



# BROMSGROVE SCHOOL

## SAFEGUARDING CHILDREN POLICY (including Child Protection)

Author:	Senior DSL
Reviewed:	August 2024
Ratified:	By the Chair of the Safeguarding and Wellbeing Committee of the Governing Body
Next Review Due:	August 2025
Scope:	All Schools

## **SAFEGUARDING CHILDREN POLICY**

<b>Headmaster:</b>	Mr Michael Punt
<b>Chair of Governors</b>	Mr Michael Luckman
<b>Safeguarding Governor:</b>	Mrs Anne Cleary (Chair of Safeguarding and Wellbeing Committee and with responsibility for Prevent and Online Safety). She is supported by Dr C Lidbury, and Col M Ballard
<b>Designated Safeguarding Lead, SPOC, Prevent, and Child Exploitation GET SAFE Lead:</b>	Bromsgrove Senior School: Mrs J Boonnak (Senior DSL) Bromsgrove Prep School: Mrs R Whiting (Director of Studies) Bromsgrove Pre-Prep School: Mr B ETTY-Leal (Deputy Head) Winterfold School: Mr R Mitchell (Deputy Head)
<b>Deputy Designated Safeguarding Leads:</b>	Mr A McClure (Senior School) Miss Z Leech (Senior School) Mr S Matthews (Senior School) Mr M Marie (Bromsgrove Prep & Pre-Prep: Headmaster) Mrs T Hill (Prep) Mrs V Sitlu (Prep) Miss E Marrs (Pre-Prep) Mrs D Toms (Winterfold: Headmistress, Lead Deputy DSL) Mrs B Miles (Winterfold) Mrs K Stark (Winterfold) Mrs T Wilson (Winterfold) Miss R Truswell (Winterfold: Holiday Club)
<b>Early Years Designated Safeguarding Lead:</b>	Mr B ETTY-Leal (Bromsgrove Pre-Prep: Deputy Head) Mr R Mitchell (Winterfold: Deputy Head)
<b>Designated Person for Looked After Children:</b>	Mrs J Boonnak

All DSLs and DDSLs are fully DSL trained.

This policy will be made available to parents on request and is available on the School website. This policy applies to all staff, governors and volunteers working in the School, including those in the Early Years Foundation Stage (EYFS) provision. It also applies to all pupils at the School.

**Safeguarding** and promoting the welfare of children is defined as:

- protecting children from maltreatment
- preventing impairment of children's mental and physical health or development
- ensuring that children are growing up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best possible outcomes.

**Child Protection** is a part of safeguarding and promoting welfare. This refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

Safeguarding is everyone's responsibility and anyone can make a referral to external agencies.

The School recognises that boarders and boarding arrangements can present particular issues. We adhere to the National Minimum Standards for Boarding Schools, and associated policies and principles, which we apply specifically in the boarding context.

At the last full inspection (May 2023), it was found that all safeguarding and child protection requirements were met.

## CONTACT INFORMATION

### Internal Contacts

To speak to a safeguarding lead, call the School switchboard on 01527 579679 (Bromsgrove) or 01562 777234 (Winterfold). If urgent contact is needed at times when the switchboard is unstaffed, the Senior DSL, Julia Boonnak, may be called on 07468 726937, or contacted via Teams [jboonnak@bromsgrove-school.co.uk](mailto:jboonnak@bromsgrove-school.co.uk).

The Chair of Governors, Mr Michael Luckman, may be contacted at [mluckman@bromsgrove-school.co.uk](mailto:mluckman@bromsgrove-school.co.uk).

### External Contacts

Worcestershire Safeguarding Adviser	Denise Hannibal 01905 844436
Local Authority Designated Officer (LADO) (Worcestershire County Council)	01905 846221
Family Front Door (Worcestershire County Council)	01905 822666 (Mon–Fri 8.30am – 5.00pm) 01905 768020 (evenings and weekends)
Out of Hours Emergency Duty Team (Worcestershire County Council)	01905 768020
Police Public Protection Unit: 24hrs non-emergency Emergency	101 999
NSPCC Helpline	0808 028 0285
Channel/Prevent (West Mercia Police)	<a href="https://www.westmercia.police.uk/advice/advice-and-information/t/prevent/prevent/alpha/prevent-referral/">https://www.westmercia.police.uk/advice/advice-and-information/t/prevent/prevent/alpha/prevent-referral/</a>
DfE dedicated helpline and mailbox for non-emergency advice for staff and governors, regarding radicalisation of children	020 7340 7264 <a href="mailto:Counter.extremism@education.gov.uk">Counter.extremism@education.gov.uk</a>

To submit an online referral to Children's Social Care please visit:  
<https://www.worcestershire.gov.uk/childrens-social-care/refer-childrens-social-care>

Police guidance on when schools should call the police is available [here](#).

## **SUMMARY OF KEY POLICY CHANGES**

These are the key changes in the September 2024 version of the policy, compared to the version dated January 2024.

- Changes to reflect the updated version of Keeping Children Safe in Education 2024 including:
  - a reminder to staff that 'children' includes everyone under the age of 18 in section 1
  - a definition of safeguarding in section 1
  - additional guidance on triggers for early help in section 10: supporting children
  - additional guidance to the definition of abuse and neglect in section 25
  - additional guidance to staff obligations in section 4
  - additional link to government guidance on data protection in section 6
  - one additional responsibility for the Governing Board regarding pupils educated with an alternative provision provider
  - additional guidance to DSLs on record keeping
  - additional links to NSPCC Learning in section 39
  - a new section 46 giving advice on children who are lesbian, gay, bisexual, or gender questioning
  - additional guidance to section 31 regarding early help
  - additional guidance on EYFS settings and devices with imagery and video sharing capabilities
  - comprehensive updates to section 36 and 37 regarding online safety
  
- Guidance on suicidal ideation

## CONTENTS

1. Introduction.....	5
2. Procedures.....	7
3. Responsibilities .....	8
4. Staff obligations.....	12
5. Training .....	12
6. Managing concerns .....	13
7. Information sharing and confidentiality .....	14
8. Communication with parents.....	15
9. Record keeping.....	16
10. Supporting children.....	16
11. Supporting and supervision of staff .....	17
12. Safer recruitment and selection of staff .....	18
13. Allegations against staff .....	20
14. Whistleblowing .....	27
15. Complaints or concerns expressed by pupils, parents, staff or volunteers.....	28
16. Positive physical intervention and the use of reasonable force.....	28
17. Abuse of position of trust.....	28
18. Photography and use of images (including mobile devices) .....	28
19. Staff/pupil relationships.....	29
20. Guidelines for staff in relation to pupils' boarding houses.....	30
21. Health and safety .....	32
22. Safe environment.....	32
23. Challenge and escalation .....	32
24. Monitoring and evaluation.....	32
25. Definition, recognition and identification of abuse and neglect. ....	33
26. Contextual safeguarding.....	39
27. Mental health .....	39
28. Children missing education (CME) .....	42
29. Private fostering arrangements.....	43
30. Homelessness .....	43
31. Child-on-child abuse (including sexual violence and sexual harassment).....	44
32. Modern slavery.....	45
33. Extremism and radicalisation .....	45
34. Racist incidents.....	46
35. Anti-bullying .....	46
36. Online safety.....	46
37. Cybercrime.....	51
38. Looked after children and previously looked after children .....	51
39. Children with additional vulnerabilities.....	51
40. Child sexual exploitation (CSE) and child criminal exploitation (CCE).....	52
41. Domestic abuse .....	55
42. Honour-based abuse.....	59
43. Sharing consensual or non-consensual nudes or semi-nudes (sexting) .....	65
44. Children and the justice system.....	69
45. Child abduction and community safety incidents .....	69
46. Children who are lesbian, gay, bisexual, or gender questioning .....	70
Appendix 1: Logging a concern .....	71
Appendix 2: Form 1 .....	72
Appendix 3: actions where there are concerns about a child.....	75
Appendix 4: Job descriptions for the roles of the Designated Safeguarding Lead (DSL), Senior DSL and Deputy Designated Safeguarding Leads (DDSL) .....	76

## 1. INTRODUCTION

Bromsgrove School fully recognises its moral and statutory responsibilities for safeguarding and promoting the welfare of children. 'Children' includes everyone under the age of 18.

Keeping Children Safe in Education 2024 defines safeguarding as:

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing the 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
- taking action to enable all children to have the best outcomes.

At Bromsgrove School we are committed to safeguarding children and we expect everyone who works in our school to share this commitment. Adults in our school take all welfare concerns seriously and encourage children and young people to talk to us about anything that worries them. We will always act in the best interest of the child and take action to enable all children to have the best outcomes.

The School's duty is to ensure that safeguarding permeates all activity and functions. This policy therefore adheres to the statutory guidance Keeping Children Safe in Education (Department for Education, current version September 2024), and complements and supports other policies and documents including:

- Staff Codes of Conduct
- Whistleblowing Policy
- Low-Level Concerns Policy
- Concerns and Complaints Policy
- Supervision of Pupils Policy and associated procedures
- Attendance Policy
- Pupil Conduct and Behaviour Policy
- Anti-Bullying Policies
- Child-on-Child Abuse Policy
- Preventing Extremism and Radicalisation Policy
- Physical Intervention Policy
- Special Educational Needs and Disability (SEND) Policy
- Educational Visits Policy
- First Aid Policy
- Administration of Medicines Policy
- Health and Safety Policy
- Personal, Social, Health and Economic Education (PSHE) Policies
- Relationships and Sex Education Policies
- Photography and Video Policy
- Equal Opportunities Policy
- Acceptable Use of IT and e-safety documents
- Whistleblowing Policy
- Intimate Care Policies
- Visiting Speakers Policy
- Changing Room Policy
- Swimming Pool Child Handling Policy
- Access to Premises Policy
- Wellbeing and Mental Health Policy

The above list is not exhaustive. When undertaking development or planning of any kind the School will need to consider safeguarding matters.

This policy has regard to the following legislation and guidance:

- Section 175 of the Education Act 2002, which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- Keeping Children Safe in Education September 2024  
<https://www.gov.uk/government/publications/keeping-children-safe-in-education-2>
- The School Staffing (England) Regulations 2009, which set out what must be recorded on the single central record and the requirement for at least one person on a school interview/appointment panel to be trained in safer recruitment techniques
- Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- The Children Acts 1989 and 2004, which provide a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children
- Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- Charity Commission guidance on charity and trustee duties to safeguard children  
<https://www.gov.uk/guidance/safeguarding-for-charities-and-trustees>
- West Midlands Child Protection and Safeguarding Procedures manual  
<https://westmidlands.procedures.org.uk/>
- West Mercia Consortium inter-agency procedures and the WSCP [Levels of Need Guidance](#).
- DfE statutory guidance '[Relationships education, relationships and sex education \(RSE\) and health education](#)' July 2019
- the Teachers' Standards 2021 [Teachers' standards - GOV.UK \(www.gov.uk\)](#)
- Working Together to Safeguard Children 2023.

This policy applies to all staff, governors and volunteers and working in the School and to visitors.

There are five main elements to our policy:

- ensuring we practice safer recruitment in checking the suitability of staff and volunteers to work with children
- raising awareness of child protection issues and equipping children with the skills needed to keep them safe, i.e. teaching them when to recognise when they are at risk and how to get help when they need it
- developing and then implementing procedures for identifying and reporting cases, or suspected cases, of abuse
- supporting pupils who have been identified as in need of early help or at risk of harm in accordance with his/her agreed Child Protection, Child in Need or Early Help plan
- establishing a safe environment in which children can learn and develop.

We recognise that because of the day-to-day contact with children, School staff are well placed to identify concerns early and to observe the outward signs of abuse. The School will therefore:

- establish and maintain an environment where children feel safe, secure, valued and respected and are encouraged to talk, believing they will be listened to

- ensure children know that there are adults in the School whom they can approach if they are worried or are in difficulty
- include in the curriculum activities and opportunities, specifically through PSHE and ICT, which equip children with the skills they need to recognise and stay safe from abuse (including online) and to know whom they should turn to for help
- operate safer recruitment procedures and make sure that all appropriate checks are carried out on new staff and volunteers who will work with children including identity, right to work, enhanced DBS criminal record and barred list (and overseas where needed), references and prohibition from teaching or managing in schools (s. 128).

We seek to ensure that the child's wishes and feelings are taken into account when determining what action to take and what services to provide to protect children from harm. To this end, we will:

- ensure there are systems in place for children to express their views and give feedback e.g. through School/class councils, safety questionnaires, participation in anti-bullying and online safety events
- ensure that the child's thoughts/wishes and feelings are sought and recorded on all referrals.

## **2. PROCEDURES**

We adhere to child protection procedures that have been agreed locally through the Worcestershire Safeguarding Children Partnership (WSCP) <https://www.safeguardingworcestershire.org.uk> and take account of guidance issued by the Department for Education (DfE).

Schools have a pivotal role to play in multi-agency safeguarding arrangements. The School not only contributes to multi-agency working in line with statutory guidance [Working Together to Safeguard Children 2023](#), but also understands our role in the three safeguarding partner arrangements. Locally, the three safeguarding partners make arrangements to work together with appropriate relevant agencies to safeguard and promote the welfare of local children including identifying and responding to their needs.

The School will:

- ensure there is a Designated Safeguarding Lead (DSL) in each School, who will undertake regular and appropriate training and support for this role
- ensure there is a designated member of staff with responsibility for safeguarding children within the Early Years Foundation Stage (EYFS)
- ensure there are suitably trained members of staff who will act in the absence of the DSL
- ensure it has a nominated governor who will take leadership responsibility for the School's safeguarding arrangements; (names of the individuals referred to above are listed on page 1 of this policy)
- ensure every member of staff (including temporary and supply staff and volunteers) and the governing body knows the name of the DSL and any deputies and understands their role
- ensure that the DSL and/or a deputy DSL is always available to speak to during School hours and has made adequate and appropriate cover arrangements for any out of hours/out of term time activities
- ensure all staff and volunteers are alert to the potential need for early help/intervention and aware of those children whose vulnerabilities may indicate a greater need and are aware of the role they may play in supporting other agencies and professionals in an early help assessment
- ensure all staff and volunteers understand their responsibilities in being alert to the signs of abuse and neglect, including the specific issues of Female Genital Mutilation (FGM), Child Sexual Exploitation (CSE), Child Criminal Exploitation, Children Missing Education (CME) and Radicalisation and Extremism (Prevent), Child-on-Child abuse, and Sexual Violence and Sexual Harassment, and maintain an attitude of 'it could happen here'
- ensure all staff and volunteers understand their responsibility for referring any concerns to the DSL or Headmasters of the Senior or Preparatory School, or Headmistress of Winterfold School, or other members of the senior leadership team, in a timely manner and are aware that they may



raise concerns directly with Children's Social Care Services if they believe their concerns have not been listened to or acted upon

- report immediately to Children's Social Care Services any children who have suffered or are likely to suffer significant harm. The School will work with external agencies in line with procedures set out by the Worcestershire Safeguarding Children Partnership (WSCP) and take account of guidance issued by the Department of Education (DfE) to support children who are in need of additional support. The School will act to promote the welfare of a child in need of additional support, even if they are not suffering harm or are not at immediate risk
- ensure that parents have an understanding of the responsibility placed on the School and staff for child protection by setting out its obligations in the School prospectus and publishing its policy on the School website
- notify Worcestershire Children's Services Family Front Door if there is an unexplained absence of more than two days of a pupil who is subject to a child protection plan
- operate a lettings policy which ensures the suitability of adults working with children on School sites at any time
- ensure that community users organising activities for children are aware of, and understand the need for compliance with the School's child protection guidelines and procedures
- develop effective links with relevant agencies and co-operate as required with their enquiries regarding safeguarding matters including attendance at strategy meetings, initial case conference, core groups and child in need review meetings
- ensure that the duty of care towards its pupils and staff is promoted by raising awareness of illegal, unsafe and unwise behaviour and assist staff to monitor their own standards and practice;
- ensure that all staff and volunteers feel able to raise concerns about poor or unsafe practice and are aware of whistleblowing procedures and helplines
- keep written records of concerns about children, even where there is no need to refer the matter immediately
- ensure all child protection records are kept securely, separate from the main pupil file, and in locked locations
- ensure that all child protection files are transferred in a safe and timely manner when a child moves schools
- be aware of and follow procedures set out by the DfE and the WSCP where an allegation of abuse is made against a member of staff or volunteer, including making a referral to the Local Authority Designated Officer (LADO)
- ensure that a referral is made to the DBS and/or the Teaching Regulation Agency if a person in regulated activity has been dismissed or suspended or removed from regulated activity where the harm criteria is met, or would have been had they not resigned
- operate safer recruitment practice, ensuring that at least one member on every recruitment panel has completed safer recruitment training
- ensure that the appropriate training in Safeguarding is provided to the Governing Body and appropriate members of staff within all four Schools
- ensure that the Governing Body undertake an annual review of the School's child protection policies and procedures and of the efficiency with which the related duties have been discharged in accordance with current legislation
- ensure that procedures will be reviewed and updated at least annually, unless an incident, new legislation or guidance requires the need for an interim review. We recognise the expertise our staff builds by undertaking safeguarding training and managing safeguarding concerns on a daily basis. We therefore invite staff to contribute to and shape this policy and associated safeguarding arrangements.

### **3. RESPONSIBILITIES**

#### **The Governing Body**

The Governing Body will nominate a member to take leadership responsibility for safeguarding children who will liaise with the DSL and/or Headmaster in matters relating to safeguarding. It will ensure that:

- the Safeguarding Children (including Child Protection) Policy, procedures, and training are effective and comply with the law
- the Safeguarding (including Child Protection) Policy is reviewed at least annually, and in the event of new guidance or a significant incident, and made available publicly
- the Staff Code of Professional Conduct, and the Support Staff Code of Conduct is in place and updated annually
- Governors receive appropriate safeguarding and child protection training at induction, equipping them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place are effective and robust
- the School operates safer recruitment practices, including the appropriate use of references and checks on new staff and volunteers
- the Headmaster, a nominated Governor, and other staff involved in the recruitment process have undertaken Safer Recruitment Training
- procedures are in place for dealing with allegations of abuse against members of staff and volunteers
- there is a whole school approach to safeguarding and processes and procedures operate within the best interests of the child
- the DSL takes lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place) and does not delegate this responsibility
- the DSL and deputy DSL role is explicit in the role holders' job descriptions
- the DSLs and deputies undertake effective DSL training, refreshed every two years, and update their knowledge and skills at regular intervals
- the DSL has the appropriate status and authority within the School to carry out the duties of the post. (The role carries a significant level of responsibility and the postholder should be given the additional time, funding, training, resources, and support needed to carry out the role effectively.)
- that all staff and volunteers receive safeguarding and child protection training. (This will include reference to FGM, Prevent, Child Exploitation and online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring at induction. The training should be updated when guidance changes and at least annually. Induction and training should be in line with any advice from the safeguarding partners.)
- all staff and volunteers are made aware of the School's arrangements for child protection and their responsibilities
- deficiencies or weaknesses in these arrangements are brought to the attention of the Governing body and rectified without delay
- the Chair of Governors (or in the absence of the Chair, the Vice Chair) deals with any allegation of abuse made against the Headmaster, with advice and guidance from the LADO
- the Chair of the Safeguarding and Wellbeing Committee liaises regularly with the Senior DSL regarding safeguarding and child protection issues
- safeguarding responses are put in place in cases where children go missing from education
- mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in Part one of Keeping Children Safe in Education
- the School contributes to inter-agency working in line with statutory guidance "Working Together to Safeguard Children" 2023, including an offer of Early Help for children who require this
- safeguarding arrangements take into account the procedures and practice of the Worcestershire Safeguarding Children Partnership (WCSP)
- termly reports on the effectiveness of the School's safeguarding procedures are presented to the governing body
- any returns requested by the LA/WSCP (e.g. s 175/157 audit, CSE audit) are completed in a timely manner to enable the WSCP to meet its statutory duties
- it complies with all legislative duties, including the duty to report suspected or known cases of FGM and the duty to prevent young people from being drawn into terrorism. In conjunction with the Headmaster and DSL, they will assess the level of risk with the School and put actions in place to reduce that risk

- relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the UK GDPR, and referred to in KCSIE 2024 sections 117 to 119
- children are taught about safeguarding, including online safety, as part of a broad and balanced curriculum
- the filtering and monitoring systems in the School, which are informed in part, by the risk assessment required by the Prevent Duty, are appropriate. (The Department for Education has published filtering and monitoring standards which set out that schools should identify and assign roles and responsibilities to manage filtering and monitoring systems, review filtering and monitoring provision at least annually, block harmful and inappropriate content without unreasonably impacting teaching and learning and have effective monitoring strategies in place that meet their safeguarding needs.)
- it is aware of the additional risk of harm to pupils placed with an alternative provision provider, and recognise that the School is responsible for the safeguarding of that pupil and should be satisfied that the placement meets the pupil's needs. [Education for children with health needs who cannot attend school - GOV.UK \(www.gov.uk\)](http://www.gov.uk/guidance/education-for-children-with-health-needs-who-cannot-attend-school) provides further guidance.

### **The Headmaster**

The Headmaster will ensure that:

- the Safeguarding policies and procedures are fully implemented and followed by all staff
- sufficient funding, support, time and resources are allocated to enable the DSL and other staff to discharge their responsibilities with regard to child protection
- all staff feel able to raise concerns about poor or unsafe practice and that these are handled sensitively and in accordance with the whistleblowing procedures. The NSPCC whistle blowing helpline number is also available (0800 028 0285)
- all allegations of abuse against staff are reported to the LADO in a timely manner
- all staff are made aware that they have an individual responsibility to pass on safeguarding concerns and if all else fails, to report these directly to Children's Social Care (Children's Services) or the Police.

