



<b>7a. Child Protection and Safeguarding Policy; including Low Level Concerns guidance</b>	
<b>Owner:</b>	<b>DHP</b>
<b>Approved by:</b>	<b>Governing Body</b>
<b>Policy is available from:</b>	<b>Website and intranet</b>
<b>Review cycle:</b>	<b>Yearly</b>
<b>Review date:</b>	<b>September 2024</b>
<b>Linked documents:</b>	<b>9a. Behaviour Management Policy 7g. Children Missing from Education Policy</b>

## **Child Protection and Safeguarding Policy**

### **Contents**

<a href="#">Contact Details</a>	<a href="#">Pg3</a>
<a href="#">Policy Statement</a>	<a href="#">Pg7</a>
<a href="#">Concerns about a child</a>	<a href="#">Pg8</a>
<a href="#">Child-on-Child allegations</a>	<a href="#">Pg12</a>
<a href="#">Management of safeguarding</a>	<a href="#">Pg17</a>
<a href="#">Training</a>	<a href="#">Pg18</a>
<a href="#">Appendix 1 signs and types of abuse</a>	<a href="#">Pg25</a>
<a href="#">Appendix 2 referral process</a>	<a href="#">Pg34</a>
<a href="#">Appendix 3 job description</a>	<a href="#">Pg38</a>
<a href="#">Appendix 4 Low Level Concern guidance</a>	<a href="#">Pg40</a>

## Child Protection and Safeguarding Policy

### KEY EXTERNAL CONTACT DETAILS

<b>Local Authority Designated Officer (LADO) and Education Safeguarding Advisory Team (ESAT) Manager</b>	Jo Lloyd LADO Mobile: 07584 581180 Direct number: 01865 816382 Team number: 01865 810603 Email: Team email: lado.safeguardingchildren@oxfordshire.gov.uk Secure email: lado.safeguarding@oxfordshire.gcsx.gov.uk Also lead 'Prevent' Officer
<b>Education Safeguarding Advisory Team at Oxfordshire Safeguarding Children Board</b>	Telephone: 01865 815843 Website: www.oscb.org.uk Email: <a href="mailto:oscb@oxfordshire.gov.uk">oscb@oxfordshire.gov.uk</a> OUT OF HOURS EMERGENCY DUTY TEAM Telephone: 0800 833 408 Access website for local procedure concerning all aspects of safeguarding, including 'Prevent'
<b>Locality and Community Support Service (LCSS)</b>	LCSS Central : 0345 241 2705
<b>Anti-Bullying Coordinator</b>	Clare Pike Email: <a href="mailto:clare.pike@oxfordshire.gov.uk">clare.pike@oxfordshire.gov.uk</a> Telephone: 03452412487
<b>Multi-Agency Safeguarding Hub (MASH)</b>	Telephone: 0345 050 7666
<b>Police Child Abuse Investigation Unit Police Enquiry Centre Sexual Exploitation</b>	Telephone: 01865 335200  Telephone:101(non-emergency Police telephone number)  Telephone: <b>0345 050 7666</b>
<b>Support and Advice about Extremism</b>	<b>Police</b> Emergency telephone: 999 Non-emergency telephone: 101 Email: <a href="mailto:preventreferrals@thamesvalley.pnn.police.uk">preventreferrals@thamesvalley.pnn.police.uk</a> Anti-Terrorist Hotline: 0800 789 321  Prevent/Channel Referral: Telephone: 0345 050 7666 (MASH)

<b>Department for Education</b>	Non-emergency number: 0207 340 7264 Email: <a href="mailto:counter.extremism@education.gsi.gov.uk">counter.extremism@education.gsi.gov.uk</a>
<b>NSPCC Whistleblowing Advice Line</b>	Address: Weston House, 42 Curtain Road, London EC2A 3NH Telephone: 0800 028 0285 Email: <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>
<b>Safeguarding Helpline</b>	Telephone: 0800 800 5000
<b>Disclosure and Barring Service</b>	Address: PO Box 181, Darlington, DL1 9FA Telephone: 01325 953795 Email: <a href="mailto:dbsdispatch@dbs.gsi.gov.uk">dbsdispatch@dbs.gsi.gov.uk</a>
<b>Teaching Regulation Agency</b>	Address: 53-55 Butts Road, Earlsdon Park, Coventry, CV1 3BH Telephone: 0207 593 5393 Email: <a href="mailto:misconduct.teacher@education.gov.uk">misconduct.teacher@education.gov.uk</a>
<b>Department for Education</b>	Non-emergency advice for staff and governors Telephone: 0207 3407 264
<b>CEOP</b>	<a href="http://www.thinkyouknow.co.uk">www.thinkyouknow.co.uk</a>
<b>Details for affiliated professional bodies</b>	<p>Independent Schools Inspectorate (ISI) Telephone: 0207 600 0100 Email: <a href="mailto:concerns@isi.net">concerns@isi.net</a></p> <p>Boarding Schools' Association (BSA) Telephone: 0207 798 1580</p> <p>Girls' Schools Association (GSA) Telephone: 0116 254 1619 Email: <a href="mailto:office@gsa.uk.com">office@gsa.uk.com</a></p> <p>The Independent Association of Prep Schools (IAPS) Telephone: 01926 887833 Email: <a href="mailto:iaps@iaps.uk">iaps@iaps.uk</a></p>

## KEY SCHOOL CONTACT DETAILS

<p><b>Governors</b></p>	<p><b>Chair of Governors</b> Shuna McGregor c/o Teresa Hudson, Clerk to the Governors Telephone: 01865 762802 Email: <a href="mailto:thudson@ryestantony.co.uk">thudson@ryestantony.co.uk</a></p> <p><b>Nominated Safeguarding Governor</b> Sue Hampshire c/o Teresa Hudson, Clerk to the Governors Telephone: 01865 762802 Email: <a href="mailto:thudson@ryestantony.co.uk">thudson@ryestantony.co.uk</a></p>
<p><b>Designated Safeguarding Lead (DSL)</b></p> <p><b>Deputy Designated Safeguarding Lead (DDSL) and extended team</b></p> <p><b>Designated Safeguarding Lead for Early Years</b></p>	<p><b>DSL</b> Jo Creber –Deputy Head Pastoral Telephone direct line: 01865 229242 Telephone: 01865 762802 School Mobile: 07770 805269 Email: <a href="mailto:jcreber@ryestantony.co.uk">jcreber@ryestantony.co.uk</a></p> <p>Alex Prockter – Deputy Head, Head of Prep, DDSL 07778 637789 Email : <a href="mailto:aprockter@ryestantony.co.uk">aprockter@ryestantony.co.uk</a></p> <p>Hattie Taylor – Director of Pupils Email: <a href="mailto:htaylor@ryestantony.co.uk">htaylor@ryestantony.co.uk</a></p> <p>Jo Talkington – Head of Boarding Email: <a href="mailto:jtalkington@ryestantony.co.uk">jtalkington@ryestantony.co.uk</a></p> <p>Sarah Gensmantel – Senior Housemistress Email: <a href="mailto:sgensmantel@ryestantony.co.uk">sgensmantel@ryestantony.co.uk</a></p> <p>Liz Eldridge – School Counsellor Email: <a href="mailto:leldridge@ryestantony.co.uk">leldridge@ryestantony.co.uk</a></p> <p>Jannicke Stevens – PSHE Co-ordinator Email: <a href="mailto:jstevens@ryestantony.co.uk">jstevens@ryestantony.co.uk</a></p> <p>Alex Prockter Email: <a href="mailto:aprockter@ryestantony.co.uk">aprockter@ryestantony.co.uk</a></p>
<p><b>Designated Teacher for Looked After Children</b></p>	<p>Jo Talkington Telephone: 01865 762802 Email: <a href="mailto:jtalkington@ryestantony.co.uk">jtalkington@ryestantony.co.uk</a></p>

<b>Head</b>	Sarah Davis Telephone: 01865 762802 Email: <a href="mailto:head@ryestantony.co.uk">head@ryestantony.co.uk</a>
-------------	---

## **POLICY STATEMENT**

Rye St Antony is committed to safeguarding young people and promoting the welfare of all those in its care

This policy applies to the whole school community, which includes the boarding and the EYFS settings. This policy is reviewed and updated annually and is available on our website as well as in the *Parent and Pupil* and *Staff* handbooks. Safeguarding the pupils and staff in the School is also part of the School's policies on Pupil supervision, Behaviour management, Exclusion and Staff Code of Conduct. The safety and well-being of every pupil at Rye St Antony is of vital importance. The School fully recognises its moral and statutory responsibility to safeguard and promote the welfare of all children in its care. The best interests of each and every pupil are paramount in order to enable them to have the best outcomes.

Safeguarding and promoting the welfare of children is the responsibility of every adult at the School. We make every effort to provide a safe and welcoming environment underpinned by a culture of openness where both children and adults feel secure, able to talk and believe that they are being listened to. We always maintain an attitude of 'it could happen here' where safeguarding is concerned and our procedures help us to identify young people who are suffering, or who are at risk of suffering, harm or abuse. We offer early help and support, and make appropriate referrals with the aim of keeping children safe at school, at home and in their communities.

The purpose of this policy is to provide staff, volunteers and governors with the framework they need in order to keep children safe and secure in our school, and to inform parents and guardians how we will safeguard their children whilst they are in our care. Specific guidance is available to staff within the procedure documents. As part of the governors' duties, section 1 and 2 of KCSIE 2023 has been read.

This policy statement and the related policies are based on model policies recommended by the several independent schools associations and prepared for the Independent Schools' Bursars Association.

This policy has regard to the following guidance and advice:

- Keeping Children Safe In Education (September 2023 ('KCSIE'))
- What to do if you're worried a child is being abused: advice for practitioners (March 2015)
- Working Together to Safeguard Children (2018 and the updates of 2019 and 2023)
- Information sharing: advice for practitioners providing safeguarding services (July 2018)
- Revised Prevent Duty Guidance for England and Wales (July 2015)
- The Prevent Duty: Departmental advice for schools and childminders (June 2015)

This policy also takes into account the procedures and practice of Oxfordshire County Council as part of the interagency safeguarding procedures set up by the Oxfordshire Local Safeguarding Children Board's Education Safeguarding Advisory Board (ESAT), as well as the requirements of the Independent Schools Inspectorate (ISI). The school furthermore adheres to the Boarding Schools' Association (BSA) *Commitment to Care Charter* 2017.

