

## Safeguarding and Child Protection Policy and Procedures

This child protection and safeguarding policy sets out the school's expectations across the whole school. This policy is applicable for all children including those in the EYFS. It should be read in conjunction with:

Early Years Policy	Positive Behaviour Policy	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 & Online safety	Health and Safety Policy
Risk assessment Policy	Social Media Policy	Whistle blowing
Trip and Visits Policy	Attendance Policy	Data protection Policy

This policy is available on the school website and a printed copy can be made available via the school office. It reflects Trafford Strategic Safeguarding Partnership Multi-agency safeguarding arrangements. 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 2022) (KCSIE)
Equality Act 2010
Education Act 2002 (section 175)
The Children Act 2004
<b>Trafford Safeguarding Children Board Inter-agency Child Protection and Safeguarding Children Procedures</b>
Working Together to Safeguard Children ((March 2018)
Information Sharing Advice for practitioners providing Safeguarding Services (July 2018)
The Education (Pupil Information) (England) Regulations 2005
Counter Terrorism & Security Act - Prevent Duty Guidance for England and Wales (March 2015)
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 2021)
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 (2017)
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	<a href="mailto:shughes@bowdonprep.org.uk">shughes@bowdonprep.org.uk</a>
Designated Safeguarding Lead EYFS: Mrs Sara Makepeace-Taylor	<a href="mailto:smakepeaceataylor@bowdonprep.org.uk">smakepeaceataylor@bowdonprep.org.uk</a>
Deputy Designated Safeguarding Lead (DDSL): Mrs Helen Gee	<a href="mailto:headmistress@bowdonprep.org.uk">headmistress@bowdonprep.org.uk</a> 07800972770
Deputy Designated Safeguarding Lead for Out of School Care (DDSL): Mrs Heather Odiowei	<a href="mailto:hodeowei@bowdonprep.org.uk">hodeowei@bowdonprep.org.uk</a>
Safeguarding Governor: Mrs Nicola Tighe	<a href="mailto:bursar@bowdonprep.org.uk">bursar@bowdonprep.org.uk</a>
Senior Mental Health Lead: Mrs Sara Makepeace-Taylor	<a href="mailto:smakepeaceataylor@bowdonprep.org.uk">smakepeaceataylor@bowdonprep.org.uk</a>
Mental Health First Aider: Mrs Gill Vasey	<a href="mailto:headteacher@bowdonprep.org.uk">headteacher@bowdonprep.org.uk</a>
Chair of Governing Body: Mrs Jennie Duschenes	<a href="mailto:chair@bowdonprep.org.uk">chair@bowdonprep.org.uk</a>

## Key External Contact Details

Trafford Children's First Response	0161 912 5125 <a href="mailto:firstresponse@trafford.gov.uk">firstresponse@trafford.gov.uk</a>
Emergency Duty Team (Out of Hours)	0161 912 2020
Greater Manchester Police	101 (non emergency) 999 (emergency)
Trafford Strategic Safeguarding Partnership	Trafford Personal Advisor
Trafford Local Authority Designated Officer (LADO): Anita Hopkins	0161 912 5024. email: <a href="mailto:anita.hopkins@trafford.gov.uk">anita.hopkins@trafford.gov.uk</a>
NSPCC	0808 800 5000
NSPCC Whistle Blowing Advice	0800 0280285 email: <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a> <a href="https://www.nspcc.org.uk">NSPCC website</a>
Childline	0800 11 11 <a href="http://www.childline.org.uk">www.childline.org.uk</a>
Independent Schools Inspectorate	0207 6000100 <a href="https://www.isi.net/parents-and-pupils/concerns-about-a-school">https://www.isi.net/parents-and-pupils/concerns-about-a-school</a> email: <a href="mailto:concerns@isi.net">concerns@isi.net</a>
Teaching Regulation Agency	02075935393 <a href="https://www.gov.uk/report-teacher-misconduct">https://www.gov.uk/report-teacher-misconduct</a> email: <a href="mailto:misconductteacher@education.gov.uk">misconductteacher@education.gov.uk</a>
UK Council for Child Internet Safety Guidance	<a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/609874/6_2939_SP_NCA_Sexting_In_Schools_FINAL_Update_Jan17.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/609874/6_2939_SP_NCA_Sexting_In_Schools_FINAL_Update_Jan17.pdf</a>
Trafford Children Social Care Protocol of Assessment	<a href="https://www.proceduresonline.com/trafford/cs/chapters/p_assessment.html">https://www.proceduresonline.com/trafford/cs/chapters/p_assessment.html</a>
Trafford Multi-Agency Safeguarding Arrangements	TSSB-multiagency-arrangements ( <a href="http://traffordsafeguardingpartnership.org.uk">traffordsafeguardingpartnership.org.uk</a> )
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	<a href="mailto:liz.baxter@trafford.gov.uk">liz.baxter@trafford.gov.uk</a>
Concerns relating to extremism (DFE)	020 7340 7264 email: <a href="mailto:counter.extremism@education.gsi.gov.uk">counter.extremism@education.gsi.gov.uk</a>
Radicalisation - Channel (Trafford)	0161 856 6362 Ext 66373 email: <a href="mailto:channel.project@gmp.police.uk">channel.project@gmp.police.uk</a>
Greater Manchester Police Prevent Team	0161 856 6345. Call anonymously on 0800 789 321.
National Anti-Terrorist Hotline	0800 789321

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## 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. It is reviewed and updated with contribution from all staff with experience and responsibility for safeguarding.

Date of update	(U) Updated (R) Reviewed by	How was updated disseminated	Parents informed	Policy on website	Gov Approved
April 2016	SH (U)	Staff meeting	No	Yes	
Sept 2016	HG (U)	Staff briefing – email – all staff to familiarise and action	Yes	Yes	Yes
Feb 2017	H Gee (U)	Staff briefing– email to Governors	Yes	Yes	
Sept 2017	S Hughes (R)		Yes	Yes	Yes
Sept 2018	S Hughes (R)	Staff INSET	Yes	Yes	
Oct 2018	S Hughes (U)	Staff training (CPD)			Yes
Sept 2019	S Hughes (U)	Staff training – INSET	Yes	Yes	Yes
Sept 2020	S Hughes (U)	Staff email, followed by INSET			Yes
Jan 2021	S.Hughes (U)	Teams	Yes	Yes	
May 2021	H. Gee	Teams	Yes	Yes	Yes
Sept 2021	S Hughes (U)	Teams	Yes	Yes	Yes
May 2022	H.Gee (U)	TEAMS and staff briefing	Yes	Yes	YES
Sept 2022	S Hughes	Staff training - INSET	Yes	Yes	Yes

Latest updates
Child on child changed to Child-on-Child
More details in definition of domestic abuse
More details relating to low level concerns
Governors to receive appropriate training
Disclosures – awareness of difficulties with pupils disclosing information
Strengthen the importance of online safety with a greater communication to parents

## Introduction

### Foreword by Jennie Duschenes – Chair of Governing Body

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. This includes the procedures and strategies for implementation of the policy and ensuring that the school contributes to interagency working. 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 non teaching 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.

All staff working in this School (including visiting staff, volunteers and students on placement) are required to report instances of actual or suspected child abuse or neglect to the Designated Safeguarding Lead who is a member of the school's leadership team. This person along with the DDSL's have the appropriate status and authority within the school to carry out the duties of the post.

Where there is a safeguarding concern the school ensures the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems are in place, and are well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

If a child is in immediate danger, contact will be made with the police via 999.

Arrangements are in place to ensure that at least one person who is a trained designated safeguarding lead is available when children are taking part in school led activity, this includes before and after school clubs and other extra-curricular activities, both during and out of term time.

When engaging other services outside of our school to form part of a Team around the Family, we will utilise Trafford's Early Help Assessment to ensure this is formalised in a consistent way for all agencies involved at that point. Where necessary the school will complete an Early Help Assessment to identify specific needs that require the assistance of other services outside of the school. We recognise our duties to both children in need of additional support and children at risk of significant harm.

## **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 and child on child abuse.
- To provide statutory staff and 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 B and Part 5 of KCSIE.
- Governors to receive appropriate safeguarding and child protection training at induction and regular intervals. Training to provide them with the knowledge to ensure that our safeguarding policies and procedures are effective.



## 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 Trafford LSCB to make sure staff are aware of training opportunities and the latest local policies on safeguarding and ensure the school follows its procedures and liaises and engages with them as required.
- 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 and DDSL 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
- take a proportionate risk-based approach to the level of information that is provided to temporary staff, volunteers and contractors
- making sure that children are taught about how to keep themselves safe
- ensure that child protection files are maintained as set out in Annex C of KCSIE 2022
- ensure appropriate safer recruitment policies in accordance with Part three of KCSIE 2022 are in place, embedded and effective
- where reasonably possible, ensure the school holds more than one emergency contact number for each pupil. The Designated Safeguarding Lead and Deputies

[Also see Appendix M](#)

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 year, to keep up to date with safeguarding developments and is in accordance with locally agreed procedures including child protection, interagency working and the safeguarding partners' approach to prevent duties. Additionally, the DSL undertakes Prevent awareness training. There are also two 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 2022 outlines the duties of the DSL (including online 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 via the online referral form.

The Designated Safeguarding Lead co-ordinates the school's representation at multi-agency meetings relating to safeguarding to ensure information is effectively shared between agencies. The DSL is also responsible for the school's contribution and commitment to any plans, team around the family and core groups or other assessment. These meetings include:

- a) Team around the Family Meetings (Early Help)
- b) Social Care Strategy Meetings
- c) Child in Need Meetings
- d) Initial Child Protection Conferences
- e) Review Child Protection Conferences

The Designated Safeguarding Lead ensures the submission of written reports for relevant multi-agency meetings (relevant meetings named above).