### **The Designated Safeguarding Leads**

The DSLs will co-ordinate action on safeguarding and promoting the welfare of children within their own School setting. The DSL will be a member of the School's senior leadership team or hold an equivalent position of status and authority. The DSLs are responsible for:

- leading child protection induction training and whole staff training, as required
- providing a mechanism to ensure that all staff understand and are able to discharge their role and responsibilities as set out in Part one of Keeping Children Safe in Education
- making use of the [Worcestershire Children First \(WCF\) Levels of Need Guidance](http://www.worcestershire.gov.uk/earlyhelp) when making a decision about whether or not the threshold for Early Help or Children's Social Care intervention is met. Informal advice on borderline cases and as required will be sought from an adviser at the Family Front Door or at [www.worcestershire.gov.uk/earlyhelp](http://www.worcestershire.gov.uk/earlyhelp). the UK Government online tool [Report Child Abuse to Your Local Council](http://www.gov.uk/guidance/report-child-abuse-to-your-local-council) directs a person to the relevant local children's social care contact number
- referring a child to the Family Front Door when there are concerns about possible abuse and neglect. The DSL will contact the police in the case of serious harm in line with [Working Together to Safeguard Children](http://www.nspcc.org.uk/keeping-children-safe-in-education/working-together-to-safeguard-children). The NPCC's document '[When to call the police](http://www.nspcc.org.uk/keeping-children-safe-in-education/when-to-call-the-police)' should help DSLs understand when they should consider calling the police and what to expect when they do
- referring a child to the Channel Panel promptly when there are concerns about possible radicalisation or involvement in extremist groups
- liaising with the Headmaster/Headmistress to ensure he/she is informed of all child protection issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations
- liaising with other staff (for example pastoral support staff, School nurses or counsellors, teachers of ICT, Heads of Curriculum Support [SEND] and the Looked After Children Co-ordinator) and the

School's IT support contractor on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies

- keeping detailed, accurate, secure written records of all concerns, discussions and decisions made about children, including the use of body maps, and rationales for decision making, even where there is no need to refer the matter immediately. Note staff must only view parts of a child's body which are normally visible
- help promote educational outcomes by sharing information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and School leadership staff
- ensuring all child protection records are kept securely, separate from the main pupil file, and in locked/password protected locations
- ensuring that all child protection files are transferred in a safe and timely manner when a child moves settings, both between and across phases, within and out of county and that a receipt of transfer is obtained
- notifying the key worker if there is an unexplained absence of more than two days of a pupil who is subject to a child protection plan
- monitoring unauthorised absence, particularly where children go missing on repeated occasions, reporting concerns in-line with the Schools' Missing Child Policies
- developing effective links with relevant agencies and other professionals and co-operate as required with their enquiries regarding safeguarding matters including co-operation with serious case reviews, attendance at strategy meetings, initial and review child protection conferences, core group and child in need review meetings
- contributing to assessments and providing a report to initial and review conferences which has been shared with parents first, whenever possible
- co-ordinating a programme of safety, health and well-being through the curriculum, including issues of protective behaviours, healthy relationships, staying safe online, and the active promotion of fundamental British values
- acting as a source of support, advice and expertise for all staff
- assisting the Senior DSL with an annual audit and any returns requested by the LA/WSCP (e.g. section 175/157 audit, CSE audit) are completed in a timely manner to enable the WSCP to meet its statutory duties.

The job description for the Designated Safeguarding Leads and Deputies is in Appendix 5.

### **The Senior DSL**

The Senior DSL will:

- be responsible for child protection induction training for newly appointed staff
- coordinate DSL and DDSL training to provide them with the knowledge and skills to carry out the role
- co-ordinate action on safeguarding and promoting the welfare of children across all the Schools
- work with the individual DSLs and the safeguarding team attending the weekly safeguarding meetings
- co-ordinate any returns requested by the LA/WSCP (e.g. section 175/157 audit, CSE audit) ensuring they are completed in a timely manner to enable the WSCP to meet its statutory duties;
- update the Safeguarding Children policy
- liaise with the Chair of Governors about all safeguarding changes to the policy
- collate the information required for termly Safeguarding and Welfare Committee meetings
- advise DSLs regarding whole school Induction presentation providing updates when necessary
- liaise with the Information Systems Manager regarding online systems for areas of compliance in safeguarding matters
- assist in the delivery of annual Governor safeguarding training.

#### **4. STAFF OBLIGATIONS**

All staff, including full time, part time, temporary and permanent members of staff, and volunteers, must adhere to the School's relevant staff code of conduct. Copies of these documents are available on NETconsent. Staff are obliged to keep the School informed of any reason why they should not work with children.

All staff should have an awareness of safeguarding issues that can put children at risk of harm, including behaviours linked to issues such as drug taking and/or alcohol misuse, unexplainable and/or persistent absences from education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nudes and semi-nude images and/or videos.

Staff should be mindful of the need to consider safeguarding arrangements where children are engaged in close one to one teaching, particularly in performing arts and sports activities. Specific guidance can be provided on a case-by-case basis by consulting with the DSL or Headmaster as required.

#### **5. TRAINING**

On joining Bromsgrove School, all staff volunteers and Governors will be informed of the safeguarding children arrangements in place. They are provided with access to this policy, the School's safeguarding response to children who go missing from education (within the Supervision of Pupils Policy), the Pupil Conduct and Behaviour Policy, part 1 and Annex B of Keeping Children Safe in Education (or Annex A for those who do not work directly with children), and the School's staff codes of conduct. They will be told who the DSL is, who acts in their absence and what this role includes.

The School uses online systems for the dissemination and acknowledgement of documentation such as KCSIE and School policies, and to support related training. Records from these systems are tracked and collated centrally.

The induction programme will include basic safeguarding information relating to signs and symptoms of abuse, how to manage a disclosure from a child, when and how to record a concern about the welfare of a child, and advice on safe working practice. All staff should be able to reassure victims that they are being taken seriously and they will be supported and kept safe. A victim should never be given the impression they are creating a problem by reporting abuse, sexual violence or sexual harassment, nor should a victim ever be made to feel ashamed for making a report.

All volunteers, supply staff and regular visitors to the School will be told where this policy is kept, given the name of the DSL and deputies, and informed of the School's procedures in reporting concerns.

All staff will receive training in child protection and safe working practice, updated at least every two years, in line with the WSCP training strategy. Training will include signs and symptoms of abuse and neglect, as well as specific safeguarding issues, such as CSE, FGM, Prevent, on-line safety and child-on-child abuse, including sexting and sexual violence and sexual harassment. Training will also include how to record and report abuse both within School and to Children's Social Care.

All staff will receive online safety training which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring.

Staff will receive safeguarding and child protection updates (including relating to online safety) from the DSL as required, for example through half termly 7 Minute Briefings, but at least annually.

Staff with specific responsibility for safeguarding children i.e. all DSLs and Deputy DSLs, will undertake both single and inter-agency training at a level suitable to their role and responsibility, updated at least every two years. In addition to formal training the DSL and deputies will update their knowledge and skills via WSCP newsletters, briefings, network meetings and seminars, at regular intervals, at least annually.

Staff with leadership responsibilities will undertake further relevant training in safeguarding related issues such as CSE, Radicalisation (WRAP Training), Sexual Violence and Sexual Harassment, Management of Allegations of Abuse and cascade the learning from this training to the rest of the staff.

## Senior Pupils

Senior Pupils, as detailed below, need to be aware of the need to report allegations or suspicions of child abuse to the DSL. Children often tell other young people, rather than staff or adults, about abuse. All those holding positions of responsibility in the Senior School (e.g. Monitors) are briefed on safeguarding procedures.

## 6. MANAGING CONCERNS

a) Teachers and other staff in schools are in a unique position to observe children's behaviour over time and often develop close and trusting relationships with pupils. If a child discloses directly to a member of staff, the following advice to staff will be followed:

- listen carefully to what is said
- do not promise confidentiality
- ask only open questions such as:
  - "Could you tell me what happened?"
  - "Please explain what you mean when you say...?"
  - "Can you describe the person?" or "Can you describe the place?"
- do not ask questions which may be considered to suggest what might have happened, or who has perpetrated the abuse, e.g. 'Did your Dad hit you?'
- do not force the child to repeat what he/she said in front of another person.

b) Do not begin an investigation – for example by asking the child to record what happened in writing or taking a photograph of any injuries. Concerns should be recorded electronically on MyConcern, or if needed, on Form 1 (see appendix) with visible injuries noted on a body map (available on NETconsent under Safeguarding). Photographs of bruising or injuries should not be taken.

c) Bromsgrove School adheres to child protection procedures that have been agreed locally through the WSCP (<https://www.safeguardingworcestershire.org.uk/>). Where we identify children and families in need of support, we will carry out our responsibilities in accordance with the [West Midlands Safeguarding Procedures](#) and the [WSCP Levels of Need Guidance](#). Early Help may be offered directly through school provision or via referral to an external support agency. Safeguarding arrangements take into account the procedures and practice of the local authority and the WSCP.

d) Every member of staff, including volunteers working with children at our School, is advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the interests of the child and have a responsibility to take action as outlined in this policy. They should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. This advice includes the seven golden rules for sharing information and considerations with regard to the Data Protection Act 2018 and UK General Data Protection Regulation (UK GDPR). In addition, the DfE Data Protection Guidance for schools [Data protection in schools - Guidance - GOV.UK \(www.gov.uk\)](#) can help staff and governors understand how to comply with data protection law, develop data policies and processes, know what staff and pupil data to keep, and follow good practices for preventing personal data breaches. If in any doubt about sharing information, staff should speak to the DSL or a deputy. 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.

e) All staff are encouraged to report any concerns that they have and not see these as insignificant. On occasions, a referral is justified by a single incident such as an injury or disclosure of abuse. More often however, concerns accumulate over a period of time and are evidenced by building up a picture of harm over time; this is particularly true in cases of emotional abuse and neglect. In these circumstances, it is crucial that staff record and pass on concerns in accordance with this policy to allow the DSL to build up a picture and access support for the child at the earliest opportunity. A reliance on memory without accurate and contemporaneous records of concern could lead to a failure to protect.

f) It is not the responsibility of School staff to investigate welfare concerns or determine the truth of any disclosure or allegation. All staff, however, have a duty to recognise concerns and pass the information on in accordance with the procedures outlined in this policy.

g) The Designated Safeguarding Lead (DSL) should be used as a first point of contact for concerns and queries regarding any safeguarding concern in our School. Any member of staff or visitor to the School who receives a disclosure of abuse or suspects that a child is at risk of harm must report it immediately to the DSL or, if unavailable, to a Deputy DSL. In the absence of either of the above, the matter should be brought to the attention of the most senior member of staff or Children's Social Care.

**h) All concerns about a child or young person should be reported without delay and recorded using MyConcern or if necessary using the written Form (see Appendix).**

i) Following receipt of any information raising concern, the DSL will consider what action to take and seek advice from Children's Services as required. All information and actions taken, including the reasons for any decisions made, will be fully documented.

j) All referrals will be made in line with [local procedures](#) as detailed on the [Worcestershire Children First website](#).

k) If, at any point, a child has suffered significant harm or is likely to suffer significant harm, a referral should be made to Children's Services immediately. Anybody can make a referral. If the child's situation does not appear to be improving the staff member with concerns should press for re-consideration by raising concerns again with the DSL and/or the Head. Concerns should always lead to help for the child at some point.

l) If a child who is in need of additional support would benefit from early help, each section of the School will use its own early help provisions in conjunction with the Worcestershire early help offer that highlights services available. The early help pathway details the approach professionals in Worcestershire use to respond to the emerging needs of the children, young people and families they are working with.

m) Staff should always follow the reporting procedures outlined in this policy in the first instance. At all stages, staff should keep the child's circumstances under review (involving the DSL, or deputies, as required) and re-refer if appropriate, to ensure the child's circumstances improve – the child's best interest must always come first. However, they may also share information directly with Children's Services, or the police if:

- the situation is an emergency and the designated senior person, their deputy and the Head are all unavailable
- they are convinced that a direct report is the only way to ensure the pupil's safety.

n) Any member of staff who does not feel that concerns about a child have been responded to appropriately and in accordance with the procedures outlined in this policy should raise their concerns with the Head or the Chair of Governors. If any member of staff does not feel the situation has been addressed appropriately at this point they should contact Children's Services directly with their concerns.

o) Parental consent is not required to make a referral.

Please see the flowchart in appendix 3 for an illustration of the actions to be taken where there is a concern about a child.

## **7. INFORMATION SHARING AND CONFIDENTIALITY**

Information sharing is vital in identifying and tackling all forms of abuse. Staff are proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to Children's social care. The arrangements in place set out the processes and principles for

sharing information within the School and with WCF children's social care, the safeguarding partners, and other organisations, agencies or practitioners as required.

- All personal information will be processed fairly and lawfully in line with our duties under legislation and government guidance. The School is aware of the updated Government non-statutory guidance [Information Sharing: advice for practitioners providing safeguarding services](#) (DfE, May 2024).
- Staff will have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the UK GDPR, and referred to in KCSIE 2024 section 118. For example:
  - safeguarding of children at risk allows practitioners to share information without consent where there is a good reason to do so under certain circumstances, for example where the failure to do so would result in a child being placed at risk of harm
  - a child's data would be withheld in response to a subject access request if there was a risk of serious harm.

We recognise that all matters relating to child protection are confidential.

The DSL and other senior staff will disclose any information about a pupil to other members of staff on a need to know basis only. Information sharing should be with the right people between and within agencies, and use appropriately secure channels.

All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children.

All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or well-being. Staff must be mindful that early information sharing is vital for the effective identification, assessment and allocation of appropriate service provision, whether this is when problems first emerge, or where a child is already known to local authority children's social care.

Keeping Children Safe in Education (2024), paragraph 119 states: 'The Data Protection Act 2018 and UK 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 safeguard and promote the welfare and protect the safety of children.'

When a child about whom concerns have been raised and/or recorded leaves the School, the safeguarding records are also transferred either via MyConcern or other secure means. Records will be transferred separately from other records, to the DSL in the receiving educational setting, within 5 days for an in-year transfer or within the first 5 days of the start of a new term, to allow the new school to have support in place for when the child arrives. Confirmation of receipt will be obtained.

The Governors of Bromsgrove School take a proportionate risk-based approach to the level of information that is provided to temporary staff, volunteers, and contractors.

## **8. COMMUNICATION WITH PARENTS**

- We recognise that good communication with parents is crucial in order to safeguard and promote the welfare of children effectively.
- We will undertake appropriate discussion with parents prior to formal involvement of another agency unless to do so could place the child or an adult at further risk of harm or could impede a criminal investigation.
- We will ensure that parents have an understanding of the responsibilities placed on the School and staff to safeguard children and their duty to co-operate with other agencies in this respect.
- Parental consent is not required to make a referral.



## 9. RECORD KEEPING

- Any member of staff receiving a disclosure of abuse from a child or young person, or noticing signs or symptoms of possible abuse, will make notes as soon as possible (within the hour, if possible) writing down exactly what was said, using the child's own words as far as possible. All notes should be timed, dated and signed, with name printed alongside the signature. Concerns will be recorded using the School's safeguarding children recording system.
- Records should include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved and a note of any action taken, decision reached and the outcome.
- All records of a child protection nature will be passed to the DSL including case conference or core group minutes, child protection plans and written records of any concerns. Child protection records are kept securely under lock and key or password protected, with only appropriate persons having access to them.
- Any referrals made to other agencies, including referrals to Children's Social Care, will be copied prior to sending, and stored in the child's child protection file.
- The DSL will maintain and regularly audit the School's child protection records, ensuring that each stand-alone file includes a chronology of significant events and that information and contact details are accurate and up-to-date.
- The DSL may copy child protection records generated by the School prior to transfer and retain for as long as is necessary (normally date of birth plus 25 years), where there is justification for believing that the records may be required as evidence of the School's involvement with the child for statutory purposes (e.g. court cases or serious case reviews). When the records are no longer required, they will be securely disposed of.
- A record of low level concerns and allegations against staff is kept in a confidential file by the Headmaster.

## 10. SUPPORTING CHILDREN

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

We act immediately when concerned for a child's welfare, follow this safeguarding policy and communicate with the DSL.

Options then include:

- Managing support for the child internally via the School's early help offer
- Undertaking an early help assessment via children's social care
- Marking a referral to child statutory services as the child might be in need, is suffering harm, or is likely to suffer harm.

The School's early help offer includes but is not limited to:

- the 'Where do I turn?' advice booklet
- the houses' pastoral teams
- qualified mental health first aiders
- a director of wellbeing based in the wellbeing hub
- a wellbeing nurse based in the wellbeing hub
- qualified nurses in the health centre
- a school counsellor based in the health centre
- a psychotherapist based in the health centre
- a youth support worker based in the centre.

Any child may benefit from early help, but all staff should be particularly alert to the potential need for early help for a child who:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health, and Care plan)
- has a mental health need
- is a young carer
- is showing signs of being drawn into anti-social or criminal behaviour, including involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from education, home, or care
- has experienced multiple suspensions, is at risk of being permanently excluded from the School, and in Alternative Provision or a Pupil Referral Unit
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- is at risk of being radicalised or exploited
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- is at risk of so-called 'honour-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child.

We recognise that children who are abused or witness violence may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation and some sense of blame. We acknowledge that school may be the only stable, secure and predictable element in the lives of children who have been abused or who are at risk of harm. We are aware that research shows that at School their behaviour may be challenging and defiant or they may be withdrawn.

The School will endeavour to support all children by:

- encouraging self-esteem and self-assertiveness through the curriculum, as well as promoting respectful relationships, challenging bullying and humiliating behaviour
- promoting a positive, supportive and secure environment giving pupils a sense of being valued
- a consistently applied School behaviour policy which is aimed at supporting vulnerable pupils
- ensuring that children know that some behaviour is unacceptable but that they are valued and not to be blamed for any abuse which has occurred. All staff should be able to reassure victims that they are being taken seriously and they will be supported and kept safe. A victim should never be given the impression they are creating a problem by reporting abuse, sexual violence or sexual harassment, nor should a victim ever be made to feel ashamed for making a report
- liaising with other agencies that support the pupil such as Children's Social Care Services, Child and Adolescent Mental Health Service (CAMHS), Educational Psychology Service and those agencies involved in the safeguarding of children
- the use of Early Help Services, through the Family Front Door, when appropriate
- notifying Children's Social Care Services immediately there is a significant concern
- providing continuing support to a child about whom there have been concerns who leaves the School by ensuring that appropriate information is forwarded under confidential cover to the child's new setting.

## **11. SUPPORTING AND SUPERVISION OF STAFF**

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

We will support such staff by providing an opportunity to talk through their anxieties with the DSL and to seek further support such as counselling or regular supervision, as appropriate.

We will enable supervision for the DSL through network meetings, direct consultation with the Safeguarding in Education Adviser or Consultant Social Workers in order to promote best practice and challenge unsatisfactory or poor practice.

In order to reduce the risk of allegations being made against staff, and ensure that staff are competent, confident and safe to work with children, they will be made aware of safer working practice guidance and will be given opportunities in training to develop their understanding of what constitutes safe and unsafe behaviour.

## **12. SAFER RECRUITMENT AND SELECTION OF STAFF**

The School has a written recruitment and selection policy statement and procedures linking explicitly to this policy. The statement is included in all job advertisements, publicity material, recruitment websites, and candidate information packs.

The recruitment process is robust in seeking to establish the commitment of candidates to support the School's measures to safeguard children and to identify, deter or reject people who might pose a risk of harm to children or are otherwise unsuited to work with them.

**Regulated activity** means a person who will be:

- responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children
- carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children
- engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not.

Any member of staff working in regulated activity prior to receipt of a satisfactory DBS check will not be left unsupervised and will be subject to a risk assessment.

Staff who provide early years or later years childcare and any managers of such childcare are covered by the disqualification regulations of the Childcare Act 2006 and are required to declare relevant information - see statutory guidance: Disqualification under the Childcare Act 2006 (as amended August 2018).

### **Appointing new staff**

When appointing new staff, we will:

- verify their identity
- obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will not keep a copy of this for longer than 6 months
- obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- verify their mental and physical fitness to carry out their work responsibilities
- verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and retain it according to the School's Information and Records Retention Policy
- verify their professional qualifications, as appropriate
- ensure they are not subject to a prohibition order if they are employed to be a teacher
- carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK, including (where relevant) any teacher sanctions or restrictions imposed by a European Economic Area professional regulating authority, and criminal records checks or their equivalent
- check that candidates taking up a management position are not subject to a prohibition from management (section 128) direction made by the Secretary of State
- ask for written information about previous employment history and check that information is not contradictory or incomplete.

Staff and volunteers who provide early years or later years childcare and managers of such childcare are covered by the [disqualification regulations of the Childcare Act 2006](#) and are required to declare relevant information.

In addition, we will carry out an online search as part of our due diligence on shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which we might want to explore with the applicant at interview. We will inform candidates that online searches may be done as part of due diligence checks.

References are requested and scrutinised for all candidates prior to interview and any discrepancies or concerns are raised and discussed during interview, including for any volunteers and internal candidates. References are always requested directly from the referee and verified as being from a senior person with appropriate authority; electronic references are checked to ensure they originate from a legitimate source. Where specific questions have not been answered satisfactorily or insufficient information is provided, the referee will be contacted directly for further clarification. Where references are not forthcoming, despite reminders, the candidate will be asked to provide an alternative referee.

Interviews are used to explore potential areas of concern and to determine the applicant's suitability to work with children. Areas that may be concerning and lead to further probing include:

- implication that adults and children are equal
- lack of recognition and/or understanding of the vulnerability of children
- inappropriate idealisation of children
- inadequate understanding of appropriate boundaries between adults and children
- indicators of negative safeguarding behaviours.

The same checks are carried out for new staff who have lived or worked outside the UK, even if they have never been to the UK. In addition, the School will make further checks as appropriate so any relevant event that occurred outside the UK can be considered.

### **Existing staff**

All staff working within the School who have substantial access to children have been checked as to their suitability, including verification of their identity, qualifications and a satisfactory barred list check, enhanced DBS check and a right to work in the UK. All staff annually will sign a self-declaration form regarding their suitability to work with children.

All teachers working within the School have been checked using the [Teacher Services website](#) to ensure they have been awarded QTS, they have completed their teacher induction and that there are no prohibitions, sanctions or restrictions in place that might prevent them from taking part in certain activities or working in specific positions e.g. management posts.

If we have concerns about an existing member of staff's suitability to work with children, we will carry out all the relevant checks as if the individual was a new member of staff. We will also do this if an individual moves from a post that is not regulated activity to one that is.

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult:

- where the 'harm test' is satisfied in respect of the individual (i.e. that no action or inaction occurred but the present risk that it could was significant)
- where the individual has received a caution or conviction for a relevant offence
- if there is reason to believe that the individual has committed a listed relevant offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009
- if the individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left.

### **Agency, supply and third-party staff**

We will obtain written notification from any agency or third-party organisation supplying staff that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

### **Contractors**

We obtain written confirmation from contractors which includes details of the DBS checks of the contractor and their employees due to work at the School, and confirmation of their other recruitment checks. This will be:

- an enhanced DBS check with barred list information for contractors engaging in regulated activity
- an enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the School.

### **Trainee/student teachers**

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children. If trainee teachers are engaging in regulated activity relating to children an enhanced DBS check will be obtained.

### **Volunteers**

We will:

- never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- obtain an enhanced DBS check without barred list information for all volunteers who are not in regulated activity, but who have an opportunity to come into contact with children on a regular basis, for example, supervised volunteers
- carry out a risk assessment when deciding whether to seek an enhanced DBS check for any volunteers not engaging in regulated activity.

### **Governance**

Members of the Governing Body are subject to an enhanced DBS check without barred list check and are checked to ensure they are not disqualified from holding office under a section 128 direction. They will have an enhanced DBS check with barred list information if working in regulated activity.

### **Single Central Register**

The School maintains a single central record of recruitment checks for audit purposes and this is checked and updated regularly and records all the recruitment checks undertaken by the School. Copies of these checks, where appropriate, will be held in individuals' personnel files. Copies of DBS certificates are not retained for more than six months. The SCR will be monitored and checked by the Headmaster and Safeguarding Governor on a regular basis.

