

CHILD PROTECTION AND SAFEGUARDING: POLICY AND GUIDANCE

Policy Review					
• Person(s) Responsible for this Policy		• Designated Safeguarding Lead			
• Last SMT Review:		• September 2023			
• Last Governing Board Approval:		• November 2023			
• Next SMT Review:		• September 2024			
• Next Governing Board Approval:		• November 2024			
Staff are reminded that they may view any of the School’s other policies at any time online (https://withamhallschool.sharepoint.com/sites/StaffNonAcademic/Shared Documents/Policies & Handbooks/); a hard copy may be requested from the School Office.					
Externally available:	Internal only		By request		On website
					X

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Introduction

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

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

The aims of the policy are:

- To support the child’s development in ways that will foster security, confidence and independence. The policy endeavours to keep the child’s best interests at the forefront of all practice.
- To provide an environment in which children and young people feel safe, secure, valued and respected, and feel confident, and know how to approach adults if they are in difficulties, believing they will be effectively listened to.
- To raise the awareness of all teaching and non-teaching staff of the need to safeguard children and their responsibilities in identifying and reporting possible cases of abuse.
- To provide a systematic means of monitoring children known or thought to be at risk of harm and to ensure we, the School, contribute to the assessments of need and support packages for those children. This policy and its procedures aim to highlight the value and importance of early intervention wherever possible.
- To emphasise the importance of good levels of communication between all members of staff.
- To develop a structured procedure within the School that will be followed by all members of the School community in cases of suspected abuse.
- To develop and promote effective working relationships with other agencies, especially the Police and Social Care.
- To provide good lines of communication with trusted adults, supported friends and an ethos of protection.
- To recognise and protect our children who may be vulnerable to radicalisation or exposed to extremist views.

This policy applies to all adults, including volunteers, working on or on behalf of the School.

The School aims to work in partnership and have an important role in inter-agency safeguarding arrangements as set out in ‘*Working Together to Safeguard Children*’ (c.f. **Additional Documents** below). Everyone working in or for the School shares an objective to help keep children and young people safe by:

- contributing to the provision of a safe environment for children and young people to learn and develop in our School; and
- identifying children and young people who are suffering or likely to suffer significant harm, and taking appropriate action with the aim of making sure they are kept safe both at home and in School.

The School and its Governing Body follow guidance in ‘Keeping Children Safe in Education’ (hereinafter “KCSIE”, see **Additional Documents** below) and observe the Independent Schools Standards, the National Minimum Standards for Boarding Schools and the requirements of the Early Years Foundation Stage.

The School and Governing Body are dedicated to safeguarding and promoting the welfare of its boarding and day pupils, regardless of age, ability, race, culture, religion, sexuality or class, considering at all times what is in the best interests of the child. Each pupil’s welfare is of paramount importance. We recognise that some children may be especially vulnerable to abuse. We recognise that children who are abused or neglected may find it difficult to develop a sense of self-worth and to view the world in a positive way. While at School, behaviour may be challenging. We recognise that they may exhibit concerning behaviours and at times this may impact on other children either directly or indirectly. We will always take a considered and sensitive approach in order that we can support all of our pupils. The child’s wishes and feelings are always taken into account when determining which actions to take and which services to provide.

This Policy demonstrates the School’s and Governing Body’s commitment to and compliance with safeguarding legislation. Through their day-to-day contact with pupils and direct work with families, staff at the School have a crucial role to play in noticing indicators of possible abuse or neglect and referring them to Lincolnshire Children’s Services (LCS), Local Safeguarding Children Partnership (LSCP), or the Police – also known as our Safeguarding Partners – or other authorities dependent upon the child’s area of residence. This also involves understanding serious case reviews and how to improve practice to prevent children from falling through the gaps.

The School recognises it has a pivotal role in multi-agency safeguarding arrangements, and as part of this recognises that new arrangements will be published by the LSCP.

Terminology

Abbreviation	Definition
BSA	Boarding Schools’ Association
Child	Refers to all young people who have not yet reached the age of 18
CME	Child Missing in Education
CPP	Child Protection Plan
CSE	Child Sexual Exploitation

Abbreviation	Definition
CWD	Children with Disabilities
DBS	Disclosure and Barring Services
DFE	Department for Education
DSL	Designated Safeguarding Lead
DSM	Designated Senior Manager
EHA	Early Help Assessment
EHC	Early Help Consultants
EMTET	Ethnic Minority and Travellers Education Team
ESCO	Early Support Care Coordination (sic)
FGM	Female Genital Mutilation
KCSIE	Keep Children Safe in Education (latest edition)
LADO	Local Area Designated Officer
LCS	Lincolnshire's Children's Services
LSCP	Lincolnshire Safeguarding Children Partnerships
Parent	Refers to birth parents and other adults who are in a parenting role (<i>e.g.</i> step-parents, foster parents, carers and adoptive parents <i>etc.</i>)
School, Us, We, Our	Witham Hall School Trust
SCR	Single Central Register
SEND	Special Educational Needs
Staff	Refers to all those working for or on behalf of the School in either a paid or voluntary capacity
TAC	Team Around the Child

Safeguarding Contact Details

Within the School

At the School the named personnel with designated responsibility for safeguarding are:

Role	Name
<ul style="list-style-type: none"> Designated Safeguarding Lead (DSL) 	<ul style="list-style-type: none"> Miss Katy Rule (Deputy Head Pastoral) krule@withamhall.com 01778 590222

Role	Name
<ul style="list-style-type: none"> Deputy Designated Safeguarding Leads 	<ul style="list-style-type: none"> Mr William Austen (Head) wausten@withamhall.com
	<ul style="list-style-type: none"> Mrs Victoria Birch (Head of Geography & Prep Teacher) vbirch@withamhall.com
	<ul style="list-style-type: none"> Mrs Melissa Offer (Pre-Prep Teacher) moffer@withamhall.com
<ul style="list-style-type: none"> Safeguarding Governor Designated Governor for Looked-After and Previously Looked-After Children 	<ul style="list-style-type: none"> Mrs Helen Banks hbanks@withamhall.com
<ul style="list-style-type: none"> Designated Teacher for Looked-After and Previously Looked-After Children 	<ul style="list-style-type: none"> Mrs Victoria Birch (DDSL) vbirch@withamhall.com 01778 590222

The named personnel with designated responsibility regarding allegations against staff are:

Role	Name
In the event of an allegation against any member of staff (other than against the DSM)	
<ul style="list-style-type: none"> Designated Senior Manager (DSM) 	<ul style="list-style-type: none"> Mr William Austen (Head) headmaster@withamhall.com 01778 590222
<ul style="list-style-type: none"> Deputy Designated Senior Manager 	<ul style="list-style-type: none"> The DSL (see above)
In the event of an allegation against the DSM	
<ul style="list-style-type: none"> Chair of Governors 	<ul style="list-style-type: none"> Mr Andrew Riddington WithamHallChairman@gmail.com (an e-mail address that is independent from the School entirely).

Outside the School

Advice on any aspect of Child Protection can be sought from the Child Protection Team:

<ul style="list-style-type: none"> Safeguarding concerns (for children living in Lincolnshire) 	<ul style="list-style-type: none"> If there is no immediate danger to the child, or if you need some advice or information, contact the Lincolnshire Safeguarding Children Partnership (LSCP) Customer Service Centre on 01522 782111 If it is outside normal office hours (<i>i.e.</i> 6pm-8am, & weekends and Bank Holidays) contact the Emergency Duty Team (EDT) on 01522 782333 https://www.lincolnshire.gov.uk/safeguarding/lscp
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<ul style="list-style-type: none"> Safeguarding Children Officer (Education Settings) for advice about safeguarding policy, audits etc. 	<ul style="list-style-type: none"> Ruth Fox 01522 554695 safeguardingschools@lincolnshire.gov.uk
<ul style="list-style-type: none"> Local Authority Designated Officer (LADO) Allegations against /concerns about adult(s) working with children 	<ul style="list-style-type: none"> Lincolnshire LADO 01522 554674 LSCP_LADO@lincolnshire.gov.uk
<ul style="list-style-type: none"> Early Help Consultants (EHC) & Team Around the Child (TAC) 	<ul style="list-style-type: none"> For Early Help Consultants contact details please e-mail earlyhelpconsultants@lincolnshire.gcsx.gov.uk Senior TAC Administrator, 07788 396129 / 01522 555827, seniorTACadmin@lincolnshire.gov.uk South Kesteven Admin, 01522 555829, tacadmin@lincolnshire.gcsx.gov.uk
<ul style="list-style-type: none"> Ethnic Minority and Traveller Education Team (EMTET) 	<ul style="list-style-type: none"> 01427 787190 www.lincolnshire.gov.uk/emtet
<ul style="list-style-type: none"> Police (Emergency) 	<ul style="list-style-type: none"> 999
<ul style="list-style-type: none"> Police (Non-Emergency) 	<ul style="list-style-type: none"> 101 01522 947590 (Lincolnshire Police Public Protection Unit, Central Referral Unit)
<ul style="list-style-type: none"> Prevent Teams 	<ul style="list-style-type: none"> Prevent@lincs.pnn.police.uk Prevent@lincolnshire.gov.uk
<ul style="list-style-type: none"> NSPCC 	<ul style="list-style-type: none"> The NSPCC whistleblowing helpline is available for adults who do not feel able to raise concerns regarding child protection failures internally. T: 0800 028 0285 – line is available from 8:00am to 8:00pm, Monday to Friday E: help@nspcc.org.uk Training and Resources for all staff https://learning.nspcc.org.uk/

Generally speaking, it is the DSL who consults with local authorities and other outside agencies about pupils who are at risk or in need. However, anyone can make a referral. Contact details for Lincolnshire are listed above, or, the following website can be used to locate a local authority in a different area with the use of a residential postcode: <https://www.gov.uk/report-child-abuse-to-local-council>.

A member of any school staff has a responsibility (under the government's direction) to take action if he or she has concerns about the safety or welfare of a child and feels they are not being acted upon by the School.

Additional Documents

The School and Governing Body take safeguarding seriously and understand that this Policy is over-arching. The School also maintains other linked policies and documents in line with the legislative requirements; together these make up the suite of policies and documents to safeguard and promote the welfare of children in this School.

Therefore this Policy is to be read in conjunction with the following additional documents:

Internal School Documents

Staff are reminded that they may view any of the School's other policies at any time online (<https://withamhallschool.sharepoint.com/sites/StaffNonAcademic/Shared Documents/Policies & Handbooks/>); a hard copy may be requested from the School Office. Some of the documents below can be made available to members of the public on request.

- Admissions Policy
- Alcohol, Smoking & Substance Policy
- Anti-Bullying Policy
- Behaviour Policy
- Complaints Policy
- GDPR and Data Protection Policies
- Health & Safety Policy
- ICT Policy
- Intimate Care Policy
- Learning for Life Policy
- Low-Level Concerns Policy
- SEND Policy
- Staff Code of Conduct Policy
- Staff Communications Policy (covering Staff use of Cameras and Mobile Phones (with specific details relating to the EYFS))¹;
- Staff Handbook

¹ The following is an extract from the School's *Staff Communications Policy*:

The use of photographs as evidence of the achievements of EYFS pupils for their developmental records is central to the ethos of the EYFS. Staff need to ensure they follow some simple guidelines:

- Staff, visitors, volunteers/students are not permitted to use their own mobile phones to take or record any images of children for their own records during session times.
- Only the designated School cameras or i-Pads or equivalent are to be used to take any photographs of EYFS pupils within the School or on outings.
- Images taken must be deemed suitable without putting the child in any compromising position that could cause embarrassment or distress.
- Under no circumstances must cameras of any kind be taken into the toilets.
- All staff are responsible for the location of the camera or School devices, which should be placed in a safe place when not in use.
- Images taken and stored on the camera must be downloaded as soon as possible onto the School's SharePoint and then removed from the camera or device.
- Images may only be uploaded publicly to the secure School website, School social media sites, or secure Tapestry website; they should never be uploaded to the internet for any other reason, including onto personal social networking sites (e.g. Facebook).

- Staff Recruitment Policy
- Visitor Policy
- Whistleblowing Policy

External Documents

- [Brook Traffic Light Tool](#)
- [Child Exploitation LSCB Tool kit and procedures](#)
- [Children Missing Education policy](#)
- [Disqualification under the Childcare Act](#)
- [Domestic Abuse Resource pack & policy](#)
- [Early Help and Team Around the Child](#)
- [ESCO \(Early Support Care Co-ordination\)](#)
- [Extremism and Radicalisation PREVENT guidance](#)
- [Handbook for the Inspection of Schools: Commentary on the Regulatory Requirements \(ISI\)](#)
- [Information Sharing: Practitioner's Guide](#)
- [Independent School Standards Regulations](#)
- [Keeping Children Safe in Education](#)
- [LADO - Reporting a concern](#)
- [Lincolnshire Safeguarding Children's Partnership multi-agency child protection procedures](#)
- [Lincolnshire Support for Children](#)
- [NSPCC website](#)
- [Prevent Duty Guidance for England and Wales April 2021](#)
- [Prevent strategy in Lincolnshire](#)
- [Professional Resolution and Escalation Protocol Flowchart](#)
- [Promoting Mental Health and Wellbeing](#)
- [Safeguarding and Protecting People for Charities and Trustees \(The Charity Commission\)](#)
- [Searching, screening and confiscation at school](#)
- [Serious Crimes Act 2015 and Reporting of FGM](#)
- [Sexual Offences Act 2003](#)
- [Sexual Violence and Sexual Harassment Between Children in Schools and Colleges](#)
- [Sharing nudes and semi-nudes: Advice for education settings working with children and young people \(2021\)](#)
- [Significant Harm](#)
- [Stay Safe Partnership](#)
- [Teacher Services system](#)
- [Teachers' Standards](#)
- [Teaching Online Safety in Schools](#)
- [What to do if you are worried a child is being abused – Advice for practitioners](#)
- [Working Together to Safeguard Children](#)
- [When to Call the Police; Guidance for Schools and Colleges \(National Police Chief Council\)](#)

Roles and Responsibilities

Governing Body

The role of the Governing Body is so important in robust Safeguarding practice. The Governing Body has a named Safeguarding Governor (see **Safeguarding Contact Details** above). The Governing Body ensures that:

