermined.

INDICATORS

- A conviction that their religion, culture or beliefs are under threat and treated unjustly;
- A tendency to look for conspiracy theories, and a distrust of mainstream media;
- A sense of debt or guilt;
- Blaming parents for family problems;
- Feeling let down, and perhaps 'religious seeking';
- Peer pressure, low self-esteem, and/or the need for identity and belonging;
- Physical change / growth spurt (being bigger than peers);
- Being secretive about who they have been talking to online and what sites they visit;
- Switching screens when you come near the phone, tablet or computer;
- Possessing items – electronic devices or phones – you have not given them; and
- Becoming emotionally volatile.

Self-harm

This includes pupils deliberately cutting their own skin, eating disorders and substance abuse. Members of staff with information about this matter must bring it to the attention of the DSL, who will consult with the local authority, where appropriate.

Serious violence

This involves pupils being at risk from or involved with serious violent crime, such that they are at risk from harm and exploitation. Members of staff with information about this matter must bring it to the attention of the DSL, who will consult with the local authority.

Other actions to cause concern

Children may find themselves in situations that are not listed above but still might be at significant risk. These might include, for example, situations where another child in the household has been harmed or the household contains a known abuser. Members of staff with information about this matter must bring it to the attention of the DSL, who will consult with the local authority.

CHILDREN IN NEED (LEVEL THREE)

At this level, which is defined by Section 17 of the Children Act (1989), a child is not immediately at risk, but his or her needs are already regularly unmet, and without the intervention of specialist support services working in partnership with the family, the child's situation will probably deteriorate still further.

INDICATORS:

Children

- Chronic or significant ongoing health issues
- A disability requiring significant support
- Weight or growth falling two centile ranges (without diagnosed medical problem)
- Missing most immunisations
- Frequent or persistent accidents
- Significant mental health issues
- Evidence of self-harm
- Suicidal thoughts (but without plans or intent)
- An acrimonious, perhaps aggressive relationship with parents

- Significant caring responsibilities at home
- Inappropriate sexual behaviour or activity under 16
- Frequently in risky situations: deliberately puts others or self in danger
- Engagement in risky online behaviour
- Behaviour at school which may lead to exclusion
- Subject to persistent discrimination
- Repeated expressions of low self-esteem

Parents or carers

- A family experiencing a crisis which may result in breakdown of care
- Parents separated, with conflict over contact (child may be used as a pawn)
- Parents are inconsistent in their attachment to child: child is rarely comforted or encouraged
- Supervision of child is sometimes unsafe
- Parents sometimes use inappropriate caregivers
- Parents struggle to provide for child's basic physical or emotional needs as a result of mental health or disability issues, substance misuse (including alcohol) or domestic abuse
- Parents frequently put their own needs above those of child

Members of staff with information about such matters must bring it to the attention of the DSL, who will consult with the local authority.

EARLY HELP PLANS (LEVEL TWO)

At this level, a child is not immediately in need, but may be vulnerable to emerging issues that may turn into more serious and longer-term issues if left unaddressed.

INDICATORS:

Children

- A disability or physical illness which requires some support
- Newly arrived in the UK
- Slight speech or language issues
- Missing routine health appointments
- Missing some immunisations
- Slow physical development
- Minor dietary issues
- Minor mental health issues emerging
- Exploring alcohol abuse or low-level drugs relationships
- Gang involvement and association with organised crime groups
- Clothing and / or personal hygiene raise low-level concerns
- School attendance is low (85%-94%)
- Special Educational Needs
- Struggling academically
- Escalating behaviour issues
- Questioning self-worth
- Has some caring responsibilities in family
- At risk of modern slavery, trafficking or exploitation

- At risk of being radicalised
- Has returned home to their family from care
- Is privately fostered

Parents or carers

- Family relationships are strained
- Family are experiencing issues such as bereavement or divorce
- Parents are experiencing parenting challenge
- Parental supervision raises low-level concerns;
- Parents are over-protective
- Parents do not provide a safe context (drug and alcohol misuse, mental health issues, domestic abuse).

The school is likely to seek advice from Children's Social Services in such a circumstance. Usually, Children's Social Services will refer the matter back to the school to put together an Early Help Plan which will seek to inform the pupil's family more formally in providing support. EHPs are only drawn up with the parent's full agreement and cannot exist without it. External professionals sometimes assist with this.

INDIVIDUAL WELFARE PLANS (LEVEL ONE)

Many of pupils will have temporary issues to do with:

- health concerns
- family issues
- academic worries
- peer relationships etc.

These matters will be addressed successfully by their families and by services that are universally open to all pupils on a daily basis:

- Medical facilities
- NHS services
- Counselling
- Chaplaincy
- Pastoral staff
- Special Educational Needs department etc.

Children whose needs are met by these universal services are said to be at Level One. There will be a few pupils every year whose difficulties will be such that the school will need to ensure it coordinates services more formally and this is done using an Individual Welfare Plan (IWP). These are not recorded as safeguarding issues unless other factors are involved. Information is shared as early as possible with parents and other agencies as appropriate.

Concerns About and Allegations Against Members of Staff

The safety and wellbeing of our pupils depends on the vigilance of all our staff and their prompt communication to the Headmistress of any concerns, no matter how small, about any adult's suitability to work with or have access to children. The notification and prompt handling of all concerns about adults (including staff, supply staff and volunteers) is fundamental to safeguarding children. It helps to identify and prevent abuse, and to protect adults against misunderstandings or misinterpretations.

Those raising concerns or reporting allegations in good faith will always be supported, and adults in respect of whom concerns or allegations have been raised will not suffer any detriment unless the concern or allegation is found to be substantiated. When handling allegations, the school will always follow Part 4 of KCSIE. Responsibility for appropriate action rests with the Headmistress. The procedure would be used in all cases in which it is alleged that a teacher or other member of staff or volunteer has:

- a) behaved in a way that has harmed a child, or may have harmed a child
- b) possibly committed a criminal offence against or related to a child
- c) behaved towards a child or children in a way that indicates they would pose a risk of harm to children or
- d) behaved or may have behaved in a way that indicates they may not be suitable to work with children (transferrable risk).