When an individual concern/incident is brought to the notice of the Designated Safeguarding Lead, they are responsible for deciding whether or not this should be reported to other agencies as a safeguarding issue, or whether a single agency response would be more appropriate and proportionate (Early Help – Level 2 of the Level of Need).

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

##### **Managing referrals**

Promptly contact children social care or channel where there are concerns that a child may be in need of help or at risk and/or LADO in relation to allegations against someone working in the school and/or the police if a criminal offense is suspected.

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 will 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 or channel.
- 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.

We promote a culture of openness and trust and ensure that adults consistently model the school's values and helps keep children safe. We also aim to ensure that we protect adults working in school from potential false allegations or misunderstandings. Staff must report all low level concerns to the Headmistress. See Appendix L

## **Glossary**

Term	Meaning
A Child	A person who has not yet reached their 18 <sup>th</sup> birthday.

Term	Meaning
Abuse	A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those who know them or, more rarely by others (e.g. via the internet). They may be abused by an adult or adults or another child or children.
Bullying & Cyberbullying	Behaviour that is: <ul style="list-style-type: none"> <li>• repeated</li> <li>• intended to hurt someone either physically or emotionally</li> <li>• often aimed at certain groups, for example because of race, religion, gender or sexual orientation</li> </ul>
Child abduction and community safety incidents	<p>Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends, and acquaintances); and by strangers.</p> <p>Other community safety incidents in the vicinity of our school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.</p> <p>As children get older and are granted more independence (for example, as some Year 6 pupils may start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Year 6 attend Trafford's 'Crucial Crew' which gives practical advice about pupils looking after themselves outside of school.</p> <p>It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: <a href="http://www.actionagainstabduction.org">www.actionagainstabduction.org</a> and <a href="http://www.clevernevergoes.org">www.clevernevergoes.org</a></p>
Child Protection	Activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.
Child sexual exploitation	<p>Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.</p>
Children and the court system	<p>Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5-11 year olds and 12-17 year olds available on the gov.uk website.</p> <p>The guides explain each step of the process and support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained. Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. We may refer some parents and carers to this service where appropriate.</p>
Children with family	<p>Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation, and poor mental</p>

Term	Meaning
members in prison	health. The National Information Centre on Children of Offenders, NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.
Children with Special Educational Needs and/or disabilities	<p>SEN - a child or young person has SEN if they have a learning difficulty or disability which calls for special educational provision to be made for him or her.</p> <p>Disability - a physical or mental impairment which has a long-term and substantial adverse effect on their ability to carry out normal day-to-day activities.</p>
Contextual Safeguarding	Contextual Safeguarding is an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse.
County Lines	County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line". This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.
Criminal Exploitation	Involves young people under the age of 18 in exploitative situations, relationships or contexts, where they may be manipulated or coerced into committing crime on behalf of an individual or gang in return for gifts, these may include: friendship or peer acceptance, but also cigarettes, drugs, alcohol or even food and accommodation.
Cybercrime	<p>is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include:</p> <ul style="list-style-type: none"> <li>• unauthorised access to computers (illegal 'hacking'), for example accessing a computer network to look for test paper answers or change grades awarded;</li> <li>• denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network, or website unavailable by overwhelming it with internet traffic from multiple sources; and,</li> <li>• making, supplying, or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets, and Remote Access Trojans with the intent to commit further offence, including those above.</li> </ul> <p>Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.</p> <p>If there are concerns about a child in this area, the DSL (or a deputy), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests. Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs</p>

Term	Meaning
	on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety
Domestic Abuse	<p>Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. They may see, hear or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, wellbeing, development, and ability to learn. Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:</p> <ul style="list-style-type: none"> <li>• psychological</li> <li>• physical</li> <li>• sexual</li> <li>• financial</li> <li>• emotional</li> </ul>
Early Help	Early help means providing support as soon as a problem emerges, at any point in a child's life, from the foundation years through to the teenage years. Early help can also prevent further problems arising.
Emotional Abuse	<p>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.</p> <p>It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children 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.</p>
Female Genital Mutilation (FGM)	Female genital mutilation (FGM) is a procedure where the female genitals are deliberately cut, injured or changed, but where there's no medical reason for this to be done.
Gangs & Youth Violence	<p>Defining a gang is difficult, They tend to fall into three categories; peer groups, street gangs and organised crime groups. It can be common for groups of children and young people to gather together in public places to socialise, and although some peer group gatherings can lead to increased antisocial behaviour and low level youth offending, these activities should not be confused with the serious violence of a Street Gang.</p> <p>A Street Gang can be described as a relatively durable, predominantly street-based group of children who see themselves (and are seen by others) as a discernible group for whom crime and violence is integral to the group's identity.</p>

Term	Meaning
	An organised criminal group is a group of individuals normally led by adults for whom involvement in crime is for personal gain (financial or otherwise).
Hate	<p>Hostility or prejudice based on one of the following things:</p> <ul style="list-style-type: none"> <li>• disability</li> <li>• race</li> <li>• religion</li> <li>• transgender identity</li> <li>• sexual orientation.</li> </ul>
Homelessness	Being homeless, or at risk of homelessness presents a real risk to a child's welfare. We will be aware of potential indicators of homelessness including household debt, rent arrears, domestic abuse, and anti-social behaviour, as well as a family being asked to leave a property. If staff are made aware or suspect that a pupil may be at risk of homelessness they should talk to the DSL in the first instance. Whilst referrals to the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not and should not replace a referral to the LADO where a child has been harmed or is at risk of harm, in accordance with this policy.
Honour-based violence	Honour based violence is a violent crime or incident which may have been committed to protect or defend the honour of the family or community.
Image Sharing "sexting"	<p>Sexting is when someone shares consensual and non-consensual sharing of nudes and semi-nudes images and/or videos.<sup>1</sup></p> <p>They can be sent using mobiles, tablets, smartphones, and laptops - any device that allows you to share media and messages.</p>
<a href="#">Mental Health</a>	<p>Negative experiences and distressing life events can affect mental health in a way that can bring about changes in a young person's behaviour or emotional state, displayed in a range of different ways, all of which can be an indication of an underlying problem. This can include:</p> <ul style="list-style-type: none"> <li>• Emotional state (fearful, withdrawn, low self-esteem)</li> <li>• Behaviour (aggressive or oppositional; habitual body rocking)</li> <li>• Interpersonal behaviours (indiscriminate contact or affection seeking, over-friendliness or excessive clinginess; demonstrating excessively 'good' behaviour to prevent disapproval; failing to seek or accept appropriate comfort or affection from an appropriate person when significantly distressed; coercive controlling behaviour; or lack of ability to understand and recognise emotions).</li> </ul>
<u>Modern Slavery</u>	Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.
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:

<sup>1</sup> Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive – but children still need to know it is illegal- whilst non-consensual is illegal and abusive. [UKCIS](#) provides detailed advice about sharing of nudes and semi-nude images and videos

Term	Meaning
	<ul style="list-style-type: none"> <li>• Protect a child from physical and emotional harm or danger.</li> <li>• Ensure adequate supervision (including the use of inadequate care-givers).</li> <li>• Ensure access to appropriate medical care or treatment.</li> <li>• It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.</li> </ul>
Operation Encompass	Operation Encompass operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs. Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or schools should make a referral to children's social care if they are concerned about a child's welfare. More information about the scheme and how schools can become involved is available on the Operation Encompass website
Child-on-Child Abuse (previously child on child abuse)	Children can abuse other children (now referred to as Child-on-Child abuse) and it can take many forms. It can happen both inside and outside of school/college and online. It is important that all staff recognise the indicators and signs of Child-on-Child abuse and know how to identify it and respond to reports. This can include (but is not limited to): bullying (including cyberbullying, prejudice-based and discriminatory bullying); abuse within intimate partner relationships; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexual violence and sexual harassment; consensual and non-consensual sharing of nudes and semi-nudes images and/or videos; causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party; upskirting and initiation/hazing type violence and rituals. Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future
Physical Abuse	A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
Private Fostering	A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more. (Close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.)
Radicalisation & Extremism	Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.



Term	Meaning
	Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.
Relationship Abuse	Teen relationship abuse consists of the same patterns of coercive and controlling behaviour as domestic abuse. These patterns might include some or all of the following: sexual abuse, physical abuse, financial abuse, emotional abuse and psychological abuse.
Safeguarding and promoting the welfare of children	<ul style="list-style-type: none"> <li>• protecting children from maltreatment;</li> <li>• preventing impairment of children's health or development;</li> <li>• ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and</li> <li>• taking action to enable all children to have the best outcomes.</li> </ul>
Serious Violence	<p>The word 'gang' means different things in different contexts, the government in their paper 'Safeguarding children and young people who may be affected by gang activity' distinguishes between peer groups, street gangs and organised criminal gangs.</p> <ul style="list-style-type: none"> <li>• Peer group A relatively small and transient social grouping which may or may not describe themselves as a gang depending on the context.</li> <li>• Street gang "Groups of young people who see themselves (and are seen by others) as a discernible group for whom crime and violence is integral to the group's identity."</li> <li>• Organised criminal gangs "A group of individuals for whom involvement in crime is for personal gain (financial or otherwise). For most crime is their 'occupation'."</li> </ul> <p>It's not illegal for a young person to be in a gang – there are different types of 'gang' and not every 'gang' is criminal or dangerous. However, gang membership can be linked to illegal activity, particularly organised criminal gangs involved in trafficking, drug dealing and violent crime.</p>
Sexual Abuse	<p>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.</p> <p>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</p>

Term	Meaning
	internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children
Sexual harassment between children	When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment, and can include: sexual comments, sexual jokes or taunting, online sexual harassment or physical behaviour such as deliberately brushing against someone.
Sexual violence between children	When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 <sup>2</sup> . Sexual violence offences include: rape, assault by penetration and sexual assault.
Trafficking	Trafficking in persons shall mean the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control of another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or removal of organs.