- The School has an effective *Child Protection and Safeguarding Policy*, with procedures in place that are in accordance with local authority guidance and locally agreed inter-agency procedures, and the policy is available publicly via the School's website. The policy will be reviewed and updated on an annual basis;
- Through the DSL's annual update to Governors, Governors are made aware of training provided to staff on safeguarding and child protection matters, any significant security and/or internet breaches should they occur;
- The School has a *Staff Code of Conduct Policy* and that this is provided to all staff and volunteers on induction. The policy includes (or directs to) acceptable use of technology (which includes use of data, e.g. 4G²), staff/pupil relationships and communications including the use of social media;
- The School operates safer recruitment procedures and makes sure that all appropriate checks (including an online search for shortlisted candidates) are carried out on staff and volunteers who work with children and that any panel involved in the recruitment of staff has at least one member who has undertaken the Safer Recruitment Training;
- The School has procedures for dealing with allegations against staff and volunteers that comply with guidance from the local authority and locally agreed inter-agency procedures;
- Online safety policy and procedures are in place and training and support is provided for staff and pupils to ensure that there is a good understanding of child protection issues related to electronic media;
- The School has appropriate electronic filtering and monitoring systems in place to ensure that children are safeguarded from potentially harmful and inappropriate online material, whilst recognising that this should not lead to unreasonable restrictions as to what children can be taught. This should be regularly reviewed to assess its effectiveness;
- A senior member of the School's Management Team is appointed to the role of DSL who will take lead responsibility for Child Protection and Safeguarding;
- The School has one or more Deputy DSL who is/are trained to the same standard as the DSL;
- Children are taught about safeguarding, including online safety as part of providing a broad and balanced curriculum;
- Staff, including the Head, undertake appropriate safeguarding training, updated annually;
- The School remedies, without delay, any deficiencies or weaknesses regarding Child Protection arrangements;
- A Governor (the Chair of Governors, see **Safeguarding Contact Details** above) is nominated to be responsible for liaising with the Local Authority and/or partner agencies in the event of allegations of abuse being made against the Head;
- The designated staff recognise the importance of information sharing within and beyond the School, and that due regard is paid to the duties placed on the School by the Data Protection

² Note that pupils do not have access to 3G, 4G or 5G on School premises, as phones are not allowed for pupils.

Act 2018 and the GDPR in processing personal information fairly and lawfully and in keeping the information they hold safe and secure;

- When services or activities are provided on the School premises by another agency or persons, the governing body should seek assurances that appropriate safeguarding and child protection policies and procedures are in place (including inspecting these as needed); and ensure that there are arrangements in place to liaise with the School on these matters where appropriate. This applies regardless of whether or not the children who attend any of these services or activities are on the school roll; and
- All governors and trustees receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures are effective and support the delivery of a robust whole-school approach to safeguarding. Their training should be regularly updated.

Head

The Head will ensure that:

- The policies and procedures adopted by the Governing Body are fully implemented, and understood and followed by all staff;
- That all new staff go through a thorough induction procedure, which includes Safeguarding policy and practices;
- Sufficient resources and time are allocated to enable the DSL and other staff to discharge their responsibilities;
- There are arrangements in place for Safeguarding Supervision for the DSL and the Deputy DSL;
- All staff and volunteers feel able to raise concerns about poor or unsafe practice in regard to children, and such concerns are addressed sensitively and effectively in a timely manner in accordance with the School's *Whistleblowing Policy*;
- The DSL is supported in providing a contact for the School to provide a report and attend Initial Child Protection Case Conferences, Reviews and Looked After Children Reviews out of school term time when needed;
- Pupils' safety (including e-safety) and welfare are addressed through the curriculum;
- Promote the education of children with a social worker in conjunction with the DSL and pastoral staff;
- Allegations regarding staff or any other adults in the School are referred to the Local Authority Designated Officer (LADO), as set out in relevant procedures; and
- Individuals are referred to the Disclosure and Barring Service (cases where a person is dismissed or left due to risk/harm to a child) and the Teacher Regulation Agency (TRA) (cases of professional misconduct or bringing the profession into disrepute) or other regulatory bodies as applicable. This is recognised as a legal duty placed upon the School.

Designated Safeguarding Staff

Whilst the DSL will take lead responsibility, the DDSL will assist and be available to step in in the absence of the DSL and when required. The DSL (or their deputy) will ensure that they:

- Raise Awareness – the DSL should create a culture of safeguarding and vigilance within the School, and:

- Ensure the School's Child Protection and Safeguarding policies are known, understood and used appropriately;
- Deliver safeguarding induction for all new staff, and regularly update all staff on safeguarding developments (e.g. through staff meetings, emails and notices).
- Ensure that the School's *Child Protection and Safeguarding Policy* and related documents are reviewed annually, the procedures and implementation are updated and reviewed regularly, and work with the Governing Body regarding this;
- Ensure the *Child Protection and Safeguarding Policy* is available publicly and, through that, parents are aware both of the fact that referrals about suspected abuse or neglect may be made and of the role of the School in this; and
- Monitor the effectiveness of policies and procedures in practice;
- Maintain an overview of safeguarding in the School;
- Link with the Lincolnshire Safeguarding Children Board to make sure staff are aware of training opportunities and the latest local policies on Safeguarding;
- Provide, with the Head and the Safeguarding Governor, an annual report for the governing body, detailing any changes to the policy and procedures; training undertaken by the DSL, and by all staff and governors; number and type of incidents/cases, and number of children with child protection plans (anonymised);
- Encourage a culture of listening to children and taking account of their wishes and feelings, among staff.
- Manage referrals
 - Refer cases of suspected abuse to the local authority children's social care (Customer Service Centre);
 - Support any other staff who make referrals to Customer Service Centre;
 - Seek advice from Prevent Team regarding radicalisation concerns & refer cases to the Channel programme when necessary;
 - Support staff who make referrals to the Channel programme when advised by Prevent team;
 - Support the Head to refer cases, where a person is dismissed or left due to risk/harm to a child, to the Disclosure and Barring Service as required; and
 - Immediately refer cases to the Police if they suspect or know a crime has been committed. The external document 'When to call the police' produced by the National Police Chiefs Council (NPCC) may be of use.
- Managing Child Protection Files
 - Keep detailed, accurate, secure written records of concerns and referrals using MyConcern (any paper records are filed securely and only accessible by the DSL & DDSLs). Keeping written records of concerns about a child even if there is no need to make an immediate referral.
 - Ensuring that all records are kept confidentially and securely, and separate from general pupil records;
 - Ensuring child protection files are kept up to date.
 - Passing on information to a new establishment when a child leaves the school. Files are transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer, or otherwise within the first 5 days of the start of a new term. This is transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt.
 - Sharing any additional information with the new school prior to a child arriving to help them put in place the right support to safeguard this child and to aid transition.

- Work with others
 - Liaise with the Head to inform them of issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
 - As required, liaise with the case manager (part four of KCSIE) and the designated officer (LADO) for child protection concerns (all cases which concern a staff member or volunteer);
 - Liaise with staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies;
 - Ensure online safety in the School, including ensuring the School has functional and effective filtering and monitoring systems in place, in conjunction with the Head of ICT; and
 - Act as a source of support, advice and expertise for all staff.
 - Take into account the learning from the following review: *Help, protection, education: concluding the Children in Need review 2019*.
 - Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, along with a social worker, are experiencing, or have experienced, with teachers, the boarding team and the School's Leadership Team. This includes ensuring that the School and the staff know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations.
 - Promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.
 - Liaising with the Designated Governor.
- Undertake training
 - The DSL (and any deputies) will undergo training to provide them with the knowledge and skills required to carry out the role. This training will be updated at least every two years. They will also undertake Prevent awareness training. In Lincolnshire, DSL will follow a 6-year pathway.
 - In addition to the formal training, their knowledge and skills will be refreshed at regular intervals, as required, but at least annually, to allow them to understand and keep up with any developments relevant to their role.
 - The DSL attends termly Lincolnshire Safeguarding Children Board inter-agency training and Safeguarding Briefings (alongside other relevant training and/or conference opportunities) so that they:
 - Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as Early Help Assessments;
 - Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
 - Are alert to the specific needs of children in need, those with special educational needs and young carers;
 - Understand data protection legislation and regulations (Data Protection Act 2018 & General Data Protection Regulation);
 - Understand the importance of information sharing, both within School and with safeguarding partners and other agencies, organisations and practitioners;
 - Are able to keep detailed, accurate, secure written records of concerns and referrals;

- Understand and support the School with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
 - Understand the unique risks associated with online safety and – working in tandem with key stakeholders in the School – be confident that they have the relevant knowledge and up-to-date capability to keep children safe;
 - Can recognise the additional risks that children with SEN and disabilities (SEND) face online, and are confident they have the capability to support them to stay safe online;
 - Obtain access to resources and attend any relevant or refresher training courses; and
- Be Available
 - During term-time the DSL (or a deputy) will always be available for staff to discuss any Safeguarding concerns.
 - There will also be a DSL or deputy available to be contacted out of hours/out of term-time for urgent enquiries such as an Initial Child Protection Case Conference.

All Staff

All staff and volunteers will:

- Read and sign to say that they understand and will fully comply with the School's *Child Protection and Safeguarding Policy*;
- Read and sign to say that they understand the part or parts of KCSIE relevant to their role;
- Maintain professional curiosity at all times and understand that children may not feel ready or know how to tell someone if they are suffering or need extra help;
- Identify concerns as early as possible and speak to the DSL, or log on MyConcern, on the same day to prevent concerns from escalating and to identify children who may be in need of extra help; if in doubt about information sharing, staff should speak to the DSL – fears about information sharing must not stand in the way of the need to promote the welfare and to protect the safety of children;
- Inform the Head of any concerns regarding an adult within School at the earliest opportunity, including for low-level concerns as detailed within the School's *Low-Level Concerns Policy*;
- Inform the Chair of Governors of any concerns regarding the Head at the earliest opportunity;
- Act on the concern and make the referral themselves if they feel the concern is not being taken seriously. Anyone can make a referral and that referral can be made directly to local authority children's social care (and if appropriate the police);
- In the absence of the DSL or Deputy DSL, staff should talk to a member of SLT and/or take advice from the Lincolnshire Safeguarding Children Partnership (LSCP), or immediately refer cases to the Police if they suspect or know a crime has been committed;
- Provide a safe environment in which children can learn and build relationships with children and young people which facilitate communication;
- Attend School Safeguarding training as required by the training pathway, and any other appropriate training identified (it is realised that for some – e.g. visiting teachers – this may be undertaken in another setting, and confirmation of this will be detailed by the HR Manager)

All Staff are responsible for promoting and safeguarding the welfare of children. They are expected to be alert to the types of abuse and neglect defined in KCSIE Part 1, including physical abuse, emotional abuse and sexual abuse and exploitation (*c.f. Definitions of Abuse*, p.17). Those with School leadership roles or those who work directly with children should also read KCSIE Annex A.

The importance of School's *Staff Code of Conduct Policy, Low Level Concerns Policy, Whistleblowing Policy, Behaviour Policy* and *Anti-Bullying Policy* are all highlighted in promoting good practice.

Concerns About a Child

The School has a duty to consider at all times the best interests of the pupil and take action to enable all pupils to achieve the best outcomes. **Safeguarding and promoting the welfare of children is everyone's responsibility.** The School adopts a 'whole school' approach to safeguarding, ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.

Parents are encouraged to raise any concerns directly with the School, if necessary, using this safeguarding policy for concerns about the safety and/or welfare of children. Parents may contact the ISI directly if they wish.

The School has arrangements for listening to children and providing early help. Details of these arrangements can be found in the **Safeguarding Information for Pupils** (p.48).

What is Safeguarding and What is Child Protection?

Safeguarding and promoting the welfare of children is defined as: protecting children from maltreatment; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

Child Protection, on the other hand, is a part of safeguarding and promoting welfare. More particularly it refers to the specific activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm (*Working Together to Safeguard Children, c.f. External Documents*).

Types and Signs of Abuse

All staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another therefore staff should be vigilant and always raise any concerns with the DSL (or deputy).

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

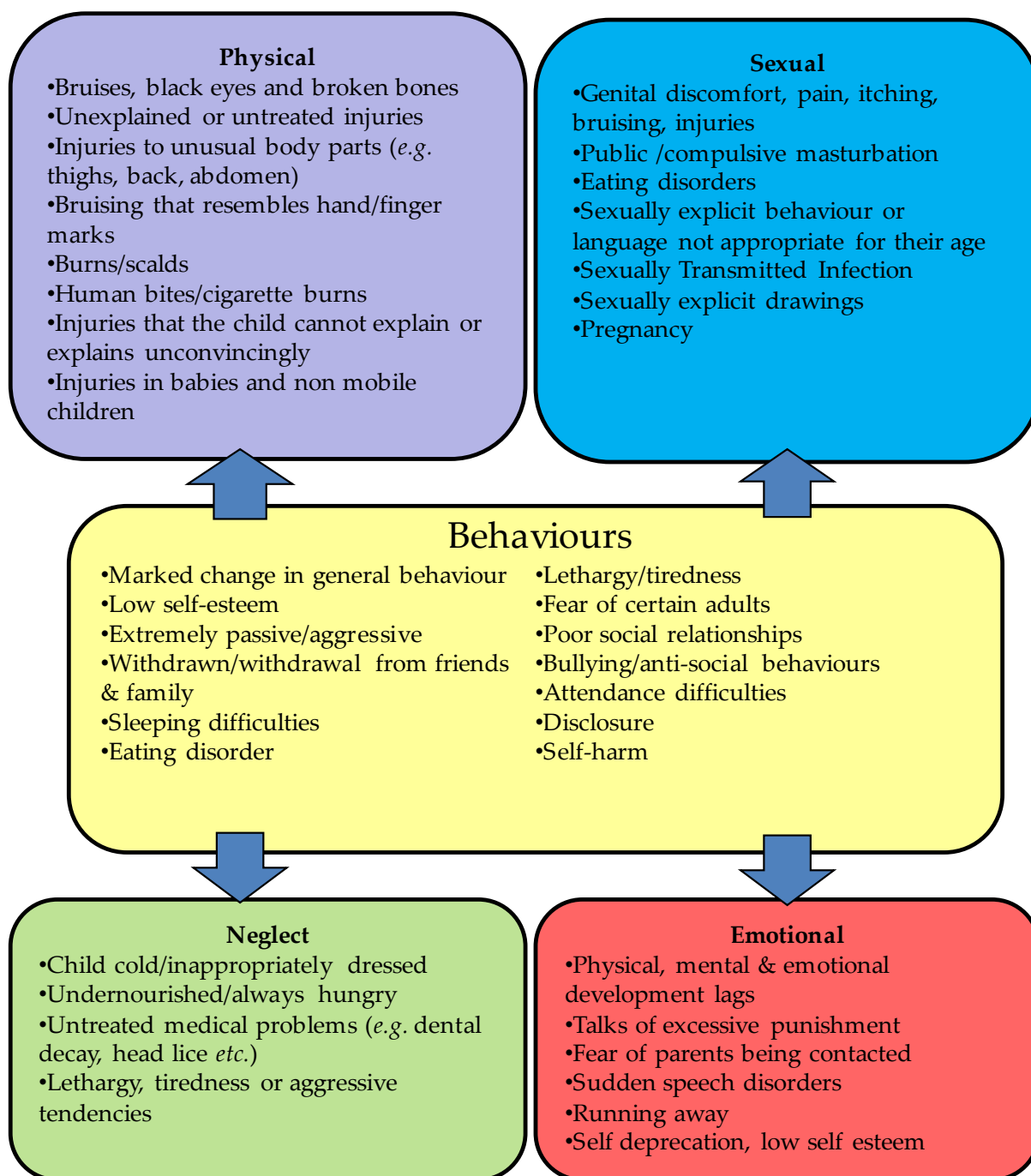
Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content.