In the event that a pupil comes from out of county, School will contact the relevant local authority. For boarders, resident overseas, contact will be through Oxfordshire.

## **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 recognises that all matters relating to child protection and safeguarding are confidential. The DSL and team will only disclose personal information about a pupil to other members of staff on a need to know basis.

All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children. All staff must also be aware that they cannot promise a pupil to keep secrets which might compromise the pupil's safety or well-being or that of another pupil.

The School has arrangements for listening to children and providing early help. This is done in consultation with the LCSS and other appropriate agencies.

### **Definitions of safeguarding and types and signs of abuse**

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.

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). 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. Abuse can be:

- physical abuse
- emotional abuse
- sexual abuse; and/or
- neglect

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.

Staff are referred to KCSIE 2023 and Appendix 1 of this policy for further detail of the types of abuse and possible signs of abuse. Staff should also be aware of the need to consider the context of any safeguarding concerns.



## PROCEDURES FOR DEALING WITH CONCERNS ABOUT A CHILD

If staff suspect or hear an allegation or complaint of abuse or neglect from a child or any third party, they must 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.

All staff should:

- listen carefully
- avoid asking leading questions
- reassure the individual that the allegation/complaint will be taken seriously
- not guarantee absolute confidentiality (as this may ultimately not be in the best interests of the child) and explain that the information needs to be passed to the appropriate person who will ensure that the correct action is taken.

All concerns, discussions and decisions (together with reasons) made under these procedures should be recorded in writing. Staff should record any concerns using MyConcern. If they are unable to do so a written record should be submitted to the DSL using the *Record of Concern* form. This will be uploaded to MyConcern. The record should include the date, time and place of the conversation and detail of what was said and done by whom and in whose presence and signed by the person making it. Where the allegation relates to harmful sexual behaviours, if possible the disclosure should be managed with two members of staff present (preferably one of them being the Designated Safeguarding Lead ('DSL') or one of the extended safeguarding team.

Where there is a safeguarding concern, the School will take into account the pupil's wishes and feelings when determining what action to take and what services to provide. This is particularly important in the context of harmful behaviours, such as sexual harassment and sexual violence. The School will always engage with the pupil at all stages of the process and operates its processes with the best interests of the pupil as its key priority.

Staff should refer to Appendix 2 'How to deal with a disclosure' for further guidance.

### Early Help

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

- Is disabled and has specific additional needs
- Has special educational needs (whether or not they have a statutory education, health and care plan)
- Is a young carer
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- Is frequently missing/goes missing from care or from home
- Is misusing drugs or alcohol themselves
- Is at risk of modern slavery, trafficking or 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
- Is a privately fostered child.

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 OSCB's referral threshold document and in consultation with the LCSS. 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 they have concerns about a child**

If staff (including governors, agency staff and volunteers) have any concerns about a child (as opposed to a child being in immediate danger), they should, where possible, speak with the School's DSL to agree a course of action although staff can make a direct referral to children's social care. As set out above, staff should not assume that somebody else will take action and share information that might be critical in keeping children safe. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. If a child's situation does not appear to be improving, the DSL should press children's social care for reconsideration. 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.

#### **What staff should do if a child is in danger or at risk of harm**

If staff (including governors, 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. Anyone can make a referral, ideally in consultation with the DSL. 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. 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.

The School's Local Safeguarding Children Board is Oxfordshire. A full copy of their local procedures can be found at [www.oscb.org.uk](http://www.oscb.org.uk).

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

Staff should follow the School's normal referral processes when there are concerns about children who may be at risk of being drawn into terrorism, as set out above. This may include a referral to Channel or children's social care depending on the level of risk. However, if staff have concerns that there is an immediate/significant risk of a child being drawn into terrorism they must call 999. Advice and support can also be sought from children's social care or through ISI ([concerns@isi.net](mailto:concerns@isi.net)).

The School, in recognition that pupils may be at risk of being drawn into terrorism or other forms of extremism, carries out appropriate risk assessments (following consultation with local partners, such

as the Police) of the potential risk in the local area. Such risk assessments are discussed with the Head, DSL and the governor responsible for safeguarding to ensure the School's safeguarding arrangements are sufficiently robust to help prevent and protect children from being drawn into terrorism and are regularly revised.

#### **What staff should do if they discover an act of Female Genital Mutilation (FGM)**

Staff must report to the Police cases where they discover that an act of FGM appears to have been carried out. This is a mandatory duty. Unless the member of staff has a good reason not to, they should still consider and discuss any such case with the DSL and involve children's social care as appropriate. Staff are referred to Appendix 1 of this policy for the procedure to be followed where they suspect that a pupil may be at risk of FGM.

#### **What staff should do if a child goes missing from education**

Children who go missing from education, particularly on repeat occasions, is a potential indicator of abuse or neglect. The School's procedures for unauthorised absence and for dealing with children who go missing from education are noted in our *7g Children missing from education and missing pupil policy* which should be referred to when searching for, and if necessary, reporting any pupil missing from education. Further detail can also be found at Appendix 1 of this policy. More than one emergency contact number is held by School.

The School will report to Oxfordshire Local Authority a pupil who fails to attend school regularly or has been absent from school without the School's permission for a continuous period of 10 school days or more.

#### **What staff should do if they have concerns about another staff member**

If staff have concerns about another staff member, then this should be referred to the Head. Where there are concerns about the Head, this should be referred to the Chair of Governors. In the event of allegations of abuse being made against the Head, staff are referred to the procedures below regarding managing allegations of abuse against staff (including volunteers) and refer the matter directly to the designated officer(s) in the Education Safeguarding Advisory Team (ESAT) at Oxfordshire Safeguarding Children Board (OSCB).

#### **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 our *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 on the Key Contacts page at the start of this policy.

## ARRANGEMENTS FOR DEALING WITH CHILD-ON-CHILD ALLEGATIONS

Children can abuse other children. This is generally referred to as child-on-child abuse and can take many forms. This can include (but is not limited to): abuse within intimate partner relationships; bullying (including cyberbullying, prejudice-based and discriminatory bullying ); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party; initiation/hazing type violence and rituals; consensual and non-consensual sharing of nudes and semi-nude images and/or videos (referred to in previous guidance as sexting or youth produced sexual imagery). Child-on-child abuse is abuse by one or more pupils against another pupil. Abusive comments and interactions should never be passed off or dismissed as “banter” or “part of growing up”. Nor will harmful sexual behaviours be dismissed as the same or “just having a laugh” as this can lead to a culture of unacceptable behaviours and an unsafe environment for children. The School recognises that a child is likely to disclose an allegation to someone they trust: this could be any member of staff. By making such a disclosure the pupil is likely to feel that the member of staff is in a position of trust. All reports will be taken seriously and the School recognises that any response to such concerns impacts on the confidence of others to report. The School also recognises that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and is simply not being reported; child on child sexual violence or sexual harassment can happen in or outside of School as well as online and has an “it could happen here” approach.

The School recognises that children with special educational needs and disabilities can be more prone to child on child group isolation than other children and will consider extra pastoral support for those children. A welfare plan will be put in place which would be agreed by the DSL, DDSL or a member of the extended safeguarding team in consultation with relevant departments such as the School Counsellor and Boarding Staff. The school also is vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys. If an allegation of child-on-child abuse is made to a member of staff the DSL must be informed and the allegation recorded.

- The DSL will contact the local authority children’s social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence.
- The DSL will put a risk assessment and support plan into place for all children involved – both the victim(s) and the child(ren) against whom the allegation has been made – with a named person they can talk to if needed.
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate.

The School recognises that children can be particularly vulnerable in residential settings and are alert to the potential for child-on-child abuse. The School takes the following steps to minimise the risk of child-on-child abuse:

- High level of supervision
- Small class sizes and detailed individual knowledge of pupils and families
- The School encourages an open and tolerant environment, where pupils or teachers can report their concerns.
- Tutors respond promptly to any such reports and offer support to all concerned

- PSHEE programme contains material aimed at promoting tolerance, and kindness, and informing pupils how to respond to unkind incidents. Sessions are delivered around cyberbullying and appropriate use of ICT and social media in PSHEE and ICT lessons.
- The school planner details definitions and consequences of bullying and summarises school rules on behaviour and use of ICT.
- Boarding pupils assigned staff mentors
- Robust and well-used system for reporting issues with prompt action taken and recorded

Where an issue of pupil behaviour or bullying gives 'reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm', staff should follow the procedures below rather than the School's Anti-Bullying and Behaviour policies:

A pupil against whom an allegation of abuse has been made may be suspended from the School during the investigation. The School will take advice from Oxfordshire's ESAT on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the alleged victim and perpetrator. If it is necessary for a pupil to be interviewed by the Police in relation to allegations of abuse, the School will ensure that, subject to the advice of Oxfordshire's ESAT, parents are informed as soon as possible and that the pupils involved are supported during the interview by an appropriate adult and until the investigation is completed. Confidentiality will be an important consideration for the School and advice will be sought as necessary from Oxfordshire's ESAT, the OCSB and/or the Police as appropriate.

Police may be informed of any harmful sexual behaviours which are potentially criminal in nature, such as grabbing bottoms, breasts and genitalia. Rape, assault by penetration and sexual assaults will be passed to the Police. If the DSL decides to make a referral to children's social care and/or a report to the Police against a victim's wishes, the reasons should be explained to the pupil and appropriate specialist support offered. The School will deal with sexting as a potential case of abuse or bullying.

In the event of disclosures about child-on-child abuse, all children involved (both victim and perpetrator) will be treated as being at risk and safeguarding procedures in accordance with this policy will be followed. Victims will be supported by the DSL and appropriate pastoral staff, including Form Tutors and support from external agencies will be sought, as appropriate. In school we will adopt appropriate measures to keep victims apart from the perpetrator and we will devise a welfare or support plan. The perpetrator will also be supported with a welfare plan. Either or both parties may be supported by counselling, if appropriate.

When there has been a report of sexual violence, the DSL will make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider:

- the victim;
- the alleged perpetrator; and
- the other children (and, if appropriate, staff) at the School.

Risk assessments will be recorded and kept under review. In relation to a report of sexual violence or sexual harassment, the DSL will reassure any victim that they are being taken seriously and that they will be supported and kept safe. The victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment; nor would a victim ever be made to feel

ashamed for making a report. The DSL will consider the risks posed to pupils and put adequate measures in place to protect them and keep them safe. This may include consideration of the proximity of the victim and alleged perpetrator and considerations regarding shared classes, sharing school premises and school transport. When a report is found to be unsubstantiated, unfounded, false or malicious the DSL will consider whether the person making the allegation did so as a cry for help, or whether disciplinary action (in line with the behavioural policy) is appropriate. Support will also be considered for both parties.

