



## **King Edward's School**

### **Safeguarding Policy and Procedures**

Reviewed September 2021 by the Designated Safeguarding Lead

Ratified by the Independent Schools Governing Body (ISGB) on \_\_\_\_\_

Signed by the Chairman of ISGB: \_\_\_\_\_

# Contents

<b>SECTION A – THE SAFEGUARDING POLICY</b> .....	<b>3</b>
Key contacts.....	3
Statement of Intent.....	4
Aim .....	5
Definition of Early Help and Child in Need .....	5
Designated Safeguarding Lead .....	6
Governor oversight .....	8
Staff training .....	8
Raising Awareness with Pupils .....	9
Online Safety - updated.....	10
Safer Recruitment .....	11
Multi -agency working and Information sharing.....	11
Use of ‘reasonable force’ in school.....	12
Visitors and Volunteers .....	12
Parents, guardians and carers .....	12
Children vulnerable to risk of harm .....	12
Children missing from education (CME) .....	13
<b>SECTION B – PEER ON PEER ABUSE (CHILD ON CHILD) – NEW</b> .....	<b>14</b>
Introduction .....	14
Awareness .....	14
Prevention .....	15
Identifying .....	16
Responding.....	16
<b>SECTION C – PROCEDURES FOR STAFF</b> .....	<b>17</b>
<b>Overview of approach to safeguarding concerns raised by staff</b> .....	<b>17</b>
Record Keeping – updated .....	17
Early Help (child not in immediate danger).....	17
Child is in immediate danger or at risk of harm .....	18
Supporting staff following a disclosure or in dealing with a safeguarding issue.....	18
<b>Talking to a child about a concern or disclosure (‘the 5 Rs’)</b> .....	<b>19</b>
<b>Review</b> .....	<b>20</b>
<b>What to do if you have a concern about safeguarding practices in the School</b> .....	<b>21</b>
<b>SECTION D – ALLEGATIONS OR CONCERNS RAISED IN RELATION TO STAFF OR VOLUNTEER</b> .....	<b>21</b>
Allegations that may meet the harms threshold .....	21
Safeguarding concerns that do not meet the harms threshold (low-level concern).....	23
<b>APPENDIX 1 – TYPES, SIGNS AND SYMPTOMS OF ABUSE AND NEGLECT</b> .....	<b>26</b>
<b>APPENDIX 2 –OTHER SAFEGUARDING ISSUES</b> .....	<b>29</b>
Cybercrime – new .....	29
Domestic abuse.....	29
Homelessness Duty .....	30
Mental Health .....	30
<b>APPENDIX 3 – SEXUAL VIOLENCE AND HARASSMENT BETWEEN CHILDREN</b> .....	<b>32</b>
Sexual violence .....	32
Sexual harassment .....	33
<b>APPENDIX 4 – CHILD CRIMINAL AND SEXUAL EXPLOITATION</b> .....	<b>35</b>
<b>APPENDIX 5 – PREVENTING RADICALISATION</b> .....	<b>37</b>
<b>APPENDIX 6 – SO CALLED ‘HONOUR-BASED’ ABUSE</b> .....	<b>40</b>
<b>APPENDIX 7 – GOVERNMENT GUIDANCE ON SAFEGUARDING ISSUES</b> .....	<b>41</b>
<b>APPENDIX 8 – DELIVERING EARLY HELP IN EDUCATION (BSCP MODEL)</b> .....	<b>42</b>
<b>APPENDIX 9 – CONCERNS ABOUT A CHILD FLOWCHART (KSCIE 2021)</b> .....	<b>43</b>
<b>APPENDIX 10 – FURTHER INFORMATION</b> .....	<b>44</b>
Safeguarding during remote learning .....	44
List of Common Acronyms .....	44
Version control.....	44

## Section A – The Safeguarding Policy

### Key contacts

Designated Safeguarding Lead	Deborah McMillan	External: 0121 472 1672 <a href="mailto:dem@kes.org.uk">dem@kes.org.uk</a>
Deputy Designated Safeguarding Lead	Henry Coverdale	External: 0121 472 1672 <a href="mailto:hmc@kes.org.uk">hmc@kes.org.uk</a>
Deputy Designated Safeguarding Lead	Carolyn Bayley	External 0121 472 1672 <a href="mailto:cvb@kes.org.uk">cvb@kes.org.uk</a>
Deputy Designated Safeguarding Lead	Sarah-Louise Jones	External: 0121 472 1672 <a href="mailto:slj@kes.org.uk">slj@kes.org.uk</a>
Chief Master	Katy Ricks	External 0121 472 1672 <a href="mailto:chief@kes.org.uk">chief@kes.org.uk</a>

Any person who has a concern but does not wish to speak to the School directly may contact any of the following people or agencies to report their concern and / or seek advice.

Liaison Governor for Safeguarding	Amanda Smith	Foundation Office Edgbaston Park Road, Birmingham, B15 2UD 0121 415 6130
Chair of ISGB	Tim Clarke Lucy Williams	Foundation Office Edgbaston Park Road, Birmingham, B15 2UD 0121 415 6130
Children’s Advice and Support Services (CASS) – single point of contact for Birmingham Safeguarding Children Partnership (BSCP)		0121 303 1888 Emergency number 0121 675 4806
Local Authority Designated Officer (LADO team)		0121 675 1669
DfE extremism concerns		020 7340 7264 <a href="mailto:counter.extremism@education.gsi.gov.uk">counter.extremism@education.gsi.gov.uk</a>
Birmingham Schools Safeguarding Advisor	Julia Davey	Tel: 0121 675 4874 / 07912794112
Police		101
NSPCC whistleblowing helpline		0800 028 0285 Email: <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>

## Statement of Intent

At King Edward's School safeguarding and promoting the welfare of children is of the highest priority. Safeguarding and promoting the welfare of children is everyone's responsibility. We take a whole-school approach to safeguarding and ensure that safeguarding and child protection are at the forefront of all aspects of process and policy development. Everyone who comes into contact with children and their families and carers has a role to play in safeguarding children. In order to fulfil this responsibility effectively, all staff at King Edward's School should ensure their approach is child-centred. This means that they should consider, at all times, what is in the best interests of the child.

No single member of staff can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

Our business is to know everyone as an individual and to provide a secure and caring environment, so that every pupil can learn in safety. We understand that as a school we are in an important position to identify concerns early, provide help and prevent concerns from escalating. We recognise the importance of early help.

Where there is a safeguarding concern, school staff (with DSL or Deputies) will ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Our systems of support are in place, and they 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

- The school will operate in line with the [Procedures of Birmingham Safeguarding Children Partnership \(BSCP\)](#)(including [Right Help Right Time \(RHRT\), version 4, Feb2020](#), and [Early Help](#)) (or other LSCPs as appropriate) and will give due regard to the key DfE guidance documents (amongst others): [Keeping Children Safe in Education \(September 2021\)](#) (KCSIE)The non-statutory advice for practitioners: [What to do if you're worried a child is being abused](#) (March 2015)
- [Sexual violence and harassment between children in Schools](#) and colleges (July 2021)
- [Working Together to Safeguard Children](#) (July 2018) (WT). [Revised Prevent Duty Guidance: for England and Wales](#) (April 2021) (Prevent) and [The Prevent duty: Departmental advice for schools and child minders](#) (June 2015). Further information and screening tool from BSCP [here](#).
- [The use of social media for on-line radicalisation](#) (July 2015)

This policy should be read in conjunction with the following King Edward's School policies:

- School Staff Code of Conduct
- Visits / Trips out of School policy
- Behaviour and Discipline policy
- Anti-bullying policy
- Online Safety policy
- Missing Pupil policy
- Whistle Blowing policy
- Safer Recruitment policy
- Visiting Speaker (No-platform) policy

These policies are available on the School website, Firefly (the School's VLE) or by request.

## **Aim**

Safeguarding and promoting the welfare of children is defined as:

- protecting children from maltreatment<sup>1</sup>
- preventing impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes
- Children includes everyone under the age of 18.

To that end, we will ensure that arrangements are in place for:

- All reasonable measures to be taken to minimise the risks of harm to children's welfare
- All appropriate actions to be taken to address concerns about the welfare of a child, or children working to agreed local policies and procedures in full partnership with other local agencies
- All persons working at this School to be made aware of this policy

In order to protect our children, we aim to:

- Create an atmosphere where all our children can feel secure, valued and listened to
- Reassure victims they are being taken seriously, will be supported and kept safe. We will never give the impression that they are creating a problem and make victims feel ashamed of reporting abuse, sexual violence or sexual harassment.
- Recognise signs and symptoms of abuse
- Maintain an 'it could happen here' approach to all aspects of safeguarding
- Respond quickly and effectively to cases of suspected abuse
- Monitor and support children at risk
- Use the curriculum to raise children's awareness of safeguarding and to build confidence and skills
- Work closely with parent/carers and support external agencies
- Ensure that all adults within our school who have access to children have been checked as to their suitability in accordance with the guidance given in KCSIE and the Education (Independent School Standards) Regulations 2019 (Independent School Standards Regulations)
- Be aware that one pupil may suffer abuse inflicted by another pupil or a group of pupils – including child on child sexual violence and sexual harassment. In such cases of peer-on-peer abuse staff will follow the same reporting procedures as when dealing with any other allegations of abuse. All appropriate action will be taken to ensure the safety and welfare of all pupils involved (including the pupil accused of abuse) with the advice of children's social care.

## **Definition of Early Help and Child in Need**

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. All staff should be prepared to identify children who may benefit from Early Help<sup>2</sup> and to support other agencies and professionals in conducting an Early Help assessment. In the first instance, staff should discuss Early Help requirements with the DSL.

A Child in Need is a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health or development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled.

In situations where a child has not suffered significant harm and is not at risk of suffering significant harm, but risk factors are present or the child is in need of support from one or more agencies, the DSL and other senior

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<sup>1</sup> 'Child protection' generally refers to the protection of children who are suffering or likely to suffer significant harm

<sup>2</sup> Circumstances where a child may benefit from early help are detailed in KCSIE Part 1

staff will advise on Early Help and preventative work that can be done within School. An agreed member of staff will talk to the child's parents/carers, sharing the School's concern about the child's vulnerability and discussing how the family and school can work together to reduce the risk. See **What to do if you have concerns about a child (as opposed to a child being in immediate danger) in Section C Procedures** for details of the actions taken in this situation.