Definitions of Abuse

Based on *Working Together to Safeguard Children* (c.f. **External Documents**) the four main categories are:

Neglect	Emotional Abuse
<p>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.</p> <p>It may occur during pregnancy as a result of maternal substance abuse.</p> <p>Once a child is born, neglect may involve a parent or carer failing to:</p> <ul style="list-style-type: none"> • provide adequate food, clothing and shelter (including exclusion from home or abandonment); • protect a child from physical and emotional harm or danger; • ensure adequate supervision (including the use of inadequate care-givers); or • ensure access to appropriate medical care or treatment. <p>It may also include unresponsiveness to, or neglect, of a child's basic emotional needs.</p>	<p>The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on their emotional development. It may involve:</p> <ul style="list-style-type: none"> • conveying to them that they are worthless, unloved, inadequate, or valued only insofar as they meet the needs of another person; • not giving them opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate; • developmentally inappropriate expectations being imposed; interactions that are beyond the child's developmental capability; • overprotection and limitation of exploration and learning; • preventing the child participating in normal social interaction; • the child seeing / hearing the ill-treatment of another; this can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse • serious bullying causing them frequently to feel frightened or in danger; or • exploitation or corruption of them. <p>Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.</p>
Sexual Abuse	Physical Abuse
<p>A form of abuse which may involve:</p> <ul style="list-style-type: none"> • forcing or enticing a child 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; • physical contact, including assault by penetration (e.g. rape or oral sex), or non-penetrative acts (e.g. masturbation, kissing, rubbing & touching outside of clothing); or • non-contact activities (e.g. involving children in looking at or in the production of sexual images or activities, encouraging children to behave in sexually inappropriate ways, grooming a child in preparation for abuse). 	<p>A form of abuse which may involve:</p> <ul style="list-style-type: none"> • hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating, or otherwise causing physical harm to a child; • physical harm may also be caused when a parent or carer feigns the symptoms of, or deliberately induces, illness in a child; or • injuries in babies and non-mobile children.

Symptoms of Abuse



Procedures for Dealing with Concerns about a Child

If staff suspect or hear any allegation or complaint of abuse, exploitation, or neglect from a child or any third party, they must act immediately and follow the relevant procedure below. Staff should

not assume that somebody else will take action and share information that might be critical in keeping children safe.

Some children can find themselves in more vulnerable positions due to a number of specific safeguarding issues. Staff should be mindful of the scenarios explained in this section and the section on specific concerns (*c.f.* **What Staff Should Do If Concerned About a Child**, p.21).

The guidance, *Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers* supports staff who have to make decisions about sharing information. Fears regarding sharing information under the Data Protection Act 2018 and the UK GDPR should not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children, and neither the DPA 2018 or the UK GDPR prevent the sharing of information for the purposes of keeping children safe. If in doubt about what information can and should be shared, staff should speak to the DSL.

Contextual Safeguarding

The School recognises that safeguarding incidents and/or behaviours can be associated with factors outside a school and/or can occur between children outside a school. All staff, but especially the DSL, will consider the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. The School will provide as much information as possible to Children's Social Care as part of any referral undertaken.

Children Who May Require Early Help

Any child may benefit from early help, but all Staff, including Governors and Volunteers, working within the School should be alert to the potential need for early help for a child who:

- Is disabled or has certain health conditions and has specific additional needs
- Has special educational needs (whether or not they have a statutory education, health, and care plan)
- Has a mental health need
- Is a young carer
- Is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- Is frequently missing / goes missing from care or from home
- Is misusing drugs or alcohol themselves
- Is at risk of modern slavery, trafficking, or sexual or criminal exploitation
- Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse
- Has returned home to their family from care
- Is showing early signs of abuse and / or neglect
- Is at risk of being radicalised or exploited
- Has a family member in prison, or is affected by parental offending;
- Is experiencing, or is at risk of experiencing, family ostracism
- Is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage;
- Is a privately fostered child; or
- Is persistently absent from education, including persistent absences for part of the school day.

Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years. In the first instance, staff who consider that a pupil may benefit from early help should discuss this with the School's DSL. The DSL will consider the appropriate action to take in accordance with the LSCP's referral threshold document. The DSL will support staff in liaising with external agencies and professionals in an inter-agency assessment, as appropriate. If early help is appropriate, the matter will be kept under review and consideration given to a referral to children's social care if the pupil's situation does not appear to be improving.

What Staff Should Do If Concerned About a Child

Staff must act on and immediately report:

- Any suspicion that a child is injured, marked, or bruised in a way which is not readily attributable to the normal knocks or scrapes received in play;
- Any explanation given which appears inconsistent or suspicious;
- Any behaviours which give rise to suspicions that a child may have suffered harm (*e.g.* worrying drawings or play);
- Any concerns that a child may be suffering from inadequate care, ill treatment, or emotional maltreatment;
- Any concerns that a child is presenting signs or symptoms of abuse or neglect;
- Any significant changes in a child's presentation, including non-attendance;
- Any hint or disclosure of abuse from any person;
- Any concerns regarding person(s) who may pose a risk to children (*e.g.* living in a household with children present);
- Any potential indicators of CSE, FGM, Radicalisation; and
- Any potential indicators of living in a household with Domestic Abuse.

How to Receive and Report Disclosures

Staff will not investigate but will, wherever possible, elicit enough information to pass on to the DSL in order that the DSL can make an informed decision of what to do next.

The DSL will ensure that the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Child Protection processes will operate with the best interests of the child at their core.

Staff will listen to and take seriously any disclosure or information that a child may be at risk of harm. Staff should be aware that children may not feel ready or know how to tell someone, or recognise that their experiences as harmful. This should not prevent staff from voicing concerns.

In receiving a disclosure staff must use the following guidelines:

- Receive

- Listen, try not to look shocked or be judgmental
- Believe what they say: 'take it seriously'
- Accept what the young person says
- Don't make them feel bad by saying "You should have told me earlier"
- Don't 'interrogate' them – let them tell you; try not to interrupt
- Note the date and time, what was done, who did it, and where it took place
- Use the young person's own words
- Don't criticise the perpetrator
- Don't take photographs of any injuries
- Don't ask leading questions (such as "Did that make you feel sad?") but rather use 'open' questions (such as "How did that make you feel?") to clarify only. Remember the acronym **T.E.D.:**
 - **T**ell me what you mean by that? / Can you **T**ell me how that happened?
 - **E**xplain that to me
 - **D**escribe that....



- Reassure

- Stay calm, tell the young person they've done the right thing in telling you
- Reassure them they are not to blame
- Empathise – don't tell them how they should be feeling
- Don't promise confidentiality, and explain who needs to know
- Explain what you'll do next
- Be honest about what you can do

- Report and Record

- Make a brief, accurate, timely and factual record – log using MyConcern immediately
- Discuss with the DSL or their Deputy, without delay if there is a risk of immediate harm
- The DSL will assess the situation and decide on the next steps
- **Things to include:**
 - Time and full date of disclosure/incident and the time and full date the record was made
 - An accurate record of what was said or seen using the pupil's words as much as possible
 - Whether it is first-hand or second-hand information
 - Whether the child was seen/spoken to
 - Whether information is fact or professional judgement (avoid personal opinion)
 - Full names and roles/status of anyone identified in the report
 - Avoid acronyms/jargon/abbreviations
 - Record actions agreed with/by the DSL

Records will be reviewed regularly and any new concerns should be added and responded to immediately (MyConcern sends an immediate alert to the DSL and DDSL when a new concern is logged).

How to Log a Concern on MyConcern

The member of staff must pass on their concern to the DSL by recording on MyConcern or by speaking directly to them; support can be given to complete MyConcern if unable to access a computer. Detailed body maps can be completed using MyConcern if required. Guidance on how to complete a concern is listed in the 'Help' section on MyConcern.

Staff are obligated to pass on their concerns to the DSL (or in their absence a DDSL) on the same day as they become aware of, or suspect a child may be at risk of harm.

Initial Action by the DSL

Following any information raising concern, the DSL will consider:

- Any urgent medical needs of the child;
- Whether the child is subject to a child protection plan;
- Discussing the matter with other agencies involved with the family;
- Consulting with appropriate persons (*e.g.* Duty and Advice Team); and
- The child's wishes.

They will then decide:

- To talk to parents, unless to do so may place a child at risk of significant harm, impede any police investigation and/or place the member of staff or others at risk; and
- Whether to make a child protection referral to Children's Social Care-Duty and Advice Team because a child is suffering or is likely to suffer significant harm and if this needs to be undertaken immediately
- DSL may share information without consent where there is good reason to do so and where the sharing of information will enhance the safeguarding of a child in a timely manner. It would be legitimate to share information without consent where: 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.

OR

- Not to make a referral at this stage;
- If further monitoring is necessary; or
- If it would be appropriate to undertake an assessment (*e.g.* Early Help Assessment (EHA)) and/or make a referral to Children's Social Care – Customer Service Centre.

Investigations into Child Abuse are Always Externally Managed

- Members of the School do not investigate reports of abuse themselves.
- Alleged victims, perpetrators, those reporting abuse and others involved will not be interviewed by members of staff beyond the point at which it is clear that there is an allegation of abuse.
- The interviewing of children and adults, if necessary, will be carried out externally by specially trained staff only, following procedures in line with government requirements and in the light of the recommendations of past inquiries into the handling of child abuse issues.
- The School acknowledges that its policy will inevitably lead to some investigations by external agencies being triggered that do not substantiate the allegations made, as well as those that do.
- It is a basic assumption that it is better to endure some 'false alarms' than to fail to initiate specialist investigation of instances of real abuse by Children's Social Care Services:

- If a child has been harmed, if there is a risk of immediate harm or if the situation is an emergency, contacting children's social care and as appropriate the police immediately is necessary.

Action Following a Child Protection Referral

The DSL or a suitable deputy will:

- Make regular contact with the social worker involved to stay informed;
- Wherever possible, contribute to the strategy discussion;
- Provide a report for, attend and contribute to, any subsequent child protection conference;
- If the child is made the subject of a child protection plan, contribute to the child protection plan and attend core group meetings and review conferences;
- Where possible, share all reports with parents prior to meetings;
- Where in disagreement with a decision and concerns still remain with the child firstly:
 - Talk in the first instance to the DSL (if not that person);
 - Check the referral included all the relevant information and clearly documented the concerns about the child;
 - Follow the professional resolution and escalation protocol on the LCSB website and in the electronic safeguarding folder in SharePoint; and
 - Where a child subject to a child protection plan moves from the School or goes missing, immediately inform Children's Social Care-Customer Service Centre.

Confidentiality

Staff must never give absolute guarantees of confidentiality to pupils or adults wishing to tell them about something serious. They should however guarantee that:

- They will only pass on information to the minimum number of people who must be told in order to ensure that the proper action is taken to sort out the problem;
- They will never tell anyone who does not have a clear 'need to know'; and
- They will take whatever steps they can to protect the informing pupil or adult from any retaliation or unnecessary stress that might be feared after a disclosure of alleged abuse has been made.

Staff must not publicly speculate about any allegation of (or hint of) criminal offence against an employee and must not respond to any request from the media, pupils, parents or the public for statements, either written or verbal. Any such requests must be directed to the Head or Bursar.

What Staff Should Do if a Child is in Danger or at Risk of Harm

If staff (including governors, supply staff, agency staff and volunteers) believe that a child is in immediate danger or at risk of harm, they should make an immediate referral to children's social care and/or the Police if the threat is imminent. Ideally, this should be made in conjunction with the DSL but anyone can make a referral. Any such referral must be made immediately and in any event within 24 hours (one working day) of staff being aware of the risk.

Parental consent is not needed for referrals to statutory agencies such as the police and children's social care. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. The local authority social worker should acknowledge receipt to the referrer within 24 hours and make a decision about the next steps and type of

response required. Staff should challenge any inaction and follow this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing on MyConcern.

The School's Local Safeguarding Children Executive is the Lincolnshire Safeguarding Children Partnership (LSCP). A full copy of their local procedures can be found on their website.

Physical restraint

Our policy on physical intervention by staff is set out separately in the *Behaviour Policy* and acknowledges that staff should only use physical restraint as a last resort, when a child is endangering themselves or others, and that at all times it must be the minimum force necessary to prevent injury.

Such events should be recorded and, where possible, signed by a witness. Staff must immediately report any incidents where a pupil has needed to be restrained to the DSL.

What staff should do if a child is seen as at risk of radicalisation

The Prevent Duty

Under section 26 of the Counter-Terrorism and Security Act 2015, the School is aware that we must have due regard to the need to prevent people from being drawn into terrorism, and that this is known as the Prevent Duty.

The key aim of the Prevent strategy in Lincolnshire is to stop people becoming terrorists or supporting violent extremism. It's essential to understand that Prevent operates in the non-criminal space. This means individuals who are referred to Prevent are supported to move away from terrorism, rather than being criminalized. This multi-agency process is called 'Channel'.