## **13. ALLEGATIONS AGAINST STAFF**

Allegations in relation to staff are addressed in Part four of Keeping Children Safe in Education. From 2021 it distinguishes between allegations and/or concerns that may meet the harms threshold, and those that do not meet the threshold, referred to as low level concerns.

We acknowledge that a pupil may make an allegation against a member of staff or others working in School including supply teachers and volunteers.

If such an allegation is made, the member of staff receiving the allegation will immediately inform the Headmaster, unless the allegation concerns the Headmaster, in which case the Chair of Governors will be informed immediately. In such circumstances, the Headmaster would not be informed.

The Headmaster (or Chair of Governors as determined above) will then decide whether the allegation meets the harms threshold or will be dealt with as a low level concern using the criteria in the relevant sections below. The procedures in the relevant section are then followed.

## **ALLEGATIONS THAT MAY MEET THE HARMS THRESHOLD**

The Headmaster (or Chair of Governors) on all such occasions, other than an allegation against the Headmaster, will discuss the content of the allegation with the LADO, prior to undertaking any investigation.

The School will follow the DfE and [West Midlands Safeguarding Children procedures](#) for managing allegations against staff.

These procedures will be followed where it is alleged that anyone working in the School, including supply teachers and volunteers, 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 may pose a risk of harm to children, or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

This could include behaviour that may have happened outside of school that might make an individual unsuitable to work with children, this is known as transferable risk.

Where appropriate an assessment of transferable risk to children with whom the person works should be undertaken and if in any doubt, seek advice from the local authority designated officer (LADO).

This relates to members of staff, supply staff, volunteers and contractors who are currently working in any school or college regardless of whether the school or college is where the alleged abuse took place. Allegations against a teacher who is no longer teaching should be referred to the police. Historical allegations of abuse should also be referred to the police.

Schools and colleges as employers have a duty of care to their employees. They should ensure they provide effective support for anyone facing an allegation and provide them with a named contact if they are suspended. Where the school or college are not the employer of an individual they still have responsibility to ensure allegations are dealt with appropriately and that they liaise with relevant parties, this includes supply teachers, volunteers and contractors. It is essential that any allegation of abuse made against a teacher, other member of staff, volunteer or contractor in a school or college is dealt with very quickly, in a fair and consistent way that provides effective protection for the child and, at the same time supports the person who is the subject of the allegation.

A case manager, usually the Headmaster, will be the lead unless it is they who are the subject of an allegation, in which case it will be led by the Chair of Governors.

### **Supply Teachers and Contractors**

In some circumstances the Schools may have to consider an allegation against an individual not directly employed by the School, where its disciplinary procedures do not fully apply, for example, supply teachers provided by an employment agency or business.

Whilst schools and colleges are not the employer of supply teachers, they should ensure allegations are dealt with properly. In no circumstances should a school or college decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the local authority designated officer (LADO) to determine a suitable outcome. Governing bodies and proprietors should discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation.

Agencies should be fully involved and co-operate in any enquiries from the LADO, police and/or children's social services. The school or college will usually take the lead because agencies do not have direct access to children or other school staff, so they will not be able to collect the facts when an allegation is made, nor do they have all the relevant information required by the LADO as part of the referral process. Agency supply teachers, whilst not employed by the School, are under the supervision, direction and control of the Governing Body when working in the School. They should be advised to seek suitable support for themselves.

The case manager will be guided by the LADO in all matters relating to the case, including suspension, sharing of information and any follow up investigation.

With regard to the registered EYFS setting at Winterfold, Ofsted should be informed of allegations against people living or working at the premises, or of any other abuse alleged to have taken place on the premises, as soon as practicable and within 14 days at the latest.

### **The initial response to an allegation**

When the School identifies a child has been harmed, that there may be an immediate risk of harm to a child or if the situation is an emergency they will contact children's social care and as appropriate the police immediately as explained in Part One of KCSIE.

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

1. **Looking after the welfare of the child.** The designated safeguarding lead (DSL) is responsible for ensuring that the child is not at risk and referring cases of suspected abuse to the local authority children's social care as described in Part One of KCSIE 2024.
2. **Investigating and supporting the person subject to the allegation.** The case manager should discuss with the LADO the nature, content and content of the allegation and agree a course of action.

When dealing with allegations, the School will:

- apply common sense and judgement
- deal with allegations quickly, fairly and consistently, and
- provide effective protection for the child and support the person subject to the allegation.

Bromsgrove School will ensure they understand the local authority arrangements for managing allegations, including the contact details and what information the LADO will require when an allegation is made. Before contacting the LADO, the School will conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation, being careful not to jeopardise any further police investigation. For example:

- Was the individual in the School at the time of the allegations?
- Did the individual, or could they have, come into contact with the child?
- Are there any witnesses? and
- Was there any CCTV footage?

These are just a sample of example questions and the School is familiar with the initial information the LADO will require.

When to inform the individual of the allegation will be considered carefully on a case-by-case basis, with guidance as required from the LADO, and if appropriate, children's social care and the police.

If there is cause to suspect a child is suffering, or is likely to suffer significant harm, a strategy discussion involving the police and/or children's social care will be convened in accordance with the statutory guidance [Working Together to Safeguard Children](#). If the allegation is about physical contact, for example restraint, the strategy discussion or initial evaluation with the LADO should take into account that teachers and other school staff are entitled to use reasonable force to control or restrain children in certain circumstances, including dealing with disruptive behaviour. Further information about the use of reasonable force can be found in part two of KCSIE.

### **No further action**

Where the initial discussion leads to no further action, the case manager and the LADO should:

- record the decision and justification for it, and
- agree on what information should be put in writing to the individual concerned and by whom.

### **Further enquiries**

Where further enquiries are required to enable a decision about how to proceed, the LADO and case manager should discuss how and by whom the investigation will be undertaken. The case manager will monitor the progress of cases to ensure that they are dealt with as quickly as possible in a thorough and fair process. Reviews should be conducted at fortnightly or monthly intervals depending on the complexity of the case.

Wherever possible, the first review should take place no later than four weeks after the initial assessment. Dates for subsequent reviews, should be set at the review meeting if the investigation continues. The LADO will provide advice and guidance when considering allegations against adults working with children. The LADO's role is not to investigate the allegation, but to ensure that an appropriate investigation is carried out, whether that is by the police, children's social care, the School or a combination of these.

These procedures aim primarily to protect children from abuse at the same time as protecting staff and volunteers from false, malicious or unfounded allegations. The procedures follow Part Four of KCSIE.

### **Disclosure of information**

- The case manager will inform the accused person of the allegation as soon as possible after the LADO has been consulted and, if appropriate, children's social care and the police.
- The parents of the pupil involved will be informed of the allegation as soon as possible if they do not already know of it, although where external agencies are involved, the case manager will not inform the accused or the parents until it has been agreed what information can be disclosed. Parents will be kept informed of the progress of the case, only in relation to their child; no information can be shared regarding the member of staff.
- The timing and extent of disclosures, and the terms on which they are made, will be dependent upon and subject to the laws on confidence and data protection and the advice of external agencies.
- Investigations will usually be undertaken by a senior member of staff, under the guidance of the LADO. However, depending on the nature and complexity of an allegation, the investigation may instead be conducted by external agencies, such as social services or the police. In some cases, the LADO may ask for further enquiries to be made before a formal decision is reached about how to proceed. When this occurs, the LADO will provide specific guidance as how and by whom the investigation should be conducted.
- Where an external agency is conducting the investigation rather than the School, the School will cooperate fully with external investigators. No internal investigation into possible breaches of the School's disciplinary code will commence until any external investigation or criminal proceedings are complete.
- The School will take the lead in any investigation involving a supply teacher to ensure that the allegation is dealt with properly and to recognise the fact that the agency would not have direct access to children or other school staff. They would therefore not be able to collect the facts or liaise with the LADO. The School will ensure that agency is fully involved in the management of any allegations.
- The School will not cease its investigations if the person involved leaves, resigns, ceases to provide their services or refuses to cooperate. Records will be kept of the nature of the allegation



and any supporting evidence used to determine whether or not, on the basis of information available, the allegation is substantiated. The person involved will be notified in writing of the outcome of investigation process.

- In accordance with DfE statutory guidance, the following definitions will be used when determining the outcome of allegation investigations:
  - substantiated: there is sufficient evidence to prove the allegation
  - malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive or cause harm to the person subject to the allegation
  - false: there is sufficient evidence to disprove the allegation
  - unsubstantiated: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence
  - unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made.

### **Support**

- The School has a duty of care towards its employees and will ensure that effective support is provided for anyone facing such an allegation. A representative will be appointed to keep him or her informed of the progress of the case and to consider what other support is available.
- The School will also provide access to counselling or medical advice, where appropriate.
- The School will not prevent social contact with work colleagues and friends, when staff are suspended, unless there is reason to believe this may prejudice the gathering of evidence.
- Support will also be offered to the pupil(s) affected and their parents/guardians. The School will consult with children's social services, or the police as appropriate, as to how this can be done in the most appropriate and effective way. The School will follow closely the guidance set out in Part 4 of KCSIE.

### **Suspension**

- Suspension will not be an automatic response to an allegation and will only be considered in a case where there is cause to suspect a pupil or other pupils at the School is or are at risk of significant harm or the allegation is so serious that it might be grounds for dismissal. The School will consider whether the result that would be achieved by suspension could be obtained by alternative arrangements, such as redeployment. A member of staff will only be suspended if there is no reasonable alternative. The School will balance the need to ensure the safety and welfare of the pupil with the need for a full and fair investigation. The LADO will be consulted as to the appropriate action to take.
- If suspension is deemed appropriate, the reasons and justification will be recorded by the School and the individual notified of the reasons for the suspension. The School will ensure that the suspended person is given the contact details for the representative who has been appointed to keep him or her informed about the progress of the case.
- If the allegation is against a member of the residential boarding staff and that member of staff is suspended from duty as a result of the allegation, the School will provide alternative accommodation for that member of staff for the duration of the investigation. Likewise, if the member of staff is residential on the School site, alternative accommodation will be provided.
- If it is decided that the person who has been suspended should return to work, the School will consider how to facilitate this; for example, whether a phased return would be appropriate. The School may provide a mentor and will also consider how to manage contact with the pupil who made the allegation.

### **Confidentiality**

The School will make every effort to guard the privacy of all parties during and after an investigation into an allegation. It is in everyone's best interest to maintain this confidentiality to ensure a fair investigation with minimum impact for all parties.

A breach of confidentiality will be taken seriously and may warrant its own investigation. It is a criminal offence to publish information that could lead to the identification of a member of staff who is the subject of an allegation before they are charged with an offence. Publication includes any speech, writing,

relevant programme or other communication in whatever form, which is addressed to the public at large or any section of the public.

### **Unsubstantiated, unfounded, false or malicious allegations**

If an allegation by a pupil is shown to be unsubstantiated, unfounded, false or malicious, the Headmaster will consider whether to take disciplinary action against the pupil in accordance with the School's Behaviour Policy. The DSL will also consider if the pupil concerned is in need of help or may have been abused by someone else to determine whether a referral to children's social care is appropriate.

If a parent has made a deliberately invented or malicious allegation the Headmaster will consider whether to require that parent to withdraw their child or children from the School, on the basis that they have treated the Headmaster or a member of staff unreasonably.

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.

### **Substantiated allegations**

If an allegation is substantiated and the member of staff, contractor or volunteer is dismissed because they are unsuitable to work with children a report to the Disclosure and Barring Service will be made promptly, and in any event within one month of the person leaving the School.

Settlement agreements, including a form of words for a reference, will not be used in cases where a member of staff, volunteer or contractor resigns or ceases to provide his or her services, where there are allegations that indicate the person is a risk or poses a risk of harm to children. Resignation or ceasing to provide services will not prevent a referral being made to the Disclosure and Barring Service where appropriate.

If a teacher has been dismissed, or would have been dismissed had they not resigned, in cases involving unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction for a relevant offence, the School will give separate consideration to whether a referral should be made to the Teaching Regulatory Authority. The School will follow the advice set out in the TRA documents: Teacher misconduct: information for teachers and Teacher misconduct: the prohibition of teachers (as updated from time to time) to decide whether a referral should be made.

At the conclusion of a case in which an allegation is substantiated, the LADO will review the circumstances of the case with the case manager to determine whether any improvements could be made to the School's procedures to prevent the occurrence of similar events in the future. Consideration will also be given to how the investigation process was managed, including, where appropriate, the use of suspension of the accused. The case manager will produce a written report that will be presented to the governors without delay.

### **Record keeping and references**

Details of allegations that are found to be malicious or false will be removed from personnel records. For all other allegations, a comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any actions taken and decisions reached will be kept on the employee's file. A copy of this summary will be provided to the individual concerned. Such records will be retained at least until the employee reaches the normal pension age (or for a period of ten years from the date of the allegation, if this is longer).

When providing employer references, the School will not refer to any allegation or history of allegations where the allegation(s) have been proven to be false, unfounded, unsubstantiated, false or malicious.

Substantiated allegations should be included in references, provided that the information is factual and does not include opinions.

### **Non-recent allegations**

Where an adult makes an allegation to the School that they were abused as a child, the individual should be advised to report the allegation to the police. Non-recent allegations made by a child, should be

reported to the LADO in line with WSCP's procedures and practice guidance for dealing with non-recent allegations.

### **Winterfold**

As Winterfold is a registered EYFS setting, all allegations of serious harm or abuse by any person living, working, or looking after children in the school must be reported to Ofsted (whether the allegations relate to harm or abuse committed on the premises or elsewhere). Ofsted will also be notified of the action taken in respect of the allegations. These notifications will be made as soon as is reasonably practicable, but at the latest within 14 days of the allegation being made.

### **LOW LEVEL CONCERNS (CONCERNS THAT DO NOT MEET THE HARMS THRESHOLD)**

Bromsgrove School has processes to deal with concerns (allegations) which do not meet the harm threshold set out above. Concerns may arise in several ways and form a number of sources. For example, suspicion, complaint, or disclosure made by a child, parent or other adult within or outside of the School, or as a result of vetting checks undertaken.

The overarching aim is to facilitate a culture in which the School values and expected behaviours which are set out in the Staff Code of Conduct are lived, constantly monitored, and reinforced by all staff. The intention of the policy is therefore to:

- maintain a culture of openness, trust and transparency in which staff are confident and clear about expected behaviours of themselves and their colleagues, the delineation of boundaries and reporting lines
- ensure staff feel empowered to raise any low-level concern, whether about their own or a colleague's behaviour, where that behaviour might be construed as falling short of the standards set out in the Code of Conduct
- provide for responsive, sensitive and proportionate handling of such concerns when they are raised – maintaining on the one hand confidence that concerns when raised will be handled promptly and effectively whilst on the other hand protecting staff from false allegations or misunderstandings.

The Headmaster should collect as much evidence as possible by speaking where possible with the person who raised the concern, to the individual involved and to any witnesses. Written records will be kept of all reported low-level concerns by the Headmaster liaising with the DSL as appropriate. These records include details of the concern, the context in which the concern arose, and any actions taken. These records are reviewed by the DSL on a termly basis to determine if potential patterns of concerning, problematic behaviour exist and how these should be addressed through changes to policies and procedures or extra training. Further details are included in the School's Low-Level Concerns Policy.

### **What is a low-level concern?**

The term low-level concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold. A low level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult working in or on behalf of the School may have acted in a way that:

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

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

- being over friendly with children
- having favourites
- taking photographs of children on their mobile phones
- engaging a child on a one-to-one basis in a secluded area or behind a closed door

- using inappropriate sexualised, intimidating or offensive language.

It is crucial that any such concerns, including those which do not meet the allegation/harms threshold (see part four, section one of KCSIE) are shared responsibly and with the right person, and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of the School from potential false allegations or misunderstandings.

### **Sharing low-level concerns**

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

Where a low-level concern relates to a person employed by a supply agency or contractor to work in the School, that concern should also be shared with the Headmaster. It should then be recorded in accordance with the School's low-level concern/staff code of conduct and their employer notified about the concern, so that any potential patterns of inappropriate behaviour can be identified.

### **Recording low-level concerns**

All low-level concerns should be recorded in writing by the Headmaster. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted. If the individual wishes to remain anonymous then that should be respected as far as reasonably possible. The School will decide where these records are kept, but they will be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation.

Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the School will decide on a course of action, either through its disciplinary procedures or if a concern meets the harms threshold, refer it to the LADO.

The School will decide how long they retain such information, and will follow recommendations that it is retained at least until the individual leaves the School employment.

### **References**

Low-level concerns should not be included in references unless they relate to issues which would normally be included in a reference such as misconduct or poor performance. It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) should not be referred to in a reference. However, where a low-level concern, or group of concerns, has met the threshold to the LADO and found to be substantiated, it should be referred to in a reference.

## **14. WHISTLEBLOWING**

The School has a Whistleblowing Policy (confidential reporting policy) to which staff should refer. We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so. Thus, all staff should be aware of their duty to raise concerns about the attitude or actions of others. Any member of staff may make a referral to external agencies. Staff should report concerns about poor or unsafe practice and potential failures in the School's safeguarding regime. Such concerns can be raised directly with the Head, Bursar or Chair of Governors.

Whistleblowing concerns about any Head should be immediately reported to the Chairman of Governors directly or via the Bursar.

Staff will be made aware that if they feel unable to raise a child protection failure internally, they can contact the [NSPCC whistleblowing helpline](#).

## **15. COMPLAINTS OR CONCERNS EXPRESSED BY PUPILS, PARENTS, STAFF OR VOLUNTEERS**

We recognise that listening to children is an important and essential part of safeguarding them against abuse and neglect. To this end, any expression of dissatisfaction or disquiet in relation to an individual child will be listened to and acted upon in order to safeguard his/her welfare.

We will also seek to ensure that the child or adult who makes a complaint is informed about not only the action the School will take, but also the length of time that will be required to resolve the complaint. The School will also endeavour to keep the child or adult regularly informed as to the progress of his/her complaint. The School's complaints procedures are readily available.

## **16. POSITIVE PHYSICAL INTERVENTION AND THE USE OF REASONABLE FORCE**

The School's Physical Intervention Policy acknowledges that staff must only ever use physical intervention as a last resort, and that at all times it must be the minimal force necessary to prevent injury or damage to property (refer to the Physical Intervention Policy on NETconsent). The School understands that physical intervention of a nature that causes injury or distress to a child may be considered under safeguarding children or disciplinary procedures.

We acknowledge that when applying reasonable force in response to risks presented by incidents involving children with SEN or disabilities or with medical conditions, it is important to recognise their additional vulnerability and make every effort to reduce the occurrence of challenging behaviour and the need to use reasonable force.

A record of all incidents of physical intervention that occur in the Senior School will be maintained by the DSL. A record of all incidents of physical intervention that occur at the Preparatory and Pre-Preparatory School, and Winterfold School, will be maintained by the respective DSLs.

The School recognises that touch is appropriate in the context of working with children and all staff are given 'safe working practice guidance' to ensure that they are clear about their professional boundaries.

We recognise that the adoption of a 'no contact' policy could leave staff unable to fully support and protect our pupils.

## **17. ABUSE OF POSITION OF TRUST**

We recognise that as adults working in Bromsgrove School, we are in a relationship of trust with pupils in our care and acknowledge that it could be considered a criminal offence to abuse that trust.

We acknowledge that the principle of equality embedded in the legislation of the Sexual Offenders Act 2003 applies irrespective of sexual orientation: neither homosexual nor heterosexual relationships are acceptable within a position of trust.

We recognise that the legislation is intended to protect young people in education who are over the age of consent but under 18 years of age.

## **18. PHOTOGRAPHY AND USE OF IMAGES (INCLUDING MOBILE DEVICES)**

In compliance with the UK General Data Protection Regulation (UK GDPR) and The Data Protection Act 2018, parents who accept a place for their child at the School are invited to indicate agreement and give consent to the School using images of their child/children as set out in this policy by signing the Acceptance Form. However, parents should be aware that certain uses of their child's images may be necessary or unavoidable (for example, our use of CCTV for security purposes and identification of pupils for internal administrative purposes).

The welfare and protection of children is paramount and consideration should always be given to whether the use of photography will place children at risk. Images may be used to harm children, for example as

a preliminary to 'grooming' or by displaying them inappropriately on the internet, particularly social networking sites. Many pupils own, or have access to, hand held devices and parents are encouraged to consider measures to keep their children safe when using the internet and social media at home and in the community.

Staff must be mindful of safeguarding issues when taking and using photographs and videos.

### **Consent for photographs to be taken**

- Below Year 7, we would not use images of children for whom parents have not given permission. In the case of group activities where one child is not allowed to have their image used, we would use Photoshop to alter the image accordingly.
- From Year 7, we would always check that the pupils themselves give consent for their photo to be taken and used. However, in the case of any pupils whose parents had previously not given consent, we would make contact with the parents and seek written consent.
- Consent will always be sought for the public use of images of looked after children of any age. Consent should be sought from those with parental responsibility, which, in the case of looked after children, may include the local authority.
- A list of all children who are not allowed to have their images used is stored on our pupil database and our marketing department keep an up to date list.
- We would ask for specific consent and record this consent if we were to want to use a photograph with a pupil's full name whether on the website or a news story/publication and if we were to do a feature on a named individual pupil in an advertising campaign.
- Formal consent would be sought if we were to consider using a photograph on a billboard, banner etc.

### **EYFS**

Photographs are regularly taken, on School-based devices, by staff during indoor and outdoor play to form part of each child's digital record on the School's EYFS secure online learning platform and may also be displayed on walls or within other development records for children and parents to look through in order to evidence learning and development. Photographs taken of the children should be part of planned activities.

- The use of mobile phones, personal cameras, and all personal electronic devices with imagery and sharing capabilities is prohibited in all areas of the EYFS, including all toilet and nappy changing areas.
- Visitors, contractors, volunteers and students are not permitted to use their own mobile phones, personal cameras or any personal digital device with imagery and sharing capabilities in any area of the EYFS.

When photographs may be taken by parents as part of planned performances:

- parents are asked not to take photographs of other pupils, except incidentally as part of a group shot, without the prior agreement of that pupil's parents.
- parents are reminded that such images are for personal use only. Images which may identify other pupils should not be made accessible to others via the internet (for example on Facebook) or published in any other way.

Staff receive full training on appropriate use of the School's and their own photographic equipment and the storage of images. Full details can be found in the Photography and Video Policy.

## **19. STAFF/PUPIL RELATIONSHIPS**

Further guidance for staff is given in the Staff Code of Professional Conduct and the Support Staff Code of Conduct, which should be read in conjunction with this Safeguarding Policy.

The School provides advice to staff regarding their personal online activity and has strict rules regarding online contact and electronic communication with pupils. Staff found to be in breach of these rules may be subject to disciplinary action or child protection investigation.