The LADO will be informed promptly and the LADO will determine the distinction between a complaint, a concern about the quality of practice and an allegation. Informing others about concerns Any such concerns or allegations about an adult in the school (including supply staff and volunteers, as well as those working with the pupils outside of the school) should be reported to the Headmistress immediately. Staff or pupils may discuss their concern with the DSL and the DSL will then refer it to the Headmistress immediately. The adult to whom the concern or allegation (referred to hereafter as allegation) relates should not be informed. If the allegation is about the DSL, then the Headmistress will need to be informed directly, without informing the DSL.

If the allegation is about the Headmistress, staff must immediately inform the Chair of the Governing Body (or, in her absence, the Governor with Responsibility for Safeguarding) without informing the Headmistress. The Headmistress (or the Chair of the Governing Body in cases of allegations against the Headmistress) will inform the LADO of all allegations if she believes that a member of staff has behaved in a way which meets the criteria above as soon as possible and in any event within 24 hours of the school becoming aware of the allegation. If it is suspected that a crime has been committed, the Police will be informed, and then the LADO.

The Headmistress will normally discuss all allegations with the DSL unless it relates to the DSL. Borderline cases will be discussed without identifying individuals in the first instance.

Child Protection and Safeguarding Concerns – Role of Staff

Confidentiality

Safeguarding children raises issues of confidentiality that must be clearly understood by all staff/volunteers in schools. All staff in school, 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 is in immediate danger or is at risk of harm, a referral should be made to Trafford Children's First Response on 0161 912 5125 during office hours (Mon - Fri 8:30 - 4:30) or 0161 912 2020 out of hours and/or the police immediately. In this case, anybody can make a referral. Make a referral direct to Trafford Children's First Response. 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.

If a member of staff is concerned about a child, they must inform the DSL. 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 using the allocated pro-forma, which can be found in the staffroom on the safeguarding noticeboard and on TEAMS > Pastoral Care > Safeguarding.

As a person who works with children, staff have a duty to refer safeguarding concerns to the DSL 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 First Response.
- if at any point, there is a risk of immediate serious harm to a child, a referral should be made to Trafford Children's First Response
- if staff have concerns about another staff member. (see Appendix F)

The DSL 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 DSL will inform the social worker responsible for the case and transfer the appropriate records to the DSL at the receiving school, in a secure manner, and separate from the child's academic file.

[General Principles - See Appendices A, B, C and D.](#)

NECESSARY AND PROPORTIONATE

When taking decisions about what information to share, you should consider how much information you need to release. Not sharing more data than is necessary to be of use is a key element of the GDPR and Data Protection Act (2018), and you should consider the impact of disclosing information on the information subject and any third parties. Information must be proportionate to the need and level of risk.

RELEVANT

Only information that is relevant to the purposes should be shared with those who need it. This allows others to do their job effectively and make informed decisions.

ADEQUATE

Information should be adequate for its purpose. Information should be of the right quality to ensure that it can be understood and relied upon.

ACCURATE

Information should be accurate and up to date, and should clearly distinguish between fact and opinion. If the information is historical then this should be explained.

TIMELY

Information should be shared in a timely fashion to reduce the risk of missed opportunities to offer support and protection to a child. Timeliness is key in emergency situations and it may not be appropriate to seek consent for information sharing if it could cause delays and therefore place a child or young person at increased risk of harm. Staff should ensure that sufficient information is shared, as well as consider the urgency with which to share it.

SECURE

Wherever possible, information should be shared in an appropriate, secure way. Staff must always follow their organisation's policy on security for handling personal information.

RECORD

Information sharing decisions should be recorded, whether or not the decision is taken to share. If the decision is to share, reasons should be cited including what information has been shared and with whom, in line with organisational procedures. If the decision is not to share, it is good practice to record the reasons for this decision and discuss them with the requester. In line with each organisation's own retention policy, the information should not be kept any longer than is necessary. In some rare circumstances, this may be indefinitely, but if this is the case, there should be a review process scheduled at regular intervals to ensure data is not retained where it is unnecessary to do so. The fundamental principle is that sharing of information should be done in the best interests of the child.

Procedure for staff dealing with abuse (including peer on peer abuse)

If a staff member has any concerns about a child, then they should discuss these with the DSL. The DSL will decide on an appropriate course of action. This discussion and actions taken will be recorded. The flow chart in Appendix C, Actions where there are concerns about a child, provides a guide to the process. Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision for both victim and perpetrator. Options include:

- managing any support for the child internally via the School's own pastoral support processes
- an early help assessment
- a referral for statutory services, for example as the child might be in need, is in need or suffering or likely to suffer harm.

The DSL will liaise with the LSCP and work with other agencies in line with Working Together to Safeguard Children (December 2020). The involvement of the Police will also be considered and helpful thresholds for contacting the Police are available (although where a child is in imminent danger, there should be no hesitation in contacting the Police immediately): NPCC: When to Call the Police.

Early Help

All staff should be aware of the Early Help process and understand their role. This includes:

- identifying emerging problems and potential unmet needs
- liaising with the DSL
- sharing information with other professionals to support early identification and assessment
- in some cases, acting as the lead professional in undertaking an assessment of the need for early help

All staff should be alert to identifying children who may benefit from Early Help. Early Help means providing support as soon as a problem emerges at any point in a child's life. If a member of staff has a concern that a child may be in need of early help then they should, in the first instance, discuss Early Help requirements with the DSL. Where a child and family would benefit from coordinated support from more than one agency (eg, education, health, Police) there should be an inter-agency early help assessment – such as the Common Assessment Framework. This should identify what help the child and family require to prevent needs escalating to a point where intervention would be needed via a statutory assessment under the Children Act 1989.

If Early Help is appropriate, where they are not taking the lead, then the DSL should support the member of staff in liaising with other agencies, and setting up an inter-agency early help assessment as appropriate. The Early Help assessment should be undertaken by a lead professional who should provide support to the child and family, act as an advocate on their behalf

and coordinate the delivery of support services. The lead professional role could be undertaken by the DSL or a teacher (or a GP, family support worker, health visitor and / or Special Educational Needs Coordinator). Decisions as to who performs this role should be taken on a case by case basis and should be informed by the child and their family. For an early help assessment to be effective:

- it should be undertaken with the agreement of the child and their parents or carers, and should involve the child and their family as well as all of the professionals who are working with them
- a teacher (or other relevant professional) should be able to discuss concerns they may have about a child and family with a social worker in the local authority
- where parents and / or the child do not consent to an early help assessment, then the lead professional should make a judgement as to whether, without help, the needs of the child will escalate. If so, a referral to Children's Social Services may be necessary.