In order to fulfil the Prevent Duty staff receive training to help them to identify children who may be vulnerable to radicalisation, and the School is committed to accessing further training to ensure that all staff are up to date and aware of this duty. If staff identify children for whom this may be a concern they should apply the usual referral process and Child Protection procedures and pass this information to the DSL. The DSL will contact the Lincolnshire Prevent Coordinator should there be concerns about a child or family linked to potential radicalisation or extremism. The Prevent Coordinator will then assist the DSL regarding whether a referral is appropriate and whether this child or family will need to be referred to the Channel Panel.

Radicalisation will also be considered within current online safety policies, procedures and curriculum in terms of having suitable filtering and monitoring in place and also raising awareness with staff, parents and children about the increased risk of online radicalisation, through the use of the internet, social media and gaming.

The School has assessed its own current exposure to likely cases of extremism as low.

IT Policies

The School ensures that children are as safe as possible from online terrorist and extremist material, typically via appropriate levels of filtering.

The pupils and staff abide by the *ICT Policy* (c.f. **Internal School Documents**) which makes it clear that accessing such sites is unacceptable. Using School equipment to send terrorist publications to others would be a breach of School rules and also a criminal offence.

Staff Training

The School ensures that its staff follow a regular training programme to equip them to identify children at risk of being drawn into terrorism, as well as challenge extremist ideas. Staff know how to refer children and young people for further help.

All staff can undertake Prevent e-learning via the VWV-Plus training platform. Face-to-face learning is available to book via the Stay Safe Partnership website (*c.f.* **External Documents**).

Wider Issues to Consider

The School helps to promote and implement the Prevent agenda, thereby building pupils' resilience, and enabling them to challenge extremist views by:

- promoting the fundamental British values of democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs;
- including in its curriculum a balanced Religious Education and Learning for Life programme;
- using assemblies to promote issues specific to the School's profile, community and philosophy.

What Staff Should Do if They Discover an Act of Honour-Based Abuse (HBA)

So called 'honour-based' abuse encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing.

Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take.

The School is aware of the need to be aware of the signs of honour-based violence and DSL keep up to date with updates nationally and inform staff. Where staff are concerned a child might be at risk of HBA, they must contact the DSL as a matter of urgency.

Female Genital Mutilation

The School understands that Female Genital Mutilation (FGM) refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons, and knows that FGM is illegal in the UK. It is a form of child abuse and that it has long-lasting harmful consequences. The School is aware that Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a **statutory personal duty upon teachers** to report to the police where they discover that FGM appears to have been carried out on a girl under 18 years of age. This mandatory duty commenced in October 2015. It is recommended that teachers report orally by using 101, the single non-emergency number. Where there is a risk to life or likelihood of serious immediate harm, professionals should report the case immediately to the police, including dialling 999 if appropriate.

Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can also be found within the Multi-agency statutory guidance on FGM. To give an example of indications that a girl has already been subjected to FGM:

- A pupil may have difficulty walking, sitting, or standing and may even look uncomfortable.
- A pupil may have frequent urinary, menstrual or stomach problems or spend longer than normal in the bathroom due to difficulties urinating.

- There may be prolonged or repeated absences from School and/or noticeable behaviour changes (e.g. withdrawal or depression) on the pupil's return.
- A pupil is reluctant to undergo medical examination.

If staff have a concern that a pupil may be at risk of FGM, they should speak to the DSL (or deputy) who will (where appropriate) activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with Police and Children's Social Care.

Forced Marriage

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

The Marriage and Civil Partnership (Minimum Age) Act 2022 came into force in February 2023 and means that 16 and 17 year olds will no longer be allowed to marry or enter a civil partnership, even if they have parental consent. Staff should inform the DSL if they suspect a child is being subjected to a forced marriage. School staff can also contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmv@fco.gov.uk.

What Staff Should Do if They Have Concerns That Children Are at Risk from or Involved with Serious Violent Crime

DSL and staff are aware of the key indicators which may signal that children are at risk from, or are involved with, serious violent crime. These may include:

- increased absence from school;
- injuries seen or mentioned by pupils that are either unexplained or where explanations do not fit the injury;
- a change in friendships or relationships with older individuals;
- a significant decline in performance or their well-being;
- signs of assault; or
- unexplained gifts.

If staff have any concerns about a child (as opposed to a child being in immediate danger), they should, where possible, speak with the DSL to agree a course of action, although staff can make a direct referral to children's social care.

What Staff Should Do if a Child is Absent from School

The School understands that poor attendance can be an indicator of concern related to welfare and safeguarding issues, and thus ensures that information is shared between class teachers, form tutors, the School secretary, Head and DSL. Likewise, these staff understand that a parent failing to inform the School that a child has an authorised absence could be a cause for concern.

Staff should ensure any messages relating to absences are forwarded immediately to the School Office and to the Matrons for monitoring and cross-referencing with daily registers.

School attendance registers are carefully monitored to identify any trends. The School will inform the local authority (and the local authority where the child is normally resident) of any pupil who fails to attend school regularly or who has been absent without the School's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the School and the local authority.

Parents should ensure that the school has at least two emergency contacts for their child, and update the School as soon as possible if numbers change. Where possible, medical or health appointments and holidays should be arranged outside of school hours. Any unavoidable absences should be communicated to the School and permission sought from the Head.

In response to the guidance in KCSIE the School has:

- Staff who understand what to do when children do not attend regularly;
- Appropriate policies, procedures and responses for pupils who go missing from education (especially on repeat occasions);
- Staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriage; and
- Procedures to inform the local authority when we plan to take pupils off-roll when they:
 - leave the School to be home educated
 - move away from the School's location
 - remain medically unfit beyond compulsory school age
 - are in custody for four months or more (and will not return to the School afterwards); or
 - are permanently excluded.

We will ensure that pupils who are expected to attend the School but fail to take up the place will be referred to the local authority. When a pupil leaves the School, we will record the name of the pupil's new school and their expected start date.

What Staff Should Do if a Child Requires Mental Health Support

Whilst recognising that all children can be at risk of mental health problems, only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff are however well-placed to observe children on a day-to-day basis and identify those at risk. It is key that staff are aware how experiences of abuse can impact on children's mental health, behaviour and education.

Staff can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies. More information can be found in the DfE *Mental Health and Behaviour in Schools* guidance. Public Health England has produced a range of resources to support school teachers to promote positive health, wellbeing, and resilience among young people. The DSL is also trained as a Mental Health First Aider and can act as a source of advice for all staff.

Any mental health concern should be referred to the DSL using MyConcern who along with the wider Pastoral Team may action as a pastoral or safeguarding concern as appropriate.

What Staff Should Do if They Have Safeguarding Concerns About Another Member of Staff

If staff have safeguarding concerns about another staff member (including supply staff, agency staff, volunteers and contractors), then this should be referred to the Head. Where their concerns are about the Head, they should contact the Chair of Governors.

What Staff Should Do if They Have Concerns About Safeguarding Practices in the School

The School aims to ensure there is a culture of safety and raising concerns and an attitude of 'it could happen here.' Where staff have concerns about poor or unsafe practices and potential failures in the School's safeguarding systems, these should be raised in accordance with the School's whistleblowing procedures which can be found in the *Whistleblowing Policy*. There will be no disciplinary action taken against a member of staff for making such a report provided that it is done in good faith.

If staff and volunteers feel unable to raise an issue with the School or feel that their genuine concerns are not being addressed, they may use other whistleblowing channels, such as the NSPCC whistleblowing advice line. Contact details for the NSPCC helpline can be found in **Key Contacts** (p. 7).

Extra-familia Harms

All staff should be aware that safeguarding incidents and / or behaviours can be associated with factors outside School or can occur between children outside of these environments. All staff, but especially DSL (or deputy) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familia harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation.

In all cases, if staff are unsure, they should always speak to the DSL (or deputy).

Online Safety

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues and should recognise that children are at risk of abuse online as well as face-to-face abuse. In many cases abuse will take place concurrently in the online world and in the physical world. All staff should be aware of the risks posed to children by technology and the internet and should understand their role in preventing, identifying and responding to harm caused by its use.

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

- **Content:** being exposed to illegal, inappropriate or harmful material (*e.g.* pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism);
- **Contact:** being subjected to harmful online interaction with other users (*e.g.* child-to-child pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes);

- **Conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example making, sending and receiving explicit images (*e.g.* consensual and non-consensual sharing of nudes and semi-nudes and / or pornography), and online bullying;
- **Commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams.

The School has a comprehensive policy outlining its approach to online safety. We have clear guidelines about the use of mobile phones and personal devices as well as an Acceptable Use Policy in School. When children use the School's network to access the internet, they are protected from inappropriate content by our filtering and monitoring systems.

Filtering refers to the technology preventing access from harmful or inappropriate content, whilst monitoring refers to the practical steps staff take to ensure harmful or inappropriate access is not made. Monitoring can include, live software monitoring, monitoring user logs and monitoring individual devices.

Although pupils are not permitted to have personal mobile devices at School, staff should remain vigilant to conversations around their use at home. Any School devices used away from the School site are also subject to filtering and monitoring procedures.

Staff undertake training to understand the risks of poor filtering and monitoring, and understand how to share their concerns. In addition, the DSL, along with the IT team and a governor, review the School's filtering and monitoring procedures to ensure that they are effective.

Child-on-Child Abuse

Children and young people may be harmful to one another in a number of ways which would be classified as child-on-child abuse. Staff should recognise that even if there are no reported incidents, this form of abuse may still be happening and always be vigilant in reporting any concerns.

There are many forms of abuse that may occur between peers and this list is not exhaustive:

- Physical abuse (*e.g.* biting, hitting, kicking, hair pulling *etc.*)
- Bullying (*e.g.* physical, name-calling, homophobic *etc.*), including cyber-bullying
- Sexting
- Sexual violence or sexual harassment between pupils
- Initiation, hazing and rituals.³

It can be motivated by sexual, racial, gender or other discrimination. The gendered nature of child-on-child abuse is recognised (*i.e.* that it is more likely that girls will be victims and boys perpetrators). Whatever form it takes, child-on-child abuse must never be tolerated and must never be passed off as "banter", "just having a laugh" or "part of growing up." The threshold for dealing with any issue of pupil behaviour under this Policy is when there is reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm. The key issues identifying the problem as abuse (rather than an isolated instance of bullying or "adolescent experimentation" which would be anticipated to be within normal bounds in the school community) are:

- i. The frequency, nature and severity of the incident(s);

³ Hazing, initiation ceremonies, ragging, or deposition, refers to the practice of rituals, challenges, and other activities involving harassment, abuse or humiliation used as a way of initiating a person into a group including a new fraternity, sorority, team, or club.

- ii. The ages and relative ages of the pupils involved;
- iii. Whether the victim was coerced by physical force, fear or by a pupil or group of pupils significantly older than the victim, or having power or authority over the victim; and
- iv. Whether the incident involved a potentially criminal act, and whether if the same incident (or injury) had occurred to a member of Staff or other adult, it would have been regarded as assault or otherwise actionable.

All allegations of child-on-child abuse are recorded, investigated and dealt with in accordance with this Policy and the School's *Anti-Bullying Policy* and *Behaviour Policy* (c.f. **Internal School Documents**), and other relevant guidance. Support for perpetrators as well as victims is built in as part of the process.

Close monitoring of children's wellbeing and vigilance from all Staff helps to minimise the risk of child-on-child abuse. The pastoral network encourages the building of trusting relationships between Staff and pupils in order to encourage children to raise concerns promptly.

Moreover, the School provides an open environment where pupils feel safe to share information about anything that is upsetting or worrying them. This is strengthened through a strong and positive Learning for Life curriculum that tackles such issues as prejudiced behaviour and gives children an open forum to talk things through rather than seek one-on-one opportunities to be harmful to one another.

Sharing of Nudes and/or Semi-Nudes (Commonly Known as 'Sexting')

This is the sending or posting of nude or semi-nude images, videos or live streams online by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. The sharing of nudes and semi-nudes can happen publicly online, in 1:1 messaging or via group chats and closed social media accounts and may include images or footage of more than one child or young person.

Alternative terms used by children and young people may include 'dick pics' or 'pics' or may be referred to by adults or professionals as 'youth-produced/involved sexual imagery', 'indecent imagery', 'image based sexual abuse' or 'sexting'.

The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner.

Incidents may also occur where:

- children and young people find nudes and semi-nudes online and share them claiming to be from a peer;
- children and young people digitally manipulate an image of a young person into an existing nude online; and
- images created or shared are used to abuse peers (e.g. by selling images online or obtaining images to share more widely without consent to publicly shame).

Sexting or youth produced sexual imagery does not refer to one single activity: it can have multiple facets and activities, be connected to sexual pleasure and be linked to a 'normal' part of sexual

development. However, something that transpires online can quickly spiral out of control as it becomes freely available in the public domain. It can then be transferred, forwarded, downloaded, uploaded and shared.

For this reason, incidents can either be classified as 'aggravated' or 'experimental'. The School follows the guidance and principles in the UKCIS document, *'Sharing nudes and semi-nudes: Advice for education settings working with children and young people'* (c.f. **External Documents**).

The School has a duty of care towards its pupils and an obligation to support them in being safe in the online world as well as the physical world. Any situations involving the School's pupils and youth-produced sexual imagery are taken seriously as potentially being indicative of a wider safeguarding or child protection concern or as being problematic sexual behaviour. The understanding of children and young people around the potential implications of taking and/or sharing youth-produced sexual imagery is likely to be influenced by the age and ability of the children involved. In some cases, even children under 13 may create youth-produced sexual imagery as a result of age-appropriate curiosity or risk-taking behaviour or simply due to naivety rather than any sexual intent.

How staff should respond

All incidents involving youth-produced sexual imagery will be responded to in line with the School's safeguarding and child protection procedures. When an incident involving youth-produced sexual imagery comes to the attention of the School community:

- The incident is referred to the DSL as soon as possible and recorded using MyConcern.
- The DSL should inform the Head and hold an initial review meeting with appropriate member(s) of staff.
- There should be subsequent interviews with the pupils involved (if appropriate).
- Parents/carers should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm.
- Carrying out a risk assessment to determine whether there is a concern that a child has been harmed or is at risk of immediate harm at any point in the process
- If not, the incident can be handled in School in accordance with the "sharing nudes" guidance and the School's *Behaviour policy*
- At any point in the process if there is a concern a young person has been harmed or is at risk of harm, a referral should be made to children's social care and/or the police immediately.