## **Designated Safeguarding Lead**

Deborah McMillan (Deputy Head Pastoral) is the Designated Safeguarding Lead (DSL). She takes lead responsibility for all safeguarding and child protection matters, including oversight of online safety provision. She has been fully trained for the demands of this role. She is part of the Senior Leadership Team and has the necessary status and authority to carry out the role and is given the time, funding, training, resources and support to enable her to support other staff on safeguarding matters, contribute to inter-agency meetings and to the assessment of children.

Her Deputies are Henry Coverdale, Carolyn Bayley and Sarah-Louise Jones who have all undergone a full training course and will attend refresher training every two years.

She or one of the deputies attends termly updates with other child support agencies to ensure that she remains conversant with best practice and undergoes full refresher training every two years. She has completed her WRAP 3 (Workshop Raising Awareness of Prevent) training and the recommended Channel online course. This will also be kept updated. She maintains close links with the BSCP and reports at least once a term to the Liaison Governor for Safeguarding.

The Deputy DSLs carry out the activities of the DSL in the DSL's absence. Whilst the activities of the DSL can be delegated to the Deputy DSL, the ultimate lead responsibility for safeguarding and child protection remains with the DSL.

The DSL and / or Deputy DSL are always available during School hours and via email and / or mobile phone outside these hours. The DSL and Deputy DSLs are most likely to have a complete safeguarding picture and are the most appropriate people to advise on a response to safeguarding concerns. -

The areas of responsibility for the DSL are detailed in KCSIE Part two and Annex C and summarised below:

### Managing referrals

- Refer (and support other staff who refer) all cases of suspected abuse or neglect to the BSCP and the LADO team (for concerns which involve a staff member), Disclosure and Barring Service (cases where a person is dismissed or left due to risk/harm to a child), Channel (where there is a concern about radicalisation); and / or Police (cases where a crime may have been committed).

### Work with others

- Liaise with the Chief Master to inform her of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- Liaise closely with case managers and LADO team as required.
- 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.
- Ensure staff are aware of children in the cohort with ongoing safeguarding concerns and support staff in providing additional academic support or adjustments as required

### Training, knowledge and skills

The DSL and Deputy DSLs undertake training to provide them with the knowledge and skills required to carry out the role. This training includes Prevent awareness training and will be updated at least every 2 years. In addition, the DSL and Deputy DSLs should undertake regular (at least annually) refresher training of skills and knowledge by way of e-bulletins, meeting other DSLs, attending courses and update sessions provided by the Local Authority so they:

- Understand the assessment process for providing Early Help and intervention (RHRT thresholds, or other LSCP guidance as appropriate)
- Have a working knowledge of how local authorities conduct child protection case conferences and be able to attend and contribute to these effectively when required to do so.
- Ensure all staff understand the School's safeguarding policy and procedures
- Be alert to the specific needs of children in need, those with special educational needs (SEN), disabilities and young carers
- Understand the unique risks associated with online safety and have the relevant knowledge to keep children safe whilst online at school. This includes the additional risks faced by children with SEND
- Understand the requirements of the Prevent duty and support staff in protecting children from the risk of radicalisation.
- Be able to keep detailed, accurate, secure written records of concerns and referrals. Sharing information, as required
- Obtain access to resources to help support the approach to whole school safeguarding
- 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.

### Raise Awareness

- The DSL should ensure the School's Safeguarding policy is known and used appropriately by ALL members of staff
- Ensure the School's Safeguarding policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly and work with the ISGB regarding this.
- Ensure the Safeguarding policy is available publicly and parents are aware that referrals about suspected abuse or neglect may be made and the role of the School in this.
- Link with BSCP to make sure staff are aware of training opportunities and the latest local policies on safeguarding
- Encourage a culture among staff of listening to children and understanding the difficulties they may have in approaching staff and consider how to build trusted relationships, help promote positive educational outcomes by sharing the relevant information with staff for pupils who have a social worker or, who are involved (or have been) in safeguarding or child protection work.

### Child protection files

The DSL will ensure the child protection files are maintained for individuals and up-to-date in line with Section D of this policy. There will be a clear chronology maintained in CPOMS and sensitive information is only accessible to the deputy DSLs and SLT.

Where children leave the School the DSL ensures that any safeguarding information is transferred to the new school or college as soon as possible to ensure good educational and welfare outcomes for those pupils who need it. This information should be transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt should be obtained. In addition to the formal transfer of safeguarding information, the DSL will consider if it is appropriate to share additional information with the new school or college to allow a

new school to continue to support a child as appropriate. DSL will ensure all leavers are registered at new schools in writing.

### *Contextual Safeguarding*

Safeguarding incidents and/ or behaviours can be associated with factors outside of the school and can occur between children outside the school, this should always be considered when a children's social care assessment is carried out. **All** staff, but especially the DSL and deputies should consider whether children are at risk of abuse and exploitation outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

More information available at [www.contextualsafeguarding.org.uk](http://www.contextualsafeguarding.org.uk)

## **Governor oversight**

Amanda Smith is the Liaison Governor for Safeguarding issues. The Liaison Governor for Safeguarding takes leadership responsibility for the School's safeguarding arrangements.

The Governors formally consider safeguarding issues once a year including a review of this policy and its procedures including good cooperation with local agencies and review the efficiency and effectiveness with which the related duties have been carried out (see also **Review** section in **Section C** of this policy).

The Governors ensure that:

- They facilitate a **whole-school** approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy.
- There are policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare; and that the child's wishes and feelings are taken into account.
- Information sharing is part of meeting a child's needs and that the relevant staff have due regard to the relevant data protection principles.
- The School's safeguarding arrangements take into account the procedures and practice of the BSCP, including understanding and reflecting local protocols for assessment and the referral threshold document; and
- The School contributes to inter-agency working, including providing a co-ordinated offer of Early Help when additional needs of children are identified and support to children subject to child protection plans.
- An annual safeguarding review is given at Risk and Compliance governor's meeting

The Governors have appointed the DSL as the senior member of staff from the School's leadership team to take lead responsibility for safeguarding and child protection.

## **Staff training**

All training will be carried out in accordance with the BSCP procedures.

All staff (including part time, temporary, visiting and contracting staff and volunteers) receive an induction on arrival, and regular training that includes:

- The Safeguarding policy (including the safeguarding response to children who go missing from education)
- The Staff Code of Conduct including the Whistleblowing policy
- The role, identity and contact details of the DSL and the Deputy DSLs



- The Behaviour and Discipline policy
- The Preventing and tackling bullying policy
- Part 1 and Annex B of KCSIE
- Online safety policy and training including the Acceptable Use policy

All new members of staff sign to confirm they have received the appropriate documents above and have been Safeguarding trained – this may be delivered by DSL or online with Educare, as appropriate.

All staff receive an updated version of this document and the relevant parts of KCSIE annually. This is followed by completing a short online test to promote understanding of the documents and to confirm the documents have been read.

All staff receive formal safeguarding training – including Prevent - at intervals of no more than two years which includes guidance on the duties of staff in relation to both children in need and children at risk of harm. In addition, termly updates (as a minimum) are provided as required via staff meetings and online. Safeguarding training is also given to new Governors and volunteers. Records of training for KES staff are kept by the DSL, the record of Governor training is kept by the Foundation Office.

Training will include details of the process for making referrals to children’s social care, the Early Help process and the importance of sharing information and liaising closely with the DSL. Key staff will undertake more specialist child protection and safeguarding training as agreed by the Risk and Compliance Committee and ISGB, in accordance with the BSCP guidance. For example, the SLT and pastoral leads in the School complete the Mental Health First Aid training.

All staff are encouraged to contribute to and shape safeguarding arrangements. Staff groups are consulted annually about safeguarding arrangements in the School.

Staff training is also provided in e-safety and drugs awareness. Additionally, the School will make an assessment of the appropriate level and focus for staff training and responsiveness to specific safeguarding concerns such as child sexual exploitation, female genital mutilation, cyberbullying and mental health to ensure that staff have the skills, knowledge and understanding to keep all children safe.

The Liaison Governor for Safeguarding and the Chair of ISGB will receive appropriate training to enable them to fulfil their safeguarding responsibilities.

### Interaction with Pupils

New members of staff, Governors and volunteers are given copies of the School’s Staff Code of Conduct which includes the policy on interaction with pupils, acceptable use of technologies and use of social media and use of reasonable force. Discussion of the procedures set out in that document forms a vital part of our induction procedures. The DSL should always be informed if a member of staff has any concerns.

### **Raising Awareness with Pupils**

The School prides itself on its culture of open and effective communication between staff and pupils, and on its excellent pastoral support structures. We prepare all of our pupils to make reasoned, informed choices, judgments and decisions. Time is allocated in Assemblies, PSE lessons (including RSE) and Form Tutor time for discussion of safeguarding and child abuse (including peer-on-peer abuse) and other relevant safeguarding issues. The aim is to develop in pupils the confidence which they require to recognise abuse and to stay safe.

The School acknowledges the important role that the curriculum can play in the prevention of abuse and in the preparation of pupils for the responsibilities of adult life and citizenship. As appropriate, the curriculum will be

used to build resilience, help pupils to keep safe and to know how to ask for help if their safety is threatened or if they are worried about a friend.

All pupils know that there are adults to whom they can turn to if they are worried, including their Form Tutor, the Heads of Year, Heads of School, the DSLs and specific staff who have been trained in counselling. They are named in the term directory where boys can also find guidance on where to turn for advice, including confidential help lines for external specialists e.g. [ChildLine](#), [CEOP](#), [Youthspace](#). And a 'worried?' button on Firefly that sends a message directly to DSL.

Systems are also in place for children to express their views and give feedback on safeguarding matters – be it through School Council, or informal channels.

Pupils are made aware of our mental provision below:

- Counsellors from [Open Door Youth Counselling Service](#) are employed by the School and appointments are arranged via the Deputy Head Pastoral.
- The School also offers a full mental health support service from a mental health nurse. Appointments are also arranged via the Deputy Head Pastoral.

### ***Online Safety - updated***

This section should be read alongside the School's **Online Safety policy** and **Mobile Device policy**.

The School understands that children must be safeguarded from potentially harmful and inappropriate material online. Also, the use of technology has become a significant component of many safeguarding issues – CSE, radicalisation and sexual predation: technology often provides the platform that facilitates harm.

The School aims to protect and educate the whole School community in their use of technology and to establish mechanisms to identify, intervene and escalate any incident as appropriate. The breadth of risk can be categorised into four areas:

**Content:** being exposed to illegal, inappropriate or harmful material. For example, fake news, pornography, racism, radical extremist views, misogyny, self-harm, suicide, anti-Semitism, or extremism.