## **MANAGEMENT OF CHILD-ON-CHILD ABUSE**

Any disclosure or incident of child-on-child abuse including harassment or sexual violence should be passed to the DSL immediately. The incident should not be investigated at this time, but a referral made to MASH to discuss the case. If the allegation indicates that a potential crime has taken place the MASH will refer the case to the police. Parents of both the alleged victim and the alleged perpetrator should be informed, this should be discussed during the consultation with the MASH. A risk assessment will be considered at this time to protect all parties involved. Police and social care will lead any investigation, however where neither police nor social care thresholds are met, the School will undertake a thorough investigation following school policies and procedures.

In some circumstances, the parent or alleged victims will report directly to other agencies. In such cases, these agencies should make referrals to the MASH or the police who should liaise directly with the DSL for the school to inform them of the situation or liaise with a member of the LADO and ESAT who will contact the DSL with the information.

The involvement of all professionals can support with the risk assessment and management of such allegations.

## **ARRANGEMENTS FOR DEALING WITH ALLEGATIONS OF ABUSE AGAINST TEACHERS AND OTHER STAFF (INCLUDING THE HEAD, GOVERNORS AND VOLUNTEERS)**

The School's procedures for managing allegations against staff who are currently working in the School follows Department for Education statutory guidance and Oxfordshire Local Child Safeguarding Board arrangements and applies when staff (including volunteers) have (or are alleged to have):

- Behaved in a way that has harmed a child, or may have harmed a child
- Possibly committed a criminal offence against or related to a child or
- Behaved towards a pupil in a way that indicated that they may pose a risk of harm if they were to work regularly or closely with children or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children

Allegations against a teacher who is no longer teaching should be referred to the Police. Historical (non-recent) allegations of abuse should be referred to the Police and also the LADO.

If an allegation is made against anyone working with children in the School, the School should not undertake their own investigation of allegations without prior consultation with the Local Authority 'designated officer' or, in the most serious cases, the Police, so as not to jeopardise statutory investigations. In borderline cases, the School may discuss informally with the 'designated officer' on a no-names basis.

All allegations should be investigated as a priority to avoid any delay.

- 1 All safeguarding concerns and allegations concerning staff, volunteers or governors which appear to meet the above reporting criteria are to be reported straight away to the 'case manager' who is the Head. Where the Head is absent the DSL can act in her place. This guidance applies equally to supply staff. Where the Head is the subject of the allegation or concern, reports should be made to the Chair of Governors. Where the Head is the subject of the allegation or concern, the Head must not be informed of the allegation prior to contact with the Chair of Governors and designated officer. However, staff may consider discussing any concerns with the DSL and may make any referral via them.
- 2 The case manager should immediately discuss the allegation with the designated officer and consider the nature, content and context of the allegation and agree a course of action including any involvement of the Police. Where the case manager deems there to be an immediate risk to children or there is evidence of a possible criminal offence, the case manager may involve the Police immediately. All discussions should be recorded in writing, and any communication with both the individual and the parents of the child(ren) agreed. The designated officer should be informed within one working day of all allegations that come to the School's attention and appear to meet the criteria or that are made directly to the Police and/or the Local Authority Children's Social care.
- 3 The case manager will ensure that the individual who is the subject of the allegation is informed as soon as possible and given an explanation of the likely course or action, unless there is an objection by Local Authority Children's Social care or the Police. The case manager will appoint a named representative to keep the individual informed of the progress of the case and will consider what other support is appropriate for the individual.
- 4 The case manager should give careful consideration as to whether the circumstances of the case warrant suspension or whether alternative arrangements should be put in place until the allegation is resolved. The case manager will give due weight to the views of the designated officer and *KCSIE* when making a decision about suspension. Where the individual is suspended, the case manager will ensure they know who their point of contact is in the School and shall provide them with their contact details.
- 5 Where a member of boarding staff is suspended pending an investigation, the case manager will consider whether arrangements for alternative accommodation away from children should be made.
- 6 The case manager will ensure that parents are informed as soon as possible and kept informed about progress of the case, subject to any advice from Local Authority Children's Social Care or the Police.

- 7 The case manager will discuss with the designated officer whether a referral to the Disclosure and Barring Service or Teaching Regulation Agency should be made where an allegation is substantiated and the person is dismissed or the School ceases to use their services, or the person resigns or otherwise ceases to provide their services. The School has a legal obligation to report promptly to the Disclosure and Barring Service any person (whether employed, contracted, a volunteer or a student) who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. Further, or in the alternative, if an investigation leads to the dismissal or resignation prior to dismissal of a member of teaching staff specifically, the School must consider making a referral to the Teaching Regulation Agency and a prohibition order may be appropriate (because that teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence).
  
- 8 On conclusion of the case, the case manager should review the circumstances of the case with the designated officer to determine whether there are any improvements to be made to the School's safeguarding procedures or practices to help prevent similar events in the future.

The School will make every reasonable effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered.

Allegations found to be malicious will be removed from the individual's personnel records. In all other circumstances a written record will be made of the decision and retained on the individual's personnel file in accordance with *KCSIE* and a copy will only be provided to the individual concerned.

Allegations proven to be false, unsubstantiated, unfounded or malicious will not be included in employer references. If an allegation is shown to be deliberately invented or malicious, the Head will consider whether any disciplinary action is appropriate against a pupil who made it; or whether the Police should be asked to consider if action might be appropriate against the person responsible even if they are not a pupil.

In all cases where there are concerns or allegations of abuse, the School will make a serious incident report to the Charity Commission whenever the Commission's guidelines indicate it appropriate to do so.



## **STAFF CODE OF CONDUCT**

The School's *Staff Code of Conduct* can be found in the Staff Handbook and on the School Intranet. The aim of the *Staff Code of Conduct* is to provide clear guidance about behaviour and actions so as to not place pupils or staff at risk of harm or of allegation of harm to a pupil.

## **SAFER RECRUITMENT**

The School is committed to safer recruitment processes. 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, for example, right to work checks, additional overseas checks (if necessary), verifying identity, taking up references, 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.

Full details of the School's safer recruitment procedures for checking the suitability of staff, Governors and volunteers to work with children and young people is set out in the School's Recruitment policies.

The School's protocols for ensuring that any visiting speakers, whether invited by staff or pupils themselves, are suitable and appropriately supervised is set out in the School's Visiting Speakers Policy.

The school will ensure that contactors and providers are aware of the school's safeguarding policy and procedures and this will be referred to and followed if an allegation is made regarding a member of their agency. The school will require that employees and volunteers provided by these organisations use the school's procedures to report concerns.

The school will seek assurance that employees and volunteers provided by these organisations and working with our children have been subjected to the appropriate level of safeguarding checks in line with KCSIE 2023. If assurance is not obtained, permission to work with our children or use our school premises may be refused.

## **MANAGEMENT OF SAFEGUARDING**

The School's DSL is Jo Creber, the Deputy Head Pastoral and she is supported by Alex Prockter as DDSL and an extended safeguarding team. In the absence of the DSL, reports should be made to the DDSL. This ensures there is the required cover for the role at all times. The following members of staff all have level 3 training to support the wider work of safeguarding and are part of the safeguarding team:

- Hattie Taylor – Director of Pupils
- Jo Talkington – Head of Boarding and designated teacher for Looked After Children
- Sarah Gensmantel -Deputy Head of Boarding
- Liz Eldridge – School Counsellor

- Jannicke Stevens – PSHE Co-ordinator

The DSL and DDSL's contact details can be found on the Key Contacts page at the start of this policy. The DSL's role is to take lead responsibility for safeguarding and child protection matters in the School, including online safety. The DSL's responsibility is to maintain an overview of safeguarding within the School, to open channels of communication with local statutory agencies, support staff in carrying out their safeguarding duties and to monitor the effectiveness of the School's policies and procedures in practice. The DSL works with the governors to review and update the School's safeguarding policy. Where a pupil leaves the School, the DSL will also ensure their child protection file is transferred to the new school (separately from the main pupil file) as soon as possible. The DSL will ensure secure transit and obtain confirmation of receipt.

The DSL regularly reviews the School's and their own practices and concerns about welfare and safeguarding matters in accordance with the safeguarding action plan. This includes the personal and professional duty of all staff to report welfare and safeguarding concerns to the DSL, or in the absence of action, directly to local children's services. The DSL, his deputy and the extended safeguarding team should liaise with the three safeguarding partners and work with other agencies in line with *Working Together to Safeguard Children*. *NSPCC- When to call the police* will be used to help the DSL understand when they should consider calling the police and what to expect when they do.

The DSL or the DDSL will always be available to discuss safeguarding concerns. During term time, the DSL and/ DDSL will always be available (during school hours) for staff in the School to discuss any safeguarding concerns. For out of hours/out of term activities, the School's arrangements are for staff to make contact with the DSL by phone.

Full details of the DSL's role can be found in appendix 3.

Ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility should not be delegated.

## **TRAINING**

Induction and training are in line with advice from OSCB. This is updated annually, and all staff receive refresher training including management of concerns, identifying abuse, managing online or peer on peer abuse, sexual violence and harassment. OSCB issued training resources which have been used in training current and new staff.

### **All Staff**

Before joining the School, all new members of staff (including peripatetic musicians, sports coaches and non-teaching staff) are asked to complete two online modules concerning safeguarding responsibilities:

- *Awareness of Child Abuse and Neglect – core version* (Oxfordshire Safeguarding Children Board online generalist training)
- Home Office e-learning training on Prevent Duty

All new staff will be provided with induction training that includes:

- the Safeguarding and child protection policy
- the role and identity of the DSL, DDSL and extended safeguarding team
- the behaviour policy
- the staff Code of Conduct including the School's whistleblowing procedure and the acceptable use of technologies policy, staff/pupil relationships and communications including the use of social media
- the unique risks associated with online safety and to ensure staff are confident that they have the relevant knowledge and up-to-date capability required to keep children safe whilst they are online at school
- the safeguarding response to children who go missing from education;
- a copy of Part one of *KCSIE 2023*
- School leaders and staff who work directly with children will also be required to read Annex A of *KCSIE 2023*. Copies of the above documents are provided to all staff during induction.