Any direct disclosure by a young person should be taken very seriously. A young person who discloses that they are the subject of sexual imagery is likely to be embarrassed and worried about the consequences. It is likely that disclosure in School is a last resort and they may have already tried to resolve the issue themselves.

All incidents relating to nudes and semi-nudes being shared need to be recorded, whether they have been referred externally or not. Schools must record the reason for not reporting incidents externally and ensure it is signed off by the Head. Records will be kept in line with statutory requirements set out in KCSIE and local safeguarding procedures. No copies of imagery will be taken or retained.

If any devices need to be seized and passed onto the police then the device(s) should be confiscated and the police should be called. The device should be turned off and placed under lock and key until the police are able to come and retrieve it. **Under no circumstances should staff view the**

images themselves. See Government guidance, '*Searching, screening and confiscation at school*' (c.f. **External Documents**).

Sexual Violence or Sexual Harassment Between Pupils

This should be read in conjunction with Part 5 and Annex A of KCSIE with additional advice available (paragraph 43) in the DFE document '*Sexual Violence and Sexual Harassment Between Children in Schools and Colleges*' (c.f. **External Documents**).

Sexual violence and sexual harassment can occur between two children of **any** age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that **all** victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows that girls, children with SEND and LGBTQ+ children are at greater risk.

Staff are aware of the importance of:

- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- Not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys";
- Challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts (including up-skirting); and
- Never dismissing or tolerating such behaviours as this can risk normalising them.

Sexual Violence

Staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. Sexual violence refers to sexual offences under the *Sexual Offences Act 2003 - Rape, Assault by Penetration and Sexual Assault*.

Sexual Harassment

Sexual harassment is 'unwanted conduct of a sexual nature' that can occur online and offline. When one references sexual harassment, one does so in the context of child-on-child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Whilst the below is not intended to be an exhaustive list, sexual harassment can include:

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

and videos, sexualised online bullying, unwanted sexual comments and messages, including, on social media and sexual exploitation; coercion and threats; and

- Upskirting. All staff are aware of the changes to the Voyeurism (Offences) Act 2019 which criminalise the act of 'upskirting'. The Criminal Prosecution Service (CPS) defines 'upskirting' as a colloquial term referring to the action of placing equipment such as a camera or mobile phone beneath a person's clothing to take a voyeuristic photograph without their permission. It is not only confined to victims wearing skirts or dresses and equally applies when men/boys or women/girls wearing trousers or shorts.

How to Respond to a Report of Sexual Violence or Sexual Harassment or Child-on-Child Abuse

The School recognises that reports of sexual violence or sexual harassment are likely to be complex and require difficult professional decisions to be made, often quickly and under pressure. This should be done on a case-by-case basis. Staff should be aware that indicators may not be verbal and disclosures could come from a third party. The initial response to a report is vital in maintaining the child's confidence. Staff should ensure they report anything of concern, including observations of changes in behaviour or overheard conversations, to the DSL without delay.

The following procedures should be adhered to if a pupil makes a disclosure;

- Immediate Response
 - All victims should be assured they are being taken seriously.
 - Abuse online/outside of school should not be downplayed.
 - Pupils should never be given the impression they are creating a problem.
- Staff should follow the same procedure as with any other disclosure from a child:
 - Listen very carefully and give the child your full attention.
 - Do not promise confidentiality, but you can tell them you will only share with those necessary like the DSL.
 - Ask 'open' questions like "Can you tell me what has happened?" and avoid any leading questions like "Did he/she do X to you?"
 - Maintain clear boundaries, and remain non-judgemental.
 - Make written notes as soon as possible, including anything you have said – avoid personal opinion, and as much as possible use the pupil's own words.
 - Do not take it upon yourself to investigate what the child has told you or to speak to the alleged perpetrator.
 - **Staff should not view or forward any illegal images of children.**
- Staff should make an immediate record of the conversation on MyConcern, including uploading any handwritten notes. **It is essential that a written record is made.** If you think that a child is at risk, also contact the DSL or DDSL verbally.
- Managing Reports
 - Staff should recognise that a disclosure may not be representative of a single incident, and that many children face additional barriers to telling someone.
 - Any follow-up conversation should be conducted with two members of staff present, ideally at least one being the DSL/DDSL.
 - There must be careful handling of any abuse online/outside of school and the School will follow the guidance from '*Sharing nudes and semi-nudes: Advice for education settings working*

*with children and young people' (c.f. **External Documents**) and 'Searching, screening and confiscation at school' (c.f. **External Documents**).*

- The victim may ask the School not to tell anyone. If the victim does not give consent, the School may still lawfully share information if there is another legal basis under UK GDPR that applies.
- The DSL should:
 - Inform parents or carers, unless this puts the victim at greater risk of harm
 - Consider the basic safeguarding principles and whether a referral to the LCSB needs to be made
 - Rape, assault by penetration, and sexual assault are a crime and the police should be informed even if the child is under the age of 10; Police will more often than not take a welfare approach rather than a criminal one. Guidance can be found in the document *When to Call the Police: Guidance for Schools and Colleges* (c.f. **External Documents**)
- The next steps should be handled carefully and reasons explained to the victim.
- The School should conduct a Risk Assessment where appropriate (this should be done immediately in the case of sexual violence, and on a case-by-case basis for sexual harassment). This should include; the victim, their protection and support; time and location of the incident and any actions to make this location safer; any other victims; the alleged perpetrator(s) and their support; all other children (and adult staff) and actions to protect them from the alleged perpetrator(s) and/or future harassment. This should be kept under regular review.
- When allegations are progressing under the criminal justice system, the School should:
 - Be aware of anonymity, witness support and the criminal process;
 - Do all that they can to protect the anonymity of and children involved, both victim and alleged perpetrators(s);
 - Consider the impact of social media in facilitating the spread of rumours; and
 - Consider the impact on siblings.

Child Sexual Exploitation (CSE)

The School recognizes that Child Sexual Exploitation (CSE) is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 (this includes children of 16 and 17 who are over the age of consent) into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual.

CSE may involve physical contact, including assault by penetration or non-penetrative acts such as masturbation or touching inside or outside clothing. It may also not involve physical contact in that it can also occur through the use of technology (e.g. forcing children to watch or look at sexual images or behave in sexually inappropriate ways).

Indicators of child sexual exploitation may include:

- Acquisition of money, clothes, mobile phones, *etc.* without plausible explanation;
- Gang-association and/or isolation from peers/social networks;
- Exclusion or unexplained absences from school, college or work;
- Leaving home/care without explanation and persistently going missing or returning late;

- Excessive receipt of texts/phone calls;
- Returning home under the influence of drugs/alcohol;
- Inappropriate sexualised behaviour for age/sexually transmitted infections;
- Evidence of/suspicions of physical or sexual assault;
- Relationships with controlling or significantly older individuals or groups;
- Multiple callers (unknown adults or peers);
- Frequenting areas known for sex work;
- Concerning use of internet or other social media;
- Increasing secretiveness around behaviours; and
- Self-harm or significant changes in emotional well-being.

Although the following vulnerabilities increase the risk of child sexual exploitation, it must be remembered that not all children with these indicators will be exploited. Child sexual exploitation can occur without any of these issues. Potential vulnerabilities include:

- Having a prior experience of neglect, physical and/or sexual abuse;
- Lack of a safe/stable home environment, now or in the past (e.g. domestic abuse or parental substance misuse, mental health issues or criminality);
- Recent bereavement or loss;
- Social isolation or social difficulties;
- Absence of a safe environment to explore sexuality;
- Economic vulnerability;
- Homelessness or insecure accommodation status;
- Connections with other children and young people who are being sexually exploited;
- Family members or other connections involved in adult sex work;
- Having a physical or learning disability;
- Being in care (particularly those in residential care and those with interrupted care histories); and
- Sexual identity.

More information can be found in *Child sexual exploitation: Definition and a guide for practitioners* (DfE 2017)

If staff identify children for whom CSE may be a concern they will apply the usual referral process and Child Protection procedures and pass this information to the DSL. The DSL can then refer cases where relevant to Lincolnshire Customer Services Team. The School also appreciates that they have a role to play in sharing soft intelligence relevant to perpetrators of CSE, and therefore if such information should come to light within School the DSL will share this appropriately with the police.

Staff are asked to be vigilant to any signs that children might be suffering from CSE (see Annex A of KCSIE) and to report any concerns to the DSL.

Child Criminal Exploitation (“CCE”) and County Lines

Staff should be aware that some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, shoplifting or pick-pocketing or other crime. Children can become trapped by this type of exploitation in a number of ways. It is important to note that experiences of boys and girls in this type of abuse can be very different, and that those who suffer from being criminally exploited may also be at higher risk of sexual

exploitation. Further information about CCE including definitions and indicators can be found in Annex B of KCSIE.

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas, using dedicated mobile phone lines or other form of 'deal line'. Exploitation of children or vulnerable adults is an integral part and offenders will use a variety of forms of coercion to ensure compliance of their victims. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

Domestic Abuse and Operation Encompass

The Domestic Abuse Act 2021 (Part 1) defines domestic abuse as any of the following behaviours, either as a pattern of behaviour, or as a single incident, between two people over the age of 16, who are 'personally connected' to each other:

- physical or sexual abuse;
- violent or threatening behaviour;
- controlling or coercive behaviour;
- economic abuse (adverse effect of the victim to acquire, use or maintain money or other property; or obtain goods or services); and
- psychological, emotional or other abuse.

Two people are 'personally connected' when:

- they are, or have been married to each other or civil partners; or have agreed to marry or become civil partners;
- they have been in an intimate relationship with each other;
- they have shared parental responsibility for the same child; or
- they are relatives.

The definition of Domestic Abuse applies to children if they see, hear or experience the effects of the abuse; and they are related to the abusive person.

(The definition can be found here: <https://www.legislation.gov.uk/ukpga/2021/17/part/1/enacted>)

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

Controlling behaviour is a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour. Coercive behaviour is an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish or frighten their victim.

If staff identify children for whom Domestic Abuse may be a concern they should apply the usual referral process and Child Protection procedures and pass this information to the DSL, who can then refer cases where relevant to Lincolnshire Customer Services. Where notifications are received from the Multi-Agency Risk Assessment Conference (MARAC), this information will be added to a

child's chronology and child protection record to ensure that appropriate support can be provided where necessary.

The School is part of **Operation Encompass** – a national police-led initiative to notify schools, prior to the start of the next school day, when a child or young person has experienced any domestic abuse. An officer attending the incident will record at the time the names and school of any children in the household. This will result in an email notification to the school before the start of the following school day.

The National Domestic Abuse helpline can be called free of charge and in confidence, 24 hours a day on 0808 2000 247

Children with SEND or Health Conditions

Children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges. We will ensure that all staff recognise that additional barriers can exist when recognising abuse and neglect in this group of children. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration;
- these children being more prone to peer-group isolation or bullying than other children;
- the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in managing or reporting these challenges.

The School has a dedicated Head of Learning Support, who along with the Deputy Head Pastoral (also the DSL) ensure appropriate support and communication is in place, including giving regular updates to staff.

Children who are Lesbian, Gay, Bi or Trans (LGBTQ+)

The fact that a child or young person may be LGBTQ+ is not itself an inherent risk factor for harm. However, children who are LGBTQ+ can be targeted by other children. In some cases, a child who is perceived by other children to be LGBTQ+ (whether or not they are) can be just as vulnerable as children who do identify as LGBTQ+.

Risks can be compounded where children who are LGBTQ+ lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced, and allow pupils to speak out or share their concerns without fear of prejudice or judgement.

Children with Family Members in Prison

The School understands that children who have members of their family in prison are more likely to underachieve and fail to reach their potential than their peers and may require specific services and support. Families and children of people in prison will be seen as families first and School will work to ensure their needs are appropriately met. This will include providing support to ensure the voice of the child is considered when seeking contact with a family member in prison.

Private Fostering

The School is required to notify the relevant County Council of any private fostering arrangements. Private fostering happens when a child under the age of 16 (under 18 if disabled) is cared for by

someone who is not their parent or a close relative. This is a private arrangement made by a parent and a carer for 28 days or more. Close relatives are defined as step-parents, grandparents, brothers, sisters, uncles or aunts (whether of full blood, half blood or marriage/affinity). Parents and private foster carers have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start. School staff will notify the DSL should they become aware of or suspect any private fostering arrangements, who will speak to the family to check that they are aware of their duty to inform the local authority. The school itself has a duty to inform the local authority of the private fostering arrangements.

Procedures for dealing with Safeguarding Concerns or Allegations of Abuse Regarding Teachers, Supply Staff and Other Staff

Allegations or Concerns about an Adult in School

The School recognises the possibility that adults working in the School may harm children, including governors, volunteers, supply teachers and agency staff. Any concerns about the conduct of a member of staff, supply teachers, volunteers, contractors or other adults in the School should be taken to the Head without delay; any concerns about the Head should go to the Chair of Governors

Concerns may come from various sources (*e.g.* a suspicion, complaint or disclosure made by a child, parent or other adult within or outside of the organisation) or as a result of vetting checks undertaken.

The notification and prompt handling of all concerns about adults (including staff, supply staff and volunteers) is fundamental to safeguarding children. It helps to identify and prevent abuse and to protect adults against misunderstandings or misinterpretations. Those raising concerns or reporting allegations in good faith will always be supported, and adults in respect of whom concerns or allegations have been raised will not suffer any detriment unless the concern or allegation is found to be substantiated.

The Head will decide whether the concern is an allegation or a low-level concern. The term 'low-level' concern does not mean that it is insignificant; it means that the behaviour towards a child does not meet the threshold for referral to the Local Authority Designated Officer (LADO) (*c.f.* **Low-level Concerns**, p.46).

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

Allegations

When handling allegations, the School will always follow Part 4 of KCSIE. Responsibility for appropriate action rests with the Head. The procedure would be used in all cases in which it is alleged the teacher, other member of staff, or volunteer has:

- behaved in a way that has harmed a child, or may have harmed a child and/or;
- possibly committed a criminal offence against or related to a child and/or;

- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children (also includes behaviour outside school). This may include Children's Social Care involvement with their own child, being the perpetrator of domestic abuse, mental ill health or substance misuse issues that may impact the care of children, criminal proceedings for Hate crime or membership of organisations with terrorist or extreme right-wing links believed to cause harm to others.

