



SAFEGUARDING POLICY

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Key People

Safeguarding Leads at Bourne Grammar School

Designated Safeguarding Lead	Safeguarding Officer (Deputy Designated Safeguarding Lead)	Link Safeguarding Trustee
Mr Mark Bruncker	Mrs Louise Holbrook	Mr Geoff Greatwood

Other Deputy Designated Safeguarding Leads
Mrs Sarah Shales, Mr Stephen Chamberlain, Mrs Mary Ford

Personnel with Designated Responsibility Regarding Allegations Against Staff

Designated Senior Manager	Deputy Designated Senior Manager	Chair of Trustees (in the event of an allegation against the Headteacher)
Mr Alastair Anderson	Mr Mark Bruncker	Mr Ian Mears (via the Trustees' Professional)

The **Local Authority Designated Officer (LADO)** can be contacted on: 01522 554674 or through LSCP_LADO@lincolnshire.gov.uk

Aims

1. The School aims to ensure that:
 1. Appropriate action is taken in a timely manner to safeguard and promote children's welfare.
 2. All staff are aware of their statutory responsibilities with respect to safeguarding.
 3. Staff are properly trained in recognising and reporting safeguarding issues.

Legislation and Statutory Guidance

1. This policy is based on the Department for Education's (DfE's) statutory guidance [Keeping Children Safe in Education \(2024\)](#) and [Working together to safeguard children \(2023\)](#), and the [Academy trust governance guide 2024](#). The School complies with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.
2. This policy is also based on the following legislation:

1. 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 students at the School.
2. [The Children Act 1989\(2004 amendment\)](#), which provides a framework for the care and protection of children.
3. Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by [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.
4. [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM.
5. The [Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children.
6. Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children.
7. [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.
8. The [Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR).
9. The [Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our trustees and Headteacher should carefully consider how they are supporting their students with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting students (where we can show it's proportionate). This includes making reasonable adjustments for disabled students. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment.
10. The [Public Sector Equality Duty](#) (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve student outcomes. Some students may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination
11. This policy also complies with the School's funding agreement and articles of association.

Links with Other Policies

This policy links to the following policies and procedures:

1. Anti-bullying
2. Attendance
3. Behaviour
4. BYOD (Bring your own Device)
5. Designated teacher for looked-after and previously looked-after children
6. Drugs and Alcohol

7. Equal Opportunities
8. eSafety
9. RSE (Relationships and Sex Education)
10. Staff Code of Conduct
11. Whistleblowing

Definitions

1. Safeguarding and promoting the welfare of children means:
 1. Providing help and support to meet the needs of children as soon as problems emerge.
 2. Protecting children from maltreatment within or outside the home, including online.
 3. Preventing impairment of children's mental and physical health or development.
 4. Ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
 5. Taking action to enable all children to have the best outcomes.
2. Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.
3. Abuse is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Appendix 2 explains the different types of abuse.
4. Neglect is a form of abuse and 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.
5. Additional information in relation to these definitions can be found in Appendix 2.
6. Sharing of nudes and semi-nudes (also known as sexting or youth-produced sexual imagery) is where children share nude or semi-nude images, videos, live streams or computer-generated imagery.
7. Children includes everyone under the age of 18, but all students of the School will be safeguarded.
8. The following 3 safeguarding partners are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:
 1. The local authority (LA).
 2. Integrated care boards (previously known as clinical commissioning groups) for an area within the LA.
 3. The chief officer of police for a police area in the LA area.
9. Victim is a widely understood and recognised term, but the School understands that not everyone who has been subjected to abuse considers themselves a victim, or would want to be described that way. When managing an incident, the School will be prepared to use any term that the child involved feels most comfortable with.
10. Alleged perpetrator(s) and perpetrator(s) are widely used and recognised terms. However, the School will carefully consider the terminology uses (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. The School will decide what's appropriate and which terms to use on a case-by-case basis.

Equality Statement

1. Some children have an increased risk of abuse, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. The School is committed to anti-discriminatory practice and recognises children's diverse circumstances. The School ensures that all children have the same protection, regardless of any barriers they may face.
2. Special consideration is given to children who:
 1. Have special educational needs and/or disabilities (SEND) or health conditions
 2. Are young carers.
 3. May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality.
 4. Have English as an additional language.
 5. Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence.
 6. Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation.
 7. Are asylum seekers.
 8. Are at risk due to either their own or a family member's mental health needs.
 9. Are looked after or previously looked after.
 10. Are missing or absent from education for prolonged periods and/or repeat occasions.
 11. Whose parent/carer has expressed an intention to remove them from school to be home educated.

Roles and Responsibilities

1. Safeguarding and child protection is everyone's responsibility. This policy applies to all staff, volunteers and trustees in the School and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.
2. The School plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing students for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment. This will be underpinned by our:
 1. Behaviour policy.
 2. Pastoral support system.
 3. Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
 1. Healthy and respectful relationships.
 2. Boundaries and consent.
 3. Stereotyping, prejudice and equality.
 4. Body confidence and self-esteem.
 5. How to recognise an abusive relationship (including coercive and controlling behaviour).
 6. The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and FGM and how to access support.

7. What constitutes sexual harassment and sexual violence and why they're always unacceptable.

All Staff

1. All staff working directly with children will:
 1. Read and understand Part 1 and Annex B of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually.
2. All staff not working directly with children will read and understand Annex A of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually.
3. All staff will:
 1. Complete a declaration at the beginning of each academic year to say that they have reviewed the guidance.
 2. Reinforce the importance of online safety, where possible, when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online).
 3. Provide a safe space for students who are LGBTQ+ to speak out and share their concerns.
4. All staff will be aware of:
 1. School systems which support safeguarding, including this child protection and safeguarding policy, the Staff Code of Conduct, the role and identity of the Designated Safeguarding Lead (DSL) and Deputies, the Behaviour for Learning policy, the Drugs and Alcohol policy, the eSafety Policy, and the safeguarding response to children who go missing from education.
 2. The Early Help Assessment (EHA) process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment.
 3. The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play.
 4. What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals.
 5. The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines).
 6. The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe.
 7. The fact that children can be at risk of harm inside and outside of their home, at school and online.
 8. The fact that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBTQ+) can be targeted by other children.

What to look for to identify children who need help or protection.