Temporary staff, Governors and volunteers who help with activities that bring them into contact with children are provided with the same documentation and training. The only adults who work in School or visit the School who are exempted from this requirement are:

- occasional visitors, for example, visiting speakers and contractors, who sign in and are given security badges (by one of our School Office staff or Bursary staff), and who are escorted throughout their visit
- contractors working on a designated site that is physically separated from the rest of the School, who are required to sign in and out at their site office and to wear security badge at all times
- contractors working during the school holidays

All staff are also required to:

- Read Part one of *KCSIE 2023* and confirm that they have done so. Each time Part one of *KCSIE* is updated by the Department for Education, staff would be made aware at Staff Briefing and an email circulated or with a paper copy.
- Understand key information contained in Part one of *KCSIE 2023*. The School will ensure staff understanding through regular and at least annual updates.
- Receive training in safeguarding and child protection regularly, in line with advice from the OSCB. Training will include online safety and harmful sexual behaviours; including peer on peer sexual violence and sexual harassment. It will also include Prevent awareness training to equip staff to raise concerns appropriately by ensuring all staff have the knowledge and confidence to identify children at risk of being drawn into terrorism; are able to challenge extremist ideas; and know how to refer children and young people for further help.
- Undertake regular informal updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. The School provides these via, for example, emails, staff meetings and *MyConcern*.

Generalist refresher training for all staff is held at three-yearly intervals, and all staff, governors and volunteers receive regular formal and informal updates through emails, in staff briefings and an annual update from the DSL at the start of the Michaelmas Term.

### **DSL(s)**

The DSL receives updated child protection training at least every two years to provide them with the knowledge and skills required to carry out the role. This includes local inter-agency working protocols, participation in child protection case conferences, supporting children in need, identifying children at risk of radicalisation, record keeping, online safety and promoting a culture of listening to children, training in OSCB's approach to *Prevent* duties and harmful sexual behaviours. Further details of the required training content for the DSL are set out in Annex C of *KCSIE 2023*.

In addition to their formal training, the DSL's knowledge and skills are updated at least annually to keep up with any developments relevant to their role.

The DDSL team is trained to the same level as the DSL.

### **OVERSIGHT OF SAFEGUARDING, INCLUDING ARRANGEMENTS FOR REVIEWING POLICIES AND PROCEDURES**

Sue Hampshire is the board-level lead designated to take a lead in relation to responsibility for the safeguarding arrangements in the School. She is a member of the governing body.

A review of the School's child protection policies takes place at least annually, including an update and review of the effectiveness of procedures and their implementation. The safeguarding policy is signed off by either the Link Governor or Chair of Governors. The School completes the Oxfordshire School's Annual Safeguarding Report which is discussed at a full Governors' meeting. The School also completes the Self-Assessment for Early Years and Childcare Settings. The School draws on the expertise of staff, including the extended safeguarding team, in shaping the School's safeguarding arrangements and policies. In addition, the DSL presents a termly Safeguarding report to Governors, and has regular supervision meetings with the Head, and provides supervision for the DDSL team.

If there has been a substantiated allegation against a member of staff, the School will work with the Local Authority designated officer to determine whether there are any improvements to be made to the School's procedures or practice to help prevent similar events in the future. The school will work in partnership with an outside agency if there is an allegation against agency supply staff.

### **THE SCHOOL'S ARRANGEMENTS TO FULFIL OTHER SAFEGUARDING RESPONSIBILITIES**

#### **Teaching children how to keep safe**

The governing body ensures that all pupils are taught about safeguarding, including online, through the curriculum, PSHEE and through Relationships Education (for all Prep pupils) and Relationships and Sex Education (for all secondary pupils) which was compulsory from September 2020 to help children to adjust their behaviours 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 and governing body takes all reasonable action to limit children's exposure to risks from the school's IT system and ensures the school has appropriate filters and monitoring systems in place and regularly reviews their effectiveness in line with national expectations.

Internet safety is an integral part of the School's ICT curriculum and also embedded in PSHE and relationships and sex education (RSE); teaching children to keep themselves safe when online or when accessing remote learning.

The School has appropriate filters and monitoring systems in place to safeguard children from potentially harmful and inappropriate material online which are regularly reviewed. The School uses the Smoothwall internet filtering system for this purpose. Such systems aim to reduce the risk of children being exposed to illegal, inappropriate and harmful materials online; reduce the risk of children being subjected to harmful online interaction with others; and help manage online behaviour that can increase a child's likelihood of, or causes, harm. Further detail of the School's approach to online safety can be found in the School's Online Safety Policy and IT Acceptable Use Policy which also include details on the use of mobile technology in school (and accessing 3G and 4G technology on school premises) and the School's IT arrangements to ensure that children are safe from terrorist and extremist material when accessing the internet through the School's systems.

### **Looked after children**

The governing body ensures that staff have the skills, knowledge and understanding necessary to keep safe any children on roll who are looked after by a local authority.

Jo Talkington is the designated member of staff who has responsibility for their welfare and progress. The School ensures that the designated member of staff receives appropriate training in order to carry out their role.

### **Arrangements for visiting speakers**

The School has clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable. The School's responsibility to pupils is to ensure that they can critically assess the information they receive as to its value to themselves, and that the information is aligned to the ethos and values of the School and British values.

The School is required to undertake a risk assessment before agreeing to a Visiting Speaker being allowed to attend the School. This will take into account any vetting requirements considered appropriate in the circumstances, and may include a DBS check if relevant.

Visiting speakers will be expected to understand that, where appropriate, their session should actively promote the British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs and at no point undermine these. In some cases, the School may request a copy of the Visiting Speaker's presentation and/or footage in advance of the session being provided.

Visiting Speakers, whilst on the School site, will be supervised by a school employee. On attending the School, Visiting Speakers will be required to show original current identification documents including a photograph such as a passport or photo card driving licence. The School keeps a formal register of Visiting Speakers held by the HR Manager.

## **EARLY YEARS PROVISION SAFEGUARDING ARRANGEMENTS**

The School does not knowingly employ people to work in childcare or allow them to be directly concerned in its management, if they are 'disqualified' or 'disqualified by association' (see 18a Recruitment policy).

There are effective systems in place to ensure that practitioners, and any other person who is likely to have regular contact with children (including those living or working on the premises), are suitable. The School keeps a record of those staff who are employed to work in or manage relevant childcare and records the date on which disqualification checks were completed on the Single Central Register. The School is committed to safeguarding all its pupils and staff and consequently the School will inform Ofsted of allegations against people living or working at the School, or of any other abuse alleged to have taken place on the premises, as soon as possible and within 14 days at latest.

### **Use of mobile phones and cameras**

The School's policy on the use of mobile phones and cameras in the setting can be found in the School's Acceptable Use and Data Protection policies. The School's Safeguarding policy (Use of ICT, Mobile Phones and Electronic Devices and Taking, Storing and Using Images of Children) also sets out the use of mobile phones and cameras in school. Staff are not permitted to use their personal mobile devices or cameras in school other than for the online registration of pupils in Years 6 to 13, access to work email and iSAMS applications. Staff who wish to use their personal mobile devices or cameras in school for any other reason must first seek permission from the Head. Staff must not use their personal mobile devices or cameras, which includes all electronic devices with imaging and sharing capabilities, at any time when EYFS pupils are present in school or on trips. Staff may use school iPads for taking images of EYFS pupils. Staff who act in breach of this may be subject to disciplinary action. The use of digital devices including mobile phones by Parents is not permitted around the EYFS setting.

### **DSLs for the EYFS**

The practitioner designated to take lead responsibility for safeguarding children in the EYFS setting is Alex Prockter, Head of Prep. Her contact details can be found on the Key Contacts page at the start of this policy.

### **Confidentiality**

The School recognises that all matters relating to child protection and safeguarding are confidential. The DSL and team will only disclose personal information about a pupil to other members of staff on a need to know basis.

All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children. All staff must also be aware that they cannot promise a pupil to keep secrets which might compromise the pupil's safety or well-being or that of another pupil.

### **Safeguarding Procedures during periods of School Closure and/or Remote Education**

Staff and volunteers are aware that these difficult periods of closure and remote learning potentially put all children at greater risk. All staff and volunteers must continue to act on any concerns they have about a child immediately, following the Child Protection policy. It is still vitally important to do this, both for children continuing to attend or returning to school and those at home.

All concerns should be recorded on MyConcern and reported to the DSL. The DSL or member of the DDSL team will be on site wherever possible. On occasions where there is no DSL or deputy on site, a senior leader will take responsibility for co-ordinating safeguarding. This will be the Head, Joanne Croft.

We will continue to monitor attendance register, and will also continue to submit the Department for Education's daily online attendance form, until no longer asked to do so.

Where any child we expect to attend online school or onsite provision (e.g. for children of key workers and vulnerable children) does not attend, or stops attending, we will:

- Follow up on their absence with their parents or carers, by telephone in the first instance.
- Notify their social worker, where they have one

We will make arrangements with parents and carers to make sure we have up-to-date emergency contact details, and additional contact details where possible. All parents are asked to supply three contact telephone numbers.

We will continue to follow the principles set out in part 5 of Keeping Children Safe in Education when managing reports and supporting victims of child-on-child abuse. Staff should continue to act on any concerns they have immediately – about both children attending school and those at home.

We will continue to follow the principles set out in part 4 of Keeping Children Safe in Education 2023. Staff should continue to act on any concerns they have immediately – whether those concerns are about staff/volunteers working on site or remotely.

The school will maintain contact with children who are not yet returning to school. Staff will try to speak directly to children at home to help identify any concerns. They will use Teams, school phones and devices to make calls home.

Staff and volunteers will look out for signs like:

- Not completing assigned work or logging on to school systems
- No contact from children or families
- Seeming more withdrawn during any class check-ins or video calls

Where staff are interacting with children online, they will continue to follow our existing our staff behaviour policy/code of conduct/IT acceptable use policy.

Below are some things to consider when delivering virtual lessons, especially where webcams are involved:

- Staff and children must wear suitable clothing, as should anyone else in the household.
- Any computers used should be in appropriate areas, for example, not in bedrooms; and the background should be blurred.
- The live class should be recorded so that if any issues were to arise, the video can be reviewed.
- Live classes should be kept to a reasonable length of time, or the streaming may prevent the family 'getting on' with their day.
- Language must be professional and appropriate, including any family members in the background.
- Staff must only use platforms provided by the School to communicate with pupil

- Staff should record, the length, time, date and attendance of any sessions held

Staff will continue to be alert to signs that a child may be at risk of harm online, and act on any concerns immediately, following our reporting procedures. Where possible, we will continue to offer our current support for pupil mental health for all pupils. We will also signpost all pupils, parents/carers and staff to other resources to support good mental health during these periods. When setting expectations for pupils learning remotely and not attending school, teachers will bear in mind the potential impact of the current situation on both children's and adults' mental health.