**Contact:** being subjected to harmful online interactions with other users. For example: commercial advertising, adults posing as children or young adults, peer-to-peer pressure

**Conduct:** personal online behaviour that increases likelihood of or causes harm. For example, making, sending, and receiving explicit images (consensual or non-consensual sharing of nude or semi-nudes), online bullying.

**Commerce:** risks such as online gambling, inappropriate advertising, phishing and / or financial scams.

Pupils have a comprehensive programme of annual online safety training and it is included as part of staff induction.

The School has a whole school approach to online safety and constantly risk assesses the type of content that may cause harm to our pupils and as required as part of the Prevent Strategy. The School does all it reasonably can to minimise the risks of children's exposure to harmful material by ensuring we have appropriate filtering and monitoring systems in place, this includes maintaining a balance between keeping children safe and avoiding 'over blocking'.

The School has a clear policy on mobile devices to limit, as far as practicable, pupil's unrestricted access to the internet via 3G, 4G and 5G see **Mobile Devices policy**. Pupils and staff are also vigilant of **cybercrime**, both as victims or perpetrators. (More about this in Appendix 2). Pupils and staff have regular updates and training, as appropriate, with regards to cyber security of the school IT network.

Parents are given information to help them manage their child's online activity.

## **Safer Recruitment**

The School follows the Government's recommendations for the safer recruitment and employment of staff who work with children including those checks required under the Independent School Standards Regulations. This includes those who have worked abroad, updated for 'Post EU exit changes. See the School's **Safer Recruitment Policy** for details of the School's procedures. The DSL, and other members of the SLT have completed courses in Safer Recruitment.

If the School ceases to use the services of a person (which includes employees, governors, contractors and volunteers) because they are unsuitable to work with children, or if a person tenders his or her resignation or ceases to provide his or her services to the School at a time when child protection concerns exist in relation to that person (which will still be investigated in full by the School), a settlement agreement will not be used and a referral to the Disclosure and Barring Service will be made promptly if the criteria for a referral are met – **this is a legal duty**. Where appropriate the School will consider referral to the TRA. Any such incidents will be followed by a review of the safeguarding procedures within the School, with a report being presented to the Governors without delay.

Where a teacher has been dismissed, or would have been dismissed had he / she not resigned, separate consideration will be given as to whether a referral to the Department of Education should be made. Advice about whether an allegation against a teacher is sufficiently serious to refer to the Department of Education can be found in the DfE guidance Teacher misconduct: the prohibition of teachers (October 2018). Further guidance is found in Part three and four of KCSIE.

When pupils are involved in off-site activities, assurance will be obtained that appropriate safeguarding checks and procedures are applied to any staff employed by the contracted organisation. See **Visits / Trips out of School policy** for further information.

## **Multi -agency working and Information sharing**

The School is committed to working with the three safeguarding partners (local authority, the police and health services) to make arrangements to work together to safeguard and promote the welfare of children. This is managed through the Birmingham Safeguarding Children Partnership (BSCP). This includes providing a coordinated offer of Early Help and contributing to the multi-agency plans for supporting children subject to child protection plans

The School recognises the importance of information sharing and understands that the Data Protection Act 2018 and the General Data Protection Regulation (GDPR) do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children.

Staff do not need consent to share personal information. It is one way to comply with data protection legislation but not the only way. GDPR provides a number of bases for sharing personal information. It is not necessary to seek consent to share information for other purposes of safeguarding and promoting the welfare of a child provided that there is a lawful basis to process any personal information required.

The School has due regard for the 'serious harm test' when considering the sharing of information, teachers should discuss with DSL or deputies if sharing information outside of KES. Further information may be found in **WT2018** and **ICO guidance**.

## **Use of 'reasonable force' in school**

There are circumstances when it is appropriate for staff to use reasonable force to safeguard children. The term 'reasonable force' covers the broad range of actions used by staff that involves a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a child needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of the classroom<sup>3</sup>.

King Edward's School does not have a 'no contact' policy as this could lead our staff unable to fully support and protect their pupils and students.

When using reasonable force in response to risks presented by incidents involving children including any with SEN or disabilities, or with medical conditions, staff should consider the risks carefully.

They should also consider their duties under the Equality Act 2010 in relation to making reasonable adjustments, non-discrimination and their Public Sector Equality Duty.

Our school will, by planning positive and proactive behaviour support, for instance through drawing up individual behaviour plans for more vulnerable children, and agreeing them with parents and carers, reduce the occurrence of challenging behaviour and the need to use reasonable force.

## **Visitors and Volunteers**

A summary of the School's procedures will be distributed to all visitors at Reception on the reverse of the visitor's badge. Visitors' attention is drawn to this information.

The School actively encourages the use of 'visiting speakers' (in school or via an online platform) to enrich the experiences of pupils and staff and to stimulate debate. However, staff must ensure that all 'visiting speakers' are suitable and appropriately supervised in accordance with the **No platform policy**. In addition, any messages communicated to pupils by visiting speakers must be consistent with the ethos of the school, and must not marginalise any communities, groups or individuals or seek to radicalise pupils through extreme or narrow views of faith, religion or culture or other ideologies.

## **Parents, guardians and carers**

Parents and carers will be informed that in certain circumstances there may be a need to contact other agencies without first notifying them. This decision will be made in partnership with BSCP and / or the Police. It will be made clear that this is a legal obligation and not a School decision.

A copy of this policy is available on the School website and a hard copy is available on request.

## **Children vulnerable to risk of harm**

Children with Special Educational Needs (SEN) and disabilities or physical health issues

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<sup>3</sup> Departmental advice for schools is available [here](#)

Staff are aware that children with special educational needs and disabilities can face additional safeguarding challenges. They are aware of all pupils in school with SEN and disabilities and know that additional barriers can exist when recognising abuse and neglect in this group of children, such as:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- these children being more prone to peer group isolation or bullying than other children;
- children with SEN and disabilities can be disproportionately impacted by things like bullying- without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers to identify whether action is required.

### Children requiring mental health support

We recognise the School's role in supporting the mental health and wellbeing of their pupils. We understand that mental health problems can, in some cases, be an indicator that a child is suffering abuse, neglect or exploitation. We have a holistic and multi-faceted approach to the prevention, identification and support of pupils experiencing mental health difficulties. The DSL oversees all aspects of mental health provision in the school. Further information about this can be found earlier in this section.

### Looked after Children and previously looked after children (children in care)

The DSL or deputy will be the designated member of staff to promote the educational achievement of any pupil who is looked after or has been previously looked after. The School will ensure that this member of staff is suitably trained and supported and has access to all relevant information about the care arrangements and support structure for the pupil.

It is acknowledged that a previously looked after child potentially remains vulnerable and prompt action may be required to safeguard these children who can be particularly vulnerable.

### Missing Pupil

All staff are informed of the procedure to be used for searching for, and if necessary, reporting, any pupil found to be missing from School during the School day. The procedure includes the requirement to record any incident, the action taken and the reasons given by the pupil for being missing. The School is aware that a pupil going missing from an educational setting is a potential indicator of abuse or neglect.

Please see the School's separate **Missing Pupil Policy** for further details

### Children who need a social worker (Child in Need and Child Protection Plans)

Children may need a social worker due to safeguarding or welfare needs. A child's experiences of adversity and trauma can leave them vulnerable to further harm, poor mental health and disadvantaged educational outcomes. LA should pass on information so that decisions in the best interest of the child can be made, in particular responding to safeguarding issues such as unauthorised absence or missing education etc. It may also inform the provision of academic / pastoral support and adjustments.

## **Children missing from education (CME)**

The Birmingham City Council Children [Missing from Education \(CME\)](#) team works jointly with schools in respect of pupils on roll at school, who are absent from school and their whereabouts is unknown'.

This might be a child who is not at their last known address, has 5 or more days of continuous absence from school without explanation, or has left school suddenly and their destination is unknown.

Where reasonably possible we hold more than one emergency contact number for each child in order to give additional options to make contact with a responsible adult if the child is identified as a welfare and/ or safeguarding concern.

A child going missing from education is a potential indicator of abuse or neglect, including sexual exploitation, FGM, forced marriage or travelling to conflict zones. School staff will be alert to these safeguarding concerns when a pupil goes missing for an extended period, or on repeat occasions. Concerns should be referred to the DSL or deputies who contact the LEA or Children's Advice and Support Service (CASS) in line with the LEA CME policy. The government's [missing children and adults strategy](#) and the DfE's [children missing education](#) guidance provide useful information when considering children who go missing from education. This includes information LA when removing a child from roll and standard and non-standard transition points. The School will refer to the DfE guidance for local authorities if a parent indicates they will be electing for home education (EHE) for their child and LA will be notified.

## Section B – Peer on peer abuse (child on child) – new

### **Introduction**

All staff should be aware that children can abuse other children (often referred to as peer on peer abuse). And that it can happen both inside and outside of school and online. Even if there are no reports, it does not mean it is not happening, it may be the case that it is just not being reported.

King Edward's School has a zero-tolerance approach to all abuse, and it should never be passed off or downplayed as "banter", "just having a laugh", "part of growing up" or "boys being boys" as this can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it. We must not underestimate the importance of challenging inappropriate behaviours between peers that are actually abusive in nature.

It is essential that all staff understand and recognise the indicators and signs of peer on peer abuse. Children can show signs or act in ways that they hope adults will notice and react to; or staff may overhear a conversation that suggests a child has been harmed, this could also be online. Staff should maintain a sense of professional curiosity and should adopt a '**see something, say something**' approach in recognition that pupils may not routinely report abuse. If staff have any concerns regarding peer on peer abuse, they should speak to DSL or deputies.

If a child reports peer on peer abuse, they should be reassured that they are being taken seriously, will be supported and kept safe. We should never give the impression that they are creating a problem or make them feel ashamed of reporting abuse, sexual violence or sexual harassment.

**Staff should follow the procedure for dealing with a pupil disclosure in Section C of this policy, where sexual violence or harassment is alleged refer to KSCIE 2021, part 5.**

### **Awareness**

All staff should be aware of the different forms peer on peer abuse can take, such as:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers (also known as 'teenage relationship abuse') and depending on age, could be domestic abuse in law;

- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (may include an online element which facilitates, threatens and /or encourages physical abuse)
- sexual violence <sup>4</sup>, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence),
- sexual harassment<sup>5</sup>, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- 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;
- consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as sexting or youth produced sexual imagery);
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

### ***Prevention***

All staff should be clear as to the school's policy and procedures with regards to peer on peer abuse and the important role they have to play in minimising it and responding where they believe a child may be at risk from it.