Effective early help in a school setting involves the School (under the guidance of the DSL) providing high quality support, in cooperation with or coordinating other agencies as appropriate, to help address the assessed needs of the child and their family early, in order to significantly improve the outcomes for the child. It is hoped that in each case this should improve the welfare of the relevant child. However, each case should be kept under constant review, and consideration should be given to a referral to Children's Social Services if the child's situation does not appear to be improving.

Whistleblowing

All staff and volunteers have a responsibility to report any concerns about poor or unsafe practice, including in relation to the care and protection of a pupil or pupils. If a member of staff believes that best practice in this area is not being adhered to or that practice may put a pupil or pupils at risk they should follow the School's Whistleblowing by Staff and Volunteers Policy. No member of staff will suffer a detriment or be disciplined for raising a genuine concern about unsafe practice, provided that they do so in good faith and following the whistleblowing procedures. Where an adult feels unable to raise a concern about poor safeguarding practice with the school, or where they feel that their concern is not being addressed, they can raise their concern externally:

- Guidance can be found at - <https://www.gov.uk/whistleblowing>
- The NSPCC Whistleblowing Advice Line is available for adults who do not feel able to raise concerns regarding child protection failures internally.
 - Email: help@nspcc.org.uk.
 - Telephone: 0800 028 0285 – line is available from 08h00 to 20h00, Monday to Friday
 - Write to: National Society for the Prevention of Cruelty to Children (NSPCC), Weston House, 42 Curtain Road, London, EC2A 3NH. 44

If a child confides in a member of staff/volunteer

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.

Step 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 DSL 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

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 DSL.

Step Two:

Discussion with the DSL

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

Step Three:

- Written record of the disclosure provided to DSL
- 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 DSL
 - 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 DSL in a sealed envelope promptly. No copies should be retained by the member of staff or volunteer. Remember that your notes of the discussion may be needed in subsequent court proceedings. You are accountable for their accuracy. After a referral has been made to the DSL, the staff member/ governor/ volunteer takes no further action and must not discuss the referral with others in or outside school.

Step Four:

Follow-up by the DSL

The DSL will follow Trafford Safeguarding Children Board procedures.

Initially, the DSL will consult the Deputy DSL and confer about approaching parents, the local Trafford Children's First Response, 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 DSL 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 DSL will inform the girl's Local Authority.

The DSL is responsible for contacting external agencies. In her absence, the Deputy DSL will contact external agencies. Initially, information may be discussed without naming the child, in order to obtain advice about whether a referral is necessary. The DSL will contact external agencies by telephone as soon as possible 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.

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 DSL, the DSL 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.

If it seems necessary to the child's welfare, the DSL 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 DSL is alerted immediately to concerns. She will liaise with the appropriate Trafford Children's First Response personnel.

Support for staff

The school recognises that staff working in the school who have become involved with a child who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting. Accordingly, the school will support such staff by providing an opportunity to talk through their anxieties with the DSL, the Wellbeing First aider or Phase Leader. Similarly, during any protracted procedure arising from claims of abuse, the Wellbeing First aider or Phase Leader may be able to offer confidential support to the member of staff. Members of staff also have access to the School's Employee Assistance Programme.

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 DSL keeps child protection records. Such information is stored in a locked cabinet in the school office by the DSL 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 DSL when a child leaves in Year 6.

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 2020 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.

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).

Corporal punishment

This 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 an instance 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 DSL and by her directly to the Chair of Governors. In such situations, the Headmistress will not be informed at this stage.

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 DSL and/or Deputy DSL is/are informed as soon as the pupil is known to be missing so that appropriate searches can take place. The DSL 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 Headmistress to the DSL at the receiving school. A receipt stating that these records have been received is requested. If the pupil is on the Child Protection Register, the DSL will contact her Social Worker. To promote the welfare and protect the safety of the child, it will also 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 admissions 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 DSL informed at each stage of the procedures outlined above.

Monitoring the Effectiveness of the Policy and Procedures

An annual report and audit is completed which is reviewed by the Governor responsible for safeguarding.

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.

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	Yes	Yes
Nov 2019	Governors (R)			
Sept 2020	S Hughes (U)	Staff email, followed by INSET		
January 2021	H.Gee/S.Hughes (U)	Teams	Yes	Yes

January 2021	Governors (R)			
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APPENDIX A

Child protection procedures (issued to staff on a pocket-sized card)

PROCESS:	HOW TO REACT:	
<ul style="list-style-type: none">• Receive• Reassure• Respond• Record• Report	<ul style="list-style-type: none">• Act professionally at all times.• Treat all pupils with respect.• Listen actively — TED: Tell, Explain, Describe.• Do not make a promise of confidentiality to pupils.	<ul style="list-style-type: none">• Do not exaggerate, trivialise or ignore child abuse (physical, sexual, emotional abuse, or neglect).• Report all concerns, however trivial: do not fail to report something about which you are concerned.

If you think a child is in immediate danger, or you believe a crime has been committed, ring the Police on 999.