We will make sure children know how to report any concerns they have back to our school, and signpost them to other sources of support too.

In addition, we will make sure parents and carers:

- Are aware of the potential risks to children online and the importance of staying safe online
- Know what our school is asking children to do online, including what sites they will be using and who they will be interacting with from our school
- Are aware that they should only use reputable online companies or tutors if they wish to supplement the remote teaching and resources our school provides
- Know where else they can go for support to keep their children safe online

Upon returning to school after a period of school closure, Staff and volunteers will be aware of the possible effects that this period may have had on pupils' mental health. They will look out for behavioural signs, including pupils being fearful, withdrawn, aggressive, oppositional or excessively clingy, to help identify where support may be needed. Tutors will run a series of sessions in form time to promote good mental health and to review how pupils have coped with lockdown and the return to school. Pupils will be given a mentor if required, and those in most need will be able to access the school counsellor. The School Counsellor and Lay Chaplain are on site to support pupils.



## APPENDIX 1 –SIGNS AND TYPES OF ABUSE

All school 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.

### **What is abuse and neglect?**

Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or another child or children. Signs of abuse can vary from the emotional withdrawal of a child, injuries within the triangle of safety, to inappropriate behaviour towards peers or members of staff. All staff are trained to identify unusual behaviour in a child and to report this to the DSL.

### **Common Signs of Abuse**

Some common signs that there may be something concerning happening in a child's life include:

- unexplained changes in behaviour or personality
- becoming withdrawn
- seeming anxious
- becoming uncharacteristically aggressive
- lacks social skills and has few friends, if any
- poor bond or relationship with a parent
- knowledge of adult issues inappropriate for their age
- running away or going missing
- always choosing to wear clothes which cover their body
- mental health problems.

**Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. This includes honour-based violence (HBV) such as female genital mutilation (FGM) (see additional paragraph below). Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

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

exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

**Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Sexual abuse also includes sexual violence and sexual harassment which can occur between two children of any sex. They can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence are sexual offences under the Sexual Offences Act 2003, such as rape, sexual assault and assault by penetration. Sexual harassment is 'unwanted conduct of a sexual nature' that can occur online and offline. Sexual harassment is likely to violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. 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 and displaying pictures, photos or drawings of a sexual nature; and online sexual harassment, which might include non-consensual sharing of sexual images and videos and sharing sexual images and videos (both often referred to as sexting); inappropriate sexual comments on social media; exploitation; coercion and threats. Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

### **Child-on-child abuse**

All staff should be aware that children are capable of abusing other children, should be able to identify this and know what to do abuse will never be tolerated or passed off as 'banter' or 'part of growing up'. Most cases of pupils hurting other pupils will be dealt with under our school's behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns.

Further guidance is given in:

- KCSIE 2023: Part 5 Child on Child Sexual Violence and Sexual Harassment

This is most likely to include, but may not be limited to:

- bullying and cyberbullying
- physical abuse which includes hitting, kicking, shaking, biting, hair-pulling or otherwise causing physical harm
- sexual violence such as rape, assault by penetration and sexual assault
- sexual harassment such as sexual comments, remarks, jokes and online sexual harassment which may be stand alone or part of a broader pattern of abuse
- upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause their victim humiliation, distress or alarm. This is a criminal offence thus there is a duty to report to the police

- sexting
- initiation/hazing type violence and rituals
- abuse with intimate partner relationships.

It is important that there is a constant culture of vigilance and recognise that some pupils are more vulnerable to be victims of child-on-child abuse such as SEND pupils.

If a pupil makes an allegation against another pupil you must tell the DSL and record the allegation, but do not investigate it.

- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence.
- The DSL will put a risk assessment and support plan into place for all children involved – both the victim(s) and the child(ren) against whom the allegation has been made – with a named person they can talk to if needed.
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate.

We will minimise child-on-child abuse by:

- challenging any form of derogatory or sexualised language or behaviour
- being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence
- ensuring our curriculum helps to educate pupils about appropriate behaviour and consent
- ensuring pupils know they can talk to staff confidentially through safeguarding information posters situated in each classroom, the PSHE and assembly programme
- ensuring staff are trained to understand that a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy.

**Domestic abuse:** Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

The School should be mindful that children can often blame themselves for the abuse or may have had to leave the family home as a result of the abuse. Domestic Abuse may lead to other safeguarding concerns, and should therefore be managed under this policy.

The school recognises and supports children who are victims of Domestic Abuse. The School is part of Operation Encompass and acts on information received to support pupils who are victims of Domestic Abuse through enhanced pastoral support. The DSL has undertaken training with Operation Encompass. Staff know what Operation Encompass is and are given training on a range of Safeguarding issues, including Domestic Abuse. The DSL updates Governors on a termly basis and has access to the Operation Encompass helpline for advice. Pupils learn about Domestic Abuse and Healthy Relationships as part of their PSHE curriculum.

**Homelessness:** or being at risk of homelessness presents a real risk to a child's welfare. The School should be aware of potential indicators of homelessness including: household debt, rent arrears, domestic abuse and anti-social behaviour, as well as a family being asked to leave a property. If staff

are made aware, or suspect that a pupil may be at risk of homelessness, they should talk to the DSL in the first instance. Whilst referrals to the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not and should not replace a referral to the LADO where a child has been harmed or is at risk of harm, in accordance with this policy.

**Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. Neglect can be a lot of different things, which can make it hard to spot. There are four particular strands of neglect which include educational and medical neglect and financial and domestic abuse. Signs of neglect can include failure of a child to thrive, dirty and unkempt condition, unrelated medical problems, dry, sparse hair, red/purple mottled skin, particularly on the hands and feet, seen in the winter due to the cold, swollen limbs that have sores and are slow to heat. Children suffering from neglect may demonstrate low self-esteem, inadequate social skills and poor socialisation, frequent lateness or non-attendance at school, abnormal voracious appetite, self-harming behaviour, constant tiredness or disturbed peer relationships.

**Specific safeguarding issues:** behaviours linked to drug taking, alcohol abuse, truanting and sexting put children in danger. Safeguarding issues can also manifest themselves via child-on-child abuse, such as bullying (including cyberbullying), physical abuse, sexual violence and sexual harassment, gender-based violence, sexting, upskirting, serious violence and initiation/hazing type violence and rituals. Safeguarding issues can also be linked to, for example, children missing education; child sexual exploitation; child drug exploitation, contextual safeguarding; domestic violence; fabricated or induced illness; faith abuse; female genital mutilation; forced marriage; gangs and youth violence; gender-based violence / violence against women and girls; hate; mental health; preventing radicalisation; relationship abuse; sexting; and trafficking.

### **Mental Health**

All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem, Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests they may be experiencing a mental health problem or be at risk of developing one. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour and education. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following the child protection policy and speaking to the DSL or a deputy. The DSL is the Senior Mental Health lead for the School

Schools should be mindful that some groups of children are more vulnerable to mental health difficulties than others. These include, but are not limited to, looked after children, children with learning difficulties, children on the autism spectrum and children from disadvantaged backgrounds.

Indicating factors may include:

- Confused thinking.
- Prolonged depression (sadness or irritability)
- Feelings of extreme highs and lows.
- Excessive fears, worries and anxieties.
- Social withdrawal.
- Dramatic changes in eating or sleeping habits.
- Strong feelings of anger.
- Strange thoughts (delusions)

School should be a safe and affirming place for children where they can develop a sense of belonging and feel able to trust and talk openly with adults about their problems. There is lots of early help provision within school, including referral to our School Counsellor and all concerns about a pupil's mental health or wellbeing should be reported to the DSL, who will take necessary action. Where appropriate, the school will support a referral to CAMHS or other adolescent and children services. DSL is held to account by both the Head and the lead Safeguard governor.

**Child criminal exploitation (CCE) (county lines):** this criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

**Child sexual exploitation (CSE):** is a form of sexual abuse where children are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation does not always involve physical contact and can happen online. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point. Some of the following signs may be indicators of sexual exploitation:

- Children who appear with unexplained gifts or new possessions;
- Children who associate with other young people involved in exploitation;

- Children who have older boyfriends or girlfriends;
- Children who suffer from sexually transmitted infections or become pregnant;
- Children who suffer from changes in emotional well-being;
- Children who misuse drugs and alcohol;
- Children who go missing for periods of time or regularly come home late; and
- Children who regularly miss school or education or do not take part in education

**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.

**FGM:** comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can also be found on pages 38-41 of 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 activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with Police and Local Authority Children's Social Care. If in any doubt, staff should speak to the DSL.**

There is a statutory duty on teachers to personally report to the Police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve the Local Authority Children's Social Care as appropriate. If the teacher is unsure whether this reporting duty applies, they should discuss their concerns with the DSL in accordance with this policy. Where a teacher suspects that a pupil is at risk (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or it involves a pupil over 18, teachers should follow the School's local safeguarding procedures.

**Forced marriage:** Any form of marriage for someone under 18 is illegal, even where violence, threats or another form of coercion are not used. Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage. There is a range of potential indicators that a child may be at risk of forced marriage, details

of which can be found on pages 13-14 of the Multi-agency guidelines: Handling cases of forced marriage. School staff can also contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email [fm@fco.gov.uk](mailto:fm@fco.gov.uk).

**Radicalisation and Terrorism:** Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. It can also call for the death of members of the armed forces, whether in this country or overseas. Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to susceptibility, which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular have become major factors in the radicalisation of young people. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately, which may include making a referral to the Channel programme.

**Serious Violence:** Children may be at risk from or involved with serious violent crime. Signs of this may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

**Upskirting:** The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019. Upskirting is a highly intrusive practice, which typically involves someone taking a picture under another person's clothing without their knowledge, with the intention of viewing their genitals or buttocks (with or without underwear). It can take place in a range of places including schools, public transport and leisure centres etc. The law will capture instances where the purpose of the behaviour is to obtain sexual gratification, or to cause humiliation, distress or alarm. Anyone and any gender can be a victim and this behaviour is completely unacceptable. Perpetrators will face two years in prison and can be placed on the sex offenders register.

**Special educational needs and/or disabilities:** Pupils with SEND may not outwardly shown signs of abuse and/or may have difficulties in communication about abuse or neglect.