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<sup>2</sup> [Legislation.gov](https://legislation.gov.uk)

## APPENDIX A

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

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

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/have a concern about a pupil's welfare:

- Report to matter immediately to the DSL or Deputy DSL
- Add incident and concerns to CPOMs
- 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](mailto:jduschenes@bowdonprep.org.uk))

### Key contacts

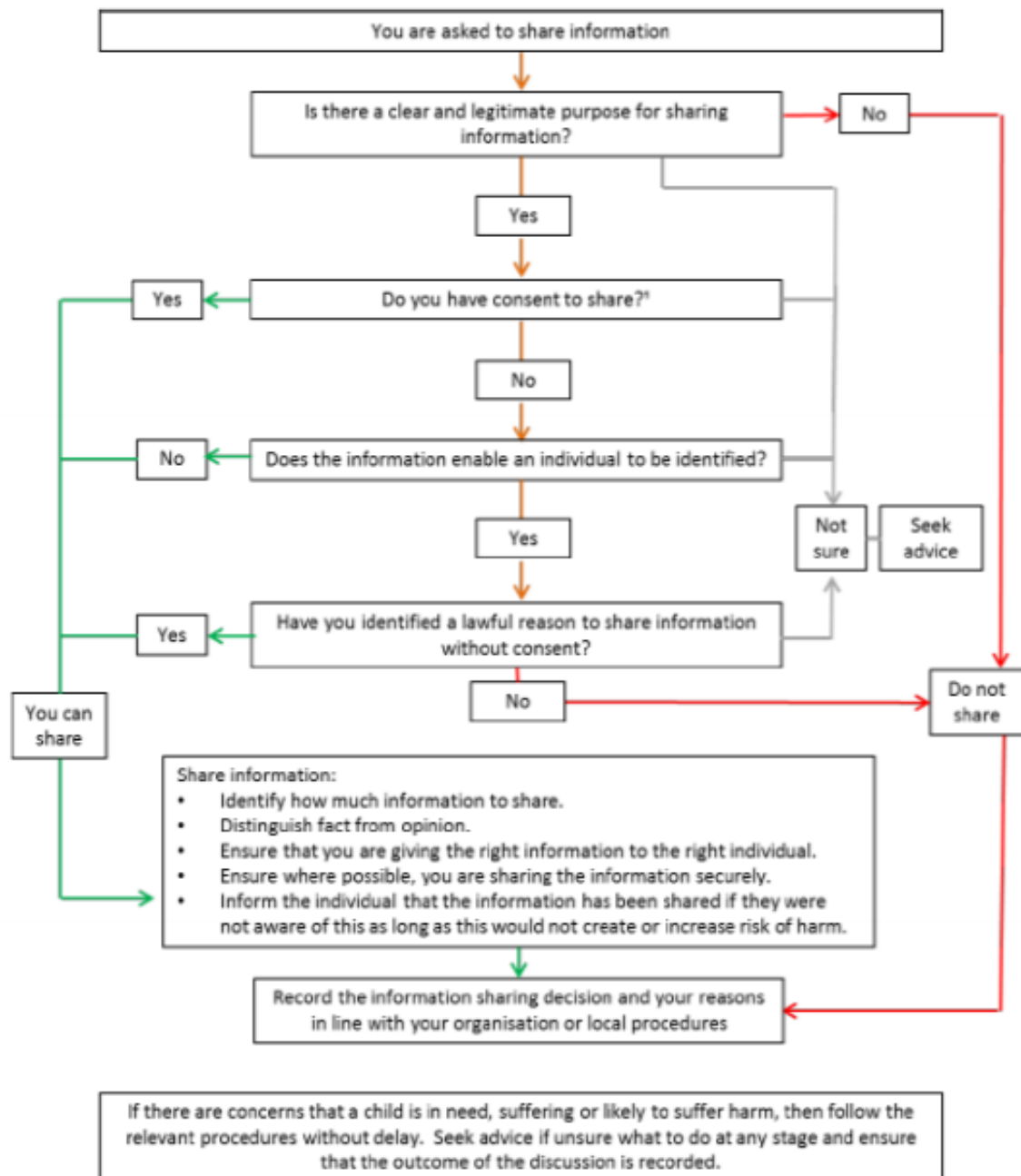
DSL: Mrs Sophie Hughes: [shughes@bowdonprep.org.uk](mailto:shughes@bowdonprep.org.uk)

Deputy DSL: Mrs Helen Cox: [headmistress@bowdonprep.org.uk](mailto:headmistress@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



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

<sup>2</sup> 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.

<sup>3</sup> 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](#).

<sup>4</sup> 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](#).

<sup>5</sup> This could include applying for an Emergency Protection Order (EPO).

## APPENDIX D

### COVID-19 School not in session

Whilst we are still living with COVID-19, it is important that we follow any current government guidance should we face any future school closures. 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 SLT 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; Child-on-Child 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 (2022). 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 (2022) (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 (2022). 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 92022) 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](mailto: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.

**Child-on-child abuse**

Where the school receives a report of child-on-child abuse, the principles as set out in KCSIE (2022) 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 via CPOMs, and appropriate referrals made.

## APPENDIX E

### COVID-19 – pupils returning to school after absence

In order to safeguard pupils during unprecedented times the school will follow 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 child on child 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 2021)
- 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 may 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. Training for the Governors equips them with the knowledge to fulfil their functions

## 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.

A report will be made to Ofsted within 14 days if there is an allegation against a member of EYFS staff, of serious harm or abuse by any person living, working or looking after children at the premises or elsewhere, or any other abuse on the premises.

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. Whilst the supply agency would be kept fully informed and involved, the school will take the lead. 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. In no circumstances would we cease to use supply staff for safeguarding reasons.

### **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**

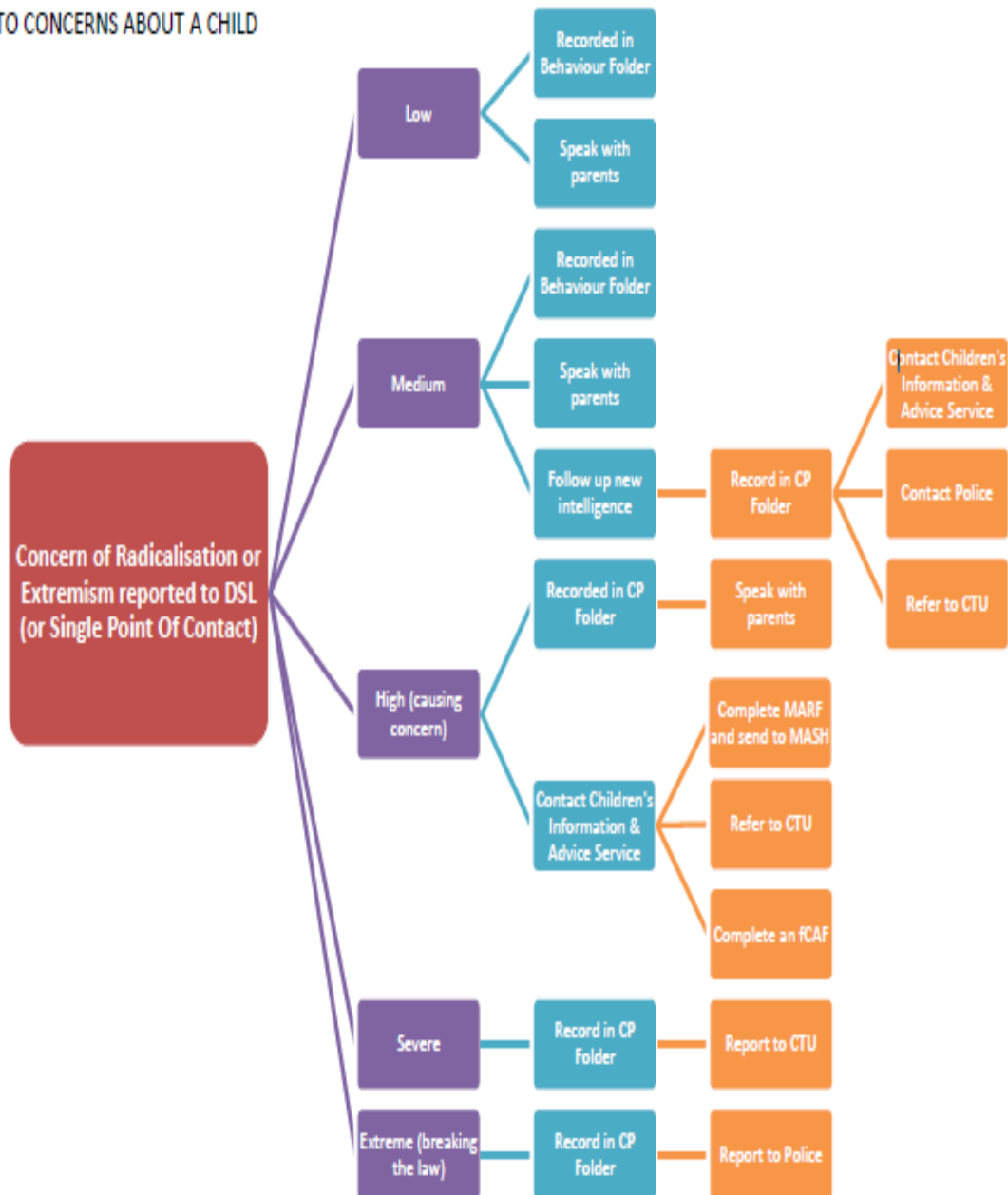
There may be occasions where it is necessary for staff to restrain children physically to prevent them from inflicting damage on either themselves, others or property. In such cases only the minimum force necessary should be used for the minimum length of time required for the child to regain self- control.