WHAT TO DO IF

...you suspect a pupil is being abused/a pupil makes a disclosure

- Report to matter immediately to the DSL or Deputy DSL
- Do not share your concerns with other adults

...you receive an allegation about a member of staff

- Report the matter immediately to the Headmistress
- If it is about the Headmistress, report to the Chair of Governors Mrs J Duschenes (jduschenes@bowdonprep.org.uk)

Key contacts

DSL: Mrs Sophie Hughes: shughes@bowdonprep.org.uk

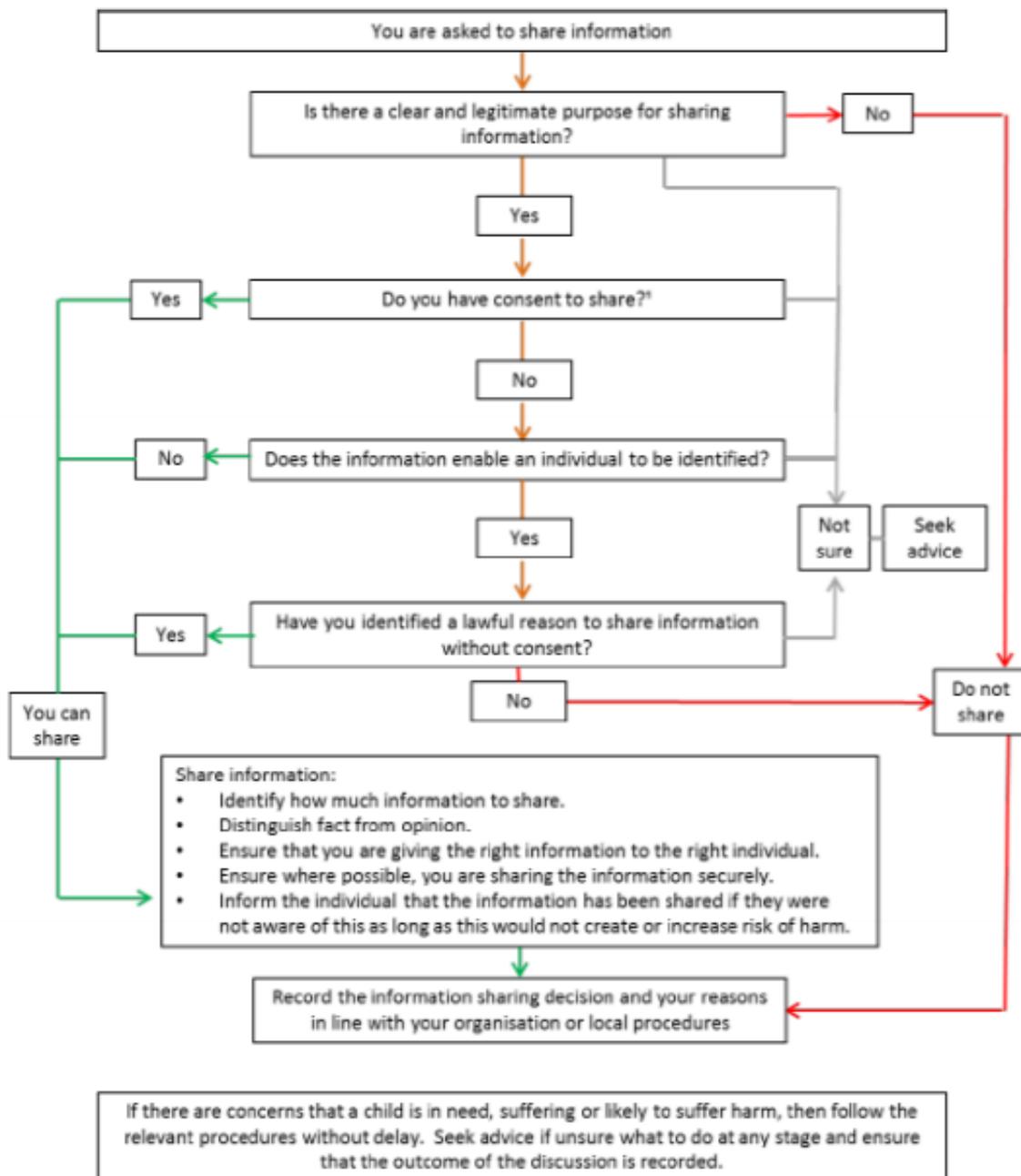
Deputy DSL: Mrs Helen Gee: headmistress@bowdonprep.org.uk – 07800972770

Deputy DSL: Mrs Sara Makepeace-Taylor: smakepeacetaylor@bowdonprep.org.uk

Deputy DSL for Out of School Care : Mrs Heather Odiowei: hodeowei@bowdonprep.org.uk

APPENDIX B

Flowchart of when and how to share information



1. Consent must be unambiguous, freely given and may be withdrawn at any time

APPENDIX C

Actions where there are concerns about a child



¹ In cases which also involve a concern or an allegation of abuse against a staff member, see Part Four of this guidance.

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

³ Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of [Working Together to Safeguard Children](#).

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

⁵ This could include applying for an Emergency Protection Order (EPO).

APPENDIX D

COVID-19 SCHOOL NOT IN SESSION

In order to safeguard pupils during these unprecedented times the School is following the government guidance for school closures during COVID-19. This Appendix sits alongside the School's existing Safeguarding Policy and will apply when the School is not in session.

This policy complies with the following key documents:

- Guidance for full reopening of schools (HM Government, July 2020 onwards)
- Safeguarding and remote education during coronavirus (COVID-19) (HM Government, April 2020) Principles

As far as is reasonably possible, we will take a whole institution approach to safeguarding. This will allow us to satisfy ourselves that any new policies and processes in response to COVID-19 are not weakening our approach to safeguarding or undermining our Safeguarding Policy. Whilst the way that we operate in response to COVID-19 is fundamentally different to business as usual, a number of important safeguarding principles remain the same:

The best interests of children will always continue to come first.

If anyone has a safeguarding concern about any child then they should continue to act and to act immediately.

A DSL or a DDSL will always be available and members of the SMC can continue to be consulted as and where necessary.

It is essential that unsuitable people are not allowed to enter the children's workforce and / or gain access to children, which means that Safer Recruitment principles remain in place.

Children should continue to be protected when they are online.

This Appendix to the School's Safeguarding Policy contains details of our individual safeguarding arrangements for the identified areas.

Additional risks

The risks which are present in a physical setting are, by and large, equally present in a virtual setting.