## **20. GUIDELINES FOR STAFF IN RELATION TO PUPILS' BOARDING HOUSES**

Boarding schools have additional factors to consider with regard to safeguarding, and must be alert to the extra vulnerabilities of SEND children, inappropriate pupil relationships and the potential for child-on-child abuse.

Given the understandable public sensitivity to the issue of relationships between teachers and pupils, it is important that our staff should have the security of agreed guidelines, especially in the carrying out of boarding duties. As a co-educational boarding school, we must exercise close and appropriate control of the boys and girls under our charge, and this includes supervision of dormitory areas. On the other hand, we must be aware of the virtue of sound relationships, sensible practices and of the possibility of misunderstanding and even of malicious allegations.

The following guidelines are offered as a help to finding the required balance in this difficult but important area of our work.

### **When not on duty**

Male and female members of staff are free to enter boarding Houses at any time (to leave a message, give prep etc.) and should do so if they hear a disturbance or have any other misgivings. However, members of staff should communicate directly with the Houseparent or duty tutor about any matters of concern.

In the normal course of events, male members of staff should not enter girls' Houses. If they are concerned about possible disorder, they should notify a female member of staff or a girl monitor as soon as possible. Only if there is clear evidence that a boy has entered a girls' House or if there is an obvious crisis, should a male member of staff intrude, and then he should if at all possible, be accompanied by a female member of staff or House monitor.

For female members of staff, the above guidelines also apply in reverse.

It is acknowledged that some male members of staff tutor in girls' Houses and vice-versa. Houseparents should offer clear guidance on access to pupils and pupil areas, in accordance with this policy.

Housemothers – by the nature of their role during the daytime – will need to visit pupils who are unwell and confined to bed.

### **Guidelines for 'Opposite Sex' Tutors**

It is perfectly reasonable to expect 'opposite sex' tutors to be present in boarders' areas at certain times; indeed it is a necessary part of fulfilling our duty of care. However, this is a potentially sensitive area and it is essential that we follow appropriate, sensible guidelines to protect boarders and staff. What follows is therefore good practice.

At the beginning of the year the Houseparent must address the House on this matter. Boarders must be informed that there will be times when a tutor of the opposite sex needs to visit their rooms. This will certainly happen during prep times and various times during a weekend duty. However, this would not happen once pupils were getting ready for bed except in an emergency.

In the Prep School Boarding House the Houseparent and all resident staff will, at times, need access to areas occupied by the opposite sex pupils, e.g. during wake-up, bedtime, changing etc.

Boarders must be told of the procedures published below, that it is their responsibility to respond accordingly and always to be dressed appropriately during prep time in order to avoid embarrassment.

If a member of staff is at all unhappy with the conduct of a pupil with regard to this policy, they should report it immediately to the Houseparent and record it.

## **Procedure**

- Boarders will be informed of the member of staff on duty (weekdays and weekends.)
- When visiting a room, the tutor must knock and wait for a response. If there is no response, the tutor knocks a second time. If there is still no response, the tutor should open the door and announce their presence before entering.
- The tutor must never enter a room and close the door behind them. Common practice must be to stand in the doorway. If a tutor needs a longer conversation, this could take place in a communal area or the tutor's office with the door open.
- Staff should be particularly mindful of these procedures at weekends when fewer pupils may be in the House and there is a more relaxed atmosphere.
- It is incumbent on Houseparents to ensure that protocols are in place so that tutors on duty are aware of any pupils who may be ill in bed.
- Please also note that these procedures should apply generally when duty staff visit rooms irrespective of 'opposite sex' or 'same sex'.

## **When on duty**

There are two particular situations which might give rise to concern:

- One to one encounters between staff and single pupils should, if possible, take place on neutral territory (a public room or area in a boarding House). Pressure of room space may occasionally necessitate such encounters in staff/study bedrooms, but when this occurs, an open door policy prevents misunderstandings. Such encounters should be brief.
- A member of staff of one sex should never be in an area where members of the opposite sex are changing for games or other activities, washing, showering and visiting the washrooms and lavatories, or preparing for bed or having gone to bed. There will be times when this is necessary in the Prep School boarding House.

Staff should only visit dormitories of the other sex during prep and for specific duties, but before bedtime and then only those dormitory areas which include prep work places. These visits should be regular and well publicised.

If a boarder has gone to bed early, e.g. because of sickness, this information must be available for the tutor on duty so that discretion may be exercised by both parties.

Public areas within Houses and House Common Rooms may be visited freely by tutors of either sex when on duty.

Washing/showering and lavatory areas in female boarding Houses should only be visited in direct emergency by a male member of staff or Houseparent and only then with another colleague, if at all possible (and vice versa).

In girls' Houses, where a husband and wife team may operate in 'loco parentis', or where the husband of the Houseparent may be in residence, it is impossible to give an undertaking that they will never be in a girls boarding section of the House or even in the study/dormitory area. However, in order to ensure privacy for the girls, the husband of the husband and wife team should not enter the dormitory areas when the girls are present, other than in dire emergency. In the Senior School, the dormitory area should be the sole concern of the Housemistress (and/or resident female tutor); there will be staff of the opposite sex working in the dormitories in the Prep School House. Tutoring of girls by male teachers should take place in a room set aside for the purpose, or in a common room, which of course must never be locked.

## **House Monitors**

It is incumbent on Houseparents to offer clear instructions as to the role of House Monitors in relationship to House Duties especially with regard to bedtimes and good order at those times.

Finally, staff should act sensibly and responsibly in order to protect themselves from misunderstandings and also in case, as sometimes happens, a pupil develops a dangerous enthusiasm for a member of staff. It is appreciated that the layout of Houses does differ but principles remain the same. The above



guidance is offered as a framework in which relationships can be handled in a way consonant with the friendly, intimate and relaxed style of the School.

## **21. HEALTH AND SAFETY**

Our Health and Safety policy reflects the consideration we give to the safeguarding of our children both within the school environment and when away from the School, for example when undertaking School trips and visits.

Risk Assessments are undertaken and reviewed regularly, in respect of site security, risk of children being drawn into terrorism or exposed to extremist behaviour, risk to and from children displaying harmful behaviour.

## **22. SAFE ENVIRONMENT**

The School undertakes appropriate risk assessments and checks in respect of all equipment and of the building and grounds in line with local and national guidance and regulations concerning health and safety.

The School has adequate security arrangements in place in respect of the use of its grounds and buildings by visitors both in and out of school hours.

Visitors to the School, for example visiting speakers, theatre groups or curriculum specialists, will be appropriately checked and vetted to ensure they are not linked to extremist groups or promoting extremist or other harmful material.

## **23. CHALLENGE AND ESCALATION**

We recognise that professional disagreements may arise between any agencies and resolving problems is an integral part of co-operation and joint working to safeguard children. As part of our responsibility for safeguarding children, we acknowledge that we must be prepared to challenge each other if we feel that responses to concerns, assessments or the way in which plans are implemented are not safeguarding the child and promoting their welfare.

We are aware of the [WSCP escalation procedures](#) for raising concerns in respect of poor practice and recognise our responsibility to utilise these as and when necessary, in the interests of safeguarding and promoting the welfare of children.

## **24. MONITORING AND EVALUATION**

The School monitors and evaluates its Safeguarding Children (including Child Protection) Policy and procedures through the following activities:

- Governors visits to the School, including termly meetings of the Governors' Safeguarding and Wellbeing Committee
- completion of the annual safeguarding audit and return to the LA/WSCP, when requested, of the annual safeguarding report to the Governing Body
- through pupil forums and pupil discussions with staff
- scrutiny of data and risk assessments
- regular review of parental concerns and parental questionnaires
- regular review of pupil-specific leisure/common rooms
- scrutiny of the School's single central record of recruitment checks
- monitoring of logs of bullying/racist behaviour incidents
- case file audits undertaken by the DSL and WCSP
- scrutiny of Governing Body minutes

- supervision of staff involved in child protection, which includes the DSL providing the Governor with responsibility for Safeguarding with regular updates as required
- regular review of effectiveness of online filters and online safety.

## **25. DEFINITION, RECOGNITION AND IDENTIFICATION OF ABUSE AND NEGLECT.**

Definitions are taken from [Working Together to Safeguard Children 2023](#), Appendix A, (DfE).

### **What is abuse?**

Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults, or another child or children.

### **Indicators of Abuse**

Caution should be used when referring to lists of signs and symptoms of abuse. Although the signs and symptoms listed below may be indicative of abuse there may be alternative explanations. In assessing the circumstances of any child, any of these indicators should be viewed within the overall context of the child's individual situation including any disability.

## **EMOTIONAL ABUSE**

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

Emotional abuse is difficult to:

- define
- identify/recognise
- prove.

Emotional abuse is chronic and cumulative and has a long-term impact. Indicators may include:

- physical, mental and emotional development lags
- sudden speech disorders
- continual self-depreciation ('I'm stupid, ugly, worthless, etc.')
- overreaction to mistakes
- extreme fear of any new situation
- inappropriate response to pain ('I deserve this')
- unusual physical behaviour (rocking, hair twisting, self-mutilation) – consider within the context of any form of disability such as autism
- extremes of passivity or aggression

- children suffering from emotional abuse may be withdrawn and emotionally flat. One reaction is for the child to seek attention constantly or to be over-familiar. Lack of self-esteem and developmental delay are again likely to be present
- babies – feeding difficulties, crying, poor sleep patterns, delayed development, irritable, non-cuddly, apathetic, non-demanding
- toddler/pre-school – head banging, rocking, bad temper, ‘violent’, clingy. From overactive to apathetic, noisy to quiet. Developmental delay – especially language and social skills
- school age – wetting and soiling, relationship difficulties, poor performance at school, non-attendance, antisocial behaviour. Feels worthless, unloved, inadequate, frightened, isolated, corrupted and terrorised
- adolescent – depression, self-harm, substance abuse, eating disorder, poor self-esteem, oppositional, aggressive and delinquent behaviour
- child may be underweight and/or stunted
- child may fail to achieve milestones, fail to thrive, experience academic failure or under achievement

It is also necessary to consider a child's difficulties in expressing their emotions and what they are experiencing and whether this has been impacted on by factors such as age, language barriers or disability.

## **NEGLECT**

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

There are occasions when nearly all parents find it difficult to cope with the many demands of caring for children. But this does not mean that their children are being neglected. Neglect involves ongoing failure to meet a child's needs.

Neglect can often fit into six forms which are:

- Medical – the withholding of medical care including health and dental
- Emotional – lack of emotional warmth, touch and nurture
- Nutritional – either through lack of access to a proper diet which can affect in their development
- Educational – failing to ensure regular school attendance that prevents the child reaching their full potential academically
- Physical – failure to meet the child's physical needs
- Lack of supervision and guidance – meaning the child is in dangerous situations without the ability to risk assess the danger.<sup>1</sup>

## **Common Concerns**

With regard to the child, some of the regular concerns are:

- The child's development in all areas including educational attainment
- Cleanliness
- Health
- Children left at home alone and accidents related to this
- Taking on unreasonable care for others
- Young carers.

---

<sup>1</sup> Horwath, J (2007): Child neglect: identification and assessment: Palgrave Macmillan

Neglect can often be an indicator of further maltreatment and is often identified as an issue in serious case reviews as being present in the lead up to the death of the child or young person. It is important to recognise that the most frequent issues and concerns regarding the family in relation to neglect relate to parental capability. This can be a consequence of:

- Poor health, including mental health or mental illness
- Disability, including learning difficulties
- Substance misuse and addiction
- Domestic violence

School staff need to consider both acts of commission (where a parent/carer deliberately neglects the child) and acts of omission (where a parent's failure to act is causing the neglect). This is a key consideration with regard to school attendance where parents are not ensuring their child attend school regularly.

Many of the signs of neglect are visible. However, School staff may not instinctively know how to recognise signs of neglect or know how to respond effectively when they suspect a pupil is being neglected. Children spend considerable time in school so staff have opportunities to identify patterns over time and recognise and respond to concerns about their safety and welfare. All concerns should be recorded and reflected upon, not simply placed in a file.

Here are some signs of possible neglect:

### **Physical signs**

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Emaciation
- Untreated medical problems
- The child seems underweight and is very small for their age
- The child is poorly clothed, with inadequate protection from the weather
- Neglect can lead to failure to thrive, manifest by a fall away from initial centile lines in weight, height and head circumference. Repeated growth measurements are crucially important
- Signs of malnutrition include wasted muscles and poor condition of skin and hair. It is important not to miss an organic cause of failure to thrive; if this is suspected, further investigations will be required
- Infants and children with neglect often show rapid growth catch-up and improved emotional response in a hospital environment
- Failure to thrive through lack of understanding of dietary needs of a child or inability to provide an appropriate diet; or may present with obesity through inadequate attention to the child's diet
- Being too hot or too cold – red, swollen and cold hands and feet or they may be dressed in inappropriate clothing
- Consequences arising from situations of danger – accidents, assaults, poisoning
- Unusually severe but preventable physical conditions owing to lack of awareness of preventative health care or failure to treat minor conditions
- Health problems associated with lack of basic facilities such as heating
- Neglect can also include failure to care for the individual needs of the child including any additional support the child may need as a result of any disability

### **Behavioural signs**

- No social relationships
- Compulsive scavenging
- Destructive tendencies
- If they are often absent from school for no apparent reason
- If they are regularly left alone, or in charge of younger brothers or sisters
- Lack of stimulation can result in developmental delay, for example, speech delay, and this may be picked up opportunistically or at formal development checks

- Craving attention or ambivalent towards adults, or may be very withdrawn
- Delayed development and failing at school (poor stimulation and opportunity to learn)
- Difficult or challenging behaviour

### **PHYSICAL ABUSE**

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

When dealing with concerns regarding physical abuse, refer any suspected non-accidental injury to the Designated Safeguarding Lead without delay so that they are able to seek appropriate guidance from the police and/or Children's Services in order to safeguard the child.

Staff must be alert to:

- Unexplained recurrent injuries or burns; improbable excuses or refusal to explain injuries
- Injuries that are not consistent with the story: too many, too severe, wrong place or pattern, child too young for the activity described.

### **Physical signs**

- Bald patches
- Bruises, black eyes and broken
- Untreated or inadequately treated injuries
- Injuries to parts of the body where accidents are unlikely, such as thighs, back, abdomen
- Scalds and burns
- General appearance and behaviour of the child may include:
  - Concurrent failure to thrive: measure height, weight and, in the younger child, head circumference
    - Frozen watchfulness: impassive facial appearance of the abused child who carefully tracks the examiner with his eyes.
- Bruising:
  - Bruising patterns can suggest gripping (finger marks), slapping or beating with an object.
    - Bruising on the cheeks, head or around the ear and black eyes can be the result of non-accidental injury.
- Other injuries:
  - Bite marks may be evident from an impression of teeth
    - Small circular burns on the skin suggest cigarette burns
    - Scalding inflicted by immersion in hot water often affects buttocks or feet and legs symmetrically
    - Red lines occur with ligature injuries
    - Retinal haemorrhages can occur with head injury and vigorous shaking of the baby
    - Tearing of the frenulum of the upper lip can occur with force-feeding. However, any injury of this type must be assessed in the context of the explanation given, the child's developmental stage, a full examination and other relevant investigations as appropriate
    - Fractured ribs: rib fractures in a young child are suggestive of non-accidental injury
    - Other fractures: spiral fractures of the long bones are suggestive of non-accidental injury

### **Behavioural signs:**

- Wearing clothes to cover injuries, even in hot weather
- Refusal to undress for gym
- Chronic running away
- Fear of medical help or examination
- Self-destructive tendencies

- Fear of physical contact - shrinking back if touched
- Admitting that they are punished, but the punishment is excessive (such as a child being beaten every night to 'make him study')
- Fear of suspected abuser being contacted
- Injuries that the child cannot explain or explains unconvincingly
- Become sad, withdrawn or depressed
- Having trouble sleeping
- Behaving aggressively or be disruptive
- Showing fear of certain adults
- Having a lack of confidence and low self-esteem
- Using drugs or alcohol
- Repetitive pattern of attendance: recurrent visits, repeated injuries
- Excessive compliance
- Hyper-vigilance

## **SEXUAL ABUSE**

Sexual Abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving 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 include non-contact activities, such as involving children in looking at or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.

Sexual abuse is usually perpetrated by people who are known to and trusted by the child – e.g. relatives, family friends, neighbours, people working with the child in school or through other activities.

### **Characteristics of child sexual abuse**

- It is usually planned and systematic – people do not sexually abuse children by accident, though sexual abuse can be opportunistic
- Grooming the child – people who abuse children take care to choose a vulnerable child and often spend time making them dependent. This can be done in person or via the internet through chat-rooms and social networking sites
- Grooming the child's environment – abusers try to ensure that potential adult protectors (parents and other carers especially) are not suspicious of their motives. Again, this can be done in person or via the internet through chat-rooms and social networking sites.

### **In young children behavioural changes may include**

- Regressing to younger behaviour patterns such as thumb sucking or bringing out discarded cuddly toys
- Being overly affectionate – desiring high levels of physical contact and signs of affection such as hugs and kisses
- Lack of trust or fear of someone they know well, such as not wanting to be alone with a babysitter or child minder
- They may start using sexually explicit behaviour or language, particularly if the behaviour or language is not appropriate for their age
- Starting to wet again, day or night/nightmares

### **In older children behavioural changes may include**

- Extreme reactions, such as depression, self-mutilation, suicide attempts, running away, overdoses, anorexia
- Personality changes such as becoming insecure or clinging

- Sudden loss of appetite or compulsive eating
- Being isolated or withdrawn
- Inability to concentrate
- Become worried about clothing being removed
- Suddenly drawing sexually explicit pictures
- Trying to be 'ultra-good' or perfect; overreacting to criticism
- Genital discharge or urinary tract infections
- Marked changes in the child's general behaviour. For example, they may become unusually quiet and withdrawn, or unusually aggressive. Or they may start suffering from what may seem to be physical ailments, but which can't be explained medically
- The child may refuse to attend school or start to have difficulty concentrating so that their schoolwork is affected
- They may show unexpected fear or distrust of a particular adult or refuse to continue with their usual social activities
- The child may describe receiving special attention from a particular adult, or refer to a new, "secret" friendship with an adult or young person
- Children who have been sexually abused may demonstrate inappropriate sexualised knowledge and behaviour
- Low self-esteem, depression and self-harm are all associated with sexual abuse

#### **Physical signs and symptoms for any age child could be**

- Medical problems such as chronic itching, pain in the genitals, venereal diseases
- Stomach pains or discomfort walking or sitting
- Sexually transmitted infections
- Any features that suggest interference with the genitalia. These may include bruising, swelling, abrasions or tears
- Soreness, itching or unexplained bleeding from penis, vagina or anus
- Sexual abuse may lead to secondary enuresis or faecal soiling and retention
- Symptoms of a sexually transmitted disease such as vaginal discharge or genital warts, or pregnancy in adolescent girls

#### **Sexual Abuse by Young People (including Child-on-Child Abuse)**

All staff should be aware that children can abuse other children and that it can happen both inside and outside school and online. It is important that all staff recognise the indicators and signs of child-on-child abuse and how to identify it and respond to reports. Even if there are no reports, staff need to know that it does not mean it is not happening. The boundary between what is abusive and what is part of normal childhood or youthful experimentation can be blurred. The determination of whether behaviour is developmental, inappropriate or abusive will hinge around the related concepts of true consent, power imbalance and exploitation. This may include children and young people who exhibit a range of sexually problematic behaviour such as indecent exposure, obscene telephone calls, fetishism, bestiality and sexual abuse against adults, peers or children.

Developmental Sexual Activity encompasses those actions that are to be expected from children and young people as they move from infancy through to an adult understanding of their physical, emotional and behavioural relationships with each other. Such sexual activity is essentially information gathering and experience testing. It is characterised by mutuality and the seeking of consent.

Inappropriate Sexual Behaviour can be inappropriate socially, inappropriate to development, or both. In considering whether behaviour fits into this category, it is important to consider what negative effects it has on any of the parties involved and what concerns it raises about a child or young person. It should be recognised that some actions may be motivated by information seeking, but still cause significant upset, confusion, worry, physical damage, etc. It may also be that the behaviour is "acting out", which may derive from other sexual situations to which the child or young person has been exposed.

If an act appears to have been inappropriate, there may still be a need for some form of behaviour management or intervention. For some children, educative inputs may be enough to address the behaviour.

Abusive sexual activity includes any behaviour involving coercion, threats, aggression together with secrecy, or where one participant relies on an unequal power base.

### **Assessment**

In order to more fully determine the nature of the incident the following factors should be given consideration. The presence of exploitation in terms of:

- Equality – consider differentials of physical, cognitive and emotional development, power and control and authority, passive and assertive tendencies
- Consent – agreement including all the following:
  - Understanding that is proposed based on age, maturity, development level, functioning and experience
  - Knowledge of society’s standards for what is being proposed
  - Awareness of potential consequences and alternatives
  - Assumption that agreements or disagreements will be respected equally
  - Voluntary decision
  - Mental competence
- Coercion – the young perpetrator who abuses may use techniques like bribing, manipulation and emotional threats of secondary gains and losses that is loss of love, friendship, etc. Some may use physical force, brutality or the threat of these regardless of victim resistance.

In evaluating sexual behaviour of children and young people, the above information should be used only as a guide. Staff should read the School’s Child-on-Child Abuse Policy.

## **26. CONTEXTUAL SAFEGUARDING**

Safeguarding incidents and behaviours can be associated with factors outside the School and can occur between children outside the School. All staff, especially the Designated Safeguarding Lead (and deputies), will consider the context within which such incidents and behaviours occur. Staff understand that children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation and serious youth violence.

## **27. MENTAL HEALTH**

Bromsgrove School is aware that mental health problems 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 observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or are at risk of developing one. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. Staff are aware of how these experiences can impact on their mental health, behaviour and education.

Bromsgrove School has access to a wide range of advice to help staff identify children in need of extra mental health support, including working with staff in the wellbeing teams, the Health Centre and throughout the School, and with external agencies. More information can be found in the School’s Wellbeing and Mental Health Policy, and in Government guidance including [Mental Health and Behaviour in Schools](#) and [Preventing and Tackling Bullying](#). In addition, the Government (via the former Public Health England) has a range of resources to support schools in the aim of promoting positive health, wellbeing and resilience among young people in [Promoting Children and Young People’s Emotional Health and Wellbeing](#). [Every Mind Matters](#) from the Department of Health and Social Care also includes materials and lesson plans.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action will be taken, following policy and by speaking to the Designated Safeguarding Lead or a deputy.



### **Mental health problems in children**

Short term stress and worry is a normal part of life, and many issues can be experienced as mild or transitory challenges for some children and their families. Others will experience more serious and longer lasting effects. The same experience can have different effects on different children depending on other factors in their life. For example, it is normal for children to feel nervous or under stress around exam times, but other factors can make such stress part of an enduring and persistent mental health problem for some children. When a problem is particularly severe or persistent over time, or when a number of these difficulties are experienced at the same time, children are often described as experiencing mental health problems.

Where children experience a range of emotional and behavioural problems that are outside the normal range for their age, they might be described as experiencing mental health problems or disorders.