These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- the potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and

- communication barriers and difficulties in overcoming these barriers.

Staff will support such pupils in expressing any concerns they may have and will be particularly vigilant to any signs or indicators of abuse, discussing this with the DSL as appropriate. The SEND Code of Practice is a source of information and support is available from specialist organisations including SENDIASS.

**Lesbian, gay, bi or trans (LGBT):** Children who are LGBT can be targeted by their peers. In some cases, a pupil who is perceived by their peers to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

**Children who go missing from school:** A child going missing from school is a potential indicator of abuse or neglect. Staff must follow the School's procedures for dealing with children who go missing, particularly on repeat occasions. The School's procedure for dealing with children who go missing can be found in the School's *policy, 7g Children missing from education and missing pupil policy*. All unexplained absences will be followed up in accordance with this policy..

The School shall inform the local authority of any pupil who is going to be added to or deleted from the School's admission register at non-standard transition points in accordance with the requirements of the Education (Pupil Registration) (England) Regulations 2006 (as amended). This will assist the local authority to:

- a) fulfil its duty to identify children of compulsory school age who are missing from education; and
- b) follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect or radicalisation.

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 has been absent without the School's permission for a continuous period of 10 school days and would maintain regular liaison with the local authority until the situation was resolved.

Action should be taken in accordance with this policy if any absence of a pupil from the School gives rise to a concern about their welfare.

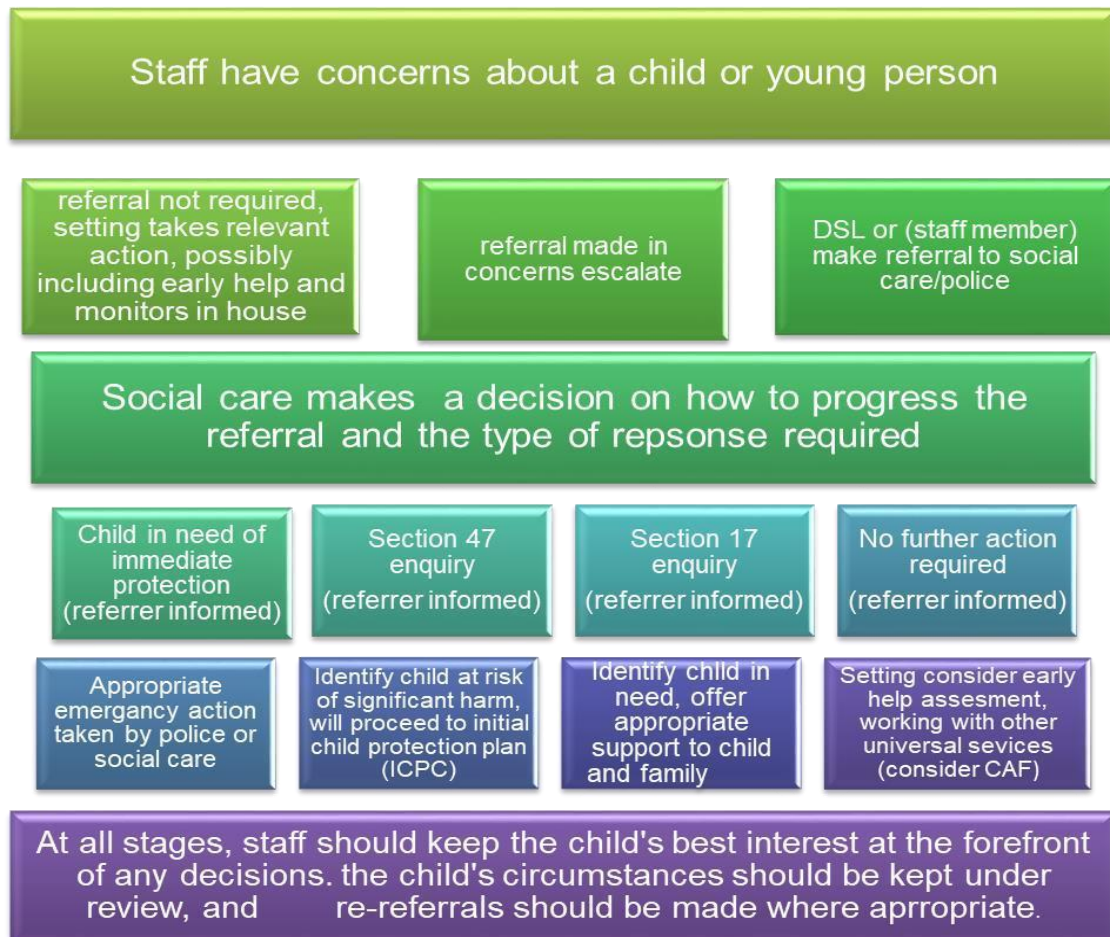
**Children and the court system:** Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5-11 year olds and 12-17 year olds available on the gov.uk website.

The guides explain each step of the process and support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

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



**Children with family members in prison:** Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.



## **APPENDIX 2 – DISCLOSURE: HOW TO RESPOND IF A CHILD CONFIDES ABUSE TO YOU**

If you have concerns about a child (as opposed to a child being in immediate danger) Figure 1 illustrates the procedure to follow if you have concerns about a child's welfare and the child is not in immediate danger. Where possible, speak to the DSL first to agree a course of action. Alternatively, make a referral to local authority children's social care directly. You can also contact the charity NSPCC on 0808 800 5000 if you need advice on the appropriate action.

All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

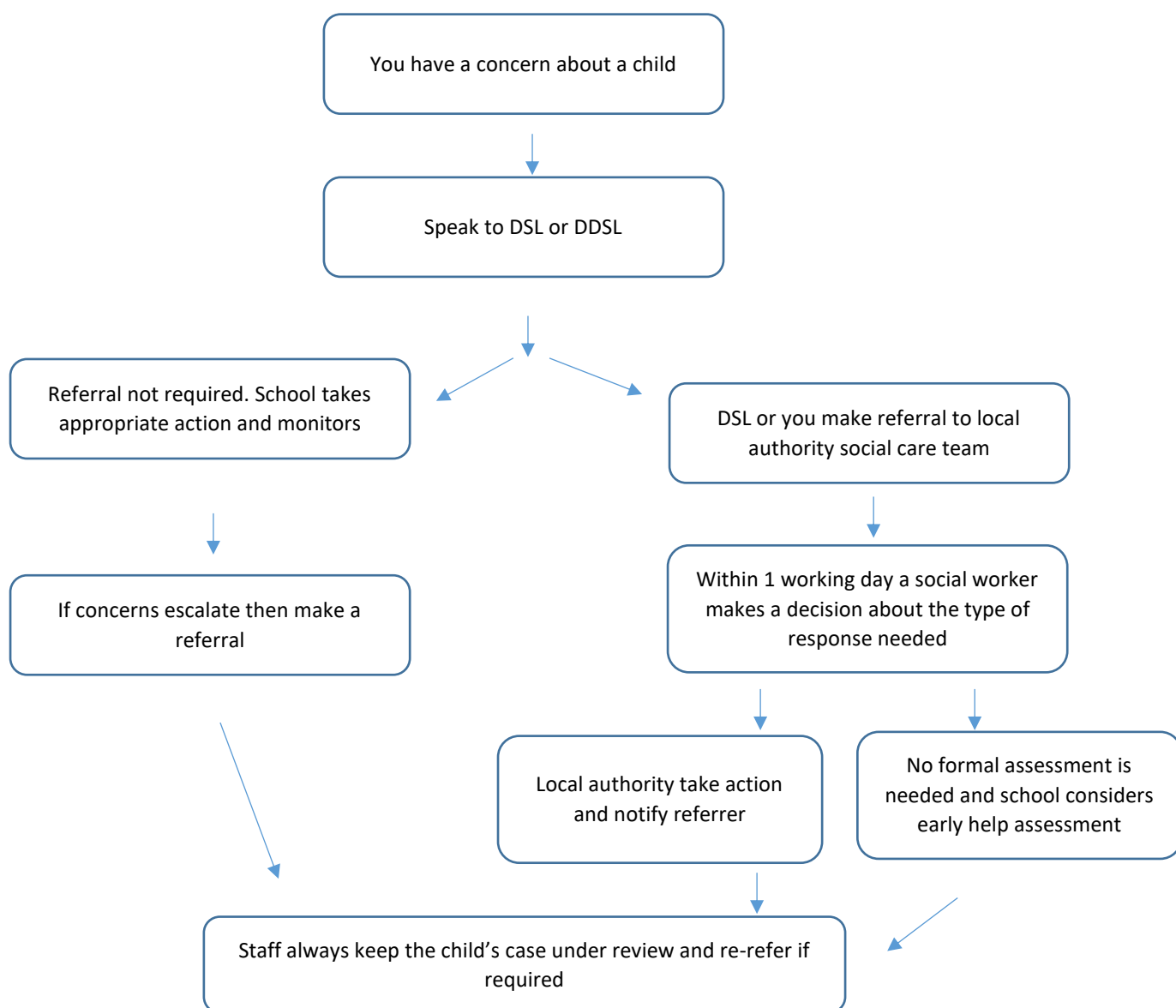
### **Early help**

All staff should be prepared to identify children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years. Any staff member who has a concern about a child's welfare should follow the referral processes. If early help is appropriate, the DSL will support you in liaising with other agencies and setting up an inter-agency assessment as appropriate. The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

### **Referral**

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so. If you make a referral directly, you must tell the DSL as soon as possible. The local authority will make a decision within one working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded. If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must contact the local authority and make sure the case is reconsidered to ensure the concerns have been addressed and the child's situation improves.

For non-urgent welfare matters follow the diagram below to report concerns:



If a child or young person tells you that they are being abused, it is important that you know how to respond. Here are the universal principles regardless of the age of the child.

- It is important you stay calm and are patient.
- Find a quiet place where your conversation will not be interrupted. Keep in mind your organisation's guidelines about being alone with a child or young person.
- Be welcoming, even if the time isn't convenient for you. It may have taken a great deal of courage for them to approach you and they may not do so again.
- Try to make the child or young person feel safe and secure. Reassure them that they have done nothing wrong in telling you.
- Listen carefully and take it seriously.
- Ask questions for clarification only.
- Explain what you will do with the information and what will happen next.
- Write down what you have been told as soon as possible. It should be dated, timed and signed. It should then be given to the DSL immediately.