Allegations should be reported to the LADO without delay, and certainly within 24 hours. The LADO will then make contact with the School to provide advice and determine whether any actions are required to safeguard children.

Initial action to be taken:

- The person who has received an allegation or witnessed an event will immediately inform the Head and make a record.
- The Head will inform the Chair of Governors of any allegation against a member of School staff.
- In the event that an allegation is made against the Head the matter will be reported to the Chair of Governors who will proceed as the Head. The Chair of Governors will not inform the Head if there is any safeguarding allegation made against him, as he informs the LADO.
- The Head (or Chair of Governors if the allegation is about the Head) will take steps, where necessary, to secure the immediate safety of children and any urgent medical needs.
- The alleged perpetrator will not be approached at this stage unless such a step is necessary to address the immediate safety of children.
- The Head (or Chair of Governors if the allegation is about the Head) may need to clarify any information regarding the allegation; however no person will be interviewed at this stage.
- The Head (or Chair of Governors if the allegation is about the Head) will consult with the LADO immediately, in order to determine if it is appropriate for the allegation to be dealt with by School or whether there needs to be a multi-agency response to the matter.
- The needs of the child or children will remain at the centre of all action taken. With this in mind, any referral to the LADO should also be accompanied by consultation with Lincolnshire Customer Service Centre when appropriate. This is to establish from the outset whether the concerns identified meet the threshold for a Section 47 child protection investigation and/or the police in respect of any criminal investigation.
- If consideration needs to be given to the individual's employment and immediate management of risk, advice will be sought from either Lincolnshire County Council HR or any external, professional HR advisor engaged by the School.

The LADO will determine the distinction between a complaint, a concern about the quality of practice and an allegation.

The LADO's role is not to investigate the allegation, but the LADO will discuss with the Head (or Chair of the Governing Body, as above), and any other relevant agencies such as the police, which further steps, if any, should be taken; this could involve informing parents.

Further actions:

Where a referral to the police has been made directly the Head, (or Chair of the Governing Body, as above) will inform the LADO of the referral as soon as possible and in any event within 24 hours of the School becoming aware of the allegation. There may be cases where the LADO or police are made aware of an allegation before the School is and in those cases they will notify the School of the allegation immediately. All discussions with external agencies should be recorded in writing.

When an allegation is made, the School will make every effort to maintain confidentiality and guard against unwanted publicity while the allegation is being investigated. Where a member of staff is facing an allegation of a criminal offence involving a pupil registered at the School, they are legally entitled to anonymity until they are charged with an offence or until the anonymity is waived by them or until the Secretary of State publishes information about an investigation or decision in a disciplinary case arising from the allegation. In particular, the Education Act 2011 prevents the publication of any material which could lead to the identification of someone who has been accused by, or on behalf of, a pupil from the same school (where that identification would identify that someone as the subject of the allegation).

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

The person against whom an allegation is made should normally be informed as soon as possible after the result of the initial investigation is known. However, where a strategy discussion is needed or police or children’s social care need to be involved neither the person against whom the allegation has been made nor the individual making the allegation should be informed until these agencies have been consulted.

Supply Teachers and Contractors

Should the School appoint a supply teacher, even though the School would not be the employer, the School would ensure allegations are dealt with properly: supply teachers, whilst not employed by the School, are under the supervision, direction and control of the governing body when working in the School. This would mean that if the School were to decide against using a supply teacher due to safeguarding concerns, the School would seek out the facts and liaise with the LADO, with the School typically taking the lead in such matters. Consideration would be given to suspending the supply teacher, or redeploying them to another part of the School, whilst the investigation was carried out. The supply teacher would be advised to contact their trade union representative if they have one, or a colleague for support.

When using an agency, schools and colleges should inform the agency of its process for managing allegations. This should include inviting the agency’s human resource manager or equivalent to meetings and keeping them up to date with information about its policies. Agencies would be fully involved and it would be expected that they would cooperate in any enquiries. The allegations management meeting which is often arranged by the LADO should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the School during the investigation.

Any concerns about contractors who work on site, either in a supervised capacity or with regular contractors who are on the School's SCR will be dealt with by the Head.

Support for Staff

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

Suspension

If there is cause to suspect that a child or children at the School are at risk of harm from the accused person, or the case is so serious that it might be grounds for dismissal, then consideration will be given to suspending the accused person. Due weight should be given to the views of the LADO and to the police when making a decision about suspension and all alternative options should be considered prior to taking that step.

The reasons and justification for suspension will be recorded and the individual informed of them. In the case of staff, the matter will normally be dealt with in accordance with the School's *Staff Code of Conduct*.

In cases where the School is made aware that the Secretary of State has made an interim prohibition order in respect of an individual at the School it will be necessary to immediately suspend that person from teaching pending the findings of the Teaching Regulation Agency ("the TRA") investigation.

In the case of a concern about or an allegation being made against a member of staff resident on the School site – if a suspension from work is deemed appropriate while an investigation takes place – that member of staff will be temporarily rehoused in accommodation which is not within the main site.

The following alternatives will be considered before suspending a member of staff:

- Redeployment within the School so that the individual does not have direct contact with the child or children concerned;
- Providing an assistant to be present when the individual does have contact with children;
- Redeploying to alternative work in the School so the individual does not have unsupervised access to children;
- Moving the child or children to classes where they will not come into contact with the member of staff (this decision should only be made if it is in the best interest of the child or children concerned and takes accounts of their views: it should be made making it clear that this is not a punishment and parents have been consulted); or,
- Temporarily redeploying the member of staff to another role in a different location.

If suspension is decided as the most appropriate course of action, a record will be kept as to what alternatives to suspension were considered and why they were rejected.

While suspended, social contact with work colleagues and friends is permitted (unless there is evidence to suggest this may prejudice the gathering of evidence), but confidentiality must be maintained.

Notification to Parents

The School will always encourage a pupil to allow the School to share information with the pupil's parents, unless there is evidence to suggest this may prejudice the gathering of evidence.

The School aims to ensure that parents of the child or children involved should be:

- Formally told about the allegation as soon as possible. The School will consult with the LADO and where involved the police and/or the Local Authority about what information can be disclosed.
- Kept informed about the progress of the case, only in relation to their child – no information can be shared regarding the staff member.
- Made aware of the requirement to maintain confidentiality and unwanted publicity about any allegations made against teachers in schools whilst investigations are in progress.

Further Enquiries and Timeframes

Every effort will be made to progress an investigation to ensure that matters are dealt with as quickly as possible in a thorough and fair process. Where it is necessary, reviews will be conducted at fortnightly or monthly intervals, depending on the complexity of the case.

Outcomes

The initial sharing of information and investigation may lead to a decision that no further action is to be taken in which case this decision should be recorded by the Head and an agreement should be reached with the LADO on what information should be put in writing to the individual concerned.

The definitions that determine the outcome of an allegation are as follows:

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 cause harm to the person 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. The term, therefore, does not imply guilt or innocence; or,
5. **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made.

If the outcome determines that the allegation was (2) malicious, (3) false, (4) unsubstantiated or (5) unfounded, a confidential record will be kept on Confide, but the decision will not affect the member of staff's employment, and it will not be mentioned in any reference for employment elsewhere.

If the allegation is (1) substantiated, this will be recorded and will be mentioned in any reference for employment elsewhere.

The Head should then consider with the LADO about what action should follow, both in respect of the individual and those who made the initial allegation.

If an allegation is made against a Governor, the School will follow the same procedures as outlined for staff. Where an allegation is substantiated, the School will follow the procedures to consider removing the Governor from office.

Record-keeping

A record will be made of all conversations, including any advice or recommendations. The following will be kept on file:

- A clear and comprehensive summary of the allegation;
- Details of how the allegation was followed up and resolved; a note of any action taken, and decisions reached and the outcome as categorised above;
- A copy provided to the person concerned, where agreed by the Police and / or the Local Authority; and,
- A declaration on whether the information will be referred to in any future reference.

Allegations that are found to have been (2) malicious or (3) false will be removed from personnel records and the person against whom the complaint has been made will be informed that the matter is closed.

However, for all other allegations, the School will in accordance with KCSIE retain a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken and decision reached on the personnel record. A copy should be provided to the person concerned.

Following-up

During the course of the investigation, the School in consultation with the LADO will decide what information (if any) will be given to parents, staff, volunteers and other students and how media enquiries are to be dealt with. Any pupils who are involved will receive appropriate care.

If it is established that the allegation is (2) malicious, (3) false, (4) unsubstantiated or (5) unfounded, a written record will be made of the decision and the justification for it and then the person against whom the complaint has been made would normally be informed that the matter is closed.

Consideration will be given as to whether the child and / or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help: in such circumstances, a referral to the Local Authority may be appropriate.

If the allegation is (1) substantiated and the member of staff (whether employed, contracted, a volunteer or a student) is dismissed; resigns, or otherwise ceases to provide their services; or is asked to leave the School, or would have been removed had they not left, on the grounds that they:

- harmed a child or vulnerable adult (engaged in relevant conduct)
- pose a risk of harm to vulnerable groups including children (satisfied the harm test)
- received a caution or conviction for a relevant offence

then the Head will (as soon as possible after the person has resigned or the School has ceased to use their services) notify the Disclosure and Barring Service at PO Box 101, Darlington DL1 9FA (01325 953795). DBS guidance is given in <http://www.homeoffice.gov.uk/dbs>.

The School will not enter into settlement or compromise agreements to prevent a referral being made to the DBS when it is legally required. Failure to make a report by an employer where the member of staff has harmed or is likely to harm a child constitutes a criminal offence.

For teachers, separate consideration will be given as to whether to refer the matter to the Secretary of State (through the Teaching Regulation Agency) in order to consider prohibiting the individual from teaching (this includes cases where they would have been dismissed if they had not resigned): the Head, consulting the LADO, will consider whether or not to refer the matter to the Teaching Regulation Agency. The Teaching Regulation Agency may impose a prohibition order to prevent teachers from working in the profession following a finding of:

- Unacceptable professional conduct;
- Conduct that may bring the profession into disrepute; or
- Conviction, at any time, for a relevant offence.

Following a Criminal Investigation

Where the Police inform the LADO and employer that:

- A criminal investigation and any subsequent trial is complete
- It is decided to close an investigation without charge
- It is decided not to continue to prosecute after the person has been charged

consideration will be given as to whether any further action, including disciplinary action, is appropriate and, if so, how to proceed.

Returning to Work

In discussion with the individual, appropriate help and support will be proffered to return to work after what is likely to have been a stressful experience. Depending on the individual's circumstances, a phased return and / or the provision of a mentor to provide assistance and support in the short term may be appropriate. Consideration will also be given as to how the individual's contact with the child or children who made the allegation can best be managed if they are still attending the School.

Resignations

Every effort will be made to reach a conclusion in all cases of allegations bearing on the safety or welfare of children, including any in which the person concerned refuses to cooperate

Wherever possible, the individual should be given full opportunity to answer the allegation and make representations about it. The process of recording the allegation and any supporting evidence and reaching a judgement about whether it can be substantiated or otherwise on the basis of all the information available, should continue even if the accused does not cooperate. It may be difficult to reach a conclusion in those circumstances, and it may not be possible to apply any disciplinary sanctions if a person's period of notice expires before the process is complete, but it is important to reach and record an outcome wherever possible. The person concerned should be notified of the conclusion of the allegations and sanctions that might be posed.

In limited circumstances, the School sometimes use settlement agreements to end the employment relationship on agreed terms, but not where there is an allegation that the individual poses a risk to children.

Learning Lessons

The School will always consider what lessons can be learnt from any cases of abuse and how the School's safeguarding systems can be improved to reduce the risk of such abuse recurring.

Non-recent allegations

Where an adult makes an allegation to the School that they were abused as a child, the individual should be advised to report the allegation to the Police; additionally, the information should be passed to the Head, who will check the existence of other relevant records before promptly informing the Police and the LADO.

Non-recent allegations made by a child should be reported to the Police and/or the Local Authority

Abuse can be reported no matter how long ago it happened

Members of staff who become aware of allegations involving former colleagues or former pupils should share the information as outlined above, but must otherwise keep the matter wholly confidential.

Low-level Concerns

Concerns may be graded low-level if the concern does not meet the criteria for an allegation; and the person has acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work. Example behaviours include, but are not limited to:

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

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

Low-level concerns should be recorded in writing, including: name⁴ of individual sharing their concerns, details of the concern, context in which the concern arose and action taken.

Further details of staff responsibilities and the School's response to low-level concerns can be found in the School's *Low-Level Concerns Policy*.

Promoting a Safeguarding Culture

Ethos

The School and Governing Body has a duty to maintain an ethos where:

⁴If the individual wishes to remain anonymous then that should be respected as far as reasonably possible

- Children feel secure in a safe environment in which they can learn and develop, and know that there are adults in the School whom they can approach if worried or in difficulty;
- Adequate signposting to external sources of support and advice is in place (for staff, parents and pupils);
- All adults feel comfortable and supported to draw safeguarding issues to the attention of the DSL and / or the Deputy DSL and are able to pose safeguarding questions with “respectful uncertainty” as part of their shared responsibility to safeguard children;
- Importance and prioritisation are given to equipping the children with the skills needed to stay safe, including providing opportunities for Learning for Life throughout the curriculum;
- Children develop realistic attitudes to their responsibilities in adult life and are equipped with the skills needed to keep themselves safe, including understanding and recognising healthy / unhealthy relationships and that support available;
- It is ensured that children are taught to recognise and manage risks in different situations, including on the internet, being able to judge what kind of physical contact is acceptable and unacceptable, recognising when pressure from others, including people they know, threatens their personal safety and well-being and that they are supported in developing effective ways of resisting pressure.

Teaching children how to keep safe

The School and Governing Body ensures that all pupils are taught about safeguarding, including online safety, through the curriculum and Learning for Life (commonly also known as PSHEE) to help children to adjust their behaviours, both inside and outside of school, in order to reduce risks and build resilience, including to radicalisation. This includes teaching pupils about the safe use of electronic equipment and the internet and the risks posed by adults or young people, who use the internet and social media to bully, groom, abuse or radicalise other people, especially children, young people and vulnerable adults. The School recognises that a “one size fits all” approach may not be appropriate for all children, and a more personalised or contextualised approach for more vulnerable children, victims of abuse and some SEND children might be needed.