Mental health professionals have classified these as:

- emotional disorders, for example phobias, anxiety states and depression
- conduct disorders, for example stealing, defiance, fire-setting, aggression and anti-social behaviour
- hyperkinetic disorders, for example disturbance of activity and attention
- developmental disorders, for example delay in acquiring certain skills such as speech, social ability or bladder control, primarily affecting children with autism and those with pervasive developmental disorders
- attachment disorders, for example children who are markedly distressed or socially impaired as a result of an extremely abnormal pattern of attachment to parents or major care givers
- trauma disorders, such as post-traumatic stress disorder, as a result of traumatic experiences or persistent periods of abuse and neglect
- other mental health problems including eating disorders, habit disorders, somatic disorders; and psychotic disorders such as schizophrenia and manic depressive disorder.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Non-professional diagnoses, however well meant, can exacerbate, or promote mental health problems. We are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. This may include withdrawn pupils whose needs may otherwise go unrecognised.

### **Identifying children with possible mental health problems**

Negative experiences and distressing life events can affect mental health in a way that can bring about changes in a young person's behaviour or emotional state, displayed in a range of different ways, all of which can be an indication of an underlying problem. This can include:

- Emotional state (fearful, withdrawn, low self-esteem)
- Behaviour (aggressive or oppositional; habitual body rocking)
- Interpersonal behaviours (indiscriminate contact or affection seeking, overfriendliness or excessive clinginess; demonstrating excessively 'good' behaviour to prevent disapproval; failing to seek or accept appropriate comfort or affection from an appropriate person when significantly distressed; coercive controlling behaviour; or lack of ability to understand and recognise emotions).

Where there are concerns about behaviour, staff should refer the concern to the Designated Safeguarding Lead as soon as possible. The DSL will work with the Wellbeing teams, Health Centre, and SENDCO, as well as other relevant agencies, to determine whether there are any underlying factors such as undiagnosed learning difficulties, difficulties with speech and language, child protection concerns, or mental health problems.

### **Adverse Childhood Experiences (ACEs) and other events that may have an impact on pupils**

The balance between the risk and protective factors set out above is most likely to be disrupted when difficult events happen in pupils' lives.

These include:

- loss or separation – resulting from death, parental separation, divorce, hospitalisation, loss of friendships (especially in adolescence), family conflict or breakdown that results in the child having to live elsewhere, being taken into care or adopted, deployment of parents in armed forces families
- life changes – such as the birth of a sibling, moving house or changing schools or during transition from primary to secondary school, or secondary school to sixth form
- traumatic experiences such as abuse, neglect, domestic violence, bullying, violence, accidents or injuries
- other traumatic incidents such as a natural disaster or terrorist attack.

Some groups could be susceptible to such incidents, even if not directly affected. For example, we ensure we are aware of armed forces families, who may have parents who are deployed in areas of terrorist activity and are surrounded by the issues in the media. We provide support to pupils at such times, including those who are not presenting any obvious issues. Providing early help is more effective in promoting the welfare of children than reacting later, and can also prevent further problems (including mental health problems) arising. Further guidance on early help can be found in ‘Working together to Safeguard Children’ statutory guidance. This support may come from existing provision within the School, or it may require the involvement of specialist staff or support services. Early intervention to address underlying causes of disruptive behaviour includes an assessment of whether appropriate provision is in place to support any SEN or disability that a pupil may have. Where there are concerns about adverse childhood experiences, staff should refer the concern to the Designated Safeguarding Lead as soon as possible.

For further information see [Mental Health and Behaviour in Schools](#).

### **Suicidal ideation and self-harm**

Suicidal ideation, often called suicidal thoughts or ideas, is a broad term used to describe a range of contemplations, wishes, and preoccupations with death and suicide. All mentions of suicide must be taken seriously. Suicidal ideation is the broad term that describes a preoccupation with death, suicide, or self-harm.

There are two types of suicidal ideation:

- passive: a person has specific thoughts of suicide, of “not wanting to be alive,” or “not wanting to wake up in the morning” but doesn’t intend or plan to commit the action
- active: a person is not only thinking about it, but having the intent to die by suicide, including planning how to do it.

We need to be aware that passive suicidal ideation, the person wishing that they could die in their sleep or in an accident rather than by their own hand, is not necessarily any less serious than active suicidal ideation. It can quickly turn active, and it most certainly has a blend of active and passive components. It's also important to note that suicidal thoughts fluctuate, thoughts may be specific, intense, and persistent one day, and the next, they may be more vague and occur less frequently.

Suicidal behaviour exists along a continuum, from thinking about ending one’s life, to developing a plan, to non-fatal suicidal behaviour to ending one’s life including that a service user may not intend to die but their behaviour may put them at risk of accidental death (death by misadventure). All these are considered as a suicidal crisis.

Self-harm is difficult to define, it is a behaviour unique to the person. Self-harm is defined as intentional self-poisoning or injury, irrespective of the apparent purpose (NICE 2022). This includes both physical and psychological forms of self-harm:

- self-harm inflicted on the body with immediate and longer-term effect
- psychological harm to the self.

Control, release, punishment, compulsion, and expression are just a selection of reasons as to why someone may injure themselves. Sometimes, self-harm can also be a reaction to overwhelming life events that may feel unmanageable.

Suicide is one of the leading causes of death in children and young people and may be linked to many factors, including: poor mental health; self-harm; academic pressures or worries; bullying; social isolation; family environment and bereavement; relationship problems; substance misuse; or neglect. Risk factors are cumulative over the life course, and adverse childhood experiences, deprivation, and poor physical health also contribute to the risk.

Young people who have been recently bereaved, and in particular if that bereavement came about as a result of suicide, are at significantly higher risk of suicide themselves<sup>2</sup> and therefore require extra vigilance and a lower threshold for mental health support and early intervention.

Early recognition and appropriate mental health support, especially for young people presenting with indications of self-harm is important. Professionals should take advantage of every encounter to enquire about mental wellbeing, recognise early signs of poor mental health and be alert to potential disclosures (verbal and non-verbal) from children and young people.

The following could all be indicators that someone is experiencing thoughts of suicide:

- changes in behaviour (loss of interest/withdrawal, giving away possessions)
- physical indicators (weight loss, lack of interest in appearance)
- expressing thoughts or feelings (Hopeless, sad, guilty, worthless)
- words/language being used (“I can’t take it anymore”, “Everyone would be better off without me”).

Recent research has indicated that asking a young person if they are experiencing thoughts of suicide reduce the risk of them ending their life. Asking and determining if that person is feeling suicidal gives you the opportunity to explore those feelings further and support them to stay safe. The most important thing to do to ascertain if someone is struggling with thoughts of suicide is to ask clearly and directly whether they are thinking about suicide. <https://www.papyrus-uk.org/>

Safeguarding concerns around mental health should be raised to the DSL and/or the Wellbeing Team. In an emergency, call 999.

## **28. CHILDREN MISSING EDUCATION (CME)**

We recognise that a child going missing from education is a potential indicator of abuse or neglect, including sexual exploitation, undergoing female genital mutilation, forced marriage or travelling to conflict zones.

Our procedures for dealing with children that go missing from education are based on the [Local Authority](#) and [West Midlands Safeguarding Children procedures](#). Staff are made aware of these procedures at induction and through the Supervision of Pupils Policy. We will make every attempt to obtain more than one emergency contact number for each child registered at the School to ensure we are able to make contact with a responsible adult when a child missing education is also identified as a welfare and/or safeguarding concern.

We will ensure that we inform the local authority when removing a child from the School role at standard and non-standard transition points in line with the [DfE guidance on Children Missing Education](#)

We will ensure that we follow these procedures for dealing with children that go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of their going missing in future.

---

<sup>2</sup> <https://stateofchildhealth.rcpch.ac.uk/evidence/mental-health/suicide/#ref-6>

We will ensure that we monitor unauthorised absences and take appropriate action. We will always follow up with parents/carers when pupils are not at school. Where reasonably possible the School will hold emergency contact numbers for more than one contact for our pupils.

We will ensure that we report children missing education to the LA CME officer, in line with statutory requirements.

Our school duties regarding children missing education, including information schools must provide to the local authority when removing a child from the school roll at standard and non-standard transition points can be found in the [Department's statutory guidance](#). Further related guidance is available at:

- [Worcestershire Children First Children Missing Education Policy](#)
- Guidance on school attendance '[Working together to improve school attendance](#)' including information on how schools should work with local authority children's services where school absence indicates safeguarding concerns
- The Government's [Missing Children and Adults Strategy](#)
- [Keeping children safe in out-of-school settings](#).

## **29. PRIVATE FOSTERING ARRANGEMENTS**

A private fostering arrangement occurs when someone other than a parent or a close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.

Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.

It applies to children under the age of 16, or aged under 18 if the child is disabled. Children who are looked after by the local authority or who are placed in a residential school, children's home or hospital are not considered to be privately fostered.

Private fostering occurs in all cultures, including British culture and children may be privately fostered at any age.

Most privately fostered children remain safe and well but safeguarding concerns have been raised in some cases so it is important that the School is alert to possible safeguarding issues, including the possibility that a child has been trafficked into the country.

By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify Children's Services as soon as possible. If we become aware of a private fostering arrangement, we will check that Children's Services have been informed.

## **30. HOMELESSNESS**

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL, (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise or progress concerns at the earliest opportunity. 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. Whilst referrals and discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this 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. The Homelessness Reduction Act 2017 places a 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, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise

the duties: [Homelessness Reduction Act Factsheets](#). The duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

In most cases we will consider homelessness in the context of children who live with their families, and intervention will be on that basis. However, it is recognised that in some cases children aged 16 years and above may be living independently from their parents or guardians, for example, following exclusion from the family home, and will require a different level of intervention and support. Children's Social Care will be the lead agency for these young people and the DSL or DDSL should ensure appropriate referrals are made based on the child's circumstances. The Department for Education and the Ministry of Housing, Communities & Local Government (now the Department for Levelling Up, Housing and Communities) published statutory guidance on the provision of accommodation for 16 and 17-year olds who may be homeless and/or require accommodation: <https://www.gov.uk/government/publications/provision-of-accommodation-for-16-and-17-year-olds-who-may-be-homeless-and-or-require-accommodation>.

### **31. CHILD-ON-CHILD ABUSE (INCLUDING SEXUAL VIOLENCE AND SEXUAL HARASSMENT)**

We recognise that children are also vulnerable to physical, sexual and emotional abuse by their peers or siblings. This is most likely to include, but not limited to: bullying (including cyber bullying); physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexual violence and sexual harassment (including upskirting - a criminal offence under the Voyeurism (Offences) Act 2019); consensual and non-consensual sharing of nudes and semi-nude images and/or videos (known as sexting or youth-produced sexual imagery); and initiation/hazing type violence and rituals. Abuse perpetrated by children can be just as harmful as that perpetrated by an adult, so it is important to remember the impact on the victim of the abuse as well as to focus on the support for the child or young person exhibiting the harmful behaviour. Such abuse will always be taken as seriously as abuse perpetrated by an adult and the same [safeguarding children procedures](#) will apply in respect of any child who is suffering or likely to suffer significant harm. Staff must never tolerate or dismiss concerns relating to child-on-child abuse, must not pass it off as 'banter', 'just having a laugh' or 'part of growing up'.

We will ensure, through training, that staff, volunteers and governors will have an understanding of the range of child-on-child abuse, including sexual violence and sexual harassment, and will be made aware of how to recognise and manage such issues. Staff will be given the skills to identify and manage harmful sexual behaviour using resources such as the [Brook Traffic Light Tool](#). Staff should be aware that some groups are potentially more at risk, for example girls, children with SEND and LGBTQ+<sup>3</sup> children.

Staff should be aware that such incidents and/or behaviours can be associated with factors outside the School and can occur between children outside the School. Staff, and particularly the DSL, should always consider the context in which such incidents and/or behaviours occur.

Where the abuse is physical, verbal or bullying (including cyber, prejudice-based and discriminatory bullying), recording of such incidents and sanctions will be applied in line with our Behaviour and Anti-Bullying policies.

Where a child discloses safeguarding allegations of a sexual nature against another pupil in the same setting, the DSL should refer to the West Midlands Safeguarding Children procedures website (section 3.3) and seek advice from the Family Front Door or Community Social Worker before commencing its own investigation or contacting parents. This may mean, on occasions, that the School is unable to conduct its own investigation into such incidents. All such incidents will be recorded using our child protection recording forms. Reports of incidents of sexual violence or sexual harassment will be responded to in line with Part 5 of Keeping Children Safe in Education 2024.

Support for the victims of abuse will be in line with support outlined in the School's Behaviour and Anti-Bullying policies. For victims of sexual abuse, the School should follow advice given by Children's Social Care and consider using external agencies, such as Early Help or [West Mercia Rape and Sexual Abuse Support Centre](#) to support any strategies that they may be able to provide within School.

---

<sup>3</sup> Bromsgrove School recognises that various abbreviations may be used by different organisations or sources.

Depending on the nature of abuse, the School may need to consider providing measures to protect and support the victim, the alleged perpetrator and other pupils and/or staff in the School by means of a risk assessment. The risk assessment should be recorded and kept under review.

The School may decide that the children involved do not require referral to statutory services but may benefit from early help. Early help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. Early help can be particularly useful to address non-violent harmful sexual behaviour and may prevent escalation of sexual violence. [Working together to safeguard children - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/collections/working-together-to-safeguard-children).

Sexual violence and sexual harassment (including child-on-child abuse and upskirting) are addressed in the School's separate Child-on-Child Abuse Policy.

### **32. MODERN SLAVERY**

The Modern Slavery Act 2015 places a new statutory duty on public authorities, including schools, to notify the National Crime Agency (NCA) (section 52 of the Act) on observing signs or receiving intelligence relating to modern slavery. The public authority (including schools) bears this obligation where it has 'reasonable grounds to believe that a person may be a victim of modern slavery or human trafficking'. Staff need to be aware of this duty and inform the DSL should they suspect or receive information that either parents or their children may be victims of modern slavery. The DSL will then contact the NCA.

### **33. EXTREMISM AND RADICALISATION**

The [Prevent Duty for England and Wales \(2023\)](https://www.gov.uk/government/collections/prevent-duty-for-england-and-wales-2023) under section 26 of the Counter-Terrorism and Security Act 2015 places a duty on education and other children's services to have due regard to the need to prevent people from being drawn into terrorism. We recognise that children are vulnerable to extremist ideology and radicalisation.

Extremism is defined as 'vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs'. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas. We recognise that safeguarding against extremism and radicalisation is no different to safeguarding against any other vulnerability in today's society.

We will ensure that:

- through training, staff, volunteers and governors have an understanding of what extremism and radicalisation are, why we need to be vigilant in School and how to respond when concerns arise
- there are systems in place for keeping pupils safe from extremist material when accessing the internet in our School by using effective filtering and usage policies
- the DSL has received Prevent training and will act as the point of contact within our School for any concerns relating to extremism and radicalisation
- The DSL will make referrals in accordance with West Midlands child protection procedures and will represent our School at Channel meetings as required
- Through our curriculum, we will promote the spiritual, moral, social and cultural development of pupils. We encourage pupils to respect the fundamental British values of democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs
- We will use relevant information, tools and resources to help our staff and parents recognise and address extremism and radicalisation in young people, for example the Educate Against hate website.

Extremism and radicalisation are addressed in the School's separate Preventing Extremism and Radicalisation Policy.

### **34. RACIST INCIDENTS**

Racist incidents are dealt with according to the School's Pupil Conduct and Behaviour Policy and associated procedures, and the Anti-Bullying Policies. The School acknowledges that repeated racist incidents or a single serious incident may lead to consideration under child protection procedures. We maintain a log of racist incidents in School.

### **35. ANTI-BULLYING**

Our position on anti-bullying is set out in separate policies for each School and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures. All incidents of bullying, including cyber-bullying, sexting, homophobic, gender-related, prejudice-based and discriminatory (including racist) bullying, will be dealt with in accordance with our anti-bullying policy. We recognise that children with special needs and/or disabilities are more susceptible to being bullied. We maintain a log of bullying incidents in School.

We recognise that there will be occasions when bullying incidents will fall within child protection procedures or may be deemed criminal activity and that it may be necessary to report the concerns to the Family Front Door or to the police.

### **36. ONLINE SAFETY**

The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk:

- content: being exposed to illegal, inappropriate, or harmful content such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.
- contact: being subjected to harmful online interaction with other users such as child on child-on-child pressure, commercial advertising, and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- conduct: online behaviour that increases the likelihood of, or causes, harm such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images, and online bullying.
- commerce: risks as online gambling, inappropriate advertising, phishing and or financial scams.

To ensure the online safeguarding of members of our school community it is important that all members of that community work together to develop safe and responsible online behaviour, learning from each other and from good practice elsewhere, reporting inappropriate online behaviour, concerns, and misuse as soon as these become apparent. All staff should be aware of the procedures that need to be followed in the event of an online safety incident taking place and the need to immediately report those incidents.

All staff are able to recognise the additional risks that children with SEN and disabilities face online, for example from online bullying, grooming and radicalisation and all staff have the capability to support SEND children to stay safe online.

Members of the Online Safety Group, made up of the Designated Safeguarding Leads, the Deputy Head (Teaching), and the Network Manager, assist the DSL with:

- the production/review/monitoring of the school filtering policy and requests for filtering changes
- mapping and reviewing the online safety education provision – ensuring relevance, breadth, progression and coverage
- reviewing network/filtering/monitoring/incident logs, where possible
- encouraging the contribution of learners to staff awareness, emerging trends and the school online safety provision
- consulting stakeholders – including staff/parents/carers about the online safety provision
- monitoring improvement actions identified through use of the 360-degree safe self-review tool.

Curriculum Leads work with the DSLs to develop a planned and coordinated online safety education programme. This is provided through:

- RSE/PHSE programmes
- assemblies and pastoral programmes
- relevant national initiatives and opportunities e.g. Safer Internet Day and Anti-Bullying Week.

**School staff ensure that:**

- they have an awareness of current online safety matters/trends and of the current school policy and practices
- they understand that online safety is a core part of safeguarding
- they have read the current IT Acceptable Use and Security Policy and follow its guidance
- they immediately report any suspected misuse or problem to the DSL for investigation/action, in line with the School's safeguarding procedures
- online safety issues are embedded in all aspects of the curriculum and other activities
- ensure learners understand and follow the acceptable use agreements, have a good understanding of research skills, and the need to avoid plagiarism and to uphold copyright regulations
- they supervise and monitor the use of digital technologies, mobile devices, cameras, etc., in lessons and other school activities (where allowed) and implement current policies regarding these devices
- in lessons where internet use is pre-planned learners are guided to sites checked as suitable for their use and that processes are in place for dealing with any unsuitable material that is found in internet searches
- where lessons take place using live-streaming or video-conferencing, there is regard to national safeguarding guidance and local safeguarding policies (NB the guidance contained in the [SWGfL Safe Remote Learning Resource](#)).
- there is a zero-tolerance approach to incidents of online-bullying, sexual harassment, discrimination, hatred etc.

**NS Optimum (NSO), the School's IT support contractor, ensures that:**

- they work effectively in line with school policy
- the School's technical infrastructure is secure and is not open to misuse or malicious attack
- the School meets (as a minimum) the required online safety technical requirements as identified by the [DfE Meeting Digital and Technology Standards in Schools and Colleges](#)
- there is clear, safe, and managed control of user access to networks
- they keep up to date with online safety technical information in order to effectively carry out their online safety role and to inform and update others as relevant
- the use of technology is regularly and effectively monitored in order that any misuse/attempted misuse can be reported to the DSL/Bursar for investigation and action
- the filtering policy is applied and updated on a regular basis and its implementation is not the sole responsibility of any single person
- monitoring systems are implemented and regularly updated as agreed in School policies

The Online Safety Group and NSO review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies. Guidance on e-security is available from the National Education Network (<https://www.nen.gov.uk/>). In addition, we have regard to the cyber security standards for schools and colleges. (<https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/cyber-security-standards-for-schools-and-colleges>). Broader guidance on cyber security including considerations for Governors and trustees can be found in the National Cyber Security Centre's cyber security training for school staff (<https://www.ncsc.gov.uk/section/education-skills/schools>).

The School and NSO ensure that the required filtering and monitoring standards are met and keep our compliance with them under review along with our IT support staff and service providers. The Prevent duty Departmental advice for schools and childcare providers and Home Office additional guidance on filtering and monitoring can be found at: UK Safer Internet Centre: "appropriate" filtering and monitoring.



<https://www.saferinternet.org.uk/advice-centre/teachers-and-school-staff/appropriate-filtering-and-monitoring>. Lightspeed Systems are used to filter and monitor our systems.

The South West Grid for Learning (swgfl.org.uk) tool is used to check whether the School's filtering provider is signed up to relevant lists (CSA content, Sexual Content, Terrorist content, Your Internet Connection Blocks Child Abuse and Terrorist Content).

#### **Learners:**

- are responsible for using the school digital technology systems in accordance with the learner acceptable use agreement and relevant policies (this includes personal devices, where allowed)
- should understand the importance of reporting abuse, misuse or access to inappropriate materials and know how to do so
- should know what to do if they or someone they know feels vulnerable when using online technology
- should understand the importance of adopting good online safety practice when using digital technologies out of school and realise that the School's acceptable use of IT agreement covers their actions out of school, if related to their membership of the School.

Pupils are expected to use their own mobile devices responsibly with due regard to safeguarding matters. We understand the fact that many children have unlimited and unrestricted access to the internet via personal mobile phone network connections. This access means some children, whilst at School, are able to sexually harass, bully, and control others via their mobile and smart technology, share indecent images consensually and non-consensually (often via large chat groups) and view and share pornography and other harmful content.

The school will take every opportunity to help parents and carers understand these issues through:

- providing them with a copy of the learners' acceptable use agreement
- parents'/carers' evenings, newsletters, website, social media and information about national/local online safety campaigns and literature.