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 confiscated<sup>18</sup> and the police should be called. The device should be turned off and placed under lock and key until the police are able to come and retrieve it.

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.

### **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.

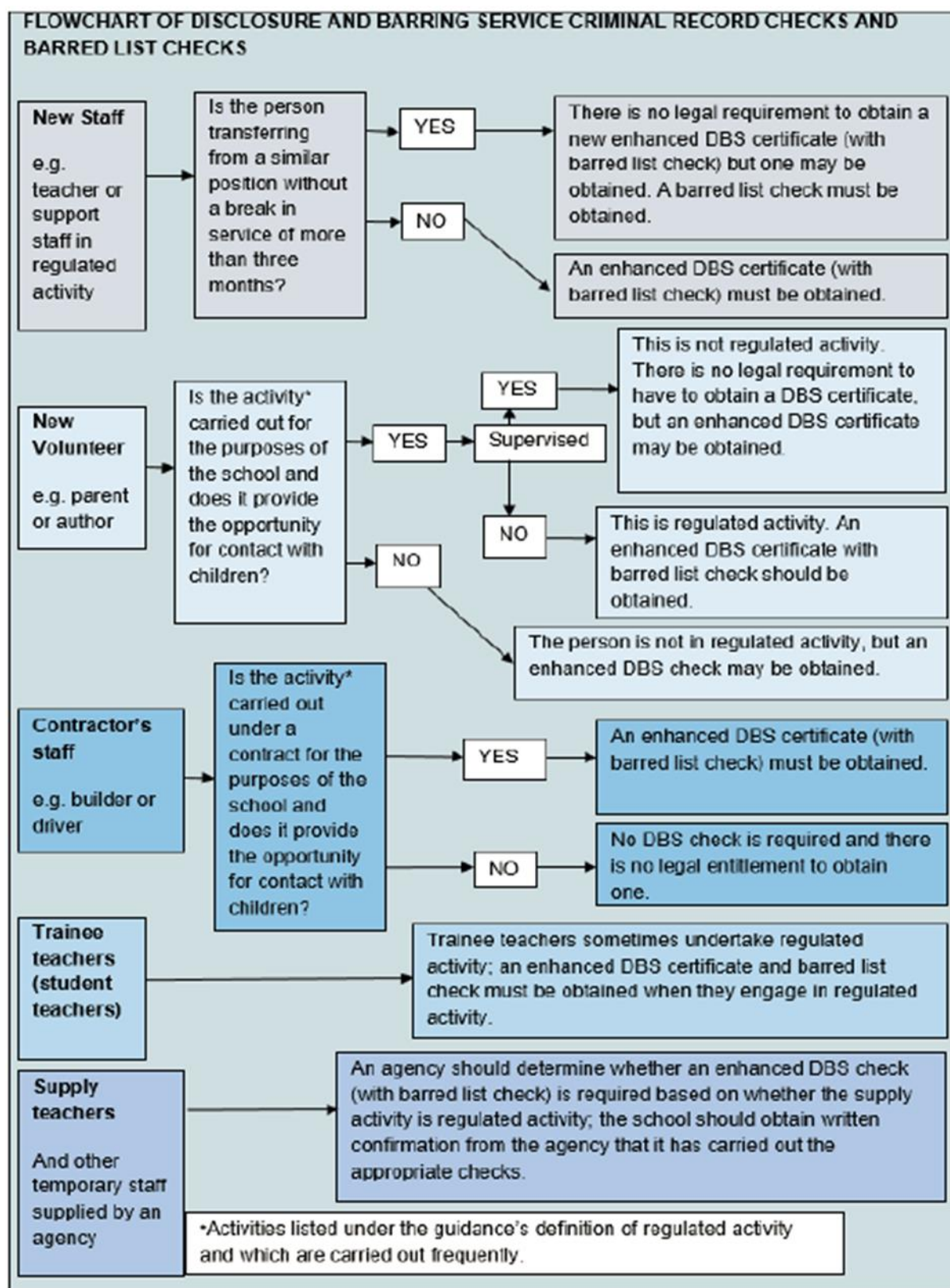
In addition, where schools do not refer incidents out to police or Trafford Children's First Response on 0161 912 5125 during office hours (Mon - Fri 8:30 - 4:30) or 0161 912 2020 out of hours they should record their reason for doing so and ensure that this is signed off by the Headmistress.

### **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.

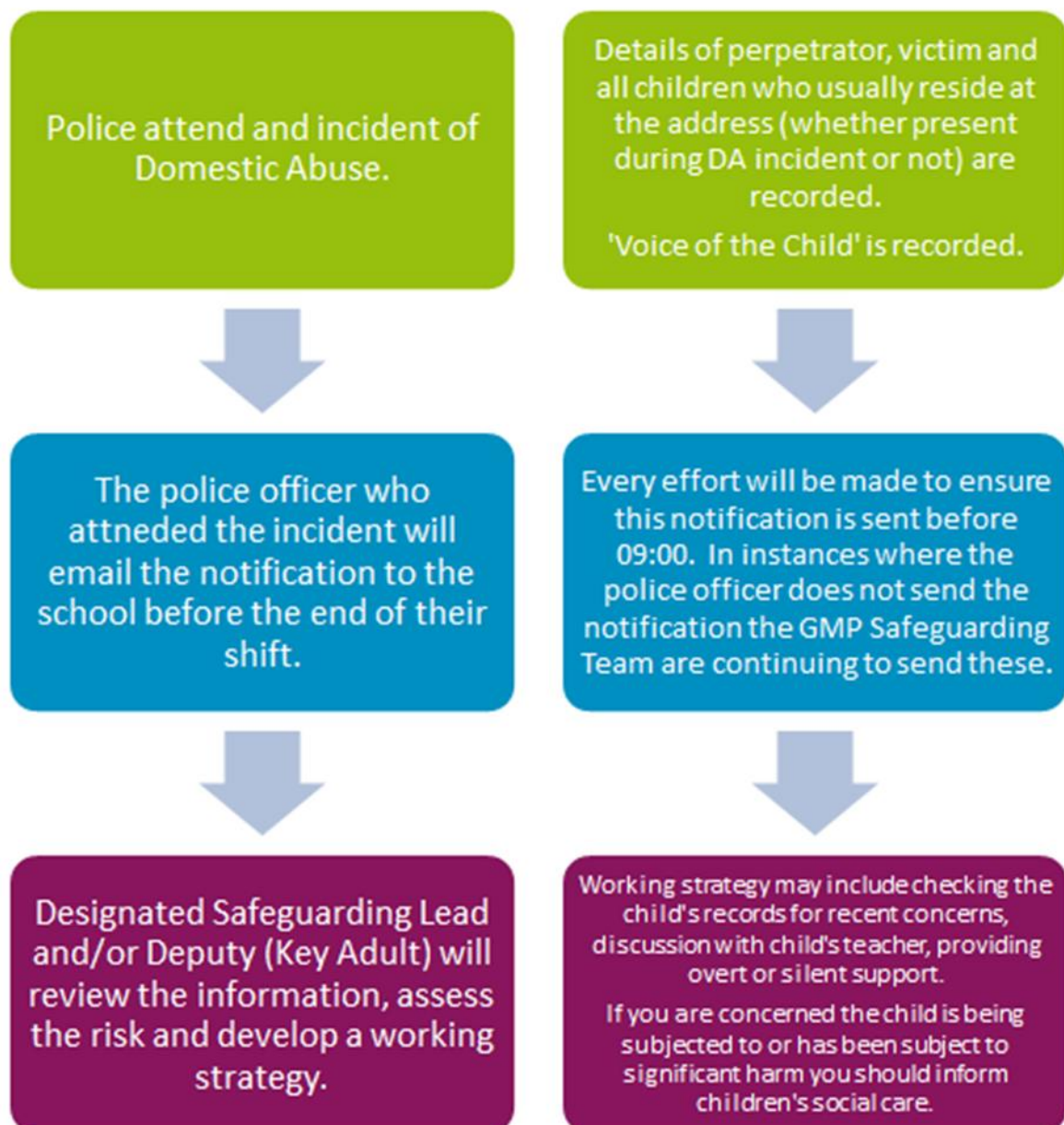
## APPENDIX J:

Flowchart of disclosure and barring service criminal records check and barred list check





## Operation Encompass Process



## APPENDIX L

### Low Level Concerns

We promote and embed a culture of openness, trust and transparency in which the clear values and expected behaviour which are set out in the school's Code of Conduct are constantly lived, monitored and reinforced by all staff. The school deals with all concerns about adults working in or on behalf of the school appropriately and promptly.

The school seeks to create an environment where staff are encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below expected professional standards.

We seek to

- ensure that staff are clear about, and confident to distinguish between, expected and appropriate behaviour from concerning, problematic or inappropriate behaviour – in themselves and others, and the delineation of professional boundaries and reporting lines
- empower staff to share any low-level concerns with the Headmistress
- help staff address unprofessional behaviour and help the individual to correct such behaviour at an early stage
- identify concerning, problematic or inappropriate behaviour – including any patterns – that may need to be consulted upon with (on a no-names basis if appropriate), or referred to, the LADO
- provide for responsive, sensitive and proportionate handling of such concerns when they are raised
- help identify any weaknesses in the school's safeguarding system.