There are also added risks including the particular emotional vulnerability of children in a time of crisis; concern about family members and friends; the potential for increased power imbalance; and the potential for neglect within the family for reasons of illness, anxiety or work requirements. Above all, the uniqueness of the emergency combined with the potential informality of virtual learning may unwittingly facilitate culture slippage, where rules which are routinely applied in ordinary circumstances are seen to be irrelevant in a crisis. Additional safeguarding risks relating to online learning may arise due to poor technical understanding; an intention to abuse; weak online security, poor parental settings on home systems; and patchy parental supervision. Also, there is greater likelihood of Youth Produced Sexual Imagery (sexting), and neglect to children where parents are ill, anxious, or busy at work. For children of key workers who are attending the school's site, risks can include the same online risks (although mitigated by the school's built-in securities and firewalls); individual safety; site security; supervision levels and knowing the whereabouts of all children at all times; peer-on-peer abuse arising from the mix across form/classes associations being more widespread than in normal school operation; and staff being unfamiliar with individual welfare needs and past behaviours.

Contact details

The Safeguarding Team and SLT continue to remain available so as to be able to receive and respond to any concerns that might arise. This can be done by email, telephone or video call. The Safeguarding Team continues to work alongside

Children's Services and the LADO. All members of the Safeguarding Team have access to the School site and any relevant files and documentation, should the need arise.

Vulnerable children

Vulnerable children include those who have a social worker and those children and young people up to the age of 25 with education, health and care (EHC) plans. Those who have a social worker include children who are subject to a Child Protection Plan, a Child in Need Plan and those who are looked after by the Local Authority. We will continue to work with and support children's social workers to help protect vulnerable children.

The Headmistress, DSL and DDSLs know who all our vulnerable children are: they also have the flexibility to offer support to those on the edge of receiving children's social care support. The school expects all pupils to attend the School remotely and, where it is deemed to be appropriate, will encourage parents of our vulnerable children to allow them to attend physically. If the expectation is that a vulnerable pupil will attend the school physically, consideration will be given as to whether the pupil has any underlying health conditions that put them at risk and will be subject to the formal agreement with the child's social worker. In circumstances where a parent does not want to bring their child to an education setting, and their child is considered vulnerable, the social worker and the school will explore the reasons for this directly with the parent following the advice set out by Public Health England.

The School will ensure that all professionals (e.g.: social workers, SEND case workers, Early Help worker etc.) involved with these vulnerable children are fully informed around the current attendance of the child (attending School or not, either remotely or physically) and if not attending School, the arrangements that have been put in place around safeguarding the child.

Registration and attendance

The School will continue to record day-to-day attendance. Absences will be reported as is usual and any unexplained absences will be followed up. Vulnerable children who are required to attend School every day whether physically or virtually (including Looked After Children, Children subject to a Child Protection Plan and Children subject to a Child in Need Plan) and who are absent, will result in the school contacting the relevant Children's Services and providing the following details:

- School name and DSL details
- Full name of child
- Date of birth of child
- When the child was last seen by school staff

The Department for Education may introduce a daily online attendance form to keep a record of children of key workers and vulnerable children who are attending School: (<https://www.gov.uk/government/publications/coronavirus-covid-19-attendance-recording-foreducational-settings>). This allows for a record of attendance for safeguarding purposes and allows schools to provide accurate, up-to-date data to the department on the number of children taking up places. The school secretary, who is the nominated member of staff responsible for recording pupil attendance, will complete and return the form daily.

Staff absence

If a member of staff is ill and needs to be absent for a school session, the line manager should be notified by 08h30; for teaching staff, the Head's PA and school secretary should also be informed. If there is to be a planned absence, authorisation should be sought by completing the relevant absence request form or by email. These arrangements ensure that pupils can be properly registered and supervised.

Reporting a concern

Where staff have a concern about a child, they should continue to follow the process outlined in the School's Safeguarding Policy. Where staff are concerned about an adult working with children in the school, they should continue to follow the normal procedures and notify the Headmistress immediately or the Chair of Governors if the matter concerns the Headmistress. If there is an immediate concern or the relevant person is not available, then it is appropriate to contact the Local Authority and / or the Police.

Safeguarding training

All DSL refresher training has been suspended by the Local Authority and it is very unlikely to take place whilst there remains a threat of the COVID-19 virus. For the period COVID-19 measures are in place, a DSL (or deputy) who has been trained will continue to be classed as a trained DSL (or deputy) even if they miss their refresher training. Every effort will be made by DSLs to keep up to date through newsletters and professional groups; DSLs will access refresher training as soon as it becomes practicable again.

All existing staff have had safeguarding training and have read Part 1 of Keeping Children Safe in Education (2020). The DSL will communicate with staff any new local arrangements, so they know what to do if they are worried about a child. Where there is an update to the school's Safeguarding Policy, it will be necessary for all members of staff to confirm that they have read and understood the school's revised Safeguarding Policy.

Where new staff are recruited, or new volunteers enter the School, they will continue to be provided with a safeguarding induction, and may be provided online or face-to-face. If staff are deployed from another education or children's workforce setting, the school will take into account the DfE supplementary guidance on safeguarding children during the COVID-19 pandemic and will accept portability as long as the current employer confirms in writing that:

- The individual has been subject to an enhanced DBS and children's barred list check
- There are no known concerns about the individual's suitability to work with children
- There is no ongoing disciplinary investigation relating to that individual. Upon arrival, they will be given a copy of the school's Safeguarding Policy, confirmation of local processes and confirmation of DSL arrangements.

Safer recruitment / volunteers

It remains essential that people who are unsuitable are not allowed to enter the children's workforce or gain access to children. When recruiting new staff, the school will continue to follow the relevant safer recruitment processes for their setting, including, as appropriate, relevant sections in Part 3 of Keeping Children Safe in Education (2020) (KCSIE).

In response to COVID-19, the Disclosure and Barring Service (DBS) has made changes to its guidance on standard and enhanced DBS ID checking to minimise the need for face-to-face contact, including checks initiated on the basis of scanned images and live video links for urgent cases where it is not possible to follow normal guidelines: where this concession is relied on, original documents will be viewed when the individual first attends in person.

Where volunteers are deployed, the School will continue to follow the checking and risk assessment process as set out in the relevant sections of KCSIE (2020). Under no circumstances will a volunteer who has not been checked be left unsupervised or allowed to work in regulated activity. The school will continue to follow its legal duty to refer to the DBS where appropriate, in line with advice from the LADO, anyone who has harmed or poses a risk of harm to a child or vulnerable adult.