9. Appendix 3-15 detail how staff are supported to achieve the above.

The Designated Safeguarding Lead (DSL)

1. The DSL is a member of the Leadership Team. Our DSL is Mark Brunner, Deputy Headteacher (Pastoral). The DSL takes lead responsibility for child protection and wider safeguarding in the School. This includes online safety and understanding filtering and monitoring processes on school devices and school networks to keep students safe online.
2. During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.
3. The DSL can also be contacted out of school hours, if necessary, by emailing mark.brunner@bourne-grammar.lincs.sch.uk
4. When the DSL is absent, the Deputies will act as cover:
 1. Louise Holbrook (Safeguarding Officer)
 2. Mary Ford (Student Manager)
 3. Sarah Shales (Head of Sixth Form)
 4. Steve Chamberlain (Head of Year 7)
5. If the DSL and Deputies are not available, Alastair Anderson, Headteacher, will coordinate any necessary safeguarding response.
6. The DSL will be given the time, funding, training, resources and support to:
 1. Provide advice and support to other staff on child welfare and child protection matters.
 2. Take part in strategy discussions and inter-agency meetings and/or support other staff to do so.
 3. Contribute to the assessment of children.
 4. Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly.
 5. Have a good understanding of harmful sexual behaviour.
 6. Have a good understanding of the filtering and monitoring systems and processes in place at the school.
7. The DSL will also:
 1. Keep the Headteacher informed of any issues.
 2. Liaise with local authority case managers and designated officers for child protection concerns as appropriate.
 3. Understand the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the School's policies.
 4. Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support.
 5. Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search.
8. The full responsibilities of the DSL and Deputies are set out in their job descriptions.

The Board of Trustees

1. The Board of Trustees will:
 1. Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development.
 2. Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the Headteacher to account for its implementation.

3. Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and the School's local multi-agency safeguarding arrangements.
4. Appoint a Link Trustee to monitor the effectiveness of this policy in conjunction with the full Board of Trustees. This is always a different person from the DSL.
5. Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners.
6. Ensure that the School has appropriate filtering and monitoring systems in place, and review their effectiveness. This includes:
 1. Making sure that the Leadership Team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training.
 2. Reviewing the [DfE's Filtering and Monitoring Standards](#), and discussing with IT staff and service providers what needs to be done to support the School in meeting these standards.
7. Make sure:
 1. The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support.
 2. Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies.
 3. The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place.
 4. The School has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). See **Appendix 1** for further details.
 5. That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised.
8. Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the School roll):
 1. Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed.
 2. Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate.
 3. Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply.
2. The Chair of Trustees will act as the 'case manager' in the event that an allegation of abuse is made against the Headteacher, where appropriate.
3. All trustees will read Keeping Children Safe in Education in its entirety.

The Headteacher

The Headteacher is responsible for the implementation of this policy, including ensuring that staff (and temporary staff) and volunteers:

1. Are informed of the School's systems which support safeguarding, including this policy, as part of their induction.

2. Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect.
3. Communicating this policy to parents/carers when their child joins the School and via the School website.
4. Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent.
5. Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate. See **Appendix 1** for full details.
6. Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this.

Confidentiality

1. The School will follow the below confidentiality principles in addition to our GDPR: Data Protection policy:
 1. Timely information sharing is essential to effective safeguarding.
 2. 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.
 3. The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe.
 4. If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk.
 5. Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests.
 6. If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:
 1. There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies.
 2. The DSL will have to balance the victim's wishes against their duty to protect the victim and other children.
 3. The DSL should consider that:
 1. Parents or carers should normally be informed (unless this would put the victim at greater risk).
 2. The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care.
 3. Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains.
 7. Regarding anonymity, all staff will:
 1. Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system.

2. Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved.
 3. Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities.
 8. The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information.
 9. If staff are in any doubt about sharing information, they should speak to the DSL (or deputy).
2. Confidentiality is also addressed in this policy with respect to record-keeping and allegations of abuse against staff in **Appendix 1**.

Recognising Abuse and Taking Action

All staff are expected to be able to identify and recognise all forms of abuse, neglect and exploitation and shall be alert to the potential need for early help for a child who:

- Is disabled
- Has special educational needs (whether or not they have a statutory education health and care (EHC) plan)
- Is a young carer
- Is bereaved
- Is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime
- Is frequently missing/goes missing from education, care or home
- Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- Is at risk of being radicalised or exploited
- Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- 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 drugs or alcohol
- Is suffering from mental ill health
- Has returned home to their family from care
- Is at risk of so-called 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage
- Is a privately fostered child
- Has a parent or carer in custody or is affected by parental offending
- Is missing education, or persistently absent from school, or not in receipt of full-time education
- Has experienced multiple suspensions and is at risk of, or has been permanently excluded.

Immediate Action

1. Staff, volunteers and trustees must follow the procedures set out below in the event of a safeguarding issue.
2. If a child is suffering or likely to suffer harm, or in immediate danger:
 1. Make a referral to children's social care and/or the police (999) immediately if you believe a child is suffering or likely to suffer from harm, or is in immediate danger. Anyone can make a referral.
 2. Tell the DSL as soon as possible if you make a referral directly.
3. If you believe that a child or adult may be a victim of neglect, abuse or cruelty:
 1. Tell the DSL or Deputies.
 2. The DSL or a Deputy assess the situation and contact Lincolnshire Children's safeguarding - 01522 782111 (Monday to Friday, 8am to 6pm) or 01522 782333 (outside office hours) if appropriate. Anyone can contact Lincolnshire Children's services - it does not have to be a DSL.
4. The following link to the GOV.UK webpage provides further information on reporting child abuse to the local council: [Report Child Abuse to Local Council](#).

If a Child Makes a Disclosure to You

1. If a child discloses a safeguarding issue to you, you should:
 1. Listen to and believe them. Allow them time to talk freely and do not ask leading questions.
 2. Stay calm and do not show that you are shocked or upset.
 3. Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner.
 4. Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret.
 5. Write up your conversation on [MyConcern](#) as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it. Mark the concern as 'urgent' if you feel a DSL or a Deputy needs to respond urgently, or speak to them in person without delay.
 6. If you do not have access to MyConcern pass your physical write-up to the DSL or Deputy DSL in person.
 7. If it is not possible to contact a DSL, you may make a referral to children's social care and/or the police directly, updating the DSL as soon as possible that you have done so.
 8. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process.
2. Bear in mind that some children may:
 1. Not feel ready, or know how to tell someone that they are being abused, exploited or neglected.
 2. Not recognise their experiences as harmful.
 3. Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers.
3. None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

If you Have a Non-urgent Concern about a Child

1. Where possible, speak to the DSL first to agree a course of action.
2. If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.
3. Make a referral to local authority children's social care directly, if appropriate. Share any action taken with the DSL as soon as possible.