All staff understand their role in challenging inappropriate behaviours between peers that are abusive in nature. Through good role-modelling and never downplaying or dismissing abusive behaviour as 'normal' we will teach pupils what is acceptable.

Staff safeguarding updates and information pages on Firefly serves to supplement this policy in the understanding of peer on peer abuse, how to prevent and respond to it. Advice or information is always available from DSL and deputies.

The risk of peer on peer abuse is also minimised by raising the awareness of these issues with pupils on an annual basis and reviewing and risk assessing needs as appropriate. Through a comprehensive PSHE (including RSE) curriculum taught by trained staff, designated assemblies and class discussions pupils have the opportunity to learn, understand and ask questions.

Pupils know how to report an issue (abuse or otherwise) to the DSL at any time of the day or night through a 'button' on Firefly. There is also a page of information in the school diary about where they can find support in and out of school as well as a list of appropriately trained staff.

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<sup>4</sup> Further information about sexual violence can be found in Appendix 3

<sup>5</sup> Further information about sexual harassment can be found in Appendix 3

The School's **Behaviour and Discipline policy** and **Preventing and tackling bullying Policy** makes clear the expectations on pupils of acceptable behaviour towards other pupils and the possible consequences of poor behaviour.

### ***Identifying***

All staff working with children are advised to maintain an attitude of '**it could happen here**' and a sense of professional curiosity where safeguarding is concerned, including peer on peer abuse.

All staff are aware of the types and signs of abuse<sup>6</sup> and that behaviour as the result of abuse are rarely standalone events and that multiple issues may overlap, therefore staff should always be vigilant and always raise any concerns with the DSL or deputies.

### ***Responding***

When a child discloses potential abuse staff will reassure victims they are being taken seriously, will be supported and kept safe. We will never give the impression that they are creating a problem and make victims feel ashamed of reporting abuse, sexual violence or sexual harassment.

Staff should follow the procedure for dealing with disclosures in **Section C** of this policy. Where an allegation about the behaviour of a pupil or pupils against another pupil, and this is deemed to be or could be a form of abuse the allegation must be reported to the DSL or deputies

As far as practicable DSL and deputies will ensure that the pupil's wishes are taken into account when determining what action to take and services to provide.

Appropriate support will be provided to all pupils involved (victim, perpetrator and witnesses), including support from external services, as necessary.

Reports of sexual violence and sexual harassment are likely to be complex. The school will deal with reports of this nature on a case by case basis with the DSL taking the lead in the response. She will take advice from the appropriate authorities in putting in place the measures necessary to safeguard all pupils involved, whether victim or perpetrator; this may involve external agencies.

Following a report, the DSL should make an immediate risk and needs assessment considering the victim, the alleged perpetrator and other children and staff. The DSL should also liaise with the authorities (including the police) as appropriate. **KCSIE Part 5** should be consulted for guidance on the ongoing management of the situation.

The School acknowledges the different gender issues associated with peer on peer abuse and recognises that it is more likely that girls will be victims and boys' perpetrators, but that all peer on peer abuse is unacceptable. We liaise closely with King Edward's VI High School for Girls (KEHS) and other schools, as required.

The School acknowledges the wide reaching issue of consensual or non-consensual sharing of nudes or semi-nudes as peer-on peer abuse, and the strategies for dealing with this are detailed in the School's **Online Safety policy**. This is covered in detail as part of the e-Safety education of the pupils in all years.

**If a member of staff suspects there may be an issue with youth produced sexual imagery, the device should be retained, and the DSL must be informed immediately. Under no circumstance should images on the device be accessed. See Youth Produced Sexual Imagery policy.**

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<sup>6</sup> See Appendix 1 of this policy



## Section C – Procedures for Staff

**Important note:** Procedures detailed below assumes the child in question has a home address within the area covered by Birmingham Children's Services. If the child in question lives outside this area then the appropriate LSCP will be consulted and their procedures referred to.

Staff working with children are advised to maintain an attitude of '**it could happen here**' where safeguarding is concerned. If staff have any concerns about a child's welfare they should act on them immediately and always in the **best** interests of the child

### **Overview of approach to safeguarding concerns raised by staff** <sup>7</sup>

#### ***Record Keeping – updated***

All concerns, discussions and decisions made and the reasons for those decisions are recorded in writing and stored confidentially on CPOMS, including any referrals. All pupils have their own separate file within CPOMS.

Records include:

- 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

In order to promote a child's welfare and prevent issues escalating we will:

- Listen to the views of the child
- Re-assess concerns when situations do not improve
- Share information with the right people and in a timely fashion
- Challenge those who appear not to be taking action

#### ***Early Help (child not in immediate danger)***

Where risk factors or concerns are present but there is **no evidence of a significant risk** or immediate danger staff should inform the DSL or deputies. The DSL or deputy advises on Early Help and preventative work that can be done within School to engage the pupil into mainstream activities and social groups. The DSL or deputy may be the person who talks to and has conversations with the pupil's family, sharing the School's concern about the young person's vulnerability and how the family and School can work together to reduce the risk.

In this situation, the School will utilise the Right Help Right Time model (RHRT) and frameworks such as Signs of Safety and Wellbeing (or the appropriate BSCP thresholds / frameworks) to consider the needs of the family and in discussion with the parent and the child (as far as possible) the DSL may decide to:

- Monitor the situation in school after taking appropriate action to address the concerns.
- Seek advice from the Children's Advice and Support Service (CASS) so that a strategic overview can be maintained and any themes or common factors can be recognised
- Undertake an 'Early Help assessment' or 'Request for Help' to try to meet the needs of the child and family through a multi-agency approach.

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<sup>7</sup> See Appendix 8 and Appendix 9 for flow diagram of procedures.

- Where possible staff are encouraged to discuss with DSL – although any member of staff can make a referral to children’s social care (BSCP – contact details on page 4 of this policy).

Once an Early Help or Request for Help referral is made:

- If a staff member does make a direct referral, the DSL should be informed at the earliest opportunity and will then take the lead in managing external agencies and liaising with other staff as appropriate
- If the child’s situation does not appear to be improving, the DSL or staff member with concerns should press for re-consideration to ensure the child’s situation improves
- Each case should be kept under review and an initial referral to Early Help does not prevent a further referral to children’s services if the child’s situation does not improve

If the concerns about the pupil are deemed ‘Complex and Significant’ meeting the criteria within RHRT, advice will be sought from CASS with a view to a potential referral to MASH. This includes concerns about a child who is affected by the behaviour of a parent or other adult in their household.

***Child is in immediate danger or at risk of harm***

- If a child is in immediate danger or is at risk of harm, a referral should be made to children’s social care (BSCP – contact details on page 4 of this policy) and/or the police immediately. Anyone can make a referral.
- Parental consent is not required before referral to statutory agencies (but is recommended).
- Where referrals are not made by the DSL, the DSL should be informed, as soon as possible, and will then take the lead in managing external agencies – liaising with other staff as appropriate
- If the referral is made by telephone, this should be followed up by logging information on CPOMS or in writing to the DSL, following the record keeping advice on the previous page.
- Confirmation of the referral and details of the decision as to what course of action will be taken should be received from the local authority within one working day. If this is not received, the DSL (or the person that made the referral) should contact children’s social care again.
- The DSL will update the incident on CPOMS, noting the action taken, and catalogue this.
- If after a referral the pupil’s situation does not appear to be improving, the DSL (or the person that made the referral) should press for reconsideration to ensure their concerns are addressed and that the pupil’s situation improves.

***Supporting staff following a disclosure or in dealing with a safeguarding issue***

The School recognise that staff who have become involved with a child who has suffered harm, or appears to be likely to suffer harm may find the situation stressful and upsetting.

The School will support such staff by providing an opportunity to talk through their anxieties with the DSL and to seek further support as appropriate.

## Talking to a child about a concern or disclosure ('the 5 Rs')

It is not education staff's role to seek disclosures. Their role is to observe that something may be wrong, ask about it, listen, be available and try to make time to talk. If staff speak with a child about a concern or a child makes a disclosure to you it is important you know how to respond in order that you are able to support the child.

### Receive

- Stay calm.
- Do not communicate shock, anger, embarrassment or judgement
- Acknowledge how difficult it must have been to talk about this.
- Tell her/him you are pleased that s/he is speaking to you.
- Tell her/him that you believe them. Children very rarely lie about abuse; but s/he may have tried to tell others and not been heard or believed. Take it seriously.
- Tell the child that it is not her/his fault.

### Reassure

- Never enter into a pact of secrecy with the child. Assure her/him that you will try to help but let the child know that you will have to tell other people in order to do this. State who this will be and why.
- Reassure, but only as far as is honest and reliable – don't make promises you can't be sure to keep e.g 'everything will be alright now'
- Praise the child for telling you. Communicate that s/he has a right to be safe and protected.
- Tell the child that they are not a burden and there is no need for them to be ashamed.

### Respond

- Encourage the child to talk but do not ask "leading questions" or press for information.
- Listen quietly, carefully and patiently – do not make assumptions or jump to conclusions
- Use open questions like 'is there anything else you'd like to tell me?'
- Check that you have understood correctly what the child is trying to tell you.
- Do not tell the child that what s/he experienced is dirty, naughty or bad.
- It is inappropriate to make any comments about the alleged offender.
- Be aware that the child may retract what s/he has told you. It is essential to record in writing, all you have heard, though not necessarily at the time of disclosure.

### Record

- At the end of the conversation, tell the child again who you are going to tell and why that person or those people need to know.
- As soon as you can afterwards, make a detailed record of the conversation using the child's own language. Include any questions you may have asked. Do not add any opinions or interpretations.
- If the disclosure relates to a physical injury do not photograph the injury, but record in writing as much detail as possible.
- Do not investigate, interrogate or decide if child is telling the truth.
- Keep it factual.
- Always keep (or pass to DSL the original notes)

### Report

- Notify the DSL or Deputy DSLs and pass on any notes as soon as possible – often via CPOMS
- Staff should not attempt to investigate the incident further without advice from the DSL
- Having been notified of a concern, the DSL will collate the notes on CPOMS and organise as required
- Always follow the appropriate procedures for referral in **Section C**

## Confidentiality

An appropriate level of confidentiality is clearly important when dealing with safeguarding concerns. The Chief Master or DSL will disclose any information about a pupil to other members of staff on a need to know basis only (subject to the advice of the LADO team in relation to allegations against a member of staff or volunteer).