The school will continue to consider and make referrals to the Teaching Regulation Agency (TRA) as set out in the relevant section of KCSIE (2020) and the TRA's "Teacher misconduct advice for making a referral". During the COVID-19 period all referrals will be made by emailing Misconduct.Teacher@education.gov.uk

Whilst acknowledging the challenge of the current national emergency, it is essential from a safeguarding perspective that the School is aware, on any given day, which staff / volunteers will be in School, and that appropriate checks have been carried out, especially for anyone engaging in regulated activity. As such, the school will continue to keep the single central record (SCR) up to date as outlined in the relevant section of KCSIE. The SCR can also be used to log details of any risk assessments carried out on volunteers.

Online safety through school systems and in school

The school will continue to provide a safe environment, including when working online. This includes the use of appropriate filters and online monitoring systems applied to the school's online platforms, through which all school business must be conducted. Where children are using computers in school, appropriate supervision will be in place. The school will ensure that any use of online learning tools and systems is in line with privacy and GDPR requirements.

Online safety away from school

It is important that all staff who interact with children, including online, continue to look out for signs that a child may be at risk. To report any such concerns, staff should continue to follow the process outlined in the School's Safeguarding Policy; where appropriate, referrals should still be made to Children's Services and, as required, the Police.

Pupils will be briefed on how to keep themselves safe when online, reporting matters to members of staff or using the following websites:

- Childline for support: <https://www.childline.org.uk/>
- UK Safer Internet Centre to report and remove harmful online content: <https://reportharmfulcontent.com/>
- CEOP for advice on making a report about online abuse: <https://www.ceop.police.uk/safety-centre/>

The Headmistress leads on matters related to remote teaching and the school's Remote Learning Procedure gives clear advice and guidance. The following expectations are to be observed when engaging in virtual lessons and especially where webcams are involved.

Appearance and presentation

Pupils should have a workspace that is quiet, safe and free from distractions.

Pupils should work from a computer that has a strong internet connection and videoconferencing functionality.

Any computers used should be in appropriate professional spaces (for example, not in bathrooms).

When video-calling on Zoom, pupils and staff should select an appropriate professional background to ensure privacy. Video backgrounds are not permitted.

Staff and pupils must wear appropriate clothing for video-calls, as should anyone else in the household who might be visible. Other than the staff and the pupil, no other member of the household should be in attendance during lessons, except by prior arrangement and with the explicit permission of all parties.

Scheduling and different types of meeting/learning sessions

Staff and pupils should adhere to the published timetable for lessons and events. Small group meetings are to be preferred to one to one meetings.

Where one to one sessions need to be scheduled, they should be pre-arranged as a calendared meeting, at a mutually convenient time during the conventional working day.

If either a pupil or a member of staff has a concern about the nature of any online interaction, the matter should be reported to the DSL.

Video calling and online platforms

Live classes and images through the online platforms are not to be recorded, except with the explicit permission of all relevant parties and only for the purposes of examination assessment.

All participants in any online video call should be visible except when specifically instructed that video should be disabled.

Only platforms provided by the school should be used in order to communicate between members of staff and pupils.

Any behaviour or comments that are inappropriate should be reported to the Phase Leader, or, in the case of a safeguarding concern, to the DSL.

Expectations of households where pupils are working

Pupils need to be able to work in a workspace that is quiet, safe and free from distractions. Pupils will need access to a computer that has wireless access and video-conferencing facilities. It is not expected that other members of the household will be in attendance or take part in a scheduled session with a member of staff, unless a separate meeting has been specifically arranged. It is not appropriate for parents to record, share or comment in any public or closed forum about individual pupils or members of staff.

Supporting children when they are not in school

Physical wellbeing

Protracted periods of time sat in front of a computer are not healthy. All members of the community should seek to break up their screen-time, taking breaks regularly away from the screen.

Pupils on the edge of social care support

The school is committed to ensuring the safety and wellbeing of all of its pupils. Where the DSL has identified a pupil to be on the edge of social care support, or who would normally receive enhanced levels of pastoral-type support in school, Phase Leaders in discussion with the DSL will ensure that a robust communication plan is in place for that child. The communication plan could include: strategic remote contact, telephone contact and door-step visits.

Pupils who are “shielding”

Those pupils who are “shielding” away from school at the request of their parents will be notified to the Local Authority. It may be that the Local Authority engages directly with the family to encourage the pupil to be able to come in to school or accepts that remote learning is appropriate in the circumstance. If the latter, Phase Leaders in discussion with the DSL will ensure that a robust communication plan is in place for that child. The communication plan could include: strategic remote contact, telephone contact and door-step visits.

Emotional welfare

The School recognises that it has a role to play in protecting the welfare of its pupils and that the current circumstances can affect the mental health of pupils, their parents / guardians and their families. Staff need to be aware of this in setting expectations of pupils' work and of the way in which they interact with pupils and their families.

Key workers' children

The School will ensure that where the children of critical workers and vulnerable children are on site, it will provide appropriate support, ensuring that appropriate staff are on site and that the staff to pupil ratio numbers are appropriate, to maximise safety.

Promoting HM Government advice

The school recognises the important role that it has to play in helping the community to safeguard itself. As such, opportunities to promote social distancing and good hygiene will be taken regularly.

Peer on peer abuse

Where the school receives a report of peer on peer abuse, the principles as set out in KCSIE (2020) and those outlined within the school's Safeguarding Policy will be followed. The school will listen and work with the child, parents and any multi-agency partner required to ensure the safety and security of that young person. Concerns and actions must be recorded, and appropriate referrals made.

APPENDIX E

COVID-19 – pupils returning to school after absence

In order to safeguard pupils during these unprecedented times the school is following the government guidance for school closures during COVID-19. This Appendix sits alongside the school's existing Safeguarding Policy and applies to pupils who have been absent from school for a period of time after having been absent.

Monitoring and responding to COVID-19 related absence

The school will continue to monitor pupil attendance in line with the Pupil Registration and Attendance Policy, which includes a number of new registration codes to record COVID-19 related absences. The school's response to any COVID-19 issues will be undertaken with relevant advice as outlined in the school's COVID-19 Symptoms and Protocols.