Early Help Assessment

1. If an early help assessment is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.
2. The School will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.
3. The DSL will keep the case under constant review and the School will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.
4. Early Help is defined as anything that supports children, young people, and their families to achieve their potential, by either preventing difficulties, or stopping those getting worse.
5. Early Help is about providing the right help, at the right time, in the right place. Our belief is that children and young people are best supported by people they know and trust.
6. All children and young people may need extra help and support at some point in their lives. All of us are committed to continuing to identify and provide support to children and young people who are at risk of poor health and wellbeing.
7. The School will identify who their vulnerable children are, ensuring all staff and volunteers know the processes to secure advice, help and support where needed.
8. The School will refer to the [guidance for Early Help](#) or seek help via TACadmin@lincolnshire.gov.uk or earlyhelpconsultants@lincolnshire.gov.uk.
9. The [Family Services Directory](#) is a useful tool when discussing early help in addition to the [Lincolnshire Early Help Strategy](#).

Referral

1. If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so.
2. If you make a referral directly, you must tell the DSL as soon as possible. You can contact Lincolnshire Children's Safeguarding Team on 01522 782111 (Monday to Friday, 8am to 6pm) or 01522 782333 (outside office hours) if appropriate. Anyone can contact Lincolnshire Children's services.
3. The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

4. If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.
5. The School will follow the [Lincolnshire LSCP Professional Resolution & Escalation Protocol](#). This allows us to open up a dialogue with other professionals and resolve any issues in an open and honest approach and in the best interests of the child.

Reporting FGM or Suspected FGM

1. Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".
2. FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.
3. Possible indicators that a student has already been subjected to FGM, and factors that suggest a student may be at risk, are set out in **Appendix 11** of this policy.
4. Any teacher who either:
 1. Is informed by a girl under 18 that an act of FGM has been carried out on her; or
 2. Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth.
5. Must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.
 1. They should also share the information with the DSL and a referral to children's social care should be made.
6. Any other member of staff who discovers that an act of FGM appears to have been carried out on a student under 18 must speak to the DSL and follow the local safeguarding procedures.
7. The duty for teachers mentioned above does not apply in cases where a student is at risk of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine students.
8. Any member of staff who suspects a student is at risk of FGM or suspects that FGM has been carried out or discovers that a student aged 18 or over appears to have been a victim of FGM should speak to the DSL and follow local safeguarding procedures.
9. Further guidance can be found here: [Mandatory reporting of female genital mutilation: procedural information - GOV.UK \(www.gov.uk\)](#).

Concerns about Extremism

1. If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.
2. If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.
3. Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include the police or [Channel](#), the government's programme for

identifying and supporting individuals at risk of becoming involved with or supporting terrorism, or the local authority children's social care team.

4. The DfE also has a dedicated telephone helpline, 020 7340 7264, which school staff and trustees can call to raise concerns about extremism with respect to a student. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.
5. In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:
 1. Think someone is in immediate danger.
 2. Think someone may be planning to travel to join an extremist group.
 3. See or hear something that may be terrorist-related.

Concerns about Mental Health

1. 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.
2. Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.
3. If you have a mental health concern take immediate action to ensure the child's safety and report on MyConcern, or speak to the DSL or a Deputy DSL.
4. The School is mindful of the [Department for Education's Guidance on Mental Health and Behaviour in Schools](#).

Concerns about a Staff Member, Supply Teacher, Volunteer or Contractor

1. If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the Headteacher as soon as possible. If the concerns/allegations are about the Headteacher, speak to the Chair of Trustees.
2. The Headteacher/Chair of Trustees will then follow the procedures set out in **Appendix 1**.
3. Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to the Headteacher, report it directly to the local authority designated officer (LADO).
4. If you receive an allegation relating to an incident where an individual or organisation was using the School premises for running an activity for children, follow the School's safeguarding policies and procedures, informing the DSL and the LADO.
5. The LADO can be contacted on: 01522 554674 or through LSCP_LADO@lincolnshire.gov.uk.
6. A [Referral Form for the LADO](#) should be completed in addition to any phone call.

Allegations about Child-on-child Abuse

1. The School recognises that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up", as this can lead to a culture of unacceptable behaviours and an unsafe environment for students.

2. We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.
3. Most cases of students hurting other students will be dealt with under the School's Behaviour for Learning policy, but this safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:
 1. Is serious, and potentially a criminal offence.
 2. Could put students in the school at risk.
 3. Is violent.
 4. Involves students being forced to use drugs or alcohol.
 5. Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes).
4. See **Appendix 8** for more information on Child-on-child abuse.

Procedures for Dealing with Allegations of Child-on-child Abuse

If a student makes an allegation of abuse against another student:

1. You must record the allegation and tell the DSL, but do not investigate it.
2. The DSL or a Deputy will make a decision about contacting the local authority children's social care team for advice, as well as the police if the allegation involves a potential criminal offence.
3. The DSL or a Deputy will consider conducting a risk assessment and implementing a support plan for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s).
4. The DSL or a Deputy will contact the children and adolescent mental health services (CAMHS), if appropriate.
5. If the incident is a criminal offence and there are delays in the criminal process, the DSL or a Deputy will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. The School will ask the police if we have any questions about the investigation.

Creating a Supportive Environment in School and Minimising the Risk of Child-on-child Abuse

1. The School recognises the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.
2. To achieve this, we will:
 1. Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images.
 2. Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female students, and initiation or hazing type violence with respect to boys.
 3. Ensure our curriculum helps to educate students about appropriate behaviour and consent.

4. Ensure students are able to easily and confidently report abuse using our reporting systems.
5. Ensure staff reassure victims that they are being taken seriously.
6. Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners.
7. Support children who have witnessed sexual violence, especially rape or assault by penetration. The School will do all it can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed.
8. Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment.
9. Ensure staff are trained to understand:
 1. How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports.
 2. That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”.
 3. That if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
 1. Children can show signs or act in ways they hope adults will notice and react to.
 2. A friend may make a report.
 3. A member of staff may overhear a conversation.
 4. A child’s behaviour might indicate that something is wrong.
 5. That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation.
 6. That a student harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy.
 7. The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it.
 8. That they should speak to the DSL if they have any concerns.
 9. That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side.
3. The DSL will take the lead role in any disciplining of the alleged perpetrator(s). The School will provide support at the same time as taking any disciplinary action.
4. Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn’t (in itself) prevent the School from coming to its own conclusion about what happened and taking appropriate disciplinary action. The School will consider these matters on a case-by-case basis, taking into account whether:
 1. Taking action would prejudice an investigation and/or subsequent prosecution – the School will liaise with the police and/or local authority children’s social care to determine this.
 2. There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing.