Internet safety (including when children are online at home) is an integral part of the School’s Computing curriculum and also embedded in the Learning for Life curriculum and within Relationships Education and/or Relationships and Sex Education (“RSE”). Further information can be found in the School’s *ICT Policy*, *Learning for Life Policy* and *Relationship and Sex Education Policy*.

Children are informed about the dangers of alcohol, smoking and other substances. The School has an *Alcohol, Smoking and Substance Policy* which is delivered throughout the School and in the Learning for Life curriculum.

Pupils

Safeguarding Information about Pupils

In order to keep children safe and provide appropriate care for them the School requires accurate and up to date information regarding:

- Names, contact details and relationship to the child of any persons with whom the child normally lives;
- Names and contact details of all persons with parental responsibility (if different from above);

- Emergency contact details (if different from above), ensuring that if the person(s) with parental responsibility is unable to collect this person, who could collect the child and keep them safe until either the person(s) with parental responsibility is available or a more suitable arrangement is made. The School ensures that all parents and carers provide more than one emergency contact, providing the School with additional options to make contact with a responsible adult when a child missing education is identified as a welfare and/or safeguarding concerns;
- Within the EYFS, details of any persons authorised to collect the child from School (if different from above);
- Any relevant court orders in place including those which affect any person's access to the child (*e.g.* Residence Order, Contact Order, Care Order, Injunctions *etc.*);
- If the child is or has been subject to a Child Protection Plan, an Early Help Assessment (EHA) or Child In Need (CIN) processes, or if the child is a Looked After (or Previously Looked After) Child (LAC);
- Name and contact detail of G.P. in cases where that becomes appropriate; and
- Any other factors which may impact on the safety and welfare of the child.

We recognise that when a child has a social worker, it is an indicator that a child is more at risk than most pupils. This may mean that they are vulnerable to further harm, as well as facing potential barriers to attendance, learning, behaviour and poor mental health. The School has a named member of staff for looked after children who is able to meet with them regularly and offer additional pastoral support.

The School will collate, store and agree access to this information, ensuring all information held electronically is stored securely with due regard to meeting data protection and safeguarding requirements.

Safeguarding Information for Pupils

All pupils in the School are aware of a number of staff whom they can approach; this is displayed around the school on 'Who Can I Contact if I Am Worried' posters, reminders are regularly given in assemblies and during Learning for Life lessons. The School is committed to ensuring that pupils are aware of behaviour towards them that is not acceptable and how they can keep themselves safe. All pupils know that we have a senior member of staff (DSL) with responsibility for child protection and know who this is. We inform pupils of whom they might talk to, both in and out of School, their right to be listened to and heard and what steps can be taken to protect them from harm. Through the Learning for Life curriculum and a commitment to online safety awareness (including a fully designated day each year) and we help pupils learn how to keep safe. Within the Pre-Prep department, worry monsters are used in every class to promote the sharing of concerns or worries and then discussed either individually or with a group as appropriate. Within the Prep department, a green box is used for alerting senior pastoral staff to issues or concerns to also then be taken forward appropriately. The children may also raise items of concern within a range of (pupil) Council meetings available to them.

Information about the School Counsellor, Independent Listener and relevant Helplines are displayed around the School (including on parent noticeboards), and children are made aware of how these can be utilised. The main noticeboards in each of the Prep and Pre-Prep also carry advice on Safeguarding and Preventing Extremism.

Alternative Provision for Pupils

This School is committed to safeguarding our children even if they are placed in alternative provision for a period of time within the school day / week. We would therefore make checks to gain written reassurance that any Alternative Provision provider has acceptable safeguarding practices in place including:

- their response to concerns about a child;
- safer recruitment processes;
- attendance and child missing education procedures; and
- appropriate information sharing procedures.

The School will also obtain a written statement from the provider that they have completed all the vetting and barring checks that are necessary on their staff.

Staff

Training & Induction

- There is a commitment to the continuous development of staff with regard to Safeguarding training.
 - All staff with direct child-facing or pastoral roles receive a safeguarding update as part of their induction, and safeguarding training at least annually to enable them to understand and fulfil their safeguarding responsibilities effectively. (

- **Appendix 2: Staff Safeguarding Training** Pathway). In addition, there will be further CPD, including scenario workshops, and safeguarding updates delivered during termly INSET sessions and regular staff CPD sessions.
- Other staff without direct child-facing or pastoral roles, plus visiting staff, receive safeguarding training on induction, plus an annual safeguarding update from the DSL. This promotes a strong awareness with regard to:
 - The kinds of issues that can give rise to safeguarding concerns;
 - The importance of identifying children who may need early help;
 - The guidance for identifying child abuse;
 - Their duty to report concerns and the referrals process;
 - What to do if a child or adult makes an allegation of child abuse; and
 - The rules about confidentiality.
- On appointment all Staff working for and on behalf of the School (including temporary Staff and regular volunteers) are issued with the following documents and required to read them:
 - Annex A of *Keeping Children Safe in Education* (and, for those in School leadership roles or those who work directly with children, Part 1 and Annex A)
 - The School's *Child Protection and Safeguarding Policy* (which thereby notifies them of the identities of the School's DSL and Deputy DSL)
 - The School's *Staff Code of Conduct Policy* and School's *Staff Communications Policy* (these policies include (or direct to) acceptable use of technology, staff/pupil relationships and communications including the use of social media)
 - The School's *Whistleblowing Policy*
 - The School's *ICT Policy*
 - The School's position on *Children Missing in Education* (c.f. p.27) and procedure if a child goes missing during the School day (c.f. the School's *Missing Child Policy*).
 - Where appropriate to the role, the School's *Behaviour Policy* and *Anti Bullying Policy*, so that they are aware of the procedures to follow if they find themselves as by-standers.

Contractors are issued with the above as appropriate to the site requirements and pupil contact level with updates as appropriate. For Staff who are unable to access the material as a result of reading difficulties or because language is a barrier, steps are taken to ensure that they understand key information.

Safe Working Practice and Professional Boundaries

Safe working practice ensures that pupils are safe and that all staff:

- Are responsible for their own actions and behaviour and should avoid any conduct which would lead any reasonable person to question their motivation and intentions;
- Work in an open and transparent way;
- Work with other colleagues where possible in those situations that could be open to question;
- Discuss and / or take advice from School management over any incident which may give rise to concern;
- Record any incidents or decisions made;
- Apply the same professional standards regardless of gender, sexuality or disability;
- Comply with and are aware of confidentiality procedures; and
- Are aware that breaches of the law and other professional guidelines could result in criminal or disciplinary action being taken against them.

This guidance should be read in conjunction with the *Staff Code of Conduct* which includes guidance on safer working practices.

Whistleblowing Procedure

The School operates a *Whistleblowing Policy*. Employees who wish to raise a concern under this procedure are entitled to have the matter treated confidentially and their name will not be disclosed to the alleged perpetrator of malpractice without their approval.

A whistleblowing disclosure must be about something that affects the general public, such as:

- A criminal offence has been committed, or is being committed or is likely to be committed
- A legal obligation has been breached
- There has been a miscarriage of justice
- The health and safety of an individual has been endangered
- The environment has been damaged
- Information about any of the above has been concealed

The NSPCC runs a whistleblowing helpline on behalf of the government. The number is 0808 800 5000.

Support, Advice and Guidance for Staff

Staff will be supported by the DSL, the Senior Management Team, the Local Authority and professional associations. The DSL will be supported by the Head and Designated Safeguarding Governor.

The School seeks advice about safeguarding concerns from Lincolnshire Customer Services (*c.f. Safeguarding Contact Details* above) and for non-urgent early help queries from our Early Help Consultant.

LCC Safeguarding and Education Welfare Supervisor for Education Settings is available for non-urgent safeguarding advice about training, policy, audit etc.

There is a dedicated area in the school SharePoint which has a number of guides and reference materials to help support staff.

Risk Assessments

Risk assessments are taken seriously and used to good effect to promote safety. Risk assessments are available for varied aspects of the School's work (*e.g.* premises and equipment, on-site activities, off-site activities, venues used, transport). Where relevant, risk assessments are carried out for individual pupils, and supported by action plans identifying how potential risks would be managed.

Visitors

The School receives visitors regularly for the educational benefit of its pupils (*e.g.* visiting speakers, nurses administering HPV vaccinations and parent volunteers).

Because of this, all visitors have to be approved by the SMT in advance of their visit and must not be left unaccompanied at any time. The School's *Visitors Policy* gives full information on the policy and procedures around visitors.

Any visiting speakers to the School will be vetted by SMT, and a record kept by them, in order to prevent extremist views being expressed without challenge, as per the Prevent duty.

Partnerships

Partnership with Parents

The School shares a purpose with parents to educate and keep children safe from harm. We are committed to working with parents positively, openly and honestly. We ensure that all parents are treated with respect, dignity and courtesy. We respect parents' rights to privacy and confidentiality and will not share sensitive information unless we have permission or it is necessary to do so in order to protect a child.

The School will share with parents any concerns we may have about their child unless to do so may place a child at risk of harm. We encourage parents to discuss any concerns they may have with their child's class teacher, form tutor, or a member of the SMT. Parents will be informed of information that they may need to be aware of to help them to protect their children from harm inside and outside the School environment.

Parents can raise a concern about their child's safety or about general safeguarding concerns in the School by informing the School immediately where there is risk of harm to a child via the School's safeguarding procedures and/or contact the Police immediately.

We will provide a secure, caring, supportive and protective relationship for the child. Children will be given a proper explanation (appropriate to age and understanding) of what action is being taken on their behalf and why. We will endeavour always to preserve the privacy, dignity and right to confidentiality of the child and parents. The DSL will determine which members of staff need to know personal information and what they need to know for the purpose of supporting and protecting the child.

The School is committed to ensuring the welfare and safety of all children in School. It follows and adopts follow the Lincolnshire Safeguarding Children Board procedures. There may be exceptional circumstances when the School will discuss concerns with the Customer Service Centre and/or the Police without parental knowledge (in accordance with Lincolnshire Safeguarding Children Board Procedures). The School will, of course, always aim to maintain a positive relationship with all parents.

This Policy is available by accessing the School website or a written copy will be provided on request to the School Office.

Partnerships with Others

The School recognises that it is essential to establish positive and effective working relationships with other agencies who are partners in Lincolnshire Safeguarding Children Board.

As a member of the Boarding Schools' Association (BSA), the School has also adopted the BSA's *Commitment to Care Charter* (c.f. **External Documents**).

Out-of-School Providers

There may be occasions where the School facilities are used by outside providers. All outside providers will receive an orientation from one of the facilities managers and will be provided with

documentation detailing their responsibilities while using the facilities. Out-of-school providers working with unaccompanied children under the age of 18 are responsible for their own safeguarding and child protection policy. However, the School will follow our own safeguarding procedures should we have concerns about an out-of-school provider which may include making a referral to the LADO.

Safer Recruitment

The School pays full regard to KCSIE. It ensures that all appropriate measures are applied in relation to everyone who works in the School or who is likely to be perceived by the children as a safe and trustworthy adult including *e.g.* volunteers and staff employed by regular and frequent contractors. Members of the teaching and non-teaching staff at the School – including part-time staff, temporary and supply staff, and visiting staff, such as musicians and sports coaches – are subject to the necessary statutory child protection checks before starting work (*e.g.* right to work checks, additional overseas checks (if necessary), verifying identity, taking up references, social media checks for shortlisted candidates, checking work history and confirming medical fitness for the role). For most appointments, an enhanced DBS check with ‘barred list’ information will be appropriate. A DBS certificate will be obtained from the candidate before or as soon as practicable after appointment. Alternatively, if the applicant has subscribed to it and gives permission, the School may undertake an online update check through the DBS Update Service. Further information can be found in the School’s *Staff Recruitment Policy*.

The School maintains a Single Central Record (SCR). This document will cover all staff (including supply staff, and teacher trainees on salaried routes) who work at the School and all members of the Governing Body. It is inspected regularly by the key staff associated with Safeguarding.

Key staff have undertaken Safer Recruitment in Education Training. At least one of the above will be involved in all staff and volunteer appointments and arrangements (including, where appropriate, contracted services).

Recording and Managing Safeguarding Concerns

Record-Keeping

The DSL and Deputy DSL will disclose any information about a pupil to other members of staff on a need-to-know basis only, and with the child’s on-going welfare in mind.

The School uses MyConcern as a secure format for record-keeping. This is the primary method of reporting concerns about pupils and should be used by all staff, who have been added as ‘Trusted Users’. For visitors to site, or those staff for whom IT access is not possible, they can request to speak to the DSL directly; the DSL and Deputy DSL will have access. Staff may also log a pastoral concern on 3Sys that is then reviewed by the DSL and they will transfer into MyConcern where the nature of the concern dictates.

The previous reporting mechanism of ‘Green Forms’ are kept secure, in a locked filing cabinet along with any documentation transferred from a pupil’s previous educational setting. Where possible,

these documents are scanned and added to MyConcern (as of September 2022) and a summary added to the pupil's profile. Increasingly, all records will become electronic.

If a pupil or a parent requests access to information held on a pupil this will be shared in accordance with relevant Data Protection Legislation in force at the time (including the *General Data Protection Regulation* and the *Freedom of Information Act 2000*) and the guidance set out in the School's *Privacy Notice* (c.f. **Internal School Documents**).

Where it is likely that a child may suffer 'significant harm' (c.f. **External Documents**), or there may be a risk of serious harm to adults, the public interest test will almost certainly be satisfied. However, there will be other cases where practitioners will be justified in sharing some confidential information in order to make decisions on sharing further information or taking action – the information shared should be balanced.

The child's best interests must be the main consideration in making any such decision. The cross-Government guidance, 'Information Sharing: Practitioner's Guide' (c.f. **External Documents**), provides advice on these issues. Any decision whether or not to share information must be properly documented. Decisions in this area need to be made by, or with the advice of, people with suitable skills in child protection work such as named or designated professionals or senior managers.