## Disclosure of sexual violence or sexual harassment

The initial response to a report from a child is incredibly important. How the school responds to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. If staff have a concern about a child or a child makes a report to them, they should follow the referral process as set out in **Section C** of this policy

**Please see Appendix 3 for specific guidance in this area.**

## Review

Any major safeguarding incidents will be followed by a review of the safeguarding procedures within the School and a prompt report to the Governors. Where an incident involves a member of staff, the LADO team will be asked to assist in this review to determine whether any improvements can be made to the School's procedures.

The DSL will ensure that this policy is reviewed annually and its procedures and implementation are updated and reviewed regularly, working with the Governors as necessary. The DSL will update the Senior Leadership Team regularly on the operation of the School's safeguarding arrangements.

The full ISGB will undertake an annual review of this policy and the School's safeguarding procedures. The full ISGB will receive annually a report on:

- Developments in safeguarding policy and procedures
- Training undertaken by the DSL, other staff and the ISGB
- Referral information
- Issues and themes and how they were handled
- The contribution the School has made to multi-agency working in individual cases or local discussions on safeguarding issues.

The full ISGB should also consider independent corroboration, such as inspection of records or feedback from external agencies including the LADO team.

The full ISGB will review the report, this policy and the implementation of its procedures and consider the proposed amendments to the Policy before giving the revised policy its final approval. Detailed minutes recording the review by the ISGB will be made.

Close links are maintained with KEHS and termly meetings are held with the Liaison Governor for Safeguarding and the KEHS DSL (as appropriate) to discuss matters relating to safeguarding and child protection and to share good practice.

## **What to do if you have a concern about safeguarding practices in the School**

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the School safeguarding regime and that concerns will be taken seriously by the Senior Leadership Team.

The **Whistle Blowing policy** should be consulted for more details.

Where a staff member feels unable to raise an issue with the School, or feels that their concerns are not being addressed, other whistleblowing channels are open to them.

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00am to 8:00pm, Monday to Friday and email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

## **Section D – Allegations or concerns raised in relation to staff or volunteer**

The School's procedures for dealing with allegations against staff and volunteers will follow **Part 4 of KCSIE**.

There are two parts to this section:

1. Allegations that may meet a harm threshold
2. Allegation / concern that do not meet the harms threshold – referred to as 'low-level concerns'

### **Allegations that may meet the harms threshold**

The School's procedures for dealing with allegations made against staff will be used where the member of staff or volunteer has:

- Behaved in a way that has harmed a child, or may have harmed a child
- Possibly committed a criminal offence against or related to a child
- Behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children; or
- Behaved or may have behaved in a way that indicated they may not be suitable to work with children  
*[Managing transferrable risk: where a member of staff or volunteer is involved in an incident outside of school which did not involve children but could impact on their suitability to work with children. For example a member of staff is involved in domestic violence at home. No children are involved but schools need to consider what triggered these actions and could a child trigger the same reaction]*

The reporting requirements for allegations against a member of staff, the Chief Master, Governor, or volunteer are set out on page 25 of this policy.

Allegations against a teacher who is no longer teaching and historical allegations will be referred to the police.

Children cannot be expected to raise concerns in an environment where staff fail to do so. All staff should be aware of their duty to raise concerns, where they exist, about the attitude or actions of colleagues. See also the School's separate **Whistleblowing Policy** and **Staff Code of Conduct**.

### Initial response from the School

Allegations will be dealt with as a priority and in accordance with the [BSCP procedures](#) and **Part 4 of KCSIE**

A case manager will be assigned, who will be directed by the Chief Master and the Human Resources department will be informed.

There are two aspects to consider when an allegation is made:

1. **Looking after the welfare of the child** – DSL is responsible for ensuring child is not at risk and referring cases of suspected abuse to LA children's social care
2. **Investigating and supporting person subject to allegation** – the case manager should discuss with the LADO, the nature, content and context of allegation and agree a course of action

Where initial discussion leads to **no further action** needed the case manager and LADO will record decision (see below on record-keeping) and justification; and agree on what information should be put in writing to the individual concerned and by whom.

Where **further enquiries** are required to enable a decision about how to proceed the LADP and case manager will discuss how and by whom this will be undertaken. It is not an automatic response to temporarily suspend the individual involved, pending further enquires, and all options to avoid suspension should be considered.

The parents of the child[ren] involved should be formally told of the allegation as soon as possible in consultation with LADO, social care and / or police about what information can be disclosed. While they should also be kept informed of the progress of the case in relation to their child, on information can be shared about the member of staff. Parents will also be made aware of the requirement to maintain confidentiality about any allegations whilst investigations are in progress as set out in the Education Act 2002.

The School has a **duty of care** towards its employees so should:

- manage and minimise stress caused by the allegation
- inform the individual as soon as possible, explaining the likely course of action, guided by the LADO, and police where necessary
- advise the individual to contact their trade union representative, or a colleague for support
- appoint a named representative to inform the person about progress of the case
- provide access to counselling (through Employee Assistance Program) or medical advice where appropriate
- explore all options to avoid suspension
- not prevent social contact with work colleagues and friends, when staff are suspended, unless there is evidence to suggest this may prejudice the gathering of evidence

Wherever possible, the first review should take place no later than four weeks after the initial assessment. The LADO will provide advice and guidance for any subsequent meetings.

The School may determine the outcome of an allegation to be substantiated, malicious, false, unsubstantiated or unfounded.

### Record keeping

Details of allegations found to be malicious or false will be removed from personnel records. For all other allegations, the following details will be recorded on the confidential personnel file of the person accused.

- a clear and comprehensive summary of allegation
- details of how the allegation was followed up and resolved

- a note of any action taken, decisions reached and the outcome
- a copy provided to the person concerned, where agreed by children's social care or the police
- a declaration on whether the information will be referred to future reference

The purpose of the record is to enable accurate information to be given in response to any future request for a reference and provide clarification in future DBS check, where it is revealed there was police involvement.

An allegation proven to be false, unfounded, unsubstantiated or malicious will not be referred to in employer references.

The School will retain all safeguarding records and relevant personnel records for so long as reasonably required.<sup>8</sup>

If an allegation is substantiated, the School will act in accordance with **Part 4 of KCSIE** and the School's employment procedures regarding its legal duty to inform DBS and TRA, where applicable.

### Malicious allegations

Where an allegation by a pupil is shown to have been deliberately invented or malicious, the Chief Master will consider whether to take disciplinary action in accordance with the **School's Behaviour and Discipline policy**.

Where a parent has made a deliberately invented or malicious allegation the Chief Master will consider whether to require that parent to withdraw their child or children from the School on the basis that they have treated the School or a member of staff unreasonably as set out in the **Exclusions Policy**

Whether or not the person making the allegation is a pupil or a parent (or other member of the public), the School reserves the right to contact the police to determine whether any action might be appropriate.

All staff need to be aware of their vulnerability to allegations and must address their practice accordingly. All staff must adhere to the School policy/guidance in respect to safe conduct (see the **Staff Code of Conduct**).

### **Safeguarding concerns that do not meet the harms threshold (low-level concern)**

King Edward's School takes a whole-school approach to safeguarding and promotes an open and transparent culture in which our values, ethos and expected professional behaviours and boundaries are clearly set out and reinforced (see **Staff code of conduct**). All staff understand their role in the safeguarding of children and that sharing concerns helps to minimise the risk of abuse and identify any weaknesses in the School's safeguarding system.

Safeguarding concerns may arise in several different ways from a number of different sources: complaint, disclosure, suspicion made by a child, parent or adult within or outside the school. Where these safeguarding concerns do not meet the harms threshold the term 'low-level concern' is used. This does not mean they are insignificant; it means the behaviour does not meet the thresholds detailed in part 1 of Section D.

A low-level concern is any concern – no matter how small, and even if no more than a sense of unease or 'nagging doubt' – that an adult working in or on behalf of the school may have acted in a way that is inconsistent

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<sup>8</sup> In accordance with the terms of reference of the Independent Inquiry into Child Sexual Abuse all Schools are required to retain information which relates to allegations (substantiated or not) of organisations and individuals who may have been involved in, or have knowledge of child sexual abuse or child sexual exploitation; allegations (substantiated or not) of individuals having engaged in sexual activity with, or having a sexual interest in, children; institutional failures to protect children from sexual abuse or other exploitation.

with the **staff code of conduct**, including inappropriate conduct outside of work. A low-level concern does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

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

- being overly friendly with children
- having favourites
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door with no window
- using inappropriate sexualised, intimidating or offensive language
- taking photographs of children on their mobile phone

Such behaviour can exist on a wide spectrum, from that which is inadvertent, thoughtless or may look inappropriate in the circumstance to that which is intended to enable abuse.

Staff should feel confident to self-refer if they find themselves in a situation that could be misinterpreted, might appear compromising to others, and/ or on reflection they feel they have behaved in such a way that they consider falls below the expected professional standards.

All low-level concerns raised will be responded to in a sensitive and proportionate manner and dealt within an appropriately timeframe. Where appropriate, addressing any unprofessional behaviour and supporting individuals to correct it at an early stage.

How to report a low-level concern is set out on page 25. A written record will be made, and a case manager assign by the Chief Master.

The case manager will then collect as much evidence as possible by speaking to the individual involved and any witnesses. The information collected and reported to the Chief Master. It will be used to categorise the type of behaviour and determine what further action may need to be taken. The rationale for decisions made and actions taken will be recorded.

All records are confidential and will be stored securely on SLT server until such time as a member of staff leaves, a low-level concern would not form part of a reference, unless it relates to an issue normally included, for example, misconduct or poor performance.

Records will be reviewed regularly so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. The School may decide on a course of action either through disciplinary procedures or if a harms threshold is met, through referral to the LADO. If a low-level concern (or group of concerns) has met a threshold for a LADO referral and found to be substantiated, this would be referred to in a reference.