Sharing of Nudes and Semi-Nudes ('sexting')

Your Responsibilities when Responding to an Incident

1. If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos, including pseudo-images which are computer-generated images that otherwise appear to be a photograph or video (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL or a Deputy without delay.
2. You must not:
 1. View, copy, print, share, store or save the imagery yourself, or ask a student to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL or a Deputy).
 2. Delete the imagery or ask the student to delete it.
 3. Ask the student(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility).
 4. Share information about the incident with other members of staff, the student(s) it involves or their, or other, parents and/or carers.
 5. Say or do anything to blame or shame any young people involved.
3. You should explain that you need to report the incident, and reassure the student(s) that they will receive support and help from the DSL or a Deputy.

Initial Review Meeting

1. Following a report of an incident, the DSL or a Deputy will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and members of the pastoral team. This meeting will consider the initial evidence and aim to determine:
 1. Whether there is an immediate risk to student(s).
 2. If a referral needs to be made to the police and/or children's social care.
 3. If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed).
 4. What further information is required to decide on the best response.
 5. Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown).
 6. Whether immediate action should be taken to delete or remove images or videos from devices or online services.
 7. Any relevant facts about the students involved which would influence risk assessment.
 8. If there is a need to contact another school, college, setting or individual.
 9. Whether to contact parents or carers of the students involved (in most cases parents/carers should be involved).
 10. The DSL or a Deputy will make an immediate referral to police and/or children's social care if:
 1. The incident involves an adult.
 2. There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to SEN).
 3. What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent.

4. The imagery involves sexual acts and any student in the images or videos is under 13.
 5. The DSL has reason to believe a student is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming).
11. If none of the above apply then the DSL or a Deputy, in consultation with the Headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

Further Review by the DSL

1. If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL or a Deputy will conduct a further review to establish the facts and assess the risks.
2. They will hold interviews with the students involved (if appropriate).
3. If at any point in the process there is a concern that a student has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

Informing Parents/Carers

The DSL will inform parents/carers at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the student at risk of harm.

Referring to the Police

If it is necessary to refer an incident to the police, this will be done through contacting the police community support officer or by dialling 101.

Recording Incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded.

Curriculum Coverage

1. Students are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our Relationship and Sex Education curriculum. Teaching covers the following in relation to the sharing of nudes and semi-nudes:
 1. What it is.
 2. How it is most likely to be encountered.
 3. The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment
 4. Issues of legality.
 5. The risk of damage to people's feelings and reputation.
2. Students also learn the strategies and skills needed to manage:
 1. Specific requests or pressure to provide (or forward) such images.
 2. The receipt of such images.

Online Safety and the Use of Mobile Technology

1. The School recognises the importance of safeguarding children from potentially harmful and inappropriate online material, and understands that technology is a significant component in many safeguarding and wellbeing issues.
2. To address this, our school aims to:
 1. Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of students, staff, volunteers and trustees.
 2. Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (referred to as 'mobile phones' in this policy).
 3. Set clear guidelines for the use of mobile phones for the whole school community.
 4. Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate.

The 4 Key Categories of Risk

1. Our approach to online safety is based on addressing the following categories of risk:
 1. **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism.
 2. **Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer 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.
 3. **Conduct** – personal 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; and
 4. **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams.
2. To meet our aims and address the risks above, we will:
 1. Educate students about online safety as part of our curriculum. For example:
 1. The safe use of social media, the internet and technology.
 2. Keeping personal information private.
 3. How to recognise unacceptable behaviour online.
 4. How to report any incidents of cyber-bullying, ensuring students are encouraged to do so, including where they're a witness rather than a victim.
 5. Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year.
 6. Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety.

7. Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
 1. Staff are allowed to bring their personal phones to school for their own use but will limit such use to non-contact time when students are not present, unless it is to facilitate teaching and learning or is serving another school-related purpose.
 2. Staff will not take pictures or recordings of students on their personal phones or cameras unless it is for a school-related purpose, such as capturing sporting moments for the School Bulletin. Where this is the case, staff will transfer any pictures or recordings onto a school device and delete the original from their personal device as soon as is practicable.
 8. Help to ensure everyone abides by our Bring your Own Device (BYOD) policy.
 9. Apply sanctions in accordance with our Behaviour for Learning policy.
 10. Make sure all staff, students and parents/carers are aware that staff have the power to search students' phones, as set out in the DfE's guidance on [Searching, Screening and Confiscation](#).
 11. Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems.
2. Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by the school community.
 3. Provide regular safeguarding and child protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively.
 4. Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly.
3. For more information about how we keep children safe online see our [eSafety policy](#).

Reporting Systems for our Students

1. Where there is a safeguarding concern, the School will take the child's wishes and feelings into account when determining what action to take and what services to provide.
2. The School recognises the importance of ensuring students feel safe and comfortable to come forward and report any concerns and/or allegations.
3. Students may share their concerns with any of the Designated Safeguarding Leads if they do not feel able to speak with another member of staff.
4. Students may share concerns with any member of staff and be reassured that their concerns will be taken seriously.
5. Students will be encouraged, through the tutorial programme, PSHE scheme of work and assembly programme, to support one another by sharing concerns/allegations with a member of staff. They will also be educated on the importance of standing up for what is right and protecting themselves and others by seeking support when they have concerns.
6. Staff will foster strong relationships with students to help cultivate an environment where students feel safe and confident in sharing their concerns.
7. All students have 1-1 SPR meetings with their form tutor to provide further opportunities to share any concerns.
8. Students are able to feedback general concerns through the School Council.
9. Students are able to email in their concerns as opposed to face-to-face disclosures. They can do so by sending an email to studentsupport@bourne-grammar.lincs.sch.uk

10. Students should be reassured that any disclosure will be dealt with sensitively and discretely, and they will be kept informed of any next steps.
11. Parents are encouraged to share concerns with the School if they feel their child is not able to do so.

Communication with Parents or Carers

1. Where appropriate, and after discussion with the child, we will share any concerns about a child with the child's parents or carers. The DSL or a Deputy will normally do this in the event of a suspicion or disclosure.
2. Other staff will only talk to parents or carers about any such concerns following consultation with the DSL or Deputy.
3. If the School believes that notifying parents or carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.
4. In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.
5. The DSL or a Deputy will, along with any relevant agencies (this will be decided on a case-by-case basis):
 1. Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed.
 2. Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s).

Students with Special Educational Needs, Disabilities or Health Issues

1. The School recognises that students with SEND or certain health conditions can face additional safeguarding challenges. Children with disabilities are more likely to be abused than their peers. Additional barriers can exist when recognising abuse, exploitation and neglect in this group, including:
 1. Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration.
 2. Students being more prone to peer group isolation or bullying (including prejudice-based bullying) than other students.
 3. The potential for students with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
 4. Communication barriers and difficulties in managing or reporting these challenges.
 5. Cognitive understanding-being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in school or the consequences of doing so.
2. All staff will be aware of these additional safeguarding challenges and any abuse involving students with SEND will require close liaison with the DSL (or Deputy) and the SENCO.