This applies to all staff at BPS.

### Defining a Low-Level Concern

A low-level concern is one that does not meet the harm threshold as stated in the school's Safeguarding Policy.

That is, when anyone working in a school (including volunteers, supply staff and contractors) has:

- behaved in a way that has harmed a child, or may have harmed a child and/or;
- possibly committed a criminal offence against or related to a child and/or;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children (which includes behaviour that may have happened outside school posing a transferable risk to children).

Responses and actions to behaviours that may meet the harm threshold are contained specifically within Appendix F of the School's Safeguarding Policy, 'Allegations Regarding Staff (or volunteers)'. These should be reported to the Headmistress without delay.

A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' (i.e. they believe it could be a concern) – that an adult working in or on behalf of the school may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

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

- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- using inappropriate sexualised, intimidating or offensive language

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

### **Responsibilities of staff**

It is important that all staff are clear of the expectations the school stipulates from them as contained in the Staff Code of Conduct. This is covered annually by the Designated Safeguarding Lead, and as part of the school's induction for new staff.

It is crucial that any concerns in relation to a staff member's behaviour, including those which do not meet the harm threshold, are shared responsibly and with the Headmistress. This should be done without delay.

Where there are concerns/allegations about the Headmistress, this should be referred to the Chair of Governors (whose contact details can be found in the School's Safeguarding Policy document).

Staff members who are concerned about how their behaviour may have been interpreted, or, on reflection, re-evaluate their behaviour as one that may have been contrary to the school's code of conduct and expectations, should self-refer to the Headmistress.

### **Dealing with Low-Level Concerns**

All low-level concerns may be shared verbally with the Headmistress in the first instance but must then be recorded in writing.

The record should include:

- details of the concern
- the context in which the concern arose
- action taken

The name of the individual sharing their concerns should also be noted, but if the individual wishes to remain anonymous then that should be respected as far as is reasonably possible.

Where the low-level concern is provided verbally, the Headmistress should make an appropriate record of the conversation, either at the time or immediately following the discussion, paying heed to the details above.

Records will be signed, timed and dated. Records will remain confidential in accordance with the school's Data Protection policies and GDPR.

### Responding to a Low-Level Concern

The Headmistress will in the first instance satisfy herself that it is a low-level concern and should not be reclassified as a higher-level concern/allegation and dealt with under the appropriate procedure below.

The circumstances in which a low-level concern might be reclassified are where:

- a) the threshold is met for a higher-level concern/allegation
- b) there is a pattern of low-level concerns which collectively amount to a higher-level concern/allegation or
- c) there is other information which when taken into account leads to a higher-level concern/allegation.

Where the Headmistress is in any doubt whatsoever, advice will be sought from the LADO, if necessary, on a 'no-names' basis.

Having established that the concern is low-level, the Headmistress will discuss it with the individual who has raised it and will take any other steps to investigate it as necessary. If the concern has been raised via a third party, the Headmistress should collect as much evidence as possible by speaking:

- directly to the person who raised the concern, unless it has been raised anonymously;
- to the individual involved and any witnesses.

The information collected will help them to categorise the type of behaviour and determine what further action may need to be taken. All of this needs to be recorded along with the rationale for their decisions and action taken. Reports about supply staff and contractors will be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

Most low-level concerns by their very nature are likely to be minor and will be dealt with by means of management guidance, training etc. In dealing with a low-level concern with a member of staff, this will be approached in a sensitive and proportionate way. In many cases, a low-level concern will simply require a conversation with the individual about whom the concern has been raised.

Details of the concern will be recorded along with the rationale for decisions and action taken.

Any conversation with a member of staff following a concern will include being clear with the individual as to why their behaviour is concerning, problematic or inappropriate, what change is required in their behaviour, enquiring what, if any, support they might need in order to achieve and maintain that, and being clear about the consequences if they fail to reach the required standard or repeat the behaviour in question. Ongoing and transparent monitoring of the individual's behaviour may be appropriate. An action plan or risk assessment may be required. Some concerns may trigger the school's disciplinary, grievance or whistleblowing procedures, which will be followed where appropriate. Some concerns may be related to performance management and advice may be sought from the school's HR manager.

### **Monitoring of Low-Level Concerns**

The Headmistress will securely retain confidential files on low-level concerns. A central log will be shared and monitored by the school's Senior Leadership Team on a monthly basis to ensure that all such concerns are being dealt with promptly and appropriately, and that any potential patterns of concerning, problematic or inappropriate behaviour are identified. A record will be kept of this review within SLT Minutes.

No record will be made of the concern on the individual's personnel file (and no mention made in job references) unless either:

- a) the concern (or group of concerns) has been reclassified as a higher-level concern
- b) the concern (or group of concerns) is sufficiently serious to result in formal action under the school's grievance, capability or disciplinary procedure

## APPENDIX M

From Annex C KCSIE 2022

### **Role of the designated safeguarding lead**

Governing bodies and proprietors should ensure an appropriate senior member of staff, from the school leadership team, is appointed to the role of designated safeguarding lead. The designated safeguarding lead should take lead responsibility for safeguarding and child protection (including online safety). This should be explicit in the role holder's job description.

The designated safeguarding lead should have the appropriate status and authority within the school to carry out the duties of the post. The role of the designated safeguarding lead carries a significant level of responsibility, and they should be given the additional time, funding, training, resources and support they need to carry out the role effectively. Their additional responsibilities include providing advice and support to other staff on child welfare, safeguarding and child protection matters, taking part in strategy discussions and inter-agency meetings, and/or supporting other staff to do so, and to contributing to the assessment of children.

### **Deputy designated safeguarding leads**

It is a matter for individual schools to whether they choose to have one or more deputy designated safeguarding leads. Any deputies should be trained to the same standard as the designated safeguarding lead and the role should be explicit in their job description. Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the designated safeguarding lead, this lead responsibility should not be delegated.

### **Availability**

During term time the designated safeguarding lead (or a deputy) should always be available (during school hours) for staff in the school to discuss any safeguarding concerns. Whilst generally speaking the designated safeguarding lead (or deputy) would be expected to be available in person, it is a matter for individual schools, working with the designated safeguarding lead, to define what "available" means and whether in exceptional circumstances availability via phone and or Skype or other such media is acceptable. It is a matter for individual schools and the designated safeguarding lead to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.

### **Manage referrals**

The designated safeguarding lead is expected to refer cases:

- of suspected abuse and neglect to the local authority children's social care as required and support staff who make referrals to local authority children's social care
- to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme
- where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required, and
- where a crime may have been committed to the Police as required. NPCC – When to call the police should help understand when to consider calling the police and what to expect when working with the police.

### **Working with others**

The designated safeguarding lead is expected to:

- act as a source of support, advice and expertise for all staff
- act as a point of contact with the safeguarding partners
- liaise with the headteacher or principal to inform him or her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance - PACE Code C 2019.
- as required, liaise with the “case manager” (as per Part four) and the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member
- liaise with staff (especially teachers, pastoral support staff, school nurses, IT technicians, senior mental health leads and special educational needs coordinators (SENCO's), or the named person with oversight for SEND and senior mental health leads) on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically
- liaise with the senior mental health lead and, where available, the mental health support team, where safeguarding concerns are linked to mental health
- promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances
- work with the headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at school. This includes:
  - ensuring that the school knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort, and
  - supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.

### **Information sharing and managing the child protection file**

The designated safeguarding lead is responsible for ensuring that child protection files are kept up to date. Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child.

### **Records should include:**

- a clear and comprehensive summary of the concern
- details of how the concern was followed up and resolved
- a note of any action taken, decisions reached and the outcome.

They should ensure the file is only accessed by those who need to see it and where the file or content within it is shared, this happens in line with information sharing advice as set out in Part one and Part two of this guidance.

Where children leave the school (including in year transfers) the designated safeguarding lead should ensure their child protection file is transferred to the new school as soon as possible, and within 5 days for an in-year transfer or within the first

5 days of the start of a new term. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained.

Receiving schools should ensure key staff such as designated safeguarding leads and special educational needs co-ordinators (SENCO's) or the named person with oversight for SEND, are aware as required.

Lack of information about their circumstances can impact on the child's safety, welfare and educational outcomes. In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any additional information with the new school in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school. For example, information that would allow the new school to continue supporting children who have had a social worker and been victims of abuse and have that support in place for when the child arrives.

### **Raising Awareness**

The designated safeguarding lead should:

- ensure each member of staff has access to, and understands, the school's child protection policy and procedures, especially new and part-time staff
- ensure the school's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this
- ensure the child protection policy is available publicly and parents know that referrals about suspected abuse or neglect may be made and the role of the school in this
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements, and
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and school leadership staff.

### **Training, knowledge and skills**

The designated safeguarding lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The designated safeguarding lead (and any deputies) should undertake Prevent awareness training. Training should provide designated safeguarding leads with a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of children, as well as specific harms that can put children at risk, and the processes, procedures and responsibilities of other agencies, particularly local authority children's social care, so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so
- understand the importance of the role the designated safeguarding lead has in providing information and support to local authority children social care in order to safeguard and promote the welfare of children
- understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes



- are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers
- understand the importance of information sharing, both within the school, and with the safeguarding partners, other agencies, organisations and practitioners
- understand and support the school with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school
- can recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from bullying, grooming and radicalisation and are confident they have the capability to support children with SEND to stay safe online
- obtain access to resources and attend any relevant or refresher training courses, and
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school may put in place to protect them.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.