It is important you do not:

- promise confidentiality
- ask leading questions
- look panicked, shocked or angry
- make the child or young person repeat their story
- interrupt
- give an opinion
- inform parents until you have had a discussion with your safeguarding lead
- make any comments about the abuser or try to guess who they are.

If emergency help is required, do not delay getting it. If a child asks for confidentiality and they are told this cannot be guaranteed, and as a result they refuse to say anything further, make an immediate report to the organisation's designated safeguarding lead.

### **Starting difficult conversations**

Recognise that children and young people who are being abused or neglected may find it difficult to tell someone for the first time because:

- They may have feelings of confusion, shame, guilt or worry about being stigmatised.
- They may not recognise their experience as abusive or neglectful. For example, a girl thinks her boyfriend's treatment of her is not abusive behaviour.
- They may be being coerced by (or may be attached to) the person or people abusing or neglecting them.
- They may fear the consequences of telling someone. They may worry that no one will believe them, the abuse or neglect might get worse, their family will be split up or excluded by their community, or they will go into care.

Communicate with the child in a way that is appropriate to their age and ability, preferred communication method (for example, Makaton or sign language) and ability to understand English. If you have safeguarding concerns, then you must not get a relative or family friend to translate.

You may find the following phrases helpful to start a conversation or encourage the young person to talk honestly with you.

"I'm concerned about you. Is everything OK?"

"May I have a word with you? You seem to be... Is there anything I can do to help?"

### **After your discussion you may find that:**

the young person is just going through a difficult time temporarily, or there is a problem (other than abuse) which you can offer your support for or guide them towards other appropriate sources of help.

If, however, your concerns are correct, and they do disclose abuse to you, listen and respond in the manner we have already covered.

It is important your approach should always be child-centred. Caring, considerate adults who take the time to really listen to children and understand the subtleties of what is being said can provide an opportunity for children to 'open up' and get help.

## Open questions

Sometimes it may not be clear a child is making a disclosure; it is therefore okay to ask open questions. Using open questions with the words what, when, who, how, where may help to clarify your understanding and what you need to do. Always remember you are not to investigate and questions are only used for clarification.

Question you may ask:

- That's a nasty bruise, when did you do that?
- How did that happen?
- Where were you when you did it? Who were you with? What did the person do?
- Have you told anybody else about this? What did the person say?
- You seem to be upset and that's not like you. Is there anything worrying you?

Remember questions should not be used to investigate, but to clarify information only.

## Making notes

The more specific your notes, the more useful they will be in forming a well-rounded picture for child protection professionals to act on. They have busy workloads and it is their role to determine next actions. When they receive a report containing ambiguous, vague information, it makes their role extremely difficult.

For example

Instead of "Nicola was wearing inappropriate clothes for the weather."

Say exactly what you see, hear or know:

"It was minus five degrees outside with a hard frost and Nicola was wearing a summer dress and open-toed sandals without socks or tights."

For example

Instead of "Omar is looking quite thin and he sometimes steals from other children's lunchboxes."

Say exactly what you see, hear or know:

"Omar looks very underweight for his age and stage of development. In the last two weeks, he has taken food from other children's lunchboxes on seven occasions."

For example

Instead of "The mother gave an implausible account of how John had come to have so many bruises."

Say exactly what you see, hear or know:

"John's mother said she wasn't aware of the multi-coloured bruises on John's arms and legs and that she thought he must have fallen over."

## **Appendix 3 Job description**

### **Deputy Head Pastoral and DSL Job Description**

#### **Accountabilities**

##### **Strategy**

- Assisting the Head and Governors in developing the school's development plan and translating the school's vision into agreed objectives and departmental plans.
- Attending Governors' meetings when required, and preparing reports as directed by the Head.
- Taking the lead and working with the Pastoral team to ensure the success of pastoral and wellbeing policies and procedures, and ensuring that provision reflects the Catholic Christian Life of the school.
- Assisting the Head with recruitment of staff and working in close collaboration with the Head, Bursar and Senior Leadership Team (SLT).
- Planning for and implementing innovation in pastoral programmes and in the wellbeing of the school community.
- Helping to create a safe and healthy environment for members of the school community.

##### **Pastoral and Wellbeing – leadership and innovation**

- Working with the Head and SLT to create and deliver the strategy for wellbeing at Rye.
- As Designated Safeguarding Lead for the School, leading the wider Safeguarding Team to ensure good practice and the wellbeing of pupils and staff at all times.
- Leading safeguarding training and working closely with Oxfordshire Safeguarding Board and other external agencies to keep abreast of developments in practice.
- Be comfortable with making professional challenge, understand the UN convention on the rights of the child, and have an understanding of the role of an 'appropriate adult' as outlined in PACE Code C 2019
- Leading the Pastoral vision for the school and working with the Pastoral team to embed it throughout.
- Leading the E-Safety group and ensuring regular meetings to review and develop practice and ensure safeguarding.
- Taking responsibility for all aspects of the pastoral provision for all pupils and monitoring and evaluating its effectiveness and development.
- Leading whole school events such as Prize Giving and St Antony's Day.
- Leading the PSHEE Co-Ordinator, Lay Chaplain, and Form Tutors to ensure continuity of provision in PSHEE and RSE throughout the school.
- Overseeing School Council and the selection of patricians (prefects).
- Being a presence around school, supporting and taking interest in events and activities, and being a positive role model for staff and pupils.
- Teaching approximately 0.3 timetable. Providing a professional model for others clearly demonstrating effective teaching and high standards of behaviour for learning, and demonstrating a personal commitment to quality and excellence.
- Overseeing the arrangements for counselling and peer mentoring in the Senior School and Sixth Form, and to liaise and meet regularly with the School Counsellor.
- Recording, reviewing, and monitoring pupil behaviour and discipline logs.

### **Staff wellbeing**

- Working with the Head, SLT and HR Manager to lead staff wellbeing throughout the school.

### **Leadership and Management of Others**

- Chairing Pastoral meetings and line managing members of middle management.
- Supporting the Head and working with the Deputy Head Academic and Head to support the deployment, motivation, and development of teaching staff to make the most of effective use of their skills, interest and experience.
- Working with the SLT and Compliance Officer to ensure compliance with ISI regulations and readiness for ISI and diocesan inspections.
- Leading by example, providing inspiration and motivation, and exemplifying the vision and values of our school.
- Attending Housemistresses' meetings and line managing the Senior Housemistress.
- Organising cover for absent colleagues and duty rotas for teaching staff.
- Leading and continually reviewing and updating the transition programme between different phases of the school.
- Reviewing and updating all pastoral documentation, including all pastoral policies, handbooks and Prep diaries.
- Deputising for the Head in her absence.

### **Training and development of self and others**

- Working with the Deputy Head Academic to organise and develop INSET training.
- Delivering quality assurance programmes to develop and maintain a culture of high expectations for self and others.
- Regularly reviewing own practice, setting personal targets and taking responsibility for own development.

## Appendix 4 Low-Level Concerns about Adults Policy

Keeping children safe is a priority of Rye St Antony School and the purpose of this policy is to create and embed a culture of openness, trust and transparency in which the clear values and expected behaviour which are set out in the Code of Conduct are constantly lived, monitored and reinforced by all staff. This policy is to be read in conjunction with the School's Child Protection and Safeguarding Policy and the Whistleblowing Policy.

In order to achieve this purpose, we:

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

This policy applies to staff and Governors.

### Definitions

**'Staff'** should be interpreted very widely to mean anyone associated with the organisation – i.e. whether working for or with the organisation, engaged as a paid employee, worker or self-employed contractor, or unpaid member of staff or volunteer. It also includes anyone who is part of the Governing Body;

**'Governing Body'** means those individuals who are responsible for an organisation's governance – for example, the Trustees and Governors of the School.

**'Designated Safeguarding Lead'** (DSL) means the person nominated in School as the Lead Safeguarding Officer for the setting who is the person in school with overall safeguarding responsibility. This is the Deputy Head Pastoral.

The School's approach to low-level concerns regarding adults' behaviour towards children includes the options of self-reporting by adults, or adults sharing such concerns about the behaviour of other adults. Whilst it does not focus on the sharing of concerns i) about adults by children, or ii) in the context of child-on-child abuse, or iii) in the context of adults' behaviour towards adults, the School believes that the same fundamental principles should nonetheless apply.



## **The distinction between an allegation and a low-level concern. (see appendix A for case studies)**

### **Allegation**

The term 'allegation' means that it is alleged that a person who works with children has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child; or
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children.

Keeping Children Safe in Education (KCSiE) makes it clear that an allegation can also relate to an adult's behaviour outside of work and their relationships with others (transferable risk) if they:

- have behaved in a way in their personal life that raises safeguarding concerns. These concerns do not have to directly relate to a child but could, for example, include an arrest for the possession of a weapon;
- have, as a parent or carer, become subject to child protection procedures;
- are closely associated with someone in their personal lives (e.g. partner, member of the family or other household member) who may present a risk of harm to child/ren for whom the adult is responsible in their employment/volunteering.

Where the threshold for an allegation is met, there is specific guidance in the School's Child Protection and Safeguarding Policy on how to respond. Any allegation against people who work with children should be reported immediately to the Head or in her absence the Deputy Head Pastoral. The LADO will then be informed within one working day of the allegation in line with the expectations laid out in Working Together to Safeguard Children (July 2018 and the update of 2023) and Keeping Children Safe in Education (September 2023).

Where concerns/allegation relate to the Head, this should be referred to the Chair of Governors.

### **Low-level concern**

A low-level concern is any concern about an adult's behaviour towards a child that does not meet the allegation threshold set out above, or is not otherwise serious enough to consider a referral to the LADO.

A low-level concern is any concern – no matter how small, and even if no more than a 'nagging doubt' – that an adult may have acted in a manner which:

- is not consistent with the School's Code of Conduct and/or
- relates to their conduct outside work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children.

KCSiE cites the following examples of concerning behaviour:

- Being over friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Using inappropriate sexualised, intimidating or offensive language

- Humiliating pupils

Staff do not need to be able to determine in each case whether their concern is a low-level concern, or if it is in fact serious enough to consider a referral to the LADO, or meets the threshold of an allegation. Once staff share what they believe to be a low-level concern, that determination should be made by the Head.

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

It is critical that all low-level concerns are ultimately received by the Head or in her absence, the Designated Deputy Safeguarding Lead as soon as reasonably possible, and, in any event, within 24 hours of becoming aware of it (where the concern relates to a particular incident). It should be emphasised however, that it is never too late to share a low-level concern.

If any low-level concern relates to the behaviour of the Head, it should be shared with the Chair of Governors.