Face-to-face engagement with pupils

Having been away from school for some time and with pupils and staff only engaging remotely, it is likely that staff will notice some change in the way that pupils present. Typically, colleagues will pick up on small changes in behaviour or outlook, but it is likely that some subtle changes will not be at all obvious. As such, the level of pastoral engagement with pupils will need to be more exploratory and potentially more searching than usual, with direct questions asked about health and wellbeing.

For those who have a safeguarding profile, it is especially important that sensitive questions are raised.

Handling concerns

Staff (and, indeed, pupils) may identify new safeguarding concerns about individual children as they see one another in person following the school's closure. As usual, any concerns should be shared with a member of the Safeguarding team and advice sought, if necessary. It continues to be the case that staff must act immediately on any safeguarding concerns that might arise. The process for sharing information about peer on peer abuse remains the same.

If staff have concerns about a staff member or volunteer who may pose a safeguarding risk to children, staff should follow the same arrangements as outlined in main policy under the heading "Concerns about / allegations against a member of staff". The DSL and Deputy DSLs continue to be available on-site and ready to provide any support that is required.

Sharing information

Phase Leaders will continue to engage with parents about the welfare of pupils, so as to inform any conversations that are taking place with pupils. Any lower level concerns will be picked up with the DSL in the weekly SLT meetings.

APPENDIX F

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

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:

- (i) Behaved in a way that has harmed a child, or may have harmed a child
- (ii) Possibly committed a criminal offence against or related to a child
- (iii) 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.

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 allegations will be dealt with fairly, quickly and consistently in a manner that provides effective protection for the child and, at the same time, supports the person who is the subject of the allegation. The LADO will discuss with the Headmistress (or Chair of the Governing Body as above), and any other relevant agencies such as the Police, which further steps (if any) should be taken; this could involve informing parents. Where a referral to the Police has been made directly, the Headmistress (or Chair of the Governing Body) will inform the LADO of the referral as soon as possible and in any event within 24 hours of the school becoming aware of the allegation.

There may be cases where the LADO or Police are made aware of an allegation before the school is and in those cases they will notify the school of the allegation immediately. All discussions with external agencies should be recorded in writing. When an allegation is made, the school will make every effort to maintain confidentiality and guard against unwanted publicity while the allegation is being investigated.

If there is cause to suspect that a child or children at the School are at risk of harm from the accused person, then the person concerned will be suspended. Due weight should be given to the views of the LADO and to the Police when making a decision about suspension and all alternative options should be considered prior to taking that step. The reasons and justification for suspension will be recorded and the individual informed of them. In the case of staff, the matter will normally be dealt with in accordance with the Disciplinary Rules and Procedures for Staff Policy. In cases where the School is made aware that the Secretary of State has made an interim prohibition order in respect of an individual at the School, it will be necessary to suspend that person from teaching immediately, pending the findings of the investigation by the Teaching Regulation Agency (TRA).

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 Trafford Children's First Response on 0161 912 5125 during office hours (Mon - Fri 8:30 - 4:30) or 0161 912 2020 out of hours 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 Trafford Children's First Response Services as appropriate, is the Headmistress
- In the event of the absence of the Headmistress, the Nominated Senior Manager will be the DSL 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 DSL for Child Protection

Procedure to be followed

1. 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 member of staff 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 46 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

Where a teacher is facing an allegation of a criminal offence involving a pupil registered at the school, the teacher concerned is legally entitled to anonymity until the teacher is charged with an offence, the anonymity is waived by the teacher or until the Secretary of State publishes information about an investigation or decision in a disciplinary case arising from the allegation. In particular, the Education Act (2002) prevents the publication of any material which could lead to the identification of a teacher who has been accused by, or on behalf of, a pupil from the same school (where that identification would identify the teacher as the subject of the allegation). The legislation imposing restrictions makes clear that "publication" of material that

may lead to the identification of the teacher who is the subject of the allegation is prohibited. "Publication" includes "any speech, writing, relevant programme or other communication in whatever form, which is addressed to the public at large or any section of the public". This means that a parent who, for example, published details of the allegation on a social networking site would be in breach of the reporting restrictions (if what was published could lead to the identification of the teacher by members of the public).

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 Headmistress who will read, sign and date it. Following consultation with LADO, communications with the individual and the parents of the child will be agreed.

- Comprehensive minutes will be produced of all meetings, preferably by a person not involved in the investigation
- The Headmistress 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.

2. Initial actions of the Headmistress

The school should take advice from LADO - Local Authority Designated Officer: Trafford Children's First Response 0161 912 5125, 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.

The purpose of an initial discussion with the LADO is for the LADO and the Headmistress to consider the nature, content and context of the allegation and agree a course of action. The LADO may ask the Headmistress 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. Discussions will be recorded in writing and any communication with both the individual and the parents of the child/children agreed.

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 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.

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 Trafford Children's First Response on 0161 912 5125 during office hours (Mon - Fri 8:30 - 4:30) or 0161 912 2020 if out of hours services is required.

- In this case, the decision and a justification for the decision will be recorded in writing by the Headmistress and the LADO
- The Headmistress and the LADO will agree what information should be put in writing to the individual concerned and by whom
- The Headmistress 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 Headmistress and the LADO will consider what action should follow in respect of:
 - a. the individual who is the subject of the allegation / concern
 - b. 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 DSL 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 Headmistress 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 Trafford Children's First Response on 0161 912 5125 during office hours (Mon - Fri 8:30 - 4:30) or 0161 912 2020 out of hours service 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 Trafford Local Authority

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 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 Bursar who has responsibility for HR.

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 DSL 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 Headmistress:

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 Headmistress without delay.

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

Suspension

Suspension will be considered by the Headmistress 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 Headmistress 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 Teaching Regulation Agency (TRA) 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.

Supply teachers

The School does not currently work with supply teachers. Should the school appoint a supply teacher, even though the school would not be the employer, the school would ensure allegations are dealt with properly: supply teachers, whilst not employed by the school, are under the supervision, direction and control of the governing body or proprietor when working in a school. This would mean that if the school were to decide against using a supply teacher due to safeguarding concerns, the school would seek out the facts and liaise with the LADO, with the school typically taking the lead in such matters. Consideration would be given to suspending the supply teacher, or redeploying them to another part of the school, whilst the investigation was carried out. The supply teacher would be advised to contact their trade union representative if they have one, or a colleague for support. When using an agency, schools should inform the agency of its process for managing allegations. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies. Agencies would be fully involved and it would be expected that they would cooperate in any enquiries. The allegations management meeting which is often arranged by the LADO should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the school during the investigation.