### **Providing support to staff**

Training should support the designated safeguarding lead in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters. This includes specifically to:

- ensure that staff are supported during the referrals processes, and
- support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

### **Understanding the views of children**

It is important that all children feel heard and understood. Therefore, designated safeguarding leads (and deputies) should be supported in developing knowledge and skills to:

- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school may put in place to protect them, and,
- understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

### **Holding and sharing information**

The critical importance of recording, holding, using and sharing information effectively is set out in Parts one, two and five KCSIE 2022, and therefore the designated safeguarding lead should be equipped to:

- understand the importance of information sharing, both within the school, and with other schools on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners

- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR), and
- be able to keep detailed, accurate, secure written records of concerns and referrals and understand the purpose of this record-keeping.

## APPENDIX N

### Summary: Description and required action steps across the 5 levels of need

Level		Description: At this level the child or family...	What Needs to happen next?	Assessment Required Referral Process
Universal	Level 1	...is thriving without requirement for additional support and all needs are being met by universal services, for example Health Visitor, School Nurse, Dentist or School.	Ensure that all families are aware of the Family Information Service and are registered with Education and Training providers, Health Services and Community Groups.	Use of Trafford Directory
Early Help / Prevention	Level 2	...may require or would benefit from additional input or support from an agency/agencies.	When a child begins to display emerging needs requiring additional support, services already working with the child should support the family by undertaking an assessment and develop an Outcome Plan. This will identify support from within the local community or a specific intervention.	Assessment required for example Early Help Assessment. Referral Form for specific agency
Intensive Family Support	Level 3	...are experiencing multiple and/or complex needs. The family is struggling to effect change without the support and intervention of services. There is a need for a greater level of support including regular home visits.	If a child or family's issues are more complex and cannot be managed within the community and the family consent, additional support can be sourced through Intensive Family Support. This would include support in the home, pulling in multi-agency partners who are, or need to be, involved with the child and family in order to achieve a positive outcome	Early Help Assessment; which will be required when referring for Intensive Family Support.
Child In Need	Level 4	...is unlikely to achieve or maintain a reasonable standard of health or development without the provision of services. The child's health or development is likely to be significantly impaired, or further impaired without the provision of additional services; or the child is disabled.	As the child and family's issues continue to escalate or if interventions are not working and it is felt that the needs cannot be met without the intervention of social care.  There should be a sound record of interventions and support offered previously by services to highlight why social intervention is required.	Child and Family Assessment. Referring agency to complete referral.
Child Protection	Level 5	...is at risk of or suffering significant harm and is in need of help and protection. Has a high level of unmet and complex needs requiring statutory interventions.	These children require immediate social care intervention to ensure continued safety and positive development and to prevent significant harm. This may lead to them becoming subject to a Multi-Agency Child Protection (CP) Plan or becoming Looked After. Any child subject to a CP Plan or Looked After will have social care intervention already in place.	Child and Family Assessment. Referring agency to complete referral.

## APPENDIX P

### Child on Child Abuse Policy

#### INTRODUCTION

The Governors, all staff, volunteers and the whole community of BPS is committed to the early identification, intervention against, and prevention of, all forms of child-on child abuse, both in and out of school. We commit to the following values and strategies:

In order to protect and safeguard children, the school should be aware of the complexities of the risks which pupils may face and create and enforce a clear and comprehensive strategy which is suited to all their safeguarding needs.

- That it is the responsibility of the school to enforce its whole-school approach in response to child-on-child abuse.
- That this policy is created to PREVENT child-on-child abuse and that it is not acceptable merely to adopt a reactive approach to child-on-child abuse as a response to an alleged serious incident.
- We recognise national and heightened concerns about these issues – particularly in light of the Everyone's Invited platform (2021) – and the even greater need to ensure that the school's pupils are safe at all times and that this policy is central to this approach.
- We encourage parents to participate in our procedures so that if a pupil is made to feel unsafe by the behaviour of one of their peers, they should inform the school immediately so that immediate and proportionate action can be taken.

The policy does not use the terms “perpetrator” and “abuser”. This is because the school actively adopts a safeguarding approach to all those involved in allegations of, or concerns about, child-on-child abuse. Research shows that some young people who engage in such abuse have sometimes been victims of it themselves, and that they are therefore vulnerable, and that context is vital in assessing such harmful behaviour, and in deciding any sanctions which may apply.

This policy refers to “pupils” or “young people” who are both defined as being under 18 years old, but this policy also reflects the school's commitment to a wider approach to safeguarding. We recognise that there may be additional considerations in relation to pupils who are over 18, or under 10, in terms of how local agencies or partners respond. In addition, the school's approach to pupil-produced sexual imagery will differ, depending on the age of the pupils involved. (See the Taking, Sharing and Using Images of Young Children Policy.)

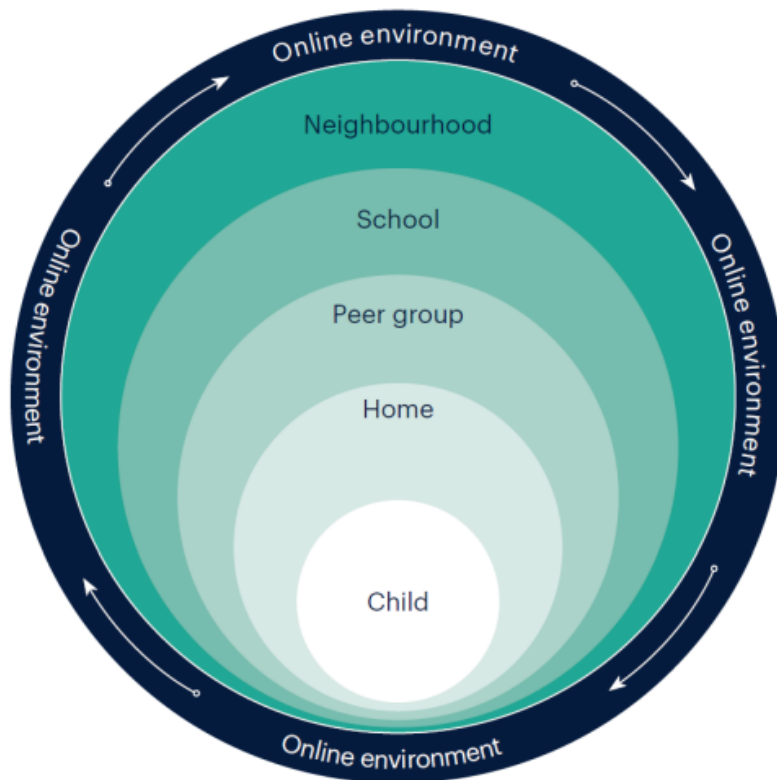
This policy will be reviewed annually (and at any other time during the course of the year as necessary) to ensure that it consistently addresses the risks to which pupils are being, or may be, exposed. Staff and pupils will be involved in the review of the policy in order to inform the assessment of the impact and effectiveness of the policy during the previous year.

This policy also refers to Part 3, Paragraph 7 (safeguarding) of the Independent Schools Standard Regulations (I.S.S.R.).

In addition, this policy builds on sexual violence and sexual harassment between children in schools and colleges (September 2021), Keeping Children Safe in Education (September 2021), Sexting in schools and colleges: responding to incidents and safeguarding children (UKCCIS), the NSPCC's and Research in Practice's Harmful Sexual Behaviour Framework

#### WHAT IS CHILD-ON-CHILD ABUSE?

Contextual circles of adolescent vulnerability



Child on child abuse is defined as “any form of physical, sexual and emotional and financial abuse, and coercive control, exercised between children and within children’s relationships, both intimate and non-intimate” (Abuse between young people: a contextual account Routledge 2017).

All staff should be aware that child-on-child abuse takes many forms. This is most likely to include, but is not limited to:

- Bullying (including cyberbullying).
- Physical abuse.
- Sexual abuse
- Sexual violence and sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment.
- Upskirting, which typically involves taking a picture under a person’s clothing without them knowing to obtain sexual gratification, or cause the victim humiliation, distress or alarm.
- Sexting.
- Initiation / hazing type violence and rituals.
- Gender-based violence.
- Relationship abuse (including domestic violence) where abuse takes place within existing intimate relationship(s).
- Non-consensual sharing of nude and semi-nude images and videos.

All child-on-child abuse is unacceptable and will be taken seriously. Staff must be aware that young people may be abused out of school but should not minimise the potential risks of pupil-on-pupil abuse within school too.

We recognise that child-on-child abuse must be addressed in the terms of the context in which it occurs. Contextual safeguarding recognises an approach which understands the harm and abuse to which young people can be exposed beyond their families.

As the school operates a contextual approach to safeguarding, it recognises the need to work alongside a Local Safeguarding Partnership, rather than just referring young people to it.

- This means that we will be aware of, and will seek to understand, the effect that wider social contexts will be having on young people.
- That we are also committed to creating a safe culture within school by implementing all the policies and procedures that address child-on-child abuse.
- That we are committed to creating healthy relationships and attitudes to gender/sexuality and all forms of difference.
- That we will provide training for staff and pupils on potential bias and stereotyping and commit to an inclusive approach for all members of our community.
- That we will commit to identifying potential geographical “hotspots” on the school site which could be risky for pupils, thus improving the pre-existing school environment for pupils.
- These “hot spots” can also include certain year groups, friendship clusters etc.
- We will be alert to, and monitor, changes in pupils’ behaviour, emotional well-being and attendance.
- In working with local agencies, we will contribute to the debate and implementation of child protection decisions by challenging threshold decisions which do not seem to be in the interest of the young person and will consistently refer cases using a contextual approach.