Parents and carers are encouraged to support the School in:

- reinforcing the online safety messages provided to learners in School.
- the safe and responsible use of their children's personal devices in School (where this is allowed)

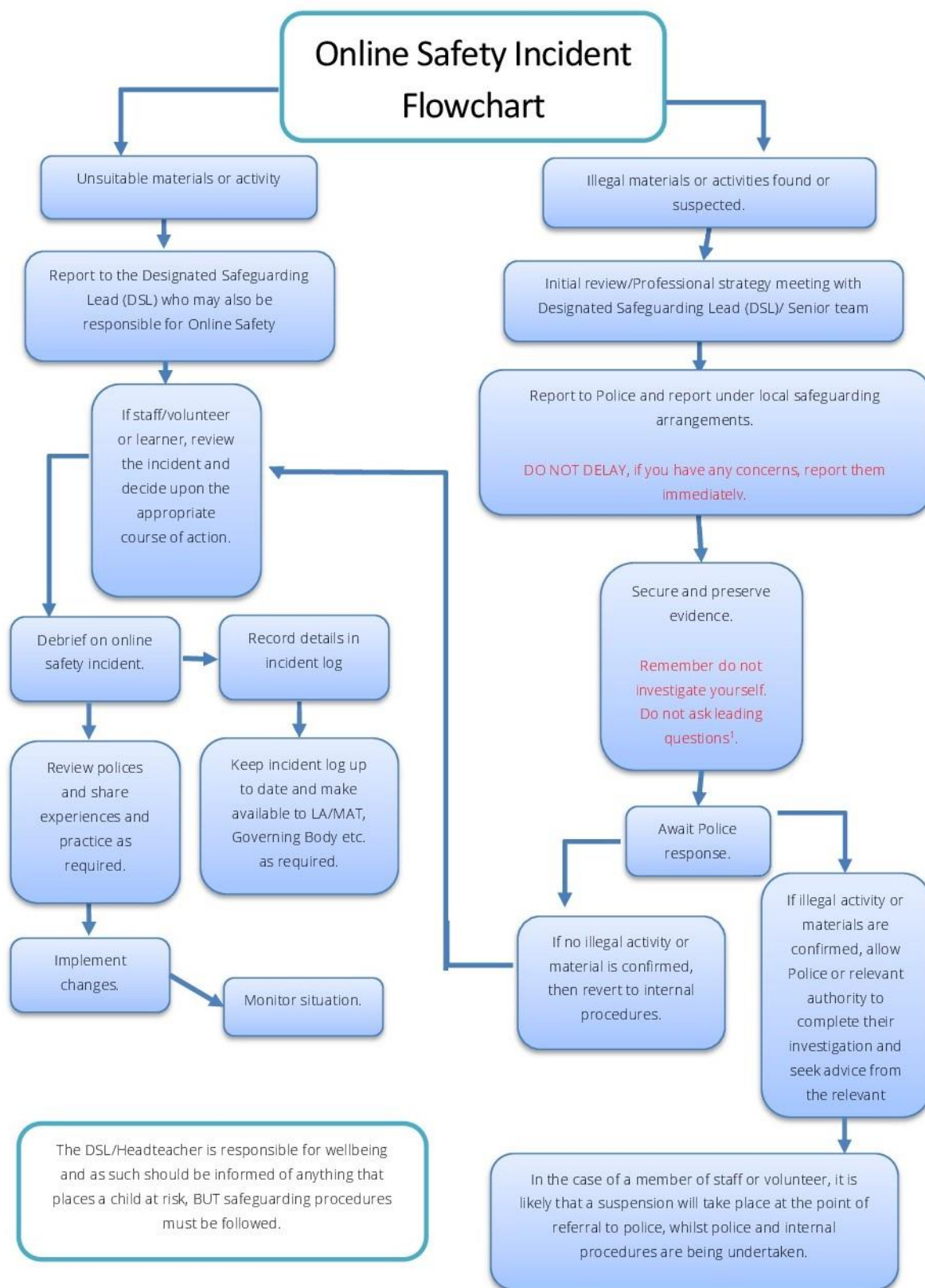
#### **Reporting and responding to online safety concerns**

The School takes all reasonable precautions to ensure online safety for all school users but recognises that incidents may occur inside and outside of the school (with impact on the school) which will need intervention. The School will ensure:

- there are clear reporting routes which are understood and followed by all members of the school community which are consistent with the School's safeguarding procedures, and with the whistleblowing, complaints and managing allegations policies.
- all members of the school community will be made aware of the need to report online safety issues/incidents
- reports will be dealt with as soon as is practically possible once they are received
- the Designated Safeguarding Lead and other responsible staff have appropriate skills and training to deal with online safety risks.
- if there is any suspicion that the incident involves any illegal activity or the potential for serious harm, the incident must be escalated through the agreed school safeguarding procedures, this may include:
  - non-consensual images
  - self-generated images
  - terrorism/extremism
  - hate crime/ abuse
  - fraud and extortion
  - harassment/stalking

- child sexual abuse material (CSAM)
  - child sexual exploitation/grooming
  - extreme pornography
  - sale of illegal materials/substances
  - cyber or hacking offences under the Computer Misuse Act
  - copyright theft or piracy
- any concern about staff misuse will be reported to the Head, unless the concern involves the Headteacher, in which case the complaint is referred to the Chair of Governors and the local authority
  - where there is no suspected illegal activity, devices may be checked using the following procedures:
    - one or more senior members of staff should be involved in this process. This is vital to protect individuals if accusations are subsequently reported.
    - conduct the procedure using a designated device that will not be used by learners and, if necessary, can be taken off site by the police should the need arise (should illegal activity be subsequently suspected). Use the same device for the duration of the procedure.
    - ensure that the relevant staff have appropriate internet access to conduct the procedure, but also that the sites and content visited are closely monitored and recorded (to provide further protection).
    - record the URL of any site containing the alleged misuse and describe the nature of the content causing concern. It may also be necessary to record and store screenshots of the content on the machine being used for investigation. These may be printed, signed, and attached to the form
  - If a concern has substance then appropriate action will be required and could include the following:
    - internal response or discipline procedures
    - involvement by local authority
    - police involvement and/or action
  - it is important that those reporting an online safety incident have confidence that the report will be treated seriously and dealt with effectively
  - there are support strategies in place e.g., peer support for those reporting or affected by an online safety incident
  - incidents should be logged
  - relevant staff are aware of external sources of support and guidance in dealing with online safety issues, e.g. local authority; police; Professionals Online Safety Helpline; Reporting Harmful Content; CEOP.
  - learning from the incident (or pattern of incidents) will be provided to:
    - the Online Safety Group for consideration of updates to policies or education programmes and to review how effectively the report was dealt with
    - staff, through regular briefings
    - learners, through assemblies/lessons
    - parents/carers, through newsletters, school social media, website
    - governors, through regular safeguarding updates
    - local authority/external agencies, as relevant

The following flowchart is available to staff to support the decision-making process for dealing with online safety incidents.



It is more likely that the school will need to deal with incidents that involve inappropriate rather than illegal misuse. It is important that any incidents are dealt with as soon as possible in a proportionate manner, and that members of the school community are aware that incidents have been dealt with. It is intended that incidents of misuse will be dealt with through normal behaviour/disciplinary procedures.

### **37. CYBERCRIME**

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
- 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 skills 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 Designated Safeguarding Lead (or a deputy) will consider referring into the Cyber Choices programme and work with local/regional policing when required. See <https://www.nationalcrimeagency.gov.uk/cyber-choices> and <https://www.ncsc.gov.uk/> for more information.

### **38. LOOKED AFTER CHILDREN AND PREVIOUSLY LOOKED AFTER CHILDREN**

The most common reason for children becoming looked after is as a result of abuse or neglect. The School ensures that staff have the necessary skills, knowledge and understanding to keep looked after children safe. Appropriate staff have information about a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents, or subject to an interim or full care order) and contact arrangements with birth parents or those with parental responsibility. They also have information about the child's care arrangements, including the level of authority delegated to the carer by the authority looking after the child. The designated teacher for looked after children and the DSL have details of the child's social worker and the name and contact details of the Local Authority's Virtual Head for children in care and previously looked after children.

We recognise that a previously looked after child potentially remains vulnerable and therefore ensure that all staff have the skills, knowledge and understanding to keep previously looked after children safe.

The designated teacher for looked after children and previously looked after children will receive updated training for working with this group of children.

The DSL will obtain details of the local authority designated person appointed to guide and support each care leaver and will liaise with them as necessary regarding any issues of concern affecting the care leaver.

### **39. CHILDREN WITH ADDITIONAL VULNERABILITIES**

We recognise that children with additional needs or whose living arrangements may mean that they are more vulnerable to harm (for example, children with special educational needs, disabilities or certain health conditions, and children in public care or privately fostered children) can face additional safeguarding challenges both online and offline. There are additional barriers when recognising abuse and neglect in this group of children.

These additional barriers can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- no single point of contact available for the School regarding a child who could have a number of care-givers and involved professionals

- being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- a disproportional impact from behaviour such as bullying without outwardly showing any signs
- communication barriers and difficulties in overcoming these barriers which can lead to over reliance on parental accounts and interpretations
- Cognitive understanding, e.g. being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in School, or not understanding the consequences of doing so

It is essential that the School knows who shares parental responsibility for children and has effective relationships with partner agencies in relation to these children. We will ensure that staff have sufficient knowledge and guidance so that they are aware of the additional challenges faced by these children and the impact of their additional vulnerabilities. Close liaison with the SENCO occurs in reports of abuse involving children with SEND.

We consider extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place, availing ourselves of support and guidance such as:

- SEND Code of Practice 0 to 25 years (<https://www.gov.uk/government/publications/send-code-of-practice-0-to-25>)
- Supporting pupils with medical conditions at school (<https://www.gov.uk/government/publications/supporting-pupils-at-school-with-medical-conditions-3>)
- The Special Educational Needs and Disabilities Information and Support Services (SENDIASS): SENDIASS offer information, advice and support for parents and carers of children and young people with SEND. (<https://www.worcestershire.gov.uk/sendiaass>)
- Mencap: represents people with learning disabilities, with specific advice and information for people who work with children and young people (<https://www.mencap.org.uk/>).
- [Children with special educational needs and disabilities \(SEND\) | NSPCC Learning](#)
- [Safeguarding d/Deaf and disabled children and young people | NSPCC Learning](#)

#### **40. CHILD SEXUAL EXPLOITATION (CSE) AND CHILD CRIMINAL EXPLOITATION (CCE)**

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female, and can include children who have been moved (trafficked) for the purpose of exploitation.

##### **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. The characteristics common to all victims of CSE are not those of age, ethnicity or gender, rather their powerlessness and vulnerability. Victims often do not recognise that they are being exploited because they will have been groomed by their abuser(s). As a result, victims do not make informed choices to enter into, or remain involved in, sexually

exploitative situations but do so from coercion, enticement, manipulation or fear. Sexual exploitation can happen face-to-face and it can happen online. It can also occur between young people.

Children and young people can be unwittingly drawn into sexual exploitation through the offer of friendship and care, gifts, drugs and alcohol, and sometimes accommodation. It may also be linked to child trafficking.

The School addresses the risks of sexual exploitation in the PSHE and SRE curriculum. A common feature of sexual exploitation is that the child often does not recognise the coercive nature of the relationship and does not see themselves as a victim. Furthermore the experiences of boys and girls can be different. 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 having sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship, i.e. there can be abuse in intimate personal relationships between peers. The child may initially resent what they perceive as interference by staff, but staff must act on their concerns, as they would for any other type of abuse.

The definition and further guidelines can be found in the DfE document [Child sexual exploitation - Definition and a guide for practitioners](#).

In all its forms, CSE is child abuse and should be treated as a child protection issue.

### **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 (particularly that of older children) is not always recognised by adults and professionals, 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.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

### **County Lines**

'County Lines' is where children and young people are being exploited and drawn into drug related activity by criminal gangs, groups or individuals. Typically, the gang exploits young or vulnerable people to store and/or supply drugs, move cash and to secure the use of homes belonging to vulnerable adults. There is a cross over between CSE and County Lines and young people are sometimes required to offer sex in order to pay off perceived debts. Concerns about young people being possibly involved should be passed to the DSL who will refer to police and the Family Front Door.

Staff should understand the possible impact of exploitation on criminal behaviour (i.e. that this behaviour may not be consensual). They should be careful in their use of language when discussing pupils, being aware not to assume or imply that such behaviour is consensual.

The Home Office have published a '[Child exploitation toolkit](#)' which is aimed at staff working to safeguard children and young people under the age of 18 from sexual and criminal exploitation.

### **Warning signs and vulnerabilities checklist**

The evidence available points to several factors that can increase a child's vulnerability to being sexually or criminally exploited. The following are typical **vulnerabilities in children prior to abuse**:

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

Signs and behaviour of children who **may be being sexually exploited:**

- Missing from home or care
- Physical injuries
- Drug or alcohol misuse
- Involvement in offending
- Repeat sexually-transmitted infections, pregnancy and terminations
- Absent from school
- Evidence of sexual bullying and/or vulnerability through the internet and/or social networking sites
- Estranged from their family
- Receipt of gifts from unknown sources
- Recruiting others into exploitative situations
- Poor mental health
- Self-harm
- Thoughts of or attempts at suicide

Signs and behaviour of children who **may be being criminally exploited:**

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Suffering from changes in emotional well-being
- Misuse of drugs and alcohol
- Missing for periods of time or regularly come home late and
- Regularly missing school or not taking part in education.

Evidence shows that any child displaying several vulnerabilities from the above lists should be considered to be at high risk of sexual and/or criminal exploitation.

The School's dedicated lead person with responsibility for implementing local guidance in respect of child sexual and criminal exploitation is the DSL.

The DSL must ensure that all staff are aware of signs and symptoms of CSE and CCE and know that these must be reported and recorded as child protection concerns. The DSL must use the [Worcestershire GETSAFE online referral](#) for dealing with issues of CSE and CCE.

All staff, volunteers and governors are made aware of the indicators of CSE and CCE, the fact that the victim may have been sexually exploited even if the sexual activity appears consensual, and that it does

not always involve physical contact but can occur through the use of technology. All concerns of child sexual exploitation and child criminal exploitation are reported immediately to the DSL. Knowing what to look out for is vital in the early identification of abuse and neglect and specific safeguarding issues such as CSE and CCE so that staff are able to identify cases of children who may be in need of early help or protection.

#### **41. DOMESTIC ABUSE**

Domestic Abuse is 'any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality'. Abuse can be direct or indirect (e.g. through a child). The abuse can encompass, but is not limited to: psychological; physical; sexual; financial; and emotional.

We recognise that exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships as well as in the context of their home life.

We will ensure that our pupils are educated to ensure they understand what a healthy relationship looks like, for example by using resources from the [WCC Domestic Abuse and Sexual Violence website](#).

All concerns regarding Domestic Abuse will be reported to the DSL, who will ensure that appropriate support is available to the young people and make referrals to the Family Front Door where the threshold for social care intervention is met.

Domestic Abuse is covered in more detail in section 34 of this document.

#### **'Honour Based' Abuse (HBA), Female Genital Mutilation (FGM), Breast Ironing and Forced Marriage**

We recognise that our staff are well placed to identify concerns and take action to prevent children from becoming victims of Female Genital Mutilation (FGM) and other forms of so-called 'honour-based' abuse (HBA) and provide guidance on these issues through our safeguarding training. If staff have a concern regarding a child that might be at risk of HBA they should inform the DSL who will activate local safeguarding procedures, using existing national and local protocols for multiagency liaison with police and children's social care.

Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers (persons employed or engaged to carry out teaching work). Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers in England and Wales, to personally report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. Staff may discuss any disclosure with the DSL unless there is a good reason not to. This mandatory reporting duty does not apply to at risk/suspected cases, and in these circumstances, teachers should follow normal school procedures. We will provide guidance and support to our teachers on this requirement and further information on when and how to make a report can be found in the following Home Office guidance '[Mandatory Reporting of Female Genital Mutilation – procedural information](#)' (October 2015).

FGM and breast ironing are covered in more detail in sections 36 and 37 of this document respectively.

So-called 'honour-based' abuse (HBA) 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. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of these dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Where staff are concerned that a child might be at risk of HBA, they must contact the Designated Safeguarding Lead as a matter of urgency.



The cross-government definition of domestic violence and abuse is: any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of sex or sexuality. The abuse can encompass but is not limited to: psychological; physical; sexual; financial; and emotional.

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at some and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development and ability to learn.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

All concerns regarding Domestic Abuse will be reported to the DSL, who will ensure that appropriate support is available to the young people and make referrals to the Family Front Door where the threshold for social care intervention is met.

Where a child is identified as at high risk of being a victim of domestic abuse, the School will consider a MARAC (multi agency risk assessment conference) referral. This is to share information and establish a multi-agency action plan to support the victim and to make links with other public protection procedures, particularly safeguarding children. MARAC does not replace a referral to children's social care.

The impact of domestic abuse on children and young people can be wide-ranging and may include effects in any or all of the following areas:

### **Physical**

Children and young people can be hurt either by trying to intervene and stopping the violence or by being injured themselves by the abuser. They may develop self-harming behaviour, or eating disorders. Their health could be affected, as they may not be being cared for appropriately. They may have suicidal thoughts or try to escape or blank out the abuse by using drugs, alcohol or by running away.

### **Sexual**

There is a high risk that children and young people will be abused themselves where there is domestic abuse. In homes where living in fear is the norm, and situations are not discussed, an atmosphere of secrecy develops and this creates a climate in which sexual abuse could occur. In addition to this, children and young people may sometimes be forced to watch the sexual abuse of their mother/carer. This can have long-lasting effects on the sexual and emotional development of the child/young person.

### **Economic**

The parent or carer of the child or young person may have limited control over the family finances. Therefore, there might be little or no money available for extra-curricular activities, clothing or even food, impacting on their health and development.

### **Emotional**

Children and young people will often be very confused about their feelings – for example, loving both parents/carers but not wanting the abuse to continue. They may be given negative messages about their own worth, which may lead to them developing low self-esteem. Many children and young people feel guilty, believing that the abuse is their fault. They are often pessimistic about their basic needs being met and can develop suicidal thoughts. Some children and young people may internalise feelings and appear passive and withdrawn or externalise their feelings in a disruptive manner.

### **Isolation**

Children and young people may become withdrawn and isolated; they may not be allowed out to play; and if there is abuse in the home they are less likely to invite their friends round. Schooling may be disrupted in many ways, and this may contribute to their growing isolation. They may frequently be absent from

School as they may be too scared to leave their mother alone. They may have to move away from existing friends and family – e.g. into a refuge or other safe or temporary accommodation.

### **Threats**

Children and young people are likely to have heard threats to harm their mother/father. They may have been directly threatened with harm or heard threats to harm their pet. They also live under the constant and unpredictable threat of violence, resulting in feelings of intimidation, fear and vulnerability, which can lead to high anxiety, tension, confusion and stress.

This clearly highlights that living with domestic abuse has a significant impact on a child's ability to achieve the five outcomes as outlined in the *Every Child Matters* agenda:

- be healthy
- stay safe
- enjoy and achieve
- make a positive contribution
- achieve economic well-being.

The Domestic Abuse Act 2021 is intended to transform the response to domestic abuse by preventing offending, supporting victims and ensuring they have the support they need.

### **WHAT YOU MIGHT SEE IN SCHOOL**

- Unexplained absences or lateness – either from staying at home to protect their parent or hide their injuries, or because they are prevented from attending school
- Children and young people attending school when ill rather than staying at home
- Children and young people not completing their homework, or making constant excuses, because of what is happening at home
- Children and young people who are constantly tired, on edge and unable to concentrate through disturbed sleep or worrying about what is happening at home
- Children and young people displaying difficulties in their cognitive and school performance
- Children and young people whose behaviour and personality changes dramatically
- Children and young people who become quiet and withdrawn and have difficulty in developing positive peer relations
- Children and young people displaying disruptive behaviour or acting out violent thoughts with little empathy for victims
- Children and young people who are no trouble at all.

This list is not exhaustive – this is intended to give you an idea of some of the types of behaviour that could be presented.

### **WHAT SCHOOLS CAN DO**

Schools can create an environment which both promotes their belief and commitment that domestic abuse is not acceptable, and that they are willing to discuss and challenge it.

For many victims, the school might be the one place that they visit without their abusive partner.

Contact details for useful agencies are:

- NSPCC: 0808 800 5000
- ChildLine: 0800 1111
- Parentline: 0808 800 2222
- Worcestershire Forum Against Domestic Abuse and Sexual Violence (WFADSA) [website](#)
- West Mercia Women's Aid 24 hr. helpline: 0800 980 3331.

Research shows that the repeated use of physical, sexual, psychological and financial abuse is one of the ways in which male power is used to control women. The underlying attitudes which legitimate and perpetuate violence against women should be challenged by schools as part of the whole school ethos.

Schools can support individual children and young people by:

- Introducing a whole-school philosophy that domestic abuse is unacceptable
- Responding to disclosures and potential child protection concerns; recognising that domestic abuse and forced marriage may be a child protection concern; policies and procedures must include domestic abuse
- Giving emotional support – the child or young person might need referral to a more specialist service or need additional support to complete coursework, exams etc.
- Facilitating a peer support network – children and young people can become isolated but often welcome talking to friends about their problems
- Offering practical support – if children or young people are new to the School they may not yet have a uniform, they may also need financial help with extra-curricular activities, or they may be unfamiliar with the syllabus, the area, where to hang out, etc.
- Providing somewhere safe and quiet to do their homework or just to sit and think
- Improving the self-esteem and confidence of children and young people by:
  - offering them opportunities to take on new roles and responsibilities
  - offering tasks which are achievable and giving praise and encouragement
  - monitoring their behaviour and setting clear limits
  - criticising the action, not the person
  - helping them to feel a sense of control in their school lives
  - involving them in decision making
  - helping them to be more assertive
  - respecting them as individuals
  - encouraging involvement in extra-curricular activities.

## **ADVICE FOR SCHOOLS ON RECEIVING NOTIFICATION OF A DOMESTIC ABUSE INCIDENT<sup>4</sup>**

### **Background**

Following a call to a domestic abuse incident where children are involved, police notify Social Care and Health. A domestic abuse triage meeting takes place each day within the Multi-Agency Safeguarding Hub (MASH) where the notifications are sorted into low, medium and high risk, depending on the perceived level of risk to the children. For those cases that are classified medium or high, the School DSL will receive an e-mail via their secure communications system on the Children's Services Portal, from the Family Front Door informing them that an incident has taken place and giving them a copy of the police log. For high risk cases, they will also be contacted by telephone and asked whether they have any concerns about the children at school. Social Care will also inform parents that the notification has been received and shared with other agencies and that the information will be treated confidentially.

### **School action**

On receiving this information, the DSL should:

- ensure the Safeguarding Education Adviser has up to date contact information
- log the information and keep the record alongside other information/concerns that the School has on this child/family, with all other confidential CP records in a secure place. This will allow the School to recognise any pattern and/or frequency of notifications and take appropriate action. Please note that School may receive further communication about this same incident, once further assessment of the situation has been undertaken by Police – be careful not to log this as a separate incident
- inform any staff of notification on a 'need to know' only basis – e.g. class teacher/form tutor

---

<sup>4</sup> From The Expect Respect Education Toolkit – Women's Aid

- alert all staff who teach pupil/student with minimum of information – e.g. ‘This pupil/student may need extra support / may need extra time to complete homework’
- monitor pupil/student behaviour in school (including attendance) and should concerns arise which may be attributed to the impact of the incident, consult with Social Care through the Family Front Door as the concerns may be significant and lead to new safeguarding action, or to seek advice on how to proceed
- provide appropriate support for child, if required – do not question pupil/student about the incident. Respect the child's decision on whether or not they wish to discuss the situation
- provide appropriate support for adult, if asked – e.g. helpline number (0800 980 3331) or [website](#).