Historic cases

A colleague who becomes aware of an allegation against a former member of staff, or against a former pupil who is now aged over 18, should pass it to the Headmistress, who will check the existence of other relevant records before promptly informing the Police. Members of staff who become aware of allegations involving former colleagues or former pupils must otherwise keep the matter wholly confidential.

APPENDIX G

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.

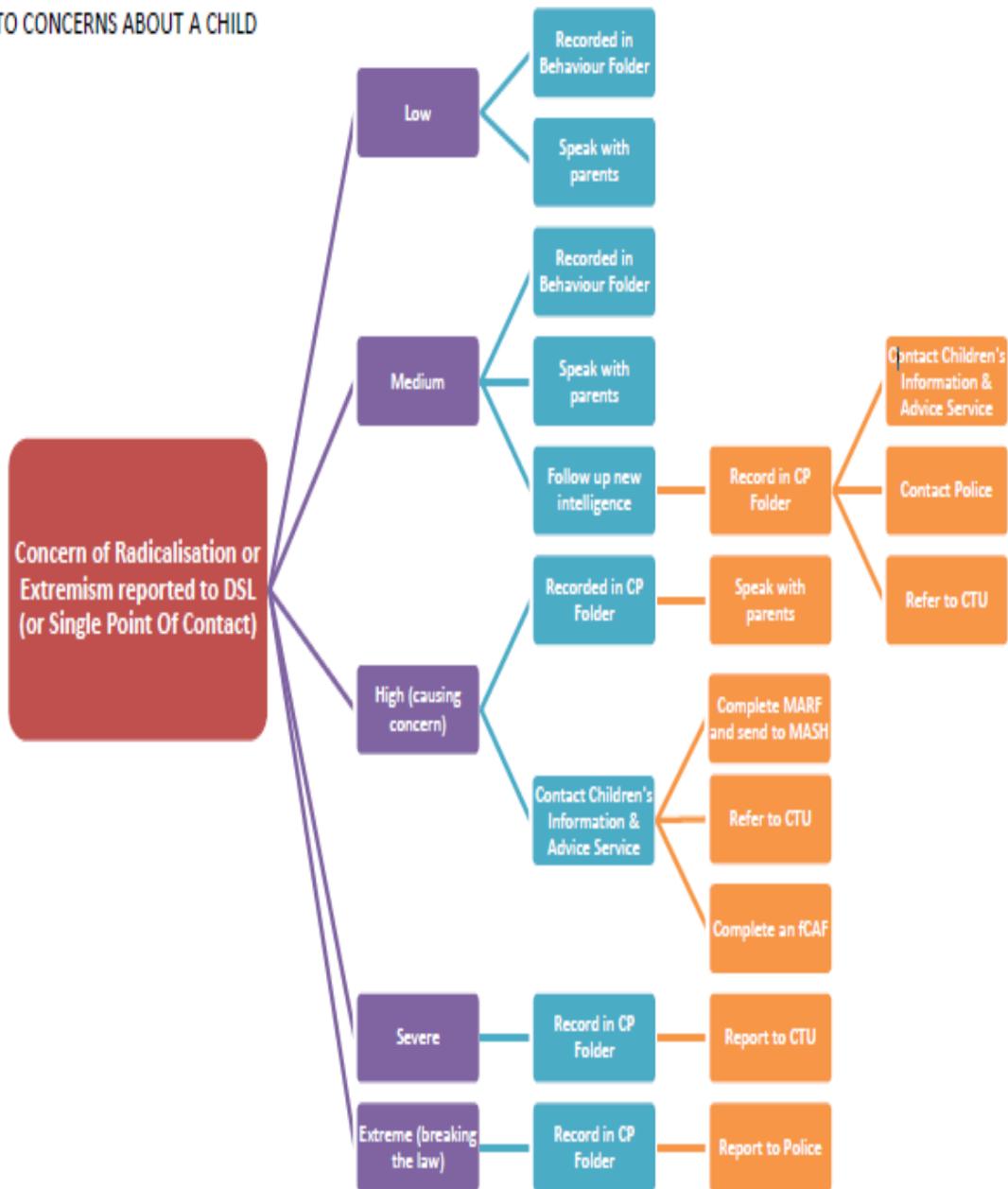
Restraint

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.

Anti-Radicalisation & Anti-Extremism Flow Chart

RESPONDING TO CONCERNS ABOUT A CHILD



APPENDIX I

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 Trafford Children's First Response on 0161 912 5125 during office hours (Mon - Fri 8:30 - 4:30) or 0161 912 2020 out of hours 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 Trafford Children's First Response on 0161 912 5125 during office hours (Mon - Fri 8:30 - 4:30) or 0161 912 2020 out of hours
- 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 Trafford Children's First Response on 0161 912 5125 during office hours (Mon - Fri 8:30 - 4:30) or 0161 912 2020 out of hours 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 Trafford Children's First Response (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 Trafford Children's First Response 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.

- The decision should be made by the DSL with input from the Headmistress 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 Trafford Children's First Response on 0161 912 5125 during office hours (Mon - Fri 8:30 - 4:30) or 0161 912 2020 out of hours, 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 Trafford Children's First Response on 0161 912 5125 during office hours (Mon - Fri 8:30 - 4:30) or 0161 912 2020 out of hours 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 confiscated¹⁸ 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.

If as a result of the investigation the DSL believes there are wider issues which meet the threshold for Trafford Children's First Response 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 Headmistress.
- Ensure viewing is undertaken by the DSL or another member of the safeguarding team with delegated authority from the Headmistress.
- Ensure viewing takes place with another member of staff present in the room, ideally the Headmistress 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 Headmistress 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 Headmistress 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 Trafford Children's First Response on 0161 912 5125 during office hours (Mon - Fri 8:30 - 4:30) or 0161 912 2020 out of hours they should record their reason for doing so and ensure that this is signed off by the Headmistress.

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.