## HOW WIDESPREAD IS CHILD-ON-CHILD ABUSE?

Research suggests child-on-child abuse is one of the most prevalent forms of abuse affecting young people in the UK. Firmin and Curtis (2015) suggest that more than 40% of teenage girls aged between 13 and 17 have experienced sexual coercion.

## When does behaviour become problematic or abusive?

All behaviour takes place on a spectrum as suggested by Professor Simon Hackett. In order to respond appropriately, we need to understand where a young person’s behaviour falls on this spectrum. Below is Professor Hackett’s model which demonstrates the range of sexual behaviour which can be presented by young people. It is not exhaustive but offers a means by which we can understand this behaviour and react to it sensitively and proportionately.

### Sexual behaviours continuum model

Normal	Inappropriate	Problematic	Abusive	Violent
<ul style="list-style-type: none"> <li>• Developmentally expected</li> <li>• Socially acceptable</li> <li>• Consensual, mutual, reciprocal</li> <li>• Shared decision making</li> </ul>	<ul style="list-style-type: none"> <li>• Single instances of inappropriate sexual behaviour</li> <li>• Socially acceptable behaviour within peer group</li> <li>• Context for behaviour may be inappropriate</li> <li>• Generally consensual and reciprocal</li> </ul>	<ul style="list-style-type: none"> <li>• Problematic and concerning behaviour</li> <li>• Developmentally unusual and socially unexpected</li> <li>• No overt elements of victimisation</li> <li>• Consent issues may be unclear</li> <li>• May lack reciprocity or equal power</li> <li>• May include levels of compulsivity</li> </ul>	<ul style="list-style-type: none"> <li>• Victimising intent or outcome</li> <li>• Includes misuse of power</li> <li>• Coercion and force to ensure compliance</li> <li>• Intrusive</li> <li>• Informed consent lacking or not able to be freely given</li> <li>• May include elements of expressive violence</li> </ul>	<ul style="list-style-type: none"> <li>• Physically violent sexual abuse</li> <li>• Highly intrusive</li> <li>• Instrumental violence which is psychologically and/or sexually arousing to the child responsible for the behaviour</li> <li>• Sadism</li> </ul>

## **ARE SOME PUPILS MORE VULNERABLE THAN OTHERS TO CHILD-ON-CHILD ABUSE?**

The influence of peers is possibly the most significant factor in a young person's social development and, as such, anyone can be subject to child-on-child abuse. However, there are certain groups who may be more at risk than others. For example, those with protected characteristics such as:

- Those who are socially isolated from their peer-group
- Those who are questioning their sexuality and identity
- Those with SEND needs: and a school must be careful not merely to assume that indicators of possible abuse relate only to their specific learning needs and are not investigated beyond this assumption
- Those with different ethnicity, race or religious beliefs.

Research also suggests that child-on-child abuse can affect boys and girls differently and so the school must explore gender dynamics within its individual context and recognise, and address, those factors within both a single-sex environment, but also if factors outside school are involved.

## **HOW CAN WE CREATE A WHOLE SCHOOL APPROACH TO PREVENTING CHILD-ONCHILD ABUSE?**

The school is actively committed to education for its entire community – staff, pupils, parents, governors and volunteers – in raising awareness of, identifying, and preventing, child-on-child abuse.

This strategy will include:

- an understanding of contextual safeguarding
- the identification of specific behaviour, including on-line activities, by encouraging young people to use social media responsibly and training them to identify and manage digitally abusive behaviour
- ensuring that even low-level concerns are followed up and never dismissing any form of concern as mere “banter” or “teasing” via the education of young people about the widespread nature of child-on-child abuse. This should include PSHE lessons about consent etc but also in the wider school curriculum where equality and respect should be promoted at all times.

Pupils should be regularly informed about the harmful effects of this abuse and the vulnerabilities of those who experience it, alongside possible reasons for such behaviour.

They should be clear about what actions to take if they witness such abuse and that the school operates a zero-tolerance approach to such incidents.

Parents should also be involved via public events and face-to-face meetings to promote this policy.

They should be regularly consulted as to their view of perceived risks to pupils and how the school can most effectively address them.

## **ENFORCING POSITIVE CULTURE**

The entire school community – governors, staff, volunteers, pupils and parents – should work together to promote a positive culture of tolerance and respect amongst all its members.

The whole school culture should be built upon a foundation of fostering healthy and respectful relationships for all.

Every member of the community has a part to play in ensuring that abusive behaviour is never acceptable and that everyone contributes to creating this safe environment.

Pupils should feel able to share their concerns in an open and non-judgemental environment and that staff are trained to develop these trusting relationships.

Staff should encourage positive qualities in pupils and encourage them to attain their goals and ambitions, realising that supervised activities offered to pupils might give them protection against

abusive behaviour.

Staff should respond to cases of child-on-child abuse promptly and appropriately. This involves informing the school's DSL or DDSL so that they can spot concerning trends and patterns in behaviour and offer additional support to pupils. This is achieved via a weekly Phase Group meeting where attitudes that underlie such abuse are explored and challenged, involving cases both within and without the classroom.

#### MULTI-AGENCY WORKING

The school actively engages with its Local Safeguarding Partnership in relation to child-on-child abuse and works closely with Trafford Children's Services, the police and other relevant agencies in accordance with the Trafford's Safeguarding Partnership's procedures, as well as with other schools.

These are essential relationships in preventing, early identifying, and appropriately handling, child on-child abuse. It is also important for pupils and staff to understand the referral pathways which are available in the area and for pupils to be able to access them quickly.

Working together with local agencies is, furthermore, crucial in supporting and helping to inform the local community about the school's response to child-on-child abuse, as well as allowing for an understanding of any underlying trends and patterns of behaviour which are emerging in this wider context.

Often, child-on-child abuse cases are complex and where the incident cannot be managed by the school itself, it is imperative that effective partnership working is involved, especially when wider safeguarding concerns exist.

#### GENERAL PRINCIPLES

All concerns and allegations of child-on-child abuse must be handled promptly, sensitively, and appropriately. These responses can have a significant impact on the environment of a school.

#### ALL RESPONSES SHOULD:

- Include a thorough investigation of the concerns and allegations in the wider context in which they occur
- Assess whether it is appropriate for the police or Children's Services to carry out this process
- Treat all young people involved as at potential risk. This should also include the young person who is allegedly responsible for the abuse as they may have unmet needs and be at risk themselves
- Ensure that a safeguarding response is in place for both the child who has allegedly been abused, and anyone who is alleged to be responsible for it and understand that sanctions may need to be applied for the latter.

#### TAKE INTO ACCOUNT THAT:



- the abuse may indicate wider safeguarding concerns for all those involved and address the impact of wider contexts, such as peer groups, family, school environment, local community, previous experiences of crime and victimisation and the young person's online presence
- in order to mitigate risk, changes may need to be made to some of the above
- the complexity of the interplay between power, choice and consent and consider that a young person cannot consent if their choices are being limited
- the DSL should discuss any referral with the young person and their parents/carers before it is made and obtain consent. This may not be possible if a referral has to be made immediately, however
- the school should manage the young person's expectations of information sharing and keep them and their parents/carers informed of developments where appropriate and safe to do so
- significantly, the wishes of the young person who has allegedly been abused must be taken into account and given as much control as is reasonably possible over decisions regarding an investigation and how they will be supported.

#### **WHAT SHOULD BE DONE IF A CHILD IS SUSPECTED OF BEING AT RISK OF BEING ABUSED BY THEIR PEERS, OR THAT A YOUNG PERSON MAY BE AT RISK OF ABUSING, OR IS ABUSING THEIR PEERS?**

All the above factors should be discussed with the DSL immediately who will adhere to the School's Safeguarding (Child Protection) Policy and then agree a course of action.

Where a young person is suffering, or is likely to suffer, a referral to Children's Services should be made (and to the police, if appropriate) immediately.

Anyone can make a referral. If it is not made by the DSL, they should be informed as soon as possible that a referral has been made.

If a child speaks to a member of the staff about child-on-child abuse, the member should listen in a non-judgemental fashion and offer understanding and sensitive responses.

#### **HOW WILL THE SCHOOL RESPOND TO CONCERNS ABOUT, OR ALLEGATIONS OF, CHILD ON CHILD ABUSE?**

The DSL will discuss with the reporting member of staff and, where necessary, take immediate steps to ensure the safety of all young people affected.

Where allegations concern the sharing of images of children on-line, the DSL should consider what urgent action can be taken to those set out in this policy and the Online Safety Policy. They should seek specialist help in preventing the images spreading further and remove the images from the here possible.

In such cases, the DSL should use their professional judgement to assess the nature and seriousness of the alleged behaviour and determine whether the alleged behaviour should be dealt with internally or whether external support is required (from The Internet Watch Foundation, for example).

In borderline cases, the DSL may want to consult with Children's Services and the Trafford LADO and other relevant agencies in accordance with the Local Safeguarding Partnership's procedures on a no-names basis, to plan the appropriate response.

Where the DSL believes, or suspects, that a young person is being subjected to abusive or violent behaviour, they should contact Children's Services and/or the police immediately, and certainly within 24 hours of the DSL being made aware of the alleged behaviour.

The DSL will discuss the allegations with the external agency and then agree a plan which may include:

- management of the case internally but with help from external agencies, where appropriate
- the school contributing to an inter-agency early help assessment to enable the young person's and those of their families, needs to be targeted
- refer the young person(s) to Children's Services for a Section 17 (Child in Need) or a Section 47 (Child Protection) statutory assessment as appropriate
- report alleged criminal behaviour to the police. (There may be some circumstances where it is not appropriate to report such behaviour, however, and all cases will be treated on an individual basis, and in conjunction with their wider context.)