Students with a Social Worker

1. Students may need a social worker due to safeguarding or welfare needs. The School recognises that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.
2. The DSL and all members of staff will work with and support social workers to help protect vulnerable children.
3. Where we are aware that a student has a social worker, the DSL or a Deputy will always consider this fact to ensure any decisions are made in the best interests of the student's safety, welfare and educational outcomes. For example, it will inform decisions about:
 1. Responding to unauthorised absence or missing education where there are known safeguarding risks.
 2. The provision of pastoral and/or academic support.

Looked-after and Previously Looked-after Children

1. The School will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, the School will ensure that:
 1. Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements.
 2. The DSL and Deputies have details of children's social workers and relevant virtual school heads.
2. The School has appointed a Designated Teacher, Mark Brunner, Deputy Headteacher, who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with [statutory guidance](#).
3. The Designated Teacher is appropriately trained and has the relevant qualifications and experience to perform the role.
4. As part of their role, the designated teacher will:
 1. Work closely with the DSL and Deputies to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to.
 2. Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how student premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans.

Complaints and Concerns about School Safeguarding Policies

1. Complaints against staff:

1. Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see Appendix 1).
2. Other complaints
 1. The response to all other safeguarding-related complaints (e.g. those against students) will be coordinated by the DSL or a Deputy.

Whistle-blowing

Refer to the School's Whistleblowing policy for information and procedures.

Record-keeping

1. The School will hold records in line with our records retention schedule.
2. All safeguarding concerns, discussions, decisions made and the rationale for those decisions, must be recorded on [MyConcern](#). This should include instances where referrals were or were not made to another agency such as local authority children's social care or the Prevent programme etc. If you are in any doubt about whether to record something, discuss it with the DSL.
3. Records will include:
 1. A clear and comprehensive summary of the concern.
 2. Details of how the concern was followed up and resolved.
 3. A note of any action taken, decisions reached and the outcome.
4. Concerns and referrals will be kept in a separate child protection file for each child or, where possible, scanned and uploaded to My Concern.
5. Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.
6. Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the School.
7. If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main student file.
8. To allow the new school/college to have support in place when the child arrives, this should be within:
 1. 5 days for an in-year transfer, or within
 2. The first 5 days of the start of a new term.
9. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.
10. The School's Safer Recruitment policy sets out our policy on record-keeping specifically with respect to recruitment and pre-appointment checks.
11. Appendix 1 sets out the School's policy on record-keeping with respect to allegations of abuse made against staff.

Training

All Staff

1. All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures and online safety, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse, exploitation or neglect.
2. This training will be regularly updated and will:
 1. Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning.
 2. Be in line with advice from the 3 safeguarding partners.
 3. Include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring.
 4. Have regard to the Teachers' Standards to support the expectation that all teachers:
 1. Manage behaviour effectively to ensure a good and safe environment.
 2. Have a clear understanding of the needs of all students.
3. All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of becoming involved with or supporting terrorism and to challenge extremist ideas.
4. Staff will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually (for example, through emails, e-bulletins and staff meetings).
5. Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.
6. Volunteers will receive appropriate training, if applicable.

The DSL and Deputies

1. The DSL and Deputies will undertake child protection and safeguarding training at least every 2 years.
2. In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).
3. They will also undertake Prevent awareness training.

Trustees

1. All trustees receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:
 1. Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge.
 2. Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding.
 3. As the Chair of Trustees may be required to act as the 'case manager' in the event that an allegation of abuse is made against the Headteacher, they receive training in managing allegations for this purpose.

Recruitment – Interview Panels

1. At least one person conducting any interview for any post at the School will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures.
2. Shortlisted candidates will now be informed that the school may carry out online checks as part of the due diligence process.
3. See the Safer Recruitment policy for more information about the School's safer recruitment procedures.

APPENDIX 1: Allegations Against Staff (including low-level concerns)

Allegations that May Meet the Harms Threshold

1. This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, has:
 1. Behaved in a way that has harmed a child, or may have harmed a child, and/or
 2. Possibly committed a criminal offence against or related to a child, and/or
 3. Behaved towards a child or children in a way that indicates they may pose a risk of harm to children, and/or
 4. Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school
2. If we're in any doubt as to whether a concern meets the harm threshold, we will consult our local authority designated officer (LADO).
3. We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.
4. A 'case manager' will lead any investigation. This will be the Headteacher, or the Chair of Trustees where the Headteacher is the subject of the allegation. The case manager will be identified at the earliest opportunity.
5. Our procedures for dealing with allegations will be applied with common sense and judgement.
6. If we receive an allegation of an incident happening while an individual or organisation was using the school premises to run activities for children, we will follow our safeguarding policies and procedures and inform our LADO.
7. Suspension of the accused will not be the default position, and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.
8. Based on an assessment of risk, we will consider alternatives such as:
 1. Redeployment within the School so that the individual does not have direct contact with the child or children concerned.
 2. Providing an assistant to be present when the individual has contact with children.
 3. Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children.
 4. Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted.

9. If in doubt, the case manager will seek views from the School's HR and Office Manager and the designated officer at the local authority, as well as the police and children's social care where they have been involved.
10. Definitions for outcomes of allegation investigations
 1. **Substantiated:** there is sufficient evidence to prove the allegation.
 2. **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation.
 3. **False:** there is sufficient evidence to disprove the allegation.
 4. **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence).
 5. **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made.

Procedure for Dealing with Allegations

1. In the event of an allegation that meets the criteria above, the case manager will take the following steps:
2. Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below.
3. Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police before consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police).
4. Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies.
5. Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate.
6. Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care.
7. If immediate suspension is considered necessary, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details.
8. If it is decided that no further action is to be taken in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what

action should follow both in respect of the individual and those who made the initial allegation.

9. If it is decided that further action is needed, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate.
10. Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate, such as signposting them to the School's Employee Assistance Programme.
11. Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice.
12. Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member).
13. Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child.
14. If the School is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.
15. Where the police are involved, wherever possible the school will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

Additional Considerations for Supply Teachers and All Contracted Staff

1. If there are concerns or an allegation is made against someone not directly employed by the school, such as a supply teacher or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures.
2. We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
3. The Board of Trustees will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation.
4. We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required.
5. We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary).
6. When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

Timescales

1. We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:
 1. Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week.
 2. If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 school days.
 3. If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 school days.
2. However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

Specific Actions

Action Following a Criminal Investigation or Prosecution

1. The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

Conclusion of a Case Where the Allegation is Substantiated

1. If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.
2. If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals Returning to Work After Suspension

1. If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.
2. The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

Unsubstantiated, Unfounded, False or Malicious Reports

1. If a report is:
 1. Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate.
 2. Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it.
2. If an allegation is:
 1. Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate.

2. Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Confidentiality and Information Sharing

1. The School will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.
2. The case manager will take advice from the LADO, police and children's social care services, as appropriate, to agree:
 1. Who needs to know about the allegation and what information can be shared
 2. How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality.
 3. What, if any, information can be reasonably given to the wider community to reduce speculation.
 4. How to manage press interest if, and when, it arises.

Record-keeping

1. The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.
2. The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).
3. For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:
 1. A clear and comprehensive summary of the allegation.
 2. Details of how the allegation was followed up and resolved.
 3. Notes of any action taken, decisions reached and the outcome.
 4. A declaration on whether the information will be referred to in any future reference.
4. In these cases, the school will provide a copy to the individual, in agreement with children's social care or the police as appropriate.
5. We will retain all records at least until the accused individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

References

1. When providing employer references, we will:
 1. Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious.
 2. Include substantiated allegations, provided that the information is factual and does not include opinions

Learning Lessons

1. After any cases where the allegations are substantiated, the case manager will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.

2. This will include consideration of (as applicable):
 1. Issues arising from the decision to suspend the member of staff.
 2. The duration of the suspension.
 3. Whether or not the suspension was justified.
 4. The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual.
 5. For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

Non-recent Allegations

1. Abuse can be reported, no matter how long ago it happened.
2. We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.
3. Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

Concerns that do not Meet the Harm Threshold

1. This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in the section above.
2. Concerns may arise through, for example:
 1. Suspicion.
 2. Complaint.
 3. Safeguarding concern or allegation from another member of staff.
 4. Disclosure made by a child, parent or other adult within or outside the school.
 5. Pre-employment vetting checks.
3. We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.
4. Definition of low-level concern: The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the school may have acted in a way that:
 1. Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
 2. Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority
 3. Examples of such behaviour could include, but are not limited to:
 1. Being overly friendly with children.
 2. Having favourites.
 3. Taking photographs of children on their mobile phone.
 4. Engaging with a child on a one-to-one basis in a secluded area or behind a closed door.
 5. Humiliating pupils.

Sharing Low-level Concerns

1. We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially share low-level concerns so that they can be addressed appropriately.

2. We will create this culture by:
 1. Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others.
 2. Empowering staff to share any low-level concerns.
 3. Empowering staff to self-refer.
 4. Addressing unprofessional behaviour and supporting the individual to correct it at an early stage.
 5. Providing a responsive, sensitive and proportionate handling of such concerns when they are raised.
 6. Helping to identify any weakness in the school's safeguarding system.

Responding to Low-level Concerns

1. If the concern is raised via a third party, the Headteacher will collect evidence where necessary by speaking:
 1. Directly to the person who raised the concern, unless it has been raised anonymously.
 2. To the individual involved and any witnesses
2. The Headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the School's Staff Code of Conduct. The Headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

Record Keeping

1. All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.
 1. Records will be:
 1. Kept confidential, held securely and comply with the DPA 2018 and UK GDPR.
 2. Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in the **section above**, we will refer it to the designated officer at the local authority.
 3. Retained at least until the individual leaves employment at the school.
 2. Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

References

1. We will not include low-level concerns in references unless:
 1. The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
 2. The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

APPENDIX 2: Types of Abuse

1. Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.
2. **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.
3. **Emotional abuse** is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
 1. Emotional abuse may involve:
 1. Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.
 2. Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.
 3. Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction.
 4. Seeing or hearing the ill-treatment of another.
 5. Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.
4. **Sexual abuse** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve:
 1. 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.
 2. Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet).
5. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.
6. **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.
 1. Once a child is born, neglect may involve a parent or carer failing to:
 1. Provide adequate food, clothing and shelter (including exclusion from home or abandonment).
 2. Protect a child from physical and emotional harm or danger.
 3. Ensure adequate supervision (including the use of inadequate care-givers).
 4. Ensure access to appropriate medical care or treatment.
 2. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

APPENDIX 3: Children who are Absent from Education

1. A child being absent from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse, exploitation or neglect, such as sexual abuse, child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.
2. There are many circumstances where a child may be absent or become missing from education, but some children are particularly at risk. These include children who:
 1. Are at risk of harm, neglect or exploitation.
 2. Are at risk of forced marriage or FGM.
 3. Come from Gypsy, Roma, or Traveller families.
 4. Come from the families of service personnel.
 5. Go missing or run away from home or care.
 6. Are supervised by the youth justice system.
 7. Cease to attend a school.
 8. Come from new migrant families.
3. We will follow our procedures for unauthorised absence and for dealing with children who are absent 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 going missing in future. This includes informing the local authority if a child leaves the school without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.
4. Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being absent, such as travelling to conflict zones, FGM and forced marriage.
5. If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

APPENDIX 4: Missing Pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing during the course of the School day:

1. The DSL or Deputies will be informed and will coordinate the response.
2. Staff will physically check all areas of the School, including toilet facilities.
3. Staff will potentially speak with a close friend of the missing student and ask for them to contact them on their mobile phone.
4. Parents will be informed that their child has gone missing.
5. CCTV may be used to help with the initial investigation.
6. The police will be called if the whereabouts of the child is still unknown.

APPENDIX 5: Child Criminal Exploitation

1. Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity. It may involve an exchange for something the victim needs or wants, and/or for the financial or advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

2. The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.
3. The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.
4. Indicators of CCE can include a child:
 1. Appearing with unexplained gifts or new possessions.
 2. Associating with other young people involved in exploitation.
 3. Suffering from changes in emotional wellbeing.
 4. Misusing drugs and alcohol.
 5. Going missing for periods of time or regularly coming home late.
 6. Regularly missing school or education.
 7. Not taking part in education.
5. If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

APPENDIX 6: County Lines

1. County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line".
2. This activity can happen locally as well as across the UK - no specified distance of travel is required.
3. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.
4. Children can be targeted and recruited into county lines in a number of locations including any type of schools (including special schools), further and higher educational institutions, pupil referral units, children's homes and care homes. Children are also increasingly being targeted and recruited online using social media.
5. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.
6. The DSL must be informed if there are any concerns that a student is at risk of, or involved in, county lines.