**What staff should do if they have safeguarding concerns about a member of staff (including visitors, volunteers, contractors or supply staff) or governor**

Safeguarding concern or allegation relating to:	Action
<i>Staff (including visitors or volunteers)</i>	<ul style="list-style-type: none"> <li>• Safeguarding concerns or allegations relating to staff (including the DSL) must be reported directly to the Chief Master without informing the subject of the concern / allegation.</li> <li>• Any concerns or allegations made about supply staff or contractors should also be notified to their employers</li> </ul>
<i>Chief Master</i>	<ul style="list-style-type: none"> <li>• Safeguarding concerns or allegations relating to the Chief Master must be immediately reported, in confidence to the Chair of ISGB without first notifying the Chief Master.</li> <li>• In the absence of the Chair of ISGB, the Liaison Governor for Safeguarding should be informed</li> </ul>
<i>A governor (other than the Chair of ISGB)</i>	<ul style="list-style-type: none"> <li>• Safeguarding concerns or allegations relating to a governor must be immediately reported, in confidence to the Chair of ISGB or the Liaison Governor for Safeguarding, without first notifying the governor</li> <li>• Where appropriate, the Chair of ISGB will consult the Liaison Governor for Safeguarding, and vice versa</li> </ul>
<i>Chair of ISGB</i>	<ul style="list-style-type: none"> <li>• Safeguarding concerns or allegations relating to the Chair of ISGB must be immediately, in confidence to the Liaison Governor for Safeguarding without informing the Chair of ISGB.</li> </ul>

If it is not possible to report to the Chief Master, Chair of ISGB or Liaison Governor for Safeguarding in the circumstances set out above, a report should be made immediately to the LADO Team.

All key contact information can be found on Page 4.

## Appendix 1 – Types, signs and symptoms of abuse and neglect

Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child either directly by inflicting harm, or indirectly, by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting; by those known to them; or more rarely, by a stranger. They may be abused by an adult or adults, or another child or children.

All staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another and are not easy to diagnose. No list can cover every child abuse possibility. Abuse is always wrong and is never the child's fault.

We recognise that staff of the School will often, by virtue of their day to day contact and knowledge of the children, be well placed to identify such abuse and offer support to children in need.

**All** staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education and consensual or non-consensual sharing of nudes, semi-nudes or videos put children in danger and can be signs that children are at risk.<sup>9</sup> Concerns should always be raised with DSL or deputy.

### **Types of abuse**

**Abuse** is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to 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.

Some of the signs and behaviours which may indicate that a child is being abused are:

- Repeated minor injuries
- Children who are dirty, smelly, poorly clothed or who appear underfed
- Children who have lingering illnesses which are not attended to, deterioration in school work, or significant changes in behaviour, aggressive behaviour, severe tantrums
- An air of 'detachment' or 'don't care' attitude
- Overly compliant behaviour
- Does not trust adults, particularly those who are close
- 'Tummy pains' with no medical reason
- Eating problems, including over-eating, loss of appetite
- Disturbed sleep, nightmares, bed wetting
- Running away from home, suicide attempts
- Self-inflicted wounds
- Reverting to younger behaviour
- Depression, withdrawal
- Relationships between child and adults which are secretive and exclude others

**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.

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<sup>9</sup> New [UKCIS guidance on sharing of nudes and semi-nudes](#)

## Signs of Physical Abuse

Physical abuse may result in the symptoms described below. Aside from direct physical contact, physical abuse can also be caused when a parent or caregiver feigns the symptoms of, or deliberately causes ill health to a child whom they are looking after. Signs of physical abuse include:

- Unexplained bruising, marks or injuries on any part of the body
- Black eyes without bruising to the forehead
- Multiple bruises in clusters, often on the upper arm, outside of thigh
- Cigarette type burns anywhere, patterned burns (irons), rope burns. Contact burns in abnormal sites. Scalds, with upward splash marks.
- Lacerations to the body or mouth
- Multiple fractures. Evidence of old fractures.
- Fading injuries noticeable after an absence from school
- Seems frightened of parents, does not want to return home at the end of the day
- Shrinks markedly (backs away) at the approach of adults
- Suffers from frozen watchfulness
- Constantly asks in words/actions what will happen next

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

## Signs of Emotional Abuse

Signs of emotional abuse displayed by children include:

- Excessive behaviour, such as extreme aggression, passivity or become overly demanding
- Self-harm, for instance by scratching or cutting
- Inappropriately adult or infantile behaviour
- High levels of anxiety, unhappiness or withdrawal
- Running away from home

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

## Signs of Sexual Abuse

Signs of sexual abuse displayed by children include:

- Difficulty walking or sitting
- Pain/itching/bleeding/bruising/discharge to the genital area/anus
- Urinary infections/sexually transmitted diseases
- Persistent sore throats
- Eating disorders
- Self-mutilation
- Refuses to change for gym or participate in physical activities
- Exhibits an inappropriate sexual knowledge for their age (e.g. playing games and showing awareness which is inappropriate for the child's age), continual open masturbation, aggressive and inappropriate sex play
- 
- Exhibits sexualised behaviour in their play or with other children
- Lack of peer relationships, sleep disturbances, acute anxiety/fear
- School refusal, running away from home

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

### Signs of Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs. This is likely to result in the serious impairment of the child's health or development. Signs of neglect include:

- Frequent absenteeism from school
- Begging or stealing money or food
- Lacking medical or dental care, immunizations or glasses
- Lacking appropriate clothing, e.g. for weather conditions, shoes are too small, ill-fitted clothes
- Clothes that are consistently dirty
- Teeth are dirty, hair quality is poor and contains infestations
- Hands are cold, red and swollen
- The parent or adult caregiver has failed to protect a child from physical harm or danger

### The Parent or other adult caregiver:

- Denies existence of or blames the child for the child's problems at home or at school
- Sees and describes the child as entirely worthless, burdensome or in another negative light
- Unrealistic expectations of the child i.e. demands a level of academic or physical performance of which they are not
- Offers conflicting or unconvincing explanation of any injuries to the child
- Appears indifferent to or overtly rejects the child
- Refuses offers of help for the child's problems
- Isolated physically/emotionally

The BSCP can provide advice on the signs of abuse and the DfE advice: *What to do if you're worried a child is being abused (2015)* provides advice in identifying child abuse. The NSPCC website is also a good source of information and advice.

## Appendix 2 –Other safeguarding Issues

### **Cybercrime – new**

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

Cyber-dependent crimes include;

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

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the DSL or deputies 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.

### **Domestic abuse**

The Domestic Abuse Act 2021 introduces the first statutory definition of domestic abuse and recognises the impact on children, as victims in their own right. The definition of domestic violence and abuse is: any incident or pattern of incidents of controlling, coercive, economic, 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: psychological; physical; sexual; financial; and emotional.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence, which includes controlling and coercive behaviour, can have a serious, long lasting emotional and psychological impact on children.

Operation Encompass operates in all police forces across England. 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 DSL).

Young people can experience domestic abuse within their own intimate relationships. This is a form of peer-on-peer abuse referred to 'teenage relationship abuse'. Depending on age of young people this may not be recognised as under law as 'domestic abuse'. Any child under 18, where there are concerns, safeguarding procedures should be followed and both parties offered support.

Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support.

## Homelessness Duty

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances.

If staff become aware of a homeless or risk of homeless pupil you should inform the DSL or deputies as soon as possible and they will progress any concerns to the Local Housing Authority (LHA) at the earliest opportunity. Any referrals to LHA does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

In most cases school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16- and 17-year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support.

In all cases, or suspected cases staff should refer to the DSL or deputies.

## Mental Health

All staff should be aware that mental health problem can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff are well placed to notice those whose behaviours suggest they may be experiencing a mental health problem or be at risk of developing one.

These behaviours (or changes in behaviour) may include the following:

- Increased volatility: aggressive, oppositional, hyper-vigilant, difficulty settling, irritability, anger
- Reduced engagement: withdrawn, feeling overwhelmed, fearful, easily tearful, lack of concentration, inability to regulate emotions
- Anxiety: low-self-esteem, excessively 'good' behaviour to prevent disapproval, indiscriminate contact or affection seeking, excessive clinginess

### *Adverse Childhood Experience (ACE)*

Adverse childhood experiences, or ACEs, are potentially traumatic events that occur in childhood (0-17 years). Examples of ACE include:

- **loss or separation** – resulting from death, parental separation, divorce, hospitalisation, loss of friendships (especially in adolescence), family conflict
- **life changes** – such as the birth of a sibling, moving house or changing schools or during transition from primary to secondary school
- **traumatic experiences** such as abuse, neglect, domestic violence, bullying, violence, accidents or injuries
- **other traumatic incidents** such as a natural disaster or terrorist attack. School should be aware of family members of pupils who may live or work in such areas.

Where children have suffered abuse and neglect or other ACE, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware how these children's experiences can impact on their mental health, behaviour and education. **All staff recognise that these children are potentially at a greater risk of harm.**

## *Referral*

Only appropriately trained professionals can make a diagnosis of a mental health problem. But any member of staff can make their concerns about a child known to a member of the pastoral team, who will liaise with Deputy Head Pastoral for the appropriate referral into the School's mental health service.

- Counsellors from [Open Door Youth Counselling Service](#) are employed by the School.
- The School also offers a full mental health support service from a mental health nurse.

If staff have a mental health concern about a child that is also safeguarding concern, immediate action should be taken by speaking DSL or deputies.

## Appendix 3 – Sexual violence and harassment between children

**KCSIE 2021 Part 5 must be referred to when dealing with allegation of sexual harassment of violence between children.**

### *Context*

Sexual violence and sexual harassment can occur between two children of any **age and sex** from primary to secondary stage. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physically and verbally) and are never acceptable.

Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with special educational needs and disabilities (SEND) and LGBT children are at greater risk.

Staff should be aware of the importance of challenging inappropriate behaviours; making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up; not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

### **Sexual violence**

It is important that school and college staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way and that it can happen both inside and outside of school/college.

When referring to sexual violence we are referring to sexual violence offences under the Sexual Offences Act 2003 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. (Schools should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent, or touching someone’s bottom/breasts/genitalia without consent, can still constitute sexual assault.)



- **Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)
- **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.

Further information about consent can be found here: [Rape Crisis England & Wales – Sexual consent](#)

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

## **Sexual harassment**

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school/college. When we reference sexual harassment, we do so in the context of child on child sexual harassment. 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.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual "jokes" or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering when any of this crosses a line into sexual violence – it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature;
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:

**consensual and non-consensual sharing of nudes and semi-nudes images and/or videos.  
Taking and sharing nude photographs of U18s is a criminal offence;**

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.

- sharing of unwanted explicit content;
- upskirting (is a criminal offence);
- sexualised online bullying;
- unwanted sexual comments and messages, including, on social media;
- sexual exploitation; coercion and threats.