## SAFETY PLANS

The school will always carry out a safety plan with regard to:

- any young person who is considered to have behaved abusively or violently
- any child who has allegedly been abused directly or affected by the alleged abusive or violent behaviour by a peer
- any young person who is deemed at risk from another young person in the judgement of the DSL.

If a child is considered to have behaved inappropriately, but not in a violent or abusive fashion, the DSL would apply their professional judgement in the context of the young person's individual needs and context, to ascertain whether it would be appropriate to contact Children's Services and carry out a Safety Plan.

If there is any concern that a young person may be being abused by another young person, a consultation with Children's Services should be carried out.

Where other young people have witnessed alleged abuse or violent behaviour, the DSL should assess the risk to them and consider whether a safety plan would be appropriate for their needs.

## SHARING OF INFORMATION, DATA PROTECTION AND RECORD KEEPING

When responding to allegations of abuse, or concerns about abuse, the school will:

- always consult external agencies in order to best decide how to share information about the concerns or allegations affecting pupils, their parents, staff and other individuals involved
- record all necessary information for all the participating agencies and respond to the concerns or allegations within a safeguarding context
- a record of the legal purpose for sharing the information with any third party, including external agencies, is kept in the data protection audit
- ensure that the third party has agreed to handle the information securely and only use it for the agreed legal purpose.
- consult, and act in accordance with, its safeguarding and data protection duties, including those set out in Working Together to Safeguard Children (July 2018) and HM Government Advice on Information Sharing (July 2018).

We recognise that this will contain sensitive personal data and will be treated accordingly as per our Staff Data protection Policy and Privacy Notices.

## DISCIPLINARY ACTION

The school may want to consider disciplinary action for any young person involved in child-on-child abuse; however, if there are police proceedings underway, or they are pending, it is crucial that the school works in partnership with the police and/or Children's Services.

Even if external agencies are not involved, the school may still need to consider sanctions in order to ensure positive behaviour in the future. This may include the young person taking responsibility for their actions and realising the gravity of them, thus demonstrating to other pupils that child-on-child abuse will never be tolerated.

Before deciding on any action, the school will always consider its duty to safeguard all young people in its care.

It should also take into account the underlying reasons for any abusive behaviour and the severity, and the causes of any abuse suffered by a young person.

Expulsion will only be considered as a last resort and in cases where the safety and wellbeing of other pupils is at risk.

In the case of an expulsion, due care must be given when sharing information with a pupil's new school in order to allow pupils in the receiving school to be protected, as well as the leaving pupil. However, disciplinary interventions rarely solve child-on-child abuse and so the school's first resort should be to wider actions and to what can be learned from such cases in the school's future planning and behavioural strategies to combat abuse.

#### HOW CAN A SCHOOL CONTINUE TO SEEK TO IMPROVE ITS APPROACH TO CONTEXTUAL SAFEGUARDING?

The school should continue to work to embed its approach to contextual safeguarding by involving the whole school community in its strategies and approach.

It should regularly review its practices by asking such questions as:

- what protective factors and influences exist in school to prevent child-on-child abuse and how can we strengthen and highlight them?
- does the school's physical environment and the pupils' journeys to and from school contribute to this abuse and how can we mitigate this risk?
- how can the school mitigate the risk posed by the online environment and encourage a positive and safe use of digital technology?
- do wider gender norms, equality issues and/or societal issues contribute to the abuse?
- what was the relationship between the abuse and the cultural norms between staff and pupils and how can these be evaluated and addressed in the future?
- does the abuse indicate a lack of staff training in particular areas and how can these needs be met?
- how have similar cases been handled in the past? What effect have they had, and what has been learned from them?
- are distinct patterns and trends emerging from the way in which the school handles these cases which can then be fed into future staff training?
- are these issues occurring in other local schools and is there the need for a multi-agency response to them?
- what has the school learned from past cases which can be addressed via the PSHE/RSE curriculum, and should it be improving its provision in terms of education in matters of consent, respect, equality, avoiding victim-blaming narratives, etc?
- are there lessons to be learned from the way in which the school engages with parents concerning child-on-child abuse cases?

- have certain types of young people been highlighted by cases of abuse and should the school be working with them to build confidence and teaching them how to identify and manage child on-child abuse?
- should the school have intervened earlier and in a different manner?
- has the pupil voice been heard with regard to developing an on-going strategy to avert child-on child abuse?

Answering these questions feeds into the school's child-on-child abuse action plan which will be reviewed regularly.

The school will work with the local agencies (where necessary) to deliver on this plan as part of its wider approach to contextual safeguarding.

## **DEFINITION OF SEXUAL VIOLENCE**

From Consultation document Sexual violence and sexual harassment between children in schools and colleges: Proposed advice for governing bodies, proprietors, headteachers, principals, senior leadership teams and designated safeguarding leads (September 2021)

It is important that schools and colleges are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence in this advice, we do so in the context of child-on-child sexual violence.

For the purpose of this advice, when referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 (here) as described below:

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

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

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

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

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

## **SUPPORT SERVICES**

From Consultation document Sexual violence and sexual harassment between children in schools and colleges: Proposed advice for governing bodies, proprietors, headteachers, principals, senior leadership teams and designated safeguarding leads (September 2021) Specialist Organisations

- Barnardo's - UK charity caring for and supporting some of the most vulnerable children and young people through their range of services.

- Lucy Faithfull Foundation - UK-wide child protection charity dedicated to preventing child sexual abuse. They work with families affected by sexual abuse and also run the confidential Stop it Now! Helpline.
- Marie Collins Foundation – Charity that, amongst other things, works directly with children, young people, and families to enable their recovery following sexual abuse
- NSPCC - Children's charity specialising in child protection with statutory powers enabling them to take action and safeguard children at risk of abuse.
- Rape Crisis - National charity and the umbrella body for their network of independent member Rape Crisis Centres.
- UK Safer Internet Centre - Provides advice and support to children, young people, parents, carers and schools about staying safe online.

#### Support for Victims

- Anti-Bullying Alliance - Detailed information for anyone being bullied, along with advice for parents and schools. Signposts to various helplines and websites for further support.
- Rape Crisis - Provide and signpost to a range of services to support people who have experience rape, child abuse or any kind of sexual violence.
- The Survivors Trust- UK-wide national umbrella agency with resources and support dedicated to survivors of rape, sexual violence and child sex abuse.
- Victim Support - Supporting children and young people who have been affected by crime. Also provides support to parents and professionals who work with children and young people – regardless of whether a crime has been reported or how long ago it was.

#### Toolkits

- ask AVA - The Ask AVA prevention platform has been created to support education practitioners across the UK to develop and deliver a comprehensive programme to stop Violence Against Women and Girls.
- Brook's Sexual Behaviours Traffic Light Tool - A tool which uses a traffic light system to categorise, identify and respond to young people's sexual behaviour
- Lucy Faithfull Foundation HSB Behaviour Toolkit – provides support, advice and information on how to prevent it, links to organisations and helplines, resources about HSB by children, internet safety, sexual development and preventing child sexual abuse.
- NSPCC - Online Self-assessment tool to ensure organisations are doing everything they can to safeguard children.
- NSPCC - Resources which help adults respond to children disclosing abuse.
- Safeguarding Unit, Farrer and Co. and Carlene Firmin, MBE, University of Bedfordshire – Child on-Child Abuse toolkit provides practical guidance for schools on how to prevent, identify early and respond appropriately to child-on-child abuse.

#### Confidential Support for parents/carers

- CEOP Thinkuknow advice for parents: Advice/resources on how to approach and deal with concerns about what children may be doing online
- Challenging harmful sexual attitudes and their impact - On the Thinkuknow site, this resource helps challenge harmful sexual attitudes
- Supporting positive sexual behaviour - On the Thinkuknow site, advice on how to start a conversation to support positive sexual behaviour

- Childnet: Advice for parents and carers to keep children safe online - Advice and resources to help parents and carers keep children safe online.
- How Can I Help My Child? - Marie Collins Foundation – Sexual Abuse Online
- Parentsafe - London Grid for Learning - Detailed advice/resources covering various issues such as online safety, apps, and how to report concerns.
- Parentzone - Provides expert information and resources to help make the internet work for families.

#### SAMPLE SAFETY PLAN

- How can I try and ensure I will not be at risk of further abuse/unpleasant behaviour?
- Try to avoid situations/ groups/individuals who make me feel uncomfortable
- I will 'check in' regularly with my Teacher, Form tutor or Phase Leader and report any concerns
- I will report any digital activity which is concerning or unsolicited
- I will not join in digital inter-actions which could be under-mining
- Do I have any mental health concerns or symptoms that make it harder to stay safe? How can I help with these?
- I will share my concerns with my parents/carers (where possible)
- I will see a Phase Leader for weekly support
- I will talk to Children's Services – as appropriate
- What can I do right now that will help me feel safe? (coping strategies)
- Talk to friends
- Take myself away from social groups to a quiet place
- Practise music/go to the library/exercise
- Avoid participation in online behaviour which could leave me vulnerable to unpleasant comments/behaviour
- Use wellbeing apps, access useful websites or telephone organisations who offer support (see below)
- Who can I reach out to for help?
  - My form tutor/teacher
  - My Phase Leader
  - Mrs Gee
- Childline 0800 1111
- MIND 0300 123 3393
- SAMARITANS 116 123
- To build resilience via supportive friends/influences
- Arrange extra support, maybe via the school counselling service or external therapist if this becomes necessary
- To move away, physically, digitally and emotionally, from those who have been abusive