APPENDIX 7: Child Sexual Exploitation

1. Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. It may involve an exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. or may not, be accompanied by violence or threats of violence.
2. The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

3. The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.
4. CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.
5. In addition to the CCE indicators above, indicators of CSE can include a child:
 1. Having an older boyfriend or girlfriend.
 2. Suffering from sexually transmitted infections or becoming pregnant.
6. If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

APPENDIX 8: Child-on-child Abuse

1. Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online, and can occur simultaneously between the two.
2. Our school has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are there no reports, that doesn't mean that this kind of abuse isn't happening.
3. Child-on-child abuse is most likely to include, but may not be limited to:
 1. Bullying (including cyber-bullying, prejudice-based and discriminatory bullying).
 2. Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse').
 3. Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse).
 4. Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence).
 5. Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse.
 6. Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
 7. Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery).
 8. Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.
 9. Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).
4. Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images,

especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

5. If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in Section 9 as appropriate.
6. When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma, and will offer them appropriate support.

APPENDIX 9: Domestic Abuse

1. Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.
2. Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. 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.
3. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.
4. Older children may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.
5. Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn.
6. If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day.
7. The DSL will provide support according to the child's needs and update records about their circumstances.

APPENDIX 10: Homelessness

1. Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.
2. The DSL and Deputies will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).
3. Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

APPENDIX 11: So-called 'Honour-based' Abuse

1. So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

2. Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.
3. All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

FGM

1. The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Section 10 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

1. Indicators that FGM has already occurred include:
 1. A pupil confiding in a professional that FGM has taken place.
 2. A mother/family member disclosing that FGM has been carried out.
 3. A family/pupil already being known to social services in relation to other safeguarding issues.
 4. A girl:
 1. Having difficulty walking, sitting or standing, or looking uncomfortable.
 2. Finding it hard to sit still for long periods of time (where this was not a problem previously).
 3. Spending longer than normal in the bathroom or toilet due to difficulties urinating.
 4. Having frequent urinary, menstrual or stomach problems.
 5. Avoiding physical exercise or missing PE.
 6. Being repeatedly absent from school, or absent for a prolonged period.
 7. Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour.
 8. Being reluctant to undergo any medical examinations.
 9. Asking for help, but not being explicit about the problem.
 10. Talking about pain or discomfort between her legs.
2. Potential signs that a pupil may be at risk of FGM include:
 1. The girl's family having a history of practising FGM (this is the biggest risk factor to consider).
 2. FGM being known to be practised in the girl's community or country of origin.
 3. A parent or family member expressing concern that FGM may be carried out.
 4. A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues.
 5. A girl:
 1. Having a mother, older sibling or cousin who has undergone FGM.
 2. Having limited level of integration within UK society.
 3. Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman".
 4. Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period.
 5. Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM.

6. Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion).
 7. Being unexpectedly absent from school.
 8. Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication.
3. The above indicators and risk factors are not intended to be exhaustive.

Forced Marriage

1. Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 1 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.
2. It is also illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not involved.
3. Staff will receive training around forced marriage and the presenting symptoms. We are aware of the '1 chance' rule, i.e. we may only have 1 chance to speak to the potential victim and only 1 chance to save them.
4. If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.
5. The DSL will:
 1. Speak to the pupil about the concerns in a secure and private place.
 2. Activate the local safeguarding procedures and refer the case to the local authority's designated officer.
 3. Seek advice from the Forced Marriage Unit on 020 7008 0151 or fm@fco.gov.uk.
 4. Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate.

APPENDIX 12: Preventing Radicalisation

1. Radicalisation refers to the process by which a person legitimises support for, or use of, terrorist violence
2. Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:
 1. Negate or destroy the fundamental rights and freedoms of others; or
 2. Undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
 3. Intentionally create a permissive environment for others to achieve the results outlined in either of the above points
3. Terrorism is an action that:
 1. Endangers or causes serious violence to a person/people;
 2. Causes serious damage to property; or
 3. Seriously interferes or disrupts an electronic system.
4. The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

5. Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.
6. We will assess the risk of children in our school from becoming involved with or supporting terrorism. . This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.
7. We will ensure that suitable internet filtering is in place, and equip our pupils to stay safe online at school and at home.
8. There is no single way of identifying an individual who is likely to be susceptible to radicalisation into terrorism. Radicalisation can occur quickly or over a long period.
9. Staff will be alert to changes in pupils' behaviour.
10. The government website Educate Against Hate and charity NSPCC say that signs that a pupil is being radicalised can include:
 1. Refusal to engage with, or becoming abusive to, peers who are different from themselves.
 2. Becoming susceptible to conspiracy theories and feelings of persecution.
 3. Changes in friendship groups and appearance.
 4. Rejecting activities they used to enjoy.
 5. Converting to a new religion.
 6. Isolating themselves from family and friends.
 7. Talking as if from a scripted speech.
 8. An unwillingness or inability to discuss their views.
 9. A sudden disrespectful attitude towards others.
 10. Increased levels of anger.
 11. Increased secretiveness, especially around internet use.
 12. Expressions of sympathy for extremist ideologies and groups, or justification of their actions.
 13. Accessing extremist material online, including on Facebook, Twitter and other platforms.
 14. Possessing extremist literature.
 15. Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations.
11. Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.
12. If staff are concerned about a pupil, they will follow our procedures set out in Section 11 of this policy, including discussing their concerns with the DSL.

Staff should always take action if they are worried.

APPENDIX 13: Sexual Violence and Sexual Harassment Between Children

1. Sexual violence and sexual harassment can occur:
 1. Between two children of any age and sex
 2. Through a group of children sexually assaulting or sexually harassing a single child or group of children
 3. Online and face to face (both physically and verbally)

2. Sexual violence and sexual harassment exist on a continuum and may overlap.
3. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.
4. If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.
5. When supporting victims, staff will:
 1. Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
 2. Regularly review decisions and actions, and update policies with lessons learnt
 3. Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
 4. Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again
 5. Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs
6. Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBT) children are at greater risk.
7. Staff should be aware of the importance of:
 1. Challenging inappropriate behaviours
 2. Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
 3. Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them
8. If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in Section 9 of this policy, as appropriate.

APPENDIX 14: Serious Violence

1. Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:
 1. Increased absence from school.
 2. Change in friendships or relationships with older individuals or groups.
 3. Significant decline in performance.
 4. Signs of self-harm or a significant change in wellbeing.
 5. Signs of assault or unexplained injuries.
 6. Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above)).
2. Risk factors which increase the likelihood of involvement in serious violence include:
 1. Being male.
 2. Having been frequently absent or permanently excluded from school.
 3. Having experienced child maltreatment.
 4. Having been involved in offending, such as theft or robbery.

3. Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL.