Bear in mind:

- the victim of the incident may be anxious that the information will be shared inappropriately
- a notification may not give details as to which parent is the perpetrator/victim – any disclosure to the ‘wrong’ parent could heighten risk
- there is a need to be aware who is ‘connected’ to the child – e.g. TA/lunchtime supervisor may be child’s relative/friend of the family
- inappropriate sharing of information could heighten the risk for the victim and/or the child.

If in doubt, consult with the Family Front Door (01905 822666)

In addition, Operation Encompass is a police and education early information sharing partnership enabling schools to offer immediate support for children and young people experiencing domestic abuse. Information is shared by the police with a school's trained Key Adult (DSL) prior to the start of the next school day after officers have attended a domestic abuse incident thus enabling appropriate support to be given, dependent upon the needs and wishes of the child. Worcestershire Children First now send domestic abuse notifications to our early years settings and we support those children and their families via our early help offer.

## **42. HONOUR-BASED ABUSE**

Honour-Based abuse (HBA) encompasses incidents or crime 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. Abuse committed in the context of preserving ‘honour’ often involves a wider network of family or community pressure and can include multiple perpetrators. We are aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and are handled and escalated as such.

Staff who have a concern regarding a child that might be at risk of HBA or who has suffered HBA, should speak to the DSL or deputy DSL, who will activate local safeguarding procedures. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers.

## **FEMALE GENITAL MUTILATION**

### **What is FGM?**

FGM includes procedures that intentionally alter or injure the female genital organs for non-medical reasons.

There are four known types of FGM, all of which have been found in the UK:

- Type 1 – clitoridectomy: partial or total removal of the clitoris and, in very rare cases, only the prepuce (the fold of skin surrounding the clitoris)
- Type 2 – excision: partial or total removal of the clitoris and the labia minora, with or without excision of the labia majora (the labia are the ‘lips’ that surround the vagina)

- Type 3 – infibulation: narrowing of the vaginal opening through the creation of a covering seal. The seal is formed by cutting and repositioning the inner, or outer, labia, with or without removal of the clitoris
- Type 4 – other: all other harmful procedures to the female genitalia for non-medical purposes, e.g., pricking, piercing, incising, scraping and cauterising the genital area.

FGM is sometimes known as ‘female genital cutting’ or ‘female circumcision’. Communities tend to use local names for this practice, including ‘sunna’.

### **Why is FGM carried out?**

It is believed that:

- it brings status and respect to the girl and that it gives a girl social acceptance, especially for marriage
- it preserves a girl’s virginity/chastity
- it is part of being a woman as a rite of passage
- it upholds the family honour
- it cleanses and purifies the girl
- it gives the girl and her family a sense of belonging to the community
- it fulfils a religious requirement believed to exist
- it perpetuates a custom/tradition
- it helps girls and women to be clean and hygienic
- it is cosmetically desirable
- it is mistakenly believed to make childbirth safer for the infant

Religion is sometimes given as a justification for FGM. For example, some people from Muslim communities argue that the Sunna (traditions or practices undertaken or approved by the prophet Mohammed) recommends that women undergo FGM, and some women have been told that having FGM will make them ‘a better Muslim’. However, senior Muslim clerics at an international conference on FGM in Egypt in 2006 pronounced that FGM is not Islamic, and the London Central Mosque has spoken out against FGM on the grounds that it constitutes doing harm to oneself or to others, which is forbidden by Islam.

### **Within which communities is FGM known to be practised?**

According to the Home Office it is estimated that up to 24,000 girls under the age of 15 are at risk of FGM.

UK communities that are most at risk of FGM include Kenyan, Somali, Sudanese, Sierra Leone, Egyptian, Nigerian and Eritrean, as well as non-African communities including Yemeni, Afghani, Kurdish, Indonesian and Pakistani.

Obviously, this not to say that all families from the communities listed above practise FGM, and many parents will refuse to have their daughters subjected to this procedure. However, in some communities a great deal of pressure can be put on parents to follow what is seen as a cultural or religious practice.

### **Is FGM harmful?**

FGM is extremely harmful and is often described as brutal because of the way it is carried out, and its short and long term effects on physical and psychological health.

FGM is carried out on children between the ages of 0 and 15, depending on the community in which they live. It is often carried out without any form of sedation and without sterile conditions. The girl or young woman is held down while the procedure of cutting takes place and survivors describe extreme pain, fear and feelings of abandonment.

Where the vagina is cut and then sewn up, only a very small opening may be left. This is often seen as a way to ensure that when the girl enters marriage, she is a virgin. In some communities the mother of the future husband and the girl’s own mother will take the girl to be cut open before the wedding night.

Repeat urinary tract infections are a common problem for women who have undergone FGM, and for some, infections come from menstruation being restricted. Many women have problems during pregnancy and childbirth. The removal of the clitoris denies women physical pleasure during sexual activity and some groups will practise complete removal to ensure chastity.

### **Is it illegal?**

FGM is internationally recognised as a violation of the human rights of girls and women, and is illegal in most countries – including the UK. The Female Genital Mutilation Act 2003 came into force in 2004. The act makes it illegal to:

- practise FGM in the UK
- take girls who are British nationals or permanent residents of the UK abroad for FGM, whether or not it is lawful in that country
- aid and abet, counsel or procure the carrying out of FGM abroad.

The offence carries a penalty of up to 14 years in prison, and/or a fine.

### **Signs, symptoms and indicators**

The following list of possible signs and indicators are not diagnostic, but are offered as a guide as to what kind of things should alert professionals to the possibility of FGM.

Things that may point to FGM happening:

- a child talking about getting ready for a special ceremony
- a family arranging a long break abroad
- a child's family being from one of the 'at-risk' communities for FGM (see above)
- knowledge that an older sibling has undergone FGM
- a young person talks of going abroad to be 'cut', or get ready for marriage.

Things that may indicate a child has undergone FGM:

- prolonged absence from school or other activities
- behaviour change on return from a holiday abroad, such as the child being withdrawn and appearing subdued
- bladder or menstrual problems
- finding it difficult to sit still, and looking uncomfortable
- complaining about pain between their legs
- mentioning something somebody did to them that they are not allowed to talk about
- secretive behaviour, including isolating themselves from the group
- reluctance to take part in physical activity
- repeated urinary tract infection
- disclosure.

### **What should schools do?**

Where schools have a concern about a child, they should contact Children's Social Care Services. If the concerns are based on more concrete indicators – i.e., the young person says this is going to happen to them, or disclosure that it has happened to them or to an older sister – schools should make a child protection referral and inform the police as required by the mandatory reporting duty. Staff may discuss any disclosure with the DSL unless there is a good reason not to. There are no circumstances in which a teacher or other member of staff should examine a girl.

This mandatory reporting duty does not apply to at risk/suspected cases, and in these circumstances, teachers should follow normal school procedures. Schools should not:

- contact the parents before seeking advice from children's social care
- make any attempt to mediate between the child/young person and parents.

It is important to keep in mind that the parents may not see FGM as a form of abuse; however, they may be under a great deal of pressure from their community and or family to subject their daughters to it. Some parents from identified communities may seek advice and support as to how to resist and prevent FGM for their daughters, and education about the harmful effects of FGM may help to make parents feel stronger in resisting the pressure of others in the community. Remember that religious teaching does not support FGM.

### **The 'one chance' rule**

In the same way that we talk about the 'one chance rule' in respect of young people coming forward with fears that they may be forced into marriage, young people disclosing fears that they are going to be sent abroad for FGM are taking the 'one chance' of seeking help.

It is essential that we take such concerns seriously and act without delay. Never underestimate the determination of parents who have decided that it is right for their daughter to undergo FGM. Attempts to mediate may place the child/young person at greater risk, and the family may feel so threatened at the news of their child's disclosure that they bring forward their plans or take action to silence her.

### **Mandatory Reporting Duty**

Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers. Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers in England and Wales, to personally report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. Further information on when and how to make a report can be found in the following Home Office guidance: [Mandatory Reporting of Female Genital Mutilation - procedural information](#) (October 2015).

## **FORCED MARRIAGE**

Forced Marriage should be recognised as a human rights abuse – and should always invoke child protection procedures within the School.

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.

A forced marriage is not the same as an arranged marriage – in an arranged marriage the families take a leading role in choosing the marriage partner. The marriage is entered into freely by both people.

### **Warning signs**

Warning signs can include a sudden drop in performance, truancy from lessons and conflicts with parents over continuation of the student's education.

There may be excessive parental restrictions and control, a history of domestic abuse within the family, or extended absence through sickness or overseas commitments. Students may also show signs of depression or self-harming, and there may be a history of older siblings leaving education early to get married.

### **The justifications**

Most cases of forced marriage in the UK involve South Asian families. This is partially a reflection of the fact that there is a large established South Asian population in the UK. It is clear, however, that forced marriage is not a solely South Asian phenomenon – there have been cases involving families from East Asia, the Middle East, Europe and Africa.

Some forced marriages take place in the UK with no overseas element, while others involve a partner coming from overseas, or a British citizen being sent abroad. Parents who force their children to marry

often justify it as protecting them, building stronger families and preserving cultural or religious traditions. They may not see it as wrong.

Forced marriage can never be justified on religious grounds: every major faith condemns it and freely given consent is a pre-requisite of Christian, Jewish, Hindu, Muslim and Sikh marriage.

### **Culture**

Often parents believe that they are upholding the cultural traditions of their home countries, when in fact practices and values there have changed. Some parents come under significant pressure from their extended families to get their children married.

### **The law**

Sexual intercourse without consent is rape, regardless of whether this occurs within the confines of a marriage. A girl who is forced into marriage is likely to be raped and may be raped until she becomes pregnant.

In addition, the Forced Marriage (Civil Protection) Act (2007) makes provision for protecting children, young people and adults from being forced into marriage without their full and free consent through Forced Marriage Protection Orders. Breaching a Forced Marriage Protection Order is a criminal offence.

The Anti-Social Behaviour, Crime and Policing Act 2014 makes it a criminal offence, with effect from 16th June 2014, to force someone to marry. This includes:

- taking someone overseas to force them to marry (whether or not the marriage takes place)
- marrying someone who lacks the mental capacity to consent to the marriage (whether they are pressured into it or not).

Since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or other form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages (<https://www.gov.uk/government/publications/the-right-to-choose-government-guidance-on-forced-marriage>).

### **What to do if a student seeks help**

- The student should be seen immediately in a private place, where the conversation cannot be overheard.
- The student should be seen on her own, even if she attends with others.
- Develop a safety plan in case the student is seen i.e. prepare another reason why you are meeting.
- Explain all options to the student and recognise and respect her wishes. If the student does not want to be referred to Children's Services, you will need to consider whether to respect the student's wishes – or whether the student's safety requires further action to be taken. If you take action against the student's wishes you must inform the student.
- Establish whether there is a family history of forced marriage – i.e. siblings forced to marry.
- Advise the student not to travel overseas and discuss the difficulties she may face.
- Seek advice from the Forced Marriage Unit.
- Concerns should be referred, via normal school procedures to the DSL or to the police and Children's Services directly, to establish if any incidents concerning the family have been reported.
- Refer to the local police child protection unit if there is any suspicion that there has been a crime or that one may be committed.
- Refer the student with her consent to the appropriate local and national support groups, and counselling services.

### **What to do if the student is going abroad imminently**

The Forced Marriage Unit advises education professionals to gather the following information if at all possible – it will help the unit to locate the student and to repatriate her:

- a photocopy of the student's passport for retention – encourage her to keep details of her passport number and the place and date of issue



- as much information as possible about the family (this may need to be gathered discretely)
- full name and date of birth of student under threat
- student's father's name
- any addresses where the student may be staying overseas
- potential spouse's name
- date of the proposed wedding
- the name of the potential spouse's father if known
- addresses of the extended family in the UK and overseas

It is also useful to take specific information that only the student would know, as this may be helpful during any interview at an embassy or British High Commission – in case another person of the same age is produced pretending to be the student.

Professionals should also take details of any travel plans and people likely to accompany the student. Note also the names and addresses of any close relatives remaining in the UK and a safe means to contact the student – a secret mobile telephone, for example, that will function abroad.

### **Forced marriage: what educators should NOT do**

- treat such allegations merely as domestic issues and send the student back to the family home
- ignore what the student has told you or dismiss the need for immediate protection
- approach the student's family or those with influence within the community, without the express consent of the student, as this will alert them to your concern and may place the student in danger
- contact the family in advance of any enquires by the police, children's services or the Forced Marriage Unit, either by telephone or letter
- share information outside child protection information sharing protocols without the express consent of the student
- breach confidentiality except where necessary in order to ensure the student's safety
- attempt to be a mediator

### **Further guidance**

Further guidance is available from The Forced Marriage Unit:

Tel: (+44) (0)20 7008 0151 between 9.00 a.m. and 5.00 p.m. Monday to Friday  
 Emergency Duty Officer (out of hours): (+44) (0)20 7008 1500  
 E-mail: [fmu@fco.gov.uk](mailto:fmu@fco.gov.uk) Website: [www.fco.gov.uk/forcedmarriage](http://www.fco.gov.uk/forcedmarriage)

Publications:

- 'Multi-Agency Practice Guidelines: Handling Cases of Forced Marriage', The Forced Marriage Unit, June 09
- 'The Right to Choose – Multi-Agency Guidance in relation to Forced Marriage' Government Office - November 2008.
- WSCP regional procedures [Forced Marriage](#)

## **BREAST IRONING**

### **What is breast ironing?**

Breast Ironing is practiced in some African countries, notably Cameroon. Girls aged between 9 and 15 have hot pestles, stones or other implements rubbed on their developing breast to stop them growing further. In the vast majority of cases breast ironing is carried out by mothers or grandmothers and the men in the family are unaware. Estimates range between 25% and 50% of girls in Cameroon are affected by breast ironing, affecting up to 3.8 million women across Africa.

### **Why does breast ironing happen?**

The practice of breast ironing is seen as a protection to girls by making them seem 'child-like' for longer and reduce the likelihood of pregnancy. Once girls' breasts have developed, they are at risk of sexual harassment, rape, forced marriage and kidnapping; consequently, breast ironing is more prevalent in

cities. Cameroon has one of the highest rates of literacy in Africa and ensuring that girls remain in education is seen as an important outcome of breast ironing.

### **Breast ironing is physical abuse**

Breast ironing is a form of physical abuse that has been condemned by the United Nations and identified as Gender-based Violence. Although, countries where breast ironing is prevalent have ratified the African Charter on Human Rights to prevent harmful traditional practices, it is not against the law.

Breast ironing does not stop the breasts from growing, but development can be slowed down. Damage caused by the 'ironing' can leave women with malformed breasts, difficulty breastfeeding or producing milk, severe chest pains, infections and abscesses. In some cases, it may be related to the onset of breast cancer.

### **Breast Ironing in the UK**

Concerns have been raised that breast ironing is also to be found amongst African communities in the UK, with as many as 1000 girls at risk. Keeping Children Safe in Education (2019) mentions breast ironing as part of the section on so-called 'honour-based' abuse. Staff worried about the risk of breast ironing in their school should speak to the Designated Safeguarding Lead as soon as possible. Schools need to know the risk level within their communities and tackle the risk as appropriate.

### **What should schools do?**

Where schools have a concern about a child, they should contact Children's Social Care Services. If the concerns are based on more concrete indicators – i.e., the young person says this is going to happen to them, or disclosure that it has happened to them or to an older sister – schools should make a child protection referral and inform the police as required by the mandatory reporting duty. Schools should not:

- Contact the parents before seeking advice from children's social care
- Make any attempt to mediate between the child/young person and parents.

It is important to keep in mind that the parents may not see breast ironing as a form of abuse; however, they may be under a great deal of pressure from their community and or family to subject their daughters to it. Some parents from identified communities may seek advice and support as to how to resist and prevent breast ironing for their daughters, and education about the harmful effects of breast ironing may help to make parents feel stronger in resisting the pressure of others in the community. Remember that religious teaching does not support breast ironing.

### **The 'one chance' rule**

In the same way that we talk about the 'one chance rule' in respect of young people coming forward with fears that they may be forced into marriage, young people disclosing fears that they are going to be sent abroad for breast ironing are taking the 'one chance', of seeking help.

It is essential that we take such concerns seriously and act without delay. Never underestimate the determination of parents who have decided that it is right for their daughter to undergo breast ironing. Attempts to mediate may place the child/young person at greater risk, and the family may feel so threatened at the news of their child's disclosure that they bring forward their plans or take action to silence her.

## **43. SHARING CONSENSUAL OR NON-CONSENSUAL NUDES OR SEMI-NUDES (SEXTING)**

### **What are nudes and semi-nudes?**

Sharing consensual or non-consensual nudes or semi-nudes, or sexting, is the sending or posting of nude or semi-nude images, videos or live streams by young people under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline.

The term 'nudes' is used as it is most commonly recognised by young people and more appropriately covers all types of image sharing incidents. Alternative terms used by children and young people may include 'dick pics' or 'pics'.

It is often seen as flirting by children and young people who think that it is part of normal life.

Often, incidents are not clear-cut or isolated; schools may encounter a variety of scenarios. Incidents can be divided into two categories – aggravated and experimental.

- **Aggravated incidents** involve criminal or abusive elements beyond the creation of an image. These include further elements, adult involvement or criminal or abusive behaviour by minors such as sexual abuse, extortion, threats, malicious conduct arising from personal conflicts, or creation or sending or showing of images without the knowledge or against the will of a minor who is pictured.
- **Experimental incidents** involve youths taking pictures of themselves to share with established boy or girlfriends, to create romantic interest in other youth, or for reasons such as attention seeking. There is no criminal element (and certainly no criminal intent) beyond the creation and sending of the images and no apparent malice or lack of willing participation.

The consequences of sharing nudes and semi-nudes can be devastating for young people. In extreme cases it can result in suicide or a criminal record, isolation and vulnerability. Young people can end up being criminalised for sharing an apparently innocently image which may have, in fact, been created for exploitative reasons.

Because of the prevalence of sharing nudes and semi-nudes, young people are not always aware that their actions are illegal. In fact, sexting as a term is not something that is recognised by young people and the 'cultural norms' for adults can be somewhat different. Some celebrities have made comments which appear to endorse sharing nudes and semi-nudes – 'it's okay, as long as you hide your face' - giving the impression that sexting is normal and acceptable. However, in the context of the law it is an illegal activity and young people must be made aware of this. The UKCIS Education Group has published [Sharing nudes and semi-nude advice for education settings working with children and young people](#) which outlines how to respond to an incident of nudes and semi-nudes being shared.

### **The Law**

Much of the complexity in responding to youth produced sexual imagery is due to its legal status. Making, possessing and distributing any imagery of someone under 18 which is 'indecent' is illegal. This includes imagery of yourself if you are under 18. 'Indecent' is not defined in legislation. For most purposes, if imagery contains a naked young person, a topless girl, and/or displays genitals or sex acts, including masturbation, then it will be considered indecent. Indecent images may also include overtly sexual images of young people in their underwear.

The law criminalising indecent images of children was created long before mass adoption of the internet, mobiles and digital photography. It was also created to protect children and young people from adults seeking to sexually abuse them or gain pleasure from their sexual abuse. It was not intended to criminalise children. Despite this, young people who share sexual imagery of themselves, or peers, are breaking the law.

The National Police Chiefs Council (NPCC) has made clear that incidents involving youth produced sexual imagery should primarily be treated as safeguarding issues. Schools may respond to incidents without involving the police. Where the police are notified of incidents of youth produced sexual imagery they are obliged, under the Home Office Counting rules and National Crime Recording Standards, to record the incident on their crime systems. The incident will be listed as a 'crime' and the young person involved will be listed as a 'suspect.' **This is not the same as having a criminal record.**

Every 'crime' recorded on police systems has to be assigned an outcome from a predefined list of outcome codes. As of January 2016 the Home Office launched a new outcome code (outcome 21) to help formalise the discretion available to the police when handling crimes such as youth produced sexual imagery. This means that even though a young person has broken the law and the police could provide

evidence that they have done so, the police can record that they chose not to take further action as it was not in the public interest.

## **HANDLING INCIDENTS**

### **Step 1 – Disclosure by a student**

Normal safeguarding practices and protocols must be followed.

When an incident involving nudes and semi-nudes comes to the attention of any member of staff in an education setting:

- **the incident should be referred to the DSL as soon as possible**
- the DSL will hold an initial review meeting with appropriate staff. This may include the staff member(s) who heard the disclosure and the safeguarding or leadership team who deal with safeguarding concerns
- there should be subsequent interviews with the children or young people involved (if appropriate)
- parents and carers should be informed at an early stage and involved in the process in order to best support the child or young person unless there is good reason to believe that involving them would put the child or young person at risk of harm
- a referral will be made to children's social care and/or the police immediately if there is a concern that a child or young person has been harmed or is at risk of immediate harm at any point in the process

A student is likely to be very distressed especially if the image has been circulated widely and if they don't know who has shared it, seen it or where it has ended up. They will need pastoral support during the disclosure and after the event. They may even need immediate protection or a referral to Social Care.

The following questions will help the DSL decide upon the best course of action:

- Is the student disclosing about themselves receiving an image, sending an image or sharing an image?
- What sort of image is it? Is it potentially illegal or is it inappropriate?
- Are the School child protection and safeguarding policies and practices being followed?
- How widely has the image been shared and is the device in their possession?
- Is it a school device or a personal device?
- Does the student need immediate support and or protection?
- Are there other students and or young people involved?
- Do they know where the image has ended up?

This situation will need to be handled very sensitively. Whatever the nature of the incident, ensure School safeguarding and child protection policies and practices are adhered to.

### **Step 2 – Searching a device**

It is highly likely that the image will have been created and potentially shared through mobile devices. The image may not be on one single device, but may be on a website or on a multitude of devices; it may be on either a school-owned or personal device. It is important to establish the location of the image but be aware that this may be distressing for the young person involved, so be conscious of the support they may need.

When searching a mobile device the following conditions should apply:

- the action is in accordance with the School's child protection and safeguarding policies
- the search is conducted by the head teacher or a person authorised by them
- a member of the safeguarding team is present
- the search is conducted by a member of the same sex.

If any illegal images of a child are found you should consider whether to inform the police. As a general rule it will almost always be proportionate to refer any incident involving “aggravated” sharing of images to the police, whereas purely “experimental” conduct may proportionately be dealt with without such referral, most particularly if it involves the child sharing images of themselves.

Any conduct involving, or possibly involving, the knowledge or participation of adults should always be referred to the police.

If an “experimental” incident is not referred to the police the reasons for this should be recorded in writing.

Always put the child first. Do not search the device if this will cause additional stress to the student/person whose image has been distributed.

If there is an indecent image of a child on a website or a social networking site then you should report the image to the site hosting it. In the case of a sexting incident involving a child or young person, where you feel that they may be at risk of abuse, then you should report the incident directly to CEOP [www.ceop.police.uk/ceop-reporting/](http://www.ceop.police.uk/ceop-reporting/), so that law enforcement can make an assessment, expedite the case with the relevant provider and ensure that appropriate action is taken to safeguard the child.