### *Upskirting*

The Voyeurism (Offences) Act 2019, which is commonly known as the Upskirting Act, came into force on 12 April 2019. 'Upskirting' is where someone takes a picture under a persons clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any sex, can be a victim.

### *The response to a report of sexual violence or sexual harassment*

The initial response to a report from a child is incredibly important. How the school responds to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward. Schools not recognising, acknowledging or understanding the scale of harassment and abuse and/or downplaying of some behaviours can actually lead to a culture of unacceptable behaviour. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. If staff have a concern about a child or a child makes a report to them, they should follow the referral process as set out in **Section C** of this policy. As is always the case, if staff are in any doubt as to what to do they should speak to the DSL or deputy.

## Appendix 4 – Child Criminal and Sexual Exploitation

Both CSE and CCE are forms of abuse and both occur where an individual or groups takes advantage of an imbalance of power to coerce, manipulate or deceive a child in sexual or criminal activity. The abuse can be perpetrated by individuals or groups and males or females. They may be exploited by other children, who themselves are victims of exploitation.

The abuse can be a one-off occurrence or a series of incidents over time. In some cases, the abuse will be in exchange for something the victim needs or wants (e.g. money, gifts or attention) and/or for other advantage such as increased status. Victims can be exploited even when activity appears consensual, it should be noted that as well as being physical, exploitation can be facilitated and / or take place online.

Age difference may contribute to an imbalance of power, but there are other factors that may make a child more vulnerable to exploitation: gender, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength access to economic resources.

Some of the following can be indicators of CSE or CCE:

- Children who appear with unexplained gifts or possessions
- Children who suffer from changes in emotional well-being
- Children who misuse drugs or alcohol
- Children who have older boyfriends or girlfriends
- Display sexual behaviours beyond expected development for age
- Suffer with STIs
- Children who regularly miss school or go missing for periods of time

Further information and definitions of exploitation can be found **Annex B** of **KCSIE** and Home Office's [‘Preventing youth violence and gang involvement’](#) and its [‘Criminal exploitation of children and vulnerable adults: county lines guidance’](#)

### *Child Criminal Exploitation (CCE)*

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

### *County Lines*

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas in the UK, using dedicated mobile phone lines or other form of ‘deal line’. Exploitation is an integral part of the county lines offending model. Children can be targeted to and recruited from schools, local area and increasingly online using social media. Victims are often subjected to violence, threat of violence towards their families, ‘manufactured drug debts’ and other coercion.

### *Serious Violence*

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self harm or significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks. All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

### *Modern Slavery*

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. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the National Referral Mechanism is available in the Modern Slavery Statutory Guidance.

### *Child Sexual Exploitation (CSE)*

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet. CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media. CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

## Appendix 5 – Preventing radicalisation

**The Prevent Duty:** The School is subject to a duty under section 26, Counter Terrorism and Security Act 2015 to have 'due regard' to the need to prevent people from being drawn into terrorism. The School seeks to protect children and young people against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to Far Right/Neo Nazi/White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements

As such we will assess the level of risk within the School and put actions in place to reduce that risk. Risk assessment may include consideration of the school's RS curriculum, PSHE curriculum, SEND policy, Online Safety policy, Assembly policy, the use of school premises by external agencies, Anti-bullying policy and other issues specific to the School's profile, community and philosophy. All staff will undertake regular Prevent training.

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools' or colleges' safeguarding approach. We ensure pupils are safe from terrorist and extremist materials when accessing the internet on school devices and that suitable filtering is in place. There have been several occasions both locally and nationally in which extremist groups have attempted to radicalise vulnerable children and young people to hold extreme views including views justifying political, religious, sexist or racist violence, or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation.

The School values freedom of speech and the expression of beliefs and ideology as fundamental rights underpinning our society's values. Both children and staff have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion.

### Definitions

**Extremism** is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

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

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

There is no such thing as a "typical extremist": those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.

### Indicators of vulnerability

Pupils may become susceptible to radicalisation through a range of social, personal and environmental factors – it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and

their families and communities. It is vital that school staff are able to recognise those vulnerabilities

There is no single way to identify an individual who is likely to be susceptible to an extremist ideology. Specific background factors may contribute to vulnerability and these are often combined with specific needs for which an extremist group may appear to provide answers, and specific influences such as family, friends and online contacts. The use of social media has become a significant feature in the radicalisation of young people.

Indicators include:

- Identity Crisis – the pupil is distanced from their cultural / religious heritage and experiences discomfort about their place in society;
- Personal Crisis – the student / pupil may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging;
- Personal Circumstances – migration; local community tensions; and events affecting the student / pupil's country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy;
- Unmet Aspirations – the student / pupil may have perceptions of injustice; a feeling of failure; rejection of civic life;
- Experiences of Criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement / reintegration;
- Special Educational Need – students / pupils may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.

More critical risk factors could include:

- Being in contact with extremist recruiters;
- Accessing violent extremist websites, especially those with a social networking element;
- Possessing or accessing violent extremist literature;
- Using extremist narratives and a global ideology to explain personal disadvantage;
- Justifying the use of violence to solve societal issues;
- Joining or seeking to join extremist organisations;
- Significant changes to appearance and / or behaviour; and
- Experiencing a high level of social isolation resulting in issues of identity crisis and / or personal crisis.

### The Prevent Duty

The Prevent duty should be seen as part of schools' and colleges' wider safeguarding obligations. Designated safeguarding leads and other senior leaders should familiarise themselves with the revised Prevent duty guidance: for England and Wales, especially paragraphs 57-76, which are specifically concerned with schools (and also covers childcare). The guidance is set out in terms of four general themes: risk assessment, working in partnership, staff training, and IT policies. There is additional guidance: Prevent duty guidance: for further education institutions in England and Wales that applies to colleges.

### Roles and responsibilities of the Single Point of Contact (SPOC)

The SPOC for the School is Deborah McMillan (Deputy Head), who is responsible for:

- Ensuring that staff of the school are aware that you are the SPOC in relation to protecting pupils from radicalisation and involvement in terrorism;
- Maintaining and applying a good understanding of the relevant guidance in relation to preventing pupils from becoming involved in terrorism, and protecting them from radicalisation by those who support terrorism or forms of extremism which lead to terrorism;
- Raising awareness about the role and responsibilities of the School in relation to protecting students/pupils from radicalisation and involvement in terrorism;
- Monitoring the effect in practice of the school's RS curriculum and Assembly policy to ensure that they are used to promote community cohesion and tolerance of different faiths and beliefs;
- Raising awareness within the school about the safeguarding processes relating to protecting pupils from radicalisation and involvement in terrorism;
- Acting as the first point of contact within the school for case discussions relating to pupils who may be at risk of radicalisation or involved in terrorism;
- Collating relevant information from in relation to referrals of vulnerable pupils into the Channel process;
- Attending Channel meetings as necessary and carrying out any actions as agreed;
- Reporting progress on actions to the Channel Co-ordinator; and
- Sharing any relevant additional information in a timely manner.

If a member of staff has concerns that a pupil may be at risk of radicalisation or involvement in terrorism, they should speak with the SPOC. The potential issue will be considered carefully before any action is taken. Any action taken will be proportional but could ultimately include referral to the Channel programme.

### Channel

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages.

Schools have a duty to cooperate with the Channel programme in the carrying out of its functions, and with the Police in providing information about an individual who is referred to Channel. The SPOC will lead in liaising with Channel should it be necessary.

And in the [Advice for Schools](#) on The Prevent Duty.

More information on all areas is available in **Annex B of KCSIE**

## Appendix 6 – So called ‘honour-based’ abuse

So-called ‘honour-based’ abuse (HVA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of honour-based abuse (regardless of the motivation) should be handled and escalated as such. If staff have a concern about a child at risk of HBA or who has suffered from HBA they should speak to the DSL.

Further information is available in **Annex B of KCSIE**.

### ***Female genital mutilation***

Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse.

Whilst **all** staff should speak to the designated safeguarding lead (or deputy) with regard to any concerns about FGM there is a specific **legal duty on teachers**. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18 (i.e through a disclosure), the teacher **must** report this to the police

The legal duty does not apply in relation to at risk or suspected cases (i.e no disclosure). In these cases, all staff should report concerns regarding FGM to the DSL who will follow the school’s normal safeguarding procedures and may consult children’s social care before a decision is made as to whether the legal reporting duty applies.

For further details about legal duty see the Home Office guidance [Mandatory Reporting of Female Genital Mutilation – procedural information](#).

There is a range of potential indicators that a child or young person may be at risk of FGM. Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 38-41 of the [Multi-agency statutory guidance on FGM](#) (pages 59-61 focus on the role of schools).

Guidance published by the [Department for Health](#) also provides useful information and support for health professionals which will be taken into account by the School’s medical staff.

### ***Forced marriage***

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools can play an important role in safeguarding children from forced marriage.

Guidance on the warning signs that forced marriage may be about to take place, or may have already taken place, can be found on pages 13-14 of the [Multi-agency guidelines: Handling case of forced marriage](#).

Staff should speak to the DSL if they have any concerns. Pages 35-36 of the [Multi-agency guidelines: Handling case of forced marriage](#) focus on the role of schools in detecting and reporting forced marriage and the Forced marriage Unit can be contacted on 020 7008 0151 or [fm@fco.gov.uk](mailto:fm@fco.gov.uk) for advice and information.



## Appendix 7 – Government guidance on safeguarding issues

All staff should have an awareness of the broader safeguarding issues – some of which are listed below. Staff should be aware that behaviours linked to the likes of drug taking, alcohol abuse, truanting and sexting put children in danger.