APPENDIX 15: Visitors

1. All visitors to the School may be asked to bring formal identification with them at the time of their visit.
2. A 'visitor' refers to an adult who is not employed by the School. This could be any of the following:
 1. A peripatetic music teacher.
 2. An enrichment provider.
 3. A sports coach.
 4. A visiting speaker.
 5. A contractor.
 6. A parent.
 7. A prospective parent.
 8. A volunteer.
 9. A trustee.

NB – This is an illustrative not an exhaustive list.

The Visitor Calendar/Arrival in School

1. All planned visitors will be recorded on the Visitor Calendar, following completion of a Visitor Booking Form.
2. Once on site, all visitors must report to reception first. No visitor is permitted to enter the School via any other entrance under any circumstances.
3. At reception, all visitors must state the purpose of their visit and who has invited them. They should be ready to produce formal identification upon request.
4. All visitors will be asked to sign the Visitors Record Book which is kept in reception at all times making note of their name, the time of their visit, their organisation, who they are visiting and car registration.
5. All visitors will be required to wear an identification badge – the badge must remain visible throughout their visit.
6. Visitors will then be escorted to their point of contact OR their point of contact will be asked to come to reception to receive the visitor. The contact will then be responsible for them while they are on site.
7. The visitor must not be allowed to move about the site unaccompanied unless they are registered on the Approved Visitor List. These visitors will appear on the Calendar, for example, as Joe Bloggs Approved.

Approved Visitor List

1. The School's Single Central Record will act as an approved visitor list, for visitors who frequently visit the School site to undertake work within the School (including contractors and supply staff). To qualify for the list the visitor must have demonstrated, prior to the visit that:
 1. They have a current clear enhanced DBS check and a copy of this has been registered on the School's Central Record AND
 2. A current clear DBS children's' barred check has been undertaken AND visitors on the Approved List MUST follow the same procedures on entry to the premises (ie come

to reception and sign in the visitors' book). A copy of the approved visitor list will be kept behind reception at all times.

3. When these criteria are met, the visitor will appear on the Visitor Calendar as, for example Joe Bloggs Approved.

Visitors Departure from School

On departing the School, visitors MUST leave via reception and:

1. Enter their departure time in the Visitors Record Book alongside their arrival entry.
2. Return the identification badge to reception.
3. A member of staff should escort the visitor to the reception.

Unknown/Uninvited Visitors to the School

1. Any visitor to the School site who is not wearing an identity badge should be challenged politely to enquire who they are and their business on the School site.
2. They should then be escorted to reception to sign the visitors' book and be issued with an identity badge.
3. The procedures under 'Visitors to the School' above will then apply. In the event that the visitor refuses to comply, they should be asked to leave the site immediately and a member of the LT informed. The LT member will consider the situation and decide if it is necessary to inform the police.
4. If an unknown/uninvited visitor becomes abusive or aggressive, they will be asked to leave the site immediately and warned that if they fail to leave the School grounds, police assistance will be called for.

Prospective Parents

1. At times Prospective Parents will visit the School during the school day. These visits are by appointment only and will appear in the School Visitors Calendar.
2. Prospective parents are expected to follow the normal visitor signing in procedure.
3. Prospective parents will undertake a tour of the School and will be escorted by two Sixth Form students who have been briefed prior to the tour about:
 1. The 'route' to take.
 2. The importance of being honest about the School.
 3. How best to stay safe when escorting visitors – students are taught how to 'keep safe' as part of their curriculum and will be reminded of this prior to the tour.
 4. What actions to take if they experience inappropriate behaviour or they feel uncomfortable during the tour.
 5. The need to return visitors to reception.

APPENDIX 16: Assessing adult-involved nude and semi-nude sharing incidents

All adult-involved nude and semi-nude image sharing incidents are child sexual abuse offences and must immediately be referred to police/social care. However, as adult-involved incidents can present as child-on-child nude/semi-nude sharing, it may be difficult to initially assess adult involvement.

There are two types of common adult-involved incidents: sexually motivated incidents and financially motivated incidents.

Sexually motivated incidents

1. In this type of incident, an adult offender obtains nude and semi-nudes directly from a child or young person using online platforms.
2. To make initial contact, the offender may present as themselves or use a false identity on the platform, sometimes posing as a child or young person to encourage a response and build trust. The offender often grooms the child or young person on social media, in chatrooms or on gaming platforms, and may then move the conversation to a private messaging app or an end-to-end encrypted (E2EE) environment where a request for a nude or semi-nude is made. To encourage the child or young person to create and share nude or semi-nude, the offender may share pornography or child sexual abuse material (images of other young people), including AI-generated material.
3. Once a child or young person shares a nude or semi-nude, an offender may blackmail the child or young person into sending more images by threatening to release them online and/or send them to friends and family.
4. Potential signs of adult-involved grooming and coercion can include the child or young person being:
 - a. Contacted by an online account that they do not know but appears to be another child or young person
 - b. Quickly engaged in sexually explicit communications, which may include the offender sharing unsolicited images
 - c. Moved from a public to a private/E2EE platform
 - d. Coerced/pressured into doing sexual things, including creating nudes and semi-nudes
 - e. Offered something of value such as money or gaming credits
 - f. Threatened or blackmailed into carrying out further sexual activity. This may follow the child or young person initially sharing the image or the offender sharing a digitally manipulated image of the child or young person to extort 'real' images

Financially motivated incidents

1. Financially motivated sexual extortion (often known as 'sextortion') is an adult-involved incident in which an adult offender (or offenders) threatens to release nudes or semi-nudes of a child or young person unless they pay money or do something else to benefit them.
2. Unlike other adult-involved incidents, financially motivated sexual extortion is usually carried out by offenders working in sophisticated organised crime groups (OCGs) overseas and are only motivated by profit. Adults are usually targeted by these groups too.
3. Offenders will often use a false identity, sometimes posing as a child or young person, or hack another young person's account to make initial contact. To financially blackmail the child or young person, they may:
 - a. Groom or coerce the child or young person into sending nudes or semi-nudes and financially blackmail them
 - b. Use images that have been stolen from the child or young person taken through hacking their account
 - c. Use digitally manipulated images, including AI-generated images, of the child or young person

4. The offender may demand payment or the use of the victim's bank account for the purposes of money laundering.
5. Potential signs of adult-involved financially motivated sexual extortion can include the child or young person being:
 - a. Contacted by an online account that they do not know but appears to be another child or young person. They may be contacted by a hacked account of a child or young person
 - b. Quickly engaged in sexually explicit communications which may include the offender sharing an image first
 - c. Moved from a public to a private/E2EE platform
 - d. Pressured into taking nudes or semi-nudes
 - e. Told they have been hacked and they have access to their images, personal information and contacts
 - f. Blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the child or young person