### **Step 3 – What to do and not do with the image**

If the image has been shared across a personal mobile device:

- confiscate and secure the device;
- don't view the image unless there is a clear reason to do so;
- don't send, share or save the image anywhere;
- don't allow students to view images or send, share or save them anywhere.

If the image has been shared across a school network, a website or social network:

- block the network to all users and isolate the image;
- don't send or print the image;
- don't move the material from one place to another;
- don't view the image outside of the protocols of your safeguarding policies and procedures.

### **Step 4 – Who should deal with the incident?**

Whoever the initial disclosure is made to must act in accordance with the School safeguarding policy, ensuring that the DSL or a senior member of staff is involved in dealing with the incident.

The DSL should always record the incident. Senior management should also always be informed. There may be instances where the image needs to be viewed and this should be done in accordance with protocols. The best interests of the child should always come first; if viewing the image is likely to cause additional stress, staff should make a judgement about whether or not it is appropriate to do so.

### **Step 5 - Deciding on a response**

There may be a multitude of reasons why a student has engaged in sexting – it may be a romantic/sexual exploration scenario or it may be due to coercion.

It is important to remember that it won't always be appropriate to inform the police; this will depend on the nature of the incident. However, as a school it is important that incidents are consistently recorded. It may also be necessary to assist the young person in removing the image from a website or elsewhere.

If indecent images of a child are found:

- act in accordance with your child protection and safeguarding policy, e.g. notify DSL
- store the device securely
- carry out a risk assessment in relation to the young person
- make a referral if needed
- contact the police (if appropriate)

- put the necessary safeguards in place for the student, e.g. they may need counselling support or immediate protection. Parents must also be informed
- inform parents and/or carers about the incident and how it is being managed.

#### **Step 6 – Contacting other agencies (making a referral)**

If the nature of the incident is high-risk, consider contacting Children's Social Care. Depending on the nature of the incident and the response you may also consider contacting local police or referring the incident to CEOP.

Understanding the nature of the incident, whether experimental or aggravated, will help to determine the appropriate course of action.

#### **Step 7 – Containing the incident and managing pupil reaction**

Sadly, there are cases in which victims of sexting have had to leave or change schools because of the impact the incident has had on them. The student will be anxious about who has seen the image and where it has ended up. They will seek reassurance regarding its removal from the platform on which it was shared. They are likely to need support from the School, their parents and their friends. Education programmes can reinforce to all students the impact and severe consequences that this behaviour can have. Consider engaging with your local police and asking them to talk to the students.

Other staff may need to be informed of incidents and should be prepared to act if the issue is continued or referred to by other students. The School, its students and parents should be on high alert, challenging behaviour and ensuring that the victim is well cared for and protected. The students' parents should usually be told what has happened so that they can keep a watchful eye over their child, especially when they are online at home.

Creating a supportive environment for students in relation to the incident is very important.

#### **Step 8 – Reviewing outcomes and procedures to prevent further incidences**

As with all incidents, a review process ensures that the matter has been managed effectively and that the School has the capacity to learn and improve its handling procedures. Incidents of sexting can be daunting for a school to manage, especially if the image has been widely shared between pupils in school.

Further information is available from the [NSPCC](#).

### **44. CHILDREN AND THE JUSTICE SYSTEM**

Our children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. We can support pupils by using age-appropriate guides to explain the process, support and special measures that are available.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families and we recognise that this can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

We understand that approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation, and poor mental health. The National Information Centre on Children of Offenders, NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

### **45. CHILD ABDUCTION AND COMMUNITY SAFETY INCIDENTS**

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers.

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation. As children get older and are granted more independence (for example, as they start walking to school on their own) the School gives practical advice on how to keep safe, for example with self-defence classes in activity time for older children. Further information is available at: [www.actionagainstabduction.org](http://www.actionagainstabduction.org) and [www.clevernevergoes.org](http://www.clevernevergoes.org).

#### **46. CHILDREN WHO ARE LESBIAN, GAY, BISEXUAL, OR GENDER QUESTIONING**

A child or young person being lesbian, gay, or bisexual is not in itself an inherent risk factor for harm, however, they can sometimes be targeted by other children. In some cases, a child who is perceived by others to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who are.

Caution is necessary for children questioning their gender as there remain many unknowns about the impact of social transition and children may well have wider vulnerabilities, including having complex mental health and psychosocial needs, and in some cases additional diagnosis of autism spectrum disorder and/or attention deficit hyperactivity disorder. Risks can be compounded where children lack trusted adults with whom they can be open. Staff endeavour to reduce the additional barriers faced and create a culture where they can speak out or share their concerns with members of staff.

Families/carers are encouraged to seek suitably experienced clinical help and advice when making decisions about support for gender questioning children. The School takes a cautious approach and considers the broad range of individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstance where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying. [Gender Questioning Children - non-statutory guidance \(education.gov.uk\)](https://www.gov.uk/guidance/gender-questioning-children-non-statutory-guidance)

## **APPENDIX 1: LOGGING A CONCERN**

All safeguarding concerns should be logged using the School's Safeguarding system, MyConcern. Training is provided to staff at the start of year INSET sessions and further details are available from the School DSL.

Alternatively, Form 1 can be used as in Appendix 2 below.

MyConcern is available at <https://www.myconcern.education/> for which there is also a shortcut on the start menu of School staff computers.

Form 1 is available below in Appendix 2, on NETconsent or a paper copy is available on staff room noticeboards.



**APPENDIX 2: FORM 1**

**Logging a Concern about a Child's Safety and Welfare – all staff and visitors**

Pupil's full name:		Date of birth:	Year group:
Date:		Time:	
Name: .....		.....	
Print		Signature	
Position:			
Details of concern/incident and reason for recording - record the who/what/where/when factually (continue on reverse of sheet if necessary):			
Any other relevant information (witnesses, immediate action taken):			
Action taken			
Reporting staff signature:		Date:	
DSL – Response/outcome			
DSL signature:		Date:	

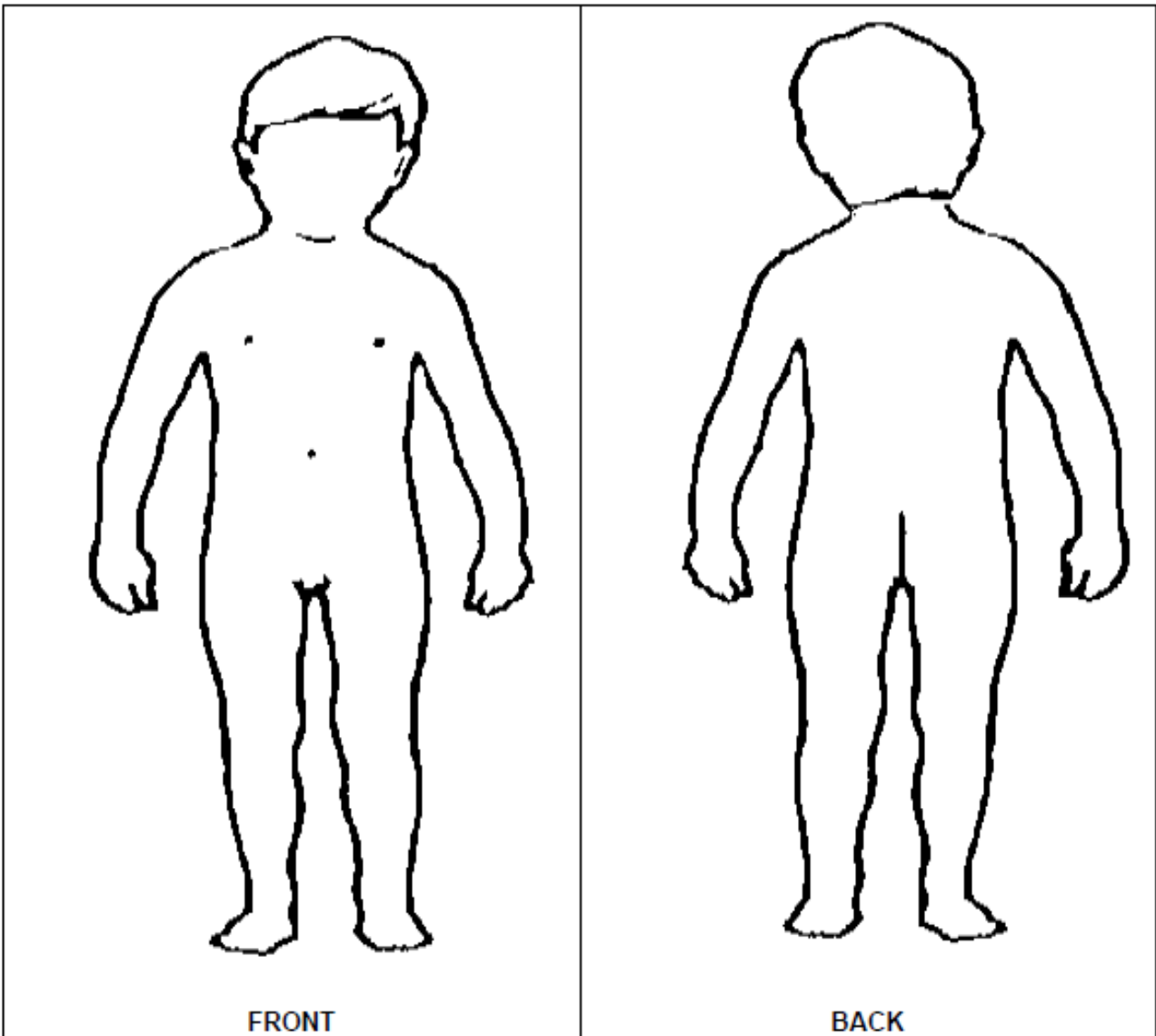
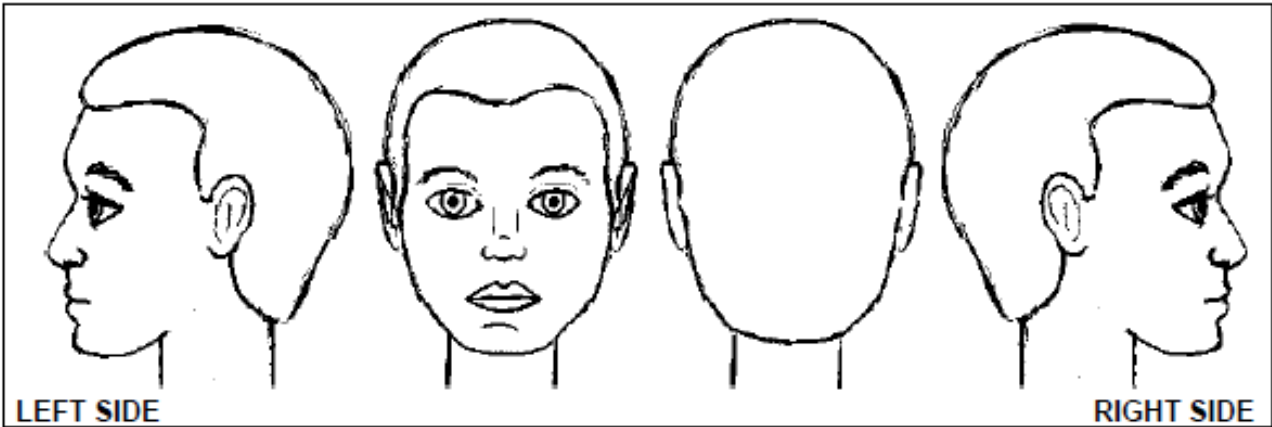
Check to make sure your report is clear now and will also be clear to someone else reading it for the first time in the future.

Remember to attach any other relevant documents such as hand written notes, a piece of work a pupil has written that you are concerned about, something which you have found (e.g. a note/piece of paper which is concerning).

**PLEASE PASS THIS FORM TO YOUR DESIGNATED SAFEGUARDING LEAD**

**Body Map (Part 1)**


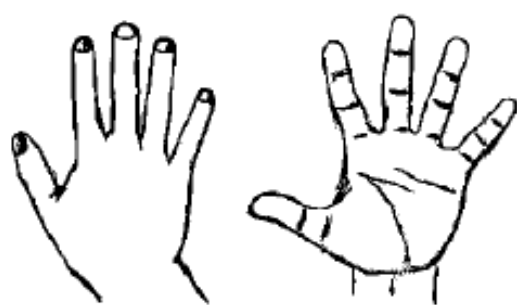
NAME OF CHILD	DATE OF BIRTH
---------------	---------------





Reporting staff signature ..... Date .....

**Body Map (Part 2)**

<b>NAME OF CHILD</b>	<b>DATE OF BIRTH</b>
----------------------	----------------------

	
<b>LEFT HAND</b>	<b>RIGHT HAND</b>

	
<b>LEFT FOOT</b>	<b>RIGHT FOOT</b>

<b>FULL DESCRIPTION OF INJURY</b>

<b>ANY EXPLANATION GIVEN?</b>

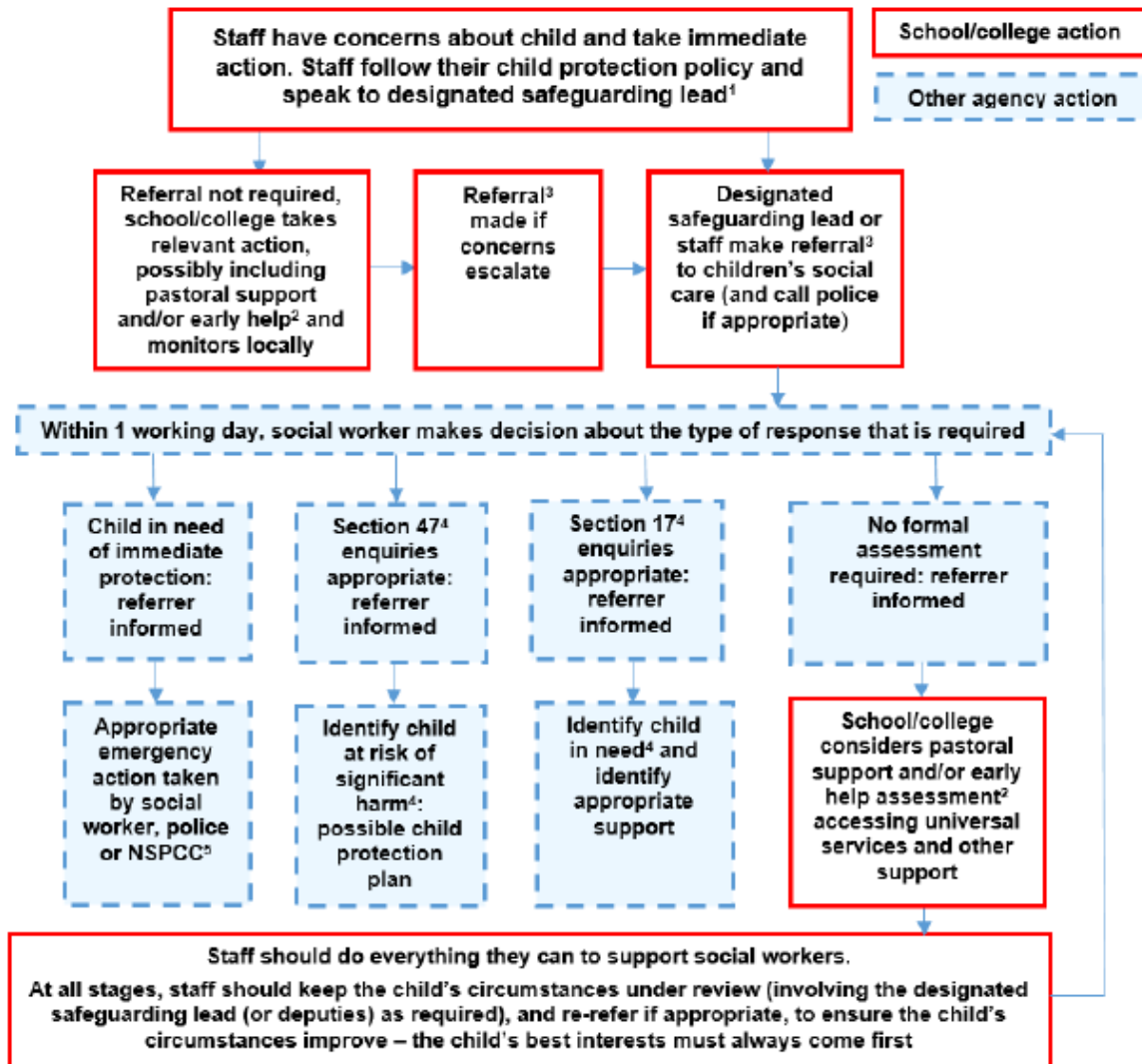
<b>REPORTED BY?</b>	
<b>REPORTED WHEN?</b>	

Reporting staff signature ..... Date .....

### APPENDIX 3: ACTIONS WHERE THERE ARE CONCERNS ABOUT A CHILD

This flowchart is a direct quotation from KCSIE September 2024 and is intended to assist staff in the processes involved where there is a concern about a child.

#### 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. [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. See [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 [Working Together to Safeguard Children](#).

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

## **APPENDIX 4: JOB DESCRIPTIONS FOR THE ROLES OF THE DESIGNATED SAFEGUARDING LEAD (DSL), SENIOR DSL AND DEPUTY DESIGNATED SAFEGUARDING LEADS (DDSL)**

Due to the size of Bromsgrove School we have a unique position of Senior Designated Safeguarding Lead (DSL) who oversees safeguarding in all four sections of the School, in addition to being DSL responsible for the Senior School.

### **SENIOR DSL JOB DESCRIPTION**

The Senior DSL is expected to:

- co-ordinate the safeguarding meetings of all four sections of the School liaising with the Chair of Governors and other Governors as required
- co-ordinate all minutes and records of meetings/training
- attend weekly safeguarding meetings in both the Prep and Senior School, and as and when required at Winterfold
- co-ordinate reflective practice
- co-ordinate all Safeguarding notice boards and information for Common Room briefings
- provide training resources for all DSLs to disseminate to all staff e.g. 7 Minute Briefings and INSET materials
- attend the Worcestershire Children First (WCF) DSL Network Meetings to disseminate good practice to staff
- compose Safeguarding policies and review annually in line with KCSIE
- undertake Safeguarding Induction training for new staff

in addition to all the responsibilities listed for DSLs and DDSLs below.

### **DSL AND DDSL JOB DESCRIPTION**

The job description for the DSL and DDSLs has regard to KCSIE 2024, Annex C: the role of the Designated Safeguarding Lead.

The Designated Safeguarding Lead (DSL) will be an appropriate senior member of staff, and a member of the School's senior leadership team, or hold an equivalent position of status and authority. They have a legal responsibility for dealing with safeguarding issues, providing advice and support to staff, liaising with the local authority (Worcestershire Children First), and working with a range of other agencies. The Designated Safeguarding Lead need not be a teacher but must have the status and authority within the management structure to carry out the duties of the post.

Deputy Designated Safeguarding Leads (DDSLs) are trained to the same standard as the DSL, but the ultimate lead responsibility for child protection remains with the designated safeguarding lead; this responsibility should not be delegated, although they may, and can, be asked to help share the workload at any time.

#### **Manage Referrals**

The DSLs are expected to:

- refer all cases of suspected abuse to the local authority children's social care and: (i) the designated officer(s) for child protection concerns (all cases which concern a staff member), (ii) the Disclosure and Barring Service (cases where a person is dismissed or left due to risk/harm to a child); and/or (iii) the police (cases where a crime may have been committed)
- 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
- support staff who make referrals to local authority children's social care
- refer cases to the Channel programme where there is a radicalisation concern as required
- support staff who make referrals to the Channel programme.

## **Work with Others**

The DSLs are expected to:

- act as a point of contact with the three safeguarding partners
- liaise with the Headmaster/Headmistress to inform them of all child protection issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations
- as required, liaise with the “case manager” (as per Part Four of Keeping Children Safe in Education 2024) and the designated officer(s) at the local authority (also known as local authority designated officer/LADO) for child protection concerns in cases which concern a staff member
- liaise with staff (for example pastoral support staff, School nurses or counsellors, IT technicians and teachers of ICT, Heads of Curriculum Support (SEND) and Looked After Children Co-ordinator) on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies
- act as a source of support, advice and expertise for all staff
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and School leadership staff
- provide a mechanism to ensure that all staff understand and are able to discharge their role and responsibilities (as set out in Part One of Keeping Children Safe in Education 2021)
- assist in conjunction with the Head, Senior DSL and Safeguarding Governor, an annual audit of safeguarding procedures, using the County s175/157 audit or similar
- make use of the Levels of Need guidance when making a decision about whether or not the threshold for Early Help or Children’s Social Care intervention is met. Informal advice on borderline cases and as required will be sought from an advisor at the Family Front Door
- develop effective links with relevant agencies and other professionals and co-operate as required with their enquiries regarding safeguarding matters including co-operation with serious case reviews, attendance at strategy meetings, initial and review child protection conferences, core group and child in need review meetings
- notify the key worker if there is an unexplained absence of more than two days of a pupil who is subject to a child protection plan
- monitor unauthorised absence, particularly where children go missing on repeated occasions, reporting concerns in-line with the Schools’ Missing Child Policies
- contribute to assessments and provide a report to initial and review conferences which have been shared with parents first, whenever possible.

## **Training**

The Designated Safeguarding Lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The Designated Safeguarding Lead should undertake Prevent awareness training.

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

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children’s social care referral arrangements
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so
- ensure each member of staff has access to, and understands, the school’s child protection policy and procedures, especially new and part time staff
- are alert to the specific needs of children in need, those with special educational needs and young carers
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation

- understand the importance of information sharing, both within the School, and with the three safeguarding partners, other agencies, organisation and practitioners
- are able to keep detailed, accurate, secure written records of concerns and referrals
- understand and support the School with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school
- can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online
- obtain access to resources and attend any relevant or refresher training courses
- 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 Designated Safeguarding Lead should, in conjunction with the Senior DSL:

- ensure the School's child protection policies are known, understood and used appropriately
- ensure the School's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the governing body regarding this
- ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the School in this
- link with Worcestershire Safeguarding Children Partnership (WSCP) to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.

### **Child Protection File**

When children leave the School, the DSL should ensure their child protection file is transferred to the new school or educational establishment as soon as possible (within 5 days for an in-year transfer or within the first 5 days of the start of a new term). This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained.

In addition to the child protection file, the DSL should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.

All child protection files should be kept securely, separate from the main pupil file, and locked/password in protected locations. There should be written records of concerns about children, including the use of body maps, even where there is no need to refer the matter immediately. Please note that staff must only view parts of a child's body which are normally visible.

### **Availability**

During term time the Designated Safeguarding Lead (or deputies) should always be available (during school hours) for staff to discuss any safeguarding concerns. Whilst generally speaking the DSL (or deputies) would be expected to be available in person, it is a matter for each section of the School working with the DSL, to define what "available" means and whether in exceptional circumstances availability via phone and or Skype or other such media is acceptable.

It is a matter for the School, and the DSL, to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.