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. KCSIE Annex A contains detailed guidance on specific forms of abuse and safeguarding issues. In addition, staff can access government guidance as required on the issues listed below via GOV.UK and other government websites:

[Bullying including cyberbullying](#)

[Children missing education – and Annex A of KCSIE](#)

[Child missing from home or care](#)

[Child sexual exploitation \(CSE\) – and Annex A of KCSIE](#)

[Domestic violence – and Annex A of KCSIE](#)

[Drugs](#)

[Fabricated or induced illness](#)

[Faith abuse](#)

[Female genital mutilation \(FGM\) – and Annex A of KCSIE](#)

[Forced marriage- and Annex A of KCSIE](#)

[Gangs and youth violence](#)

[Gender-based violence/violence against women and girls \(VAWG\)](#)

[Hate](#)

[Mental health](#)

[Missing children and adults strategy](#)

[Sexual violence and sexual harassment between children in schools](#)

[Private fostering](#)

[Prevent duty](#)

[Promoting children and young people's emotional health and wellbeing](#)

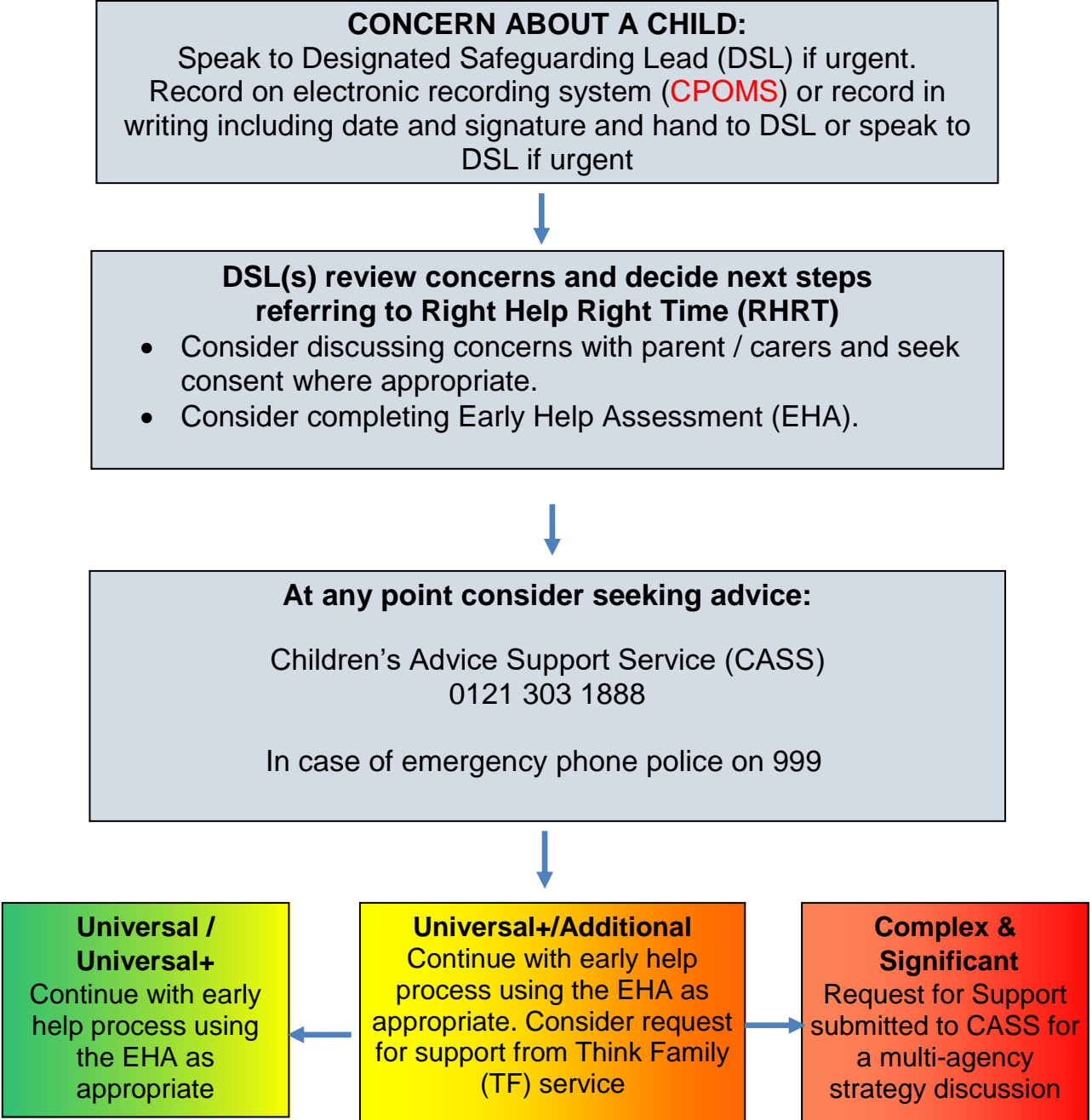
[Relationship abuse](#)

[Trafficking](#)

Detailed guidance on children in specific circumstances is also provided in the [West Midlands Safeguarding Children procedures](#)

# Appendix 8 – Delivering early help in education (BSCP model)

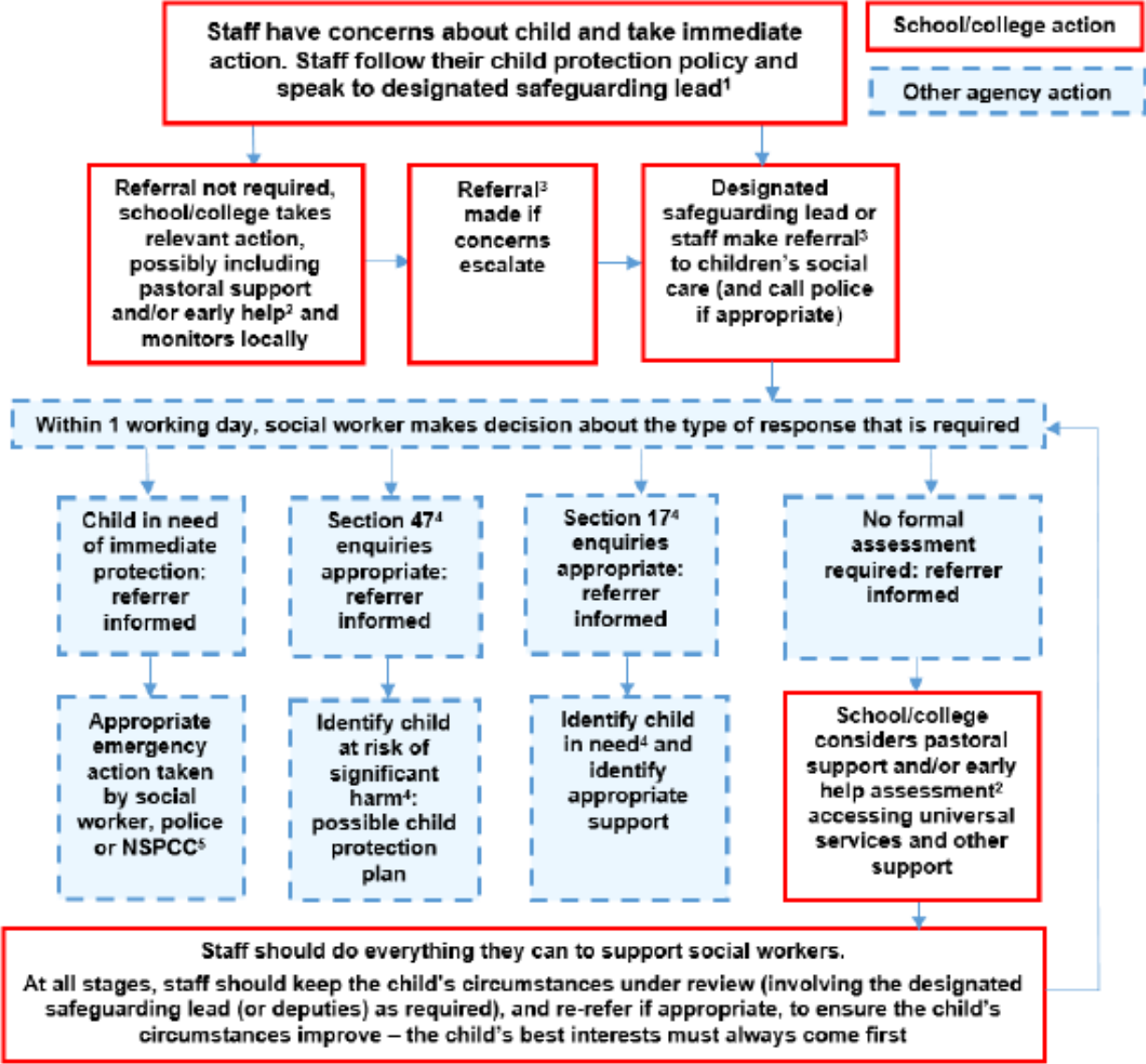
This is taken from the BSCP 'model' Safeguarding Policy (September 2020). It illustrates the emphasis on Early Help when initially dealing with safeguarding concerns. This is the BSCP model. Other LSCP procedures may differ slightly. We would follow School specific procedures within these steps.



# Appendix 9 – Concerns about a child flowchart (KSCIE 2021)

This is taken from KCSIE (September 2021p22) and gives further details of procedures followed by other agencies when a concern is raised.

## 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 10 – Further Information

### ***Safeguarding during remote learning***

If a pupil is required to self-isolate due to positive Covid-19 test, they must have access to remote teaching. The school approved method for remote teaching via live streaming and online meetings can be found on Firefly and google docs, they must be used in all instances and recorded with DSL as per the guidance.

Staff will continue to have a safeguarding duty for pupil in line with this policy and KCSIE 2021. Any member of school staff with a safeguarding concern about a pupil during remote learning report their concerns to the DSL or deputies **immediately** as per Section C of this policy.

Guidelines on behaviour and consequences, the School's Acceptable Use Policy, a specific Code of Conduct for distance learning and how to report online abuse are available on the school's intranet, Firefly. Further information can be found in this government guidance for [Safeguarding during remote teaching](#).

In the event of the school being required to enter a full or partial lockdown as direct by PHE, DfE or LA, a policy addendum for safeguarding during remote learning will be re-issued in line with Government guidance.

### ***List of Common Acronyms***

BSCP	Birmingham Safeguarding Children Partnership
CASS	Children's Advice and Support Service
DBS	Disclosure and Barring Service
DfE	Department for Education
DSL	Designated Safeguarding Lead
ISGB	Independent School Governing Body
KCSIE	Keeping Children Safe in Education – September 2021
LADO	Local Authority Designated Officer (or Designated Officer)
LA	Local Authority
PHE	Public Health England
TRA	Teacher Regulation Agency
VLE	Virtual Learning Environment (i.e. Intranet platform 'Firefly')
WT	Working Together to safeguard children – July 2018

### ***Version control***

	<b>Note</b>
1.0	Updated September 2021 to reflect KCSIE 2021
1.1	Page number, low-level concern and remote learning update

This policy will be reviewed in September 2022 by Deputy Head Pastoral and DSL or sooner in line with government guidance.