The School will ensure that / be aware that:

- Safeguarding information including Child Protection information is stored and handled in line with the principles of the relevant Data Protection Legislation in force at the time ensuring that information is:
 - used fairly and lawfully;
 - for limited, specifically stated purposes;
 - used in a way that is adequate, relevant and not excessive;
 - accurate;
 - kept for no longer than necessary;
 - handled according to people's data protection rights; and
 - kept safe and secure.
- Relevant staff should be confident of processing conditions under DPA 2018 and GDPR, storage and sharing of information for safeguarding purposes including 'special category data';
- The DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information (e.g. with statutory agencies) without consent if gaining it would place a child at risk; and
- Any concerns about a child are recorded in writing within 24 hours. All records will provide a factual, evidence-based account. Timely, accurate recording of every episode, incident, concern, activity and actions taken will be made including telephone calls to other professionals. Records will be signed, dated and, where appropriate, witnessed.

Transfer of Files

When a child leaves the School, the pupil record, including child protection file which, if hard-copy, is separated from the main pupil record in a sealed envelope clearly marked as such, is transferred to the new school as soon as possible. The child protection file will be clearly marked "Child Protection, Confidential", for the attention of the new school's Designated Safeguarding Lead and a receipt of this transfer will be retained. The receiving school should sign a copy of the list to say that

they have received the files and return that to the sending school for tracking and auditing purposes.

If the destination school also uses MyConcern, relevant files can be electronically transferred in a secure manner.

This information should be added to a record of transfer which the sending school keep until the child reaches their 25th birthday and must contain:

- Name & DOB of child;
- Name & address of receiving school;
- Date file(s) transferred with name and role of person who received it;
- Date sending school received confirmation of receipt of files from receiving school; and
- Brief description of case at the time of transfer *e.g.* Child Protection Plan: Neglect.

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

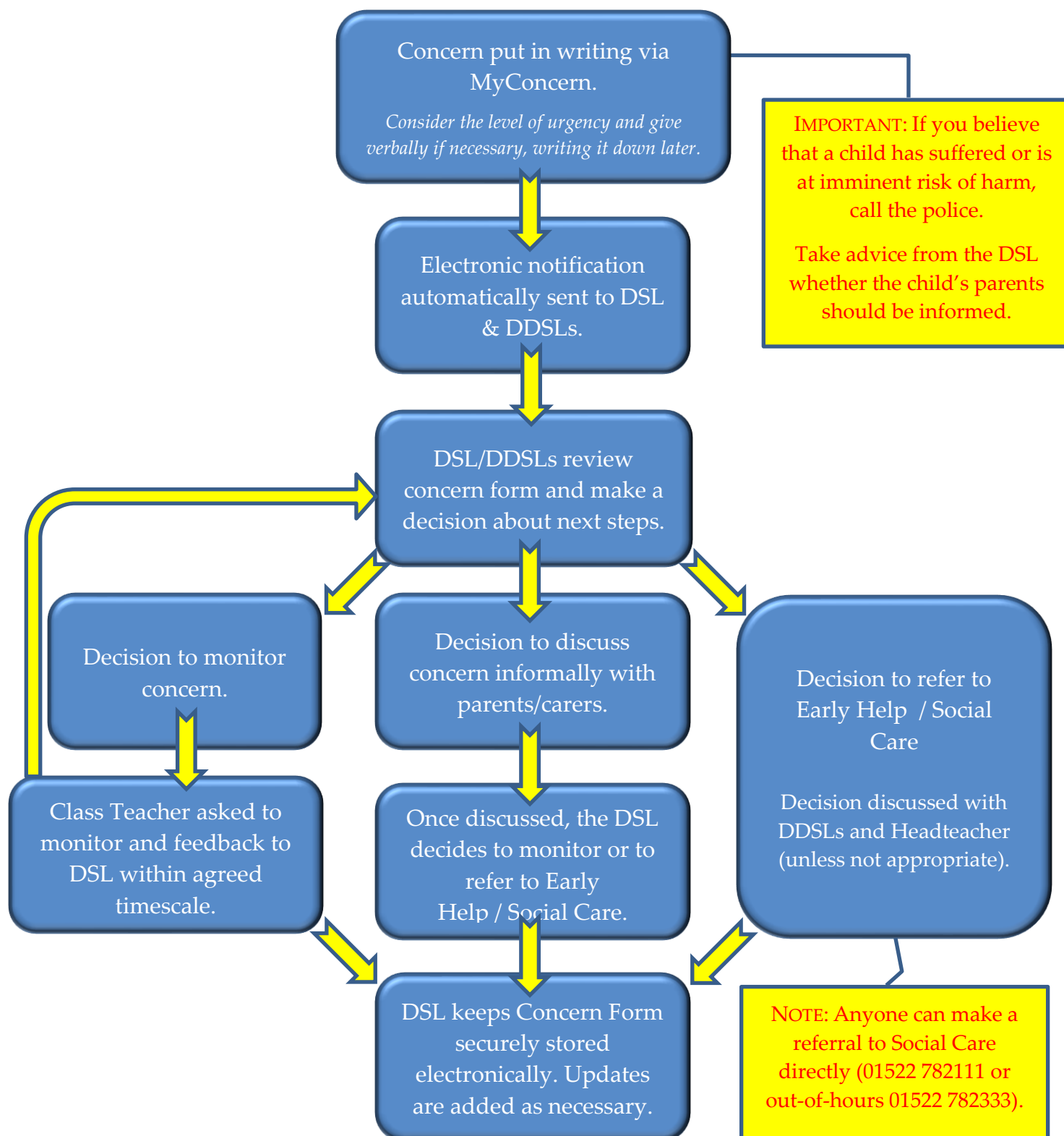
The pupil record should not be weeded before transfer to the next school unless any records with a short retention period have been placed in the file. It is important to remember that the information which may seem unnecessary to the person weeding the file may be a vital piece of information required at a later stage. Electronic documents that relate to the pupil file also need to be transferred, or, if duplicated in a master paper file, destroyed. Sending schools do not need to keep copies of any records in the pupil record except if there is an ongoing legal action when the pupil leaves the school. Custody of and responsibility for the records passes to the school the pupil transfers to.

The School which the pupil attended until statutory school leaving age is responsible for retaining the pupil record until the pupil reaches the age of 25 years. This School retains a copy of the child's chronology and any documents that the School created (*e.g.* risk assessment) in an archive until the child reaches the age of 25 years, the receipt of the transferred file is kept alongside this archive. Any archived files are stored securely in the same way as an active file. If any records relating to child protection issues are placed on the pupil file, it should be in a sealed envelope and then retained for the same period of time as the pupil file (commonly DOB + 25 years).

Sources of further support:

- Data Protection Toolkit for Schools August 2018
- Lincolnshire County Council Data Protection Advice Service
- Perspective Lite/ Safeguarding in Schools/ SafeguardingPro Documents/IRMS Toolkit for schools

Appendix 1: Flowchart – Raising a Safeguarding Concern About a Child



If, at any stage, you are dissatisfied with the effectiveness of the above protocols, you can always contact the NSPCC Whistleblowing Helpline on 0800 028 0285.

Appendix 2: Staff Safeguarding Training Pathway

	Teaching Staff and those Non-Teaching Staff with Child-Facing Responsibilities (e.g. Teaching Assistants, Gap Students, Matrons)	Other Staff (e.g. Admin, Domestic, Estates, Grounds, Visiting)
At Induction	<ul style="list-style-type: none"> Face-to-face induction from DSL, including responsibilities of all staff, identifying children who need additional support, and how to report concerns Mandatory reading of relevant policies 	
Annual Training	<ul style="list-style-type: none"> Annual update on Safeguarding Children either face-to-face or virtually depending on role (Sep) Prevent Training (every 2 years) 	
	<ul style="list-style-type: none"> Two INSET session either online or delivered by DSL 	<ul style="list-style-type: none"> NA
	<ul style="list-style-type: none"> External workshops, internal presentations or e-learning as recommended (e.g. Domestic Abuse etc.) during CPD sessions 	<ul style="list-style-type: none"> Internal presentations or e-learning as recommended/required

Other training to respond to unforeseen events or changes in legislation will be administered on a reactive basis by the DSL. Support is available from Lincolnshire's Safeguarding Children Officer and is available to all staff.

Key Staff

In addition to the above, staff with key safeguarding responsibilities will complete the Six-Year Combined Lincolnshire Safeguarding Children's Partnership (LSCP) & Education Safeguarding Training Pathways for DSLs

	Key Staff (e.g. DSL, Deputy DSL) Houseparents will be included in some of these additional elements as the DSL advises.
At Induction & Post-Induction	Introduction (depending on previous experience): <ul style="list-style-type: none"> Introduction to Safeguarding Children (e-learning)/<i>Safeguarding Children Level 3 Designated Lead</i> Brook Traffic Light Toolkit (e-learning)
Year 1	<ul style="list-style-type: none"> The Role of the DSL (virtual learning) Introduction to Safeguarding Children and Young People (e-learning) Inter-Agency Safeguarding Children and Young People (virtual learning and face-to-face) Understanding Domestic Abuse (e-learning) <p><i>Plus, attend three DSL briefings (1 per term) and engage with weekly LSCP Bulletin</i></p>

	<p>Key Staff</p> <p>(e.g. DSL, Deputy DSL)</p> <p>Houseparents will be included in some of these additional elements as the DSL advises.</p>
Year 2	<ul style="list-style-type: none"> • - Child Exploitation (e-learning) • - Missing Children in Lincolnshire (e-learning) • - Child Exploitation in Lincolnshire (face-to-face) • - Understanding the Impacts of the Trio of Vulnerabilities <p><i>Plus, attend three DSL briefings (1 per term) and engage with weekly LSCP Bulletin</i></p>
Year 3	<ul style="list-style-type: none"> • - Recognise Disguised Compliance and Disengagement Within Families (face-to-face) • - Refresher: Safeguarding Children (e-learning) • - Radicalisation and Extremism (e-learning) • - Safer Recruitment (if involved in recruitment and no current training) (e-learning) • - The Role of the DSL (virtual learning) <p><i>Plus, attend three DSL briefings (1 per term) and engage with weekly LSCP Bulletin</i></p>
Year 4	<ul style="list-style-type: none"> • - An Introduction to ASD (e-learning) • - FGM (Abuse linked to faith or belief) (e-learning) <p><i>Plus, attend three DSL briefings (1 per term) and engage with weekly LSCP Bulletin</i></p>
Year 5	<ul style="list-style-type: none"> • - Self-Harm (e-learning) • - Suicidal Thoughts (e-learning) • - Nurturing Wellbeing in Children & Young People (virtual learning) • - E-Safety (e-learning) • - Online Safety (virtual learning) • - The Role of the DSL (virtual learning) <p><i>Plus, attend three DSL briefings (1 per term) and engage with weekly LSCP Bulletin</i></p>
Year 6	<ul style="list-style-type: none"> • - Safer Sleep for Babies (e-learning) • - Special Educational Needs and Disabilities (SEND) (e-learning) <p><i>Plus, attend three DSL briefings (1 per term) and engage with weekly LSCP Bulletin</i></p>

* Once the six-year pathway is complete, start again from year 1

Appendix 3: How to Minimise Your Vulnerability to False Allegations

Always:

- work in an open environment. Avoid private or out of sight locations and encourage open communication;
- speak clearly, without whispering, so that students do not need to come close to hear;
- avoid spending time alone with individual students away from others;
- treat all students, regardless of race, disability, religion or belief, gender, sexual orientation, equally and with respect and dignity;
- ensure the student's welfare comes first and record it;
- be aware of the impact of proxemics; maintain safe and appropriate distances; know where and how to place your body;
- avoid touching students, but where **educationally necessary** staff should follow these guidelines:
 - try to demonstrate without touching first
 - ask permission; say what you intend to do first and explain why
 - if a pupil seems uncomfortable, stop
 - only touch hands, arms or shoulder nearest you (don't reach across the body)
 - be aware of overall proximity; maintain physical space; don't stand behind
 - inappropriate areas for touch include: chest, diaphragm, waist, thighs
 - move away as soon as the contact is no longer required;
- maintain professional boundaries, using a School mobile number or School email address for work purposes, rather than sharing personal details;
- present as an exemplary role model by not smoking or drinking alcohol excessively, swearing, allowing suggestive conversations or jokes or wearing less than professional clothing when in the company of a student;
- seek to be enthusiastic and constructive when giving feedback rather than making negative or critical remarks;
- record any injury that occurs and seek attention from a qualified First Aider or parent; and
- record any incident of concern involving student's welfare.

Never:

- allow allegations made by a child to go unchallenged, unrecorded or not acted upon (this applies to any form of abuse or bullying);
- lock doors, cover windows or use 'Do Not Disturb' signs;
- impose humiliating or power-based punishments on a student or attempt to reduce a child to tears;
- engage in rough, physical or sexually provocative games, including horseplay;
- allow or engage in any form of inappropriate touching;
- share a bedroom with a child;
- allow children to use inappropriate language unchallenged;
- make sexually suggestive comments to a young person, even in fun;
- engage in any form of relationship, sexual or otherwise, with a young person with whom you work even if they are over the age of consent, but under 18 (older with vulnerable adults);
- do things of a personal or intimate nature for children or disabled young people that they can do for themselves;

- invite or allow children to stay with you at your home unsupervised;
- 'friend' a child on their social media or yours; social media can blur boundaries;
- use mobile phones / personal devices for personal use while on duty;
- use cameras or mobile phones / electronic media in the toilets, changing areas or poolside;
- take photographs or videos of children unless written/signed consent has been obtained from a parent/carer; this includes the use of phones;
- seek physical contact. Try to gently discourage contact, rather than reject students. Model appropriate contact (*e.g.* shaking hands or patting the shoulder). Never allow physical contact when you are alone; or
- take a child in your car, but where this is unavoidable:
 - prepare a risk assessment
 - ensure there is insurance to cover the journey
 - obtain parental permission, preferably in writing
 - take more than one person
 - sit child in the back
 - travel directly to the destination
 - keep conversation professional.⁵

⁵ Where a situation requires a pupil to receive emergency or prompt medical attention, a member of staff (*e.g.* a matron) may need to take a child to hospital in a car. In this instance, it is in the best of interests of the child to proceed with the car journey and as many of the above precautionary measures will be taken as are feasible in the circumstances. Where direct parental consent cannot be readily obtained (*e.g.* the parents do not respond to attempts to contact them) then permission can be granted by the Headmaster or Bursar.