### **Self-reporting**

Occasionally a member of staff may find themselves in a situation which could be misinterpreted, or might appear compromising to others.

Equally, a member of staff may, for whatever reason, have behaved in a manner which, on reflection, they consider falls below the standard set out in the Code of Conduct.

Self-reporting to the Head in these circumstances can be positive for a number of reasons: it is self-protective, in that it enables a potentially difficult issue to be addressed at the earliest opportunity; it demonstrates awareness of the expected behavioural standards and self-awareness as to the individual's own actions or how they could be perceived; and, crucially, it is an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

### **Recording and sharing a concern**

Low-level concerns can be shared verbally with the Head or by providing the Head with a written summary by email or anonymously in a sealed envelope.

Where the low-level concern is provided verbally, the Head will make a record of the conversation either contemporaneously or immediately following the discussion. The record will include the name of the individual sharing the low-level concern, their role, the name of the individual about whom the concern is being raised, and their role within the organisation at the time the concern is being raised. The record should include brief context in which the low-level concern arose, and concise details (which are chronological and as precise and accurate as possible) of any such concern and relevant incident(s). The record should be signed, timed and dated.

### **Responding to a low-level concern.**

Once the Head has received the low-level concern, she should:

- a) speak to the person who raised the concern (unless it has been raised anonymously), regardless of whether a written summary, or completed low-level concerns form has been provided;
- b) review the information and determine whether the behaviour (i) is entirely consistent with the organisation's Code of Conduct and the law, (ii) constitutes a low-level concern, (iii) is serious enough to consider a referral to the LADO, or (iv) when considered with any other low-level concerns that have previously been raised about the same individual, should be reclassified as an allegation and referred to the LADO/other relevant external agencies;

- c) where the Head is in any doubt whatsoever, they should seek advice from the LADO – on a no names basis if necessary;
- d) speak to the individual about whom the low-level concern has been raised (unless advised not to do so by the LADO/other relevant external agencies, where they have been contacted); e) make appropriate records of:
  - all internal conversations – including with the person who initially shared the low-level concern (where this has been possible), the adult about whom the concern has been shared (subject to the above), and any relevant witnesses
  - all external conversations – for example, with the LADO/other external agencies (where they have been contacted, and whether on a no-names or names basis)
  - their determination
  - the rationale for their decision; and
  - any action taken

The Head's approach will also be informed by the following:

If it is decided that the low-level concern in fact amounts to behaviour which is entirely consistent with the School's Code of Conduct and the law:

- a) it will still be important for the Head to inform the individual in question what was shared about their behaviour, and to give them an opportunity to respond to it;
- b) in addition, the Head will speak to the person who shared the low-level concern – to provide them with feedback about how and why the behaviour is consistent with the organisation's Code of Conduct and the law;

If it is decided that the current concern is low-level:

- a) it will be responded to promptly. Any investigation of low-level concerns will be discreet and on a need-to-know basis to protect staff from any potential false allegations or misunderstandings
- b) most low-level concerns by their very nature are likely to be minor. Some will not give rise to any ongoing concern and, accordingly, will not require any further action. Others may be most appropriately dealt with by means of management guidance and/or training;
- c) in many cases, a low-level concern will simply require a conversation with the individual about whom the concern has been raised.
- d) any such conversation will include being clear with the individual as to why their behaviour is concerning, problematic or inappropriate, what change is required in their behaviour, enquiring what, if any, support they might need in order to achieve and maintain that, and being clear about the consequences if they fail to reach the required standard or repeat the behaviour in question. Ongoing and transparent monitoring of the individual's behaviour may be appropriate. An action plan or risk assessment which is agreed with the individual, and regularly reviewed with them, may also be appropriate;
- e) some low-level concerns may also raise issues of misconduct or poor performance. The Head will consider whether this is the case – taking into account any advice from the LADO, and consulting HR on a no-names basis where necessary – and, if so, to refer the matter to HR. Any such referral should be made by the Head having received the low-level concern and not by individual staff members. Equally, it is essential that there is close liaison and appropriate information sharing between the Head and HR, so that a holistic view of the individual can be

taken. Where a low-level concern does not raise misconduct or poor performance issues, it will not be a matter for HR;

If it is decided that the concern:

- in and of itself is sufficiently serious (and perhaps having followed consultation with the LADO (and on a no-names basis if necessary)), then it will be referred to the LADO;
- when considered with any other low-level concerns that have been shared about the same individual, should be reclassified as an allegation, then the allegation will be dealt with in accordance with the School's Child Protection and Safeguarding Policy.

### **How the School holds low-level concerns**

The School will retain all records of low-level concerns (including those which are subsequently deemed by the Head to relate to behaviour which is entirely consistent with the Code of Conduct) in a central low-level concerns file (either electronic or hard copy). Where multiple low-level concerns have been shared regarding the same individual these are kept in chronological order as a running record, and with a timeline alongside. These records are kept confidential and held securely by the Head and are accessible to the DSL and HR Manager.

Some low-level concerns may also involve issues of misconduct or poor performance, or they may trigger the School's disciplinary, grievance or whistleblowing procedures. Where these issues would ordinarily require records to be made and retained on the staff member's personnel file, this will be done in the normal way, in addition to the records of the low-level concern(s) being retained in a central low-level concerns file by the DSL.

If a low-level concern in and of itself is deemed to be serious enough to consider a referral to the LADO and, perhaps following consultation, a referral is made to them, then records relating to the low-level concern should be placed and retained on the staff member's personnel file.

If a low-level concern (or group of concerns) is re-classified as an allegation, all previous records of low-level concerns relating to the same individual will be moved from the central low-level concerns file to the staff member's personnel file, and retained in accordance with Part 4 of KCSiE – which requires schools and colleges to produce a clear and comprehensive summary of all allegations (except those which are found to have been malicious), details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached, to be kept on the confidential personnel file of the staff member, and a copy provided to them.

The Head reviews the central low-level concerns file termly to ensure that all such concerns are being dealt with promptly and appropriately, and that any potential patterns of concerning, problematic or inappropriate behaviour are identified. A record of these reviews is kept.

The Designated Safeguarding Governor will review anonymised low-level concerns as part of her termly review.

### **Retention of records**

Low-level concerns will be retained until further guidance provides otherwise. When a staff member leaves or takes up new employment, this creates a natural point at which the content of the file may be reviewed to ensure it still has value, and is therefore necessary to keep.

## **Appendix A**

### **Examples of low-level concerns, and to illustrate the boundaries between low-level concerns and allegations**

These examples are not exhaustive, nor will the responses set out below be appropriate in every context. This is because determining the appropriate response to any low-level concern is highly context-specific and depends on a range of factors. The purpose is not, therefore, to provide a template response to any given low-level concern. Rather, it is intended to stimulate discussion, and to provide examples of low-level concerns that might be shared with an organisation, as well as a situation in which low-level concerns might cumulatively amount to an allegation, as well as to illustrate the boundaries between low-level concerns and allegations.

#### **Low-level concern shared in a school context responded to under disciplinary procedure**

A female teacher aged 38 consumes a large quantity of alcohol at the end of term party. The teacher persuades a 21-year-old male student PE coach, who is on a placement, to join her in some selfies, where they appear to be kissing each other. She posts the photos on her Facebook account which elsewhere identifies the school.

A colleague sees the photos and shares their concern about this verbally with the school's Designated Safeguarding Lead (DSL), who makes a record of the information. The DSL shares the concern immediately with the Head. The DSL reviews the Facebook photographs and speaks with the teacher concerned, who is very embarrassed and apologetic, and agrees to remove the photographs and apologise to the student PE coach.

The DSL considers this to constitute a low-level concern and, as such, does not make a referral to the LADO (given it is not considered to meet the threshold of an allegation). The DSL makes a record of the information initially shared with her, and her conversation with the teacher, and retains the record in a central low-level concerns file. Given the misconduct concerns, the DSL also refers the matter to the HR manager.

The HR manager invokes the school's disciplinary procedure. The teacher admits the allegation of inappropriate social media use, and the teacher is issued with a formal warning, a record of which is kept on her personnel file. If the teacher were to leave before the expiry of the formal warning this should be referred to in any reference in the normal way

#### **Low-level concern shared in a charity context resulting in further training**

Mr. Simpson, a volunteer for a charity that provides support for vulnerable children, is part of a group of volunteers accompanying a class of reception age children from a local school on an outing to a local park. During the outing, Mr. Simpson is seen on the edge of the group talking to a child who is on his own for a significant period. He also sits with the same child during lunch, and is seen speaking to the child later in the day when waiting for the parents to collect him. Another volunteer speaks to the charity's Safeguarding Lead (SL) about this, as it did not sit comfortably with them, and the SL makes a record of the information shared as a low-level concern.

The SL asks to speak to Mr. Simpson and, during their conversation, asks if he was aware of any behaviour which may have caused any possible concern whilst he was on the outing. Mr. Simpson explains that the child in question was "having a bad day," and he felt he needed some extra support and, new to volunteering, had not come across a situation like this before. He is horrified to hear that someone was concerned about his behaviour.

The SL considers this to constitute a low-level concern and, as such, does not make a referral to the LADO (given it is not considered to meet the threshold of an allegation). The SL also arranges some further training for Mr. Simpson and all the other volunteers. The SL retains a copy of the relevant paperwork (including the SL's record of their initial conversation with the volunteer, and with Mr. Simpson, and of the subsequent action taken) in a central low-level concerns file.

This one-off low-level concern should not be referred to in any reference.

#### **Low-level concern in a school context dealt with by management guidance**

Several pupils, male and female, in Year 6, approach their Head of Year to say that they feel uncomfortable around Mrs. Brown because she ‘touches’ them, and they don’t like it. When asked if they can explain a little more about what they mean, the pupils tell their Head of Year that Mrs. Brown puts her hands on their shoulder when she is talking to them, and sometimes sits at their table in such a way that their legs touch.

The Head of Year immediately makes a record of their conversation with the pupils, which they promptly share with the school’s DSL. The DSL shares the concern immediately with the Head.

The DSL asks to speak to Mrs. Brown, who explains that she is working in very cramped conditions, especially with a group of Year 6 boys who have grown so much that they take up all the space around the table, and that she sometimes puts a hand on the shoulder to get a pupil’s attention.

The DSL explains that they understand this is making pupils feel uncomfortable, and refers Mrs. Brown to the school’s policy regarding appropriate touch. The DSL then plans for the Year 6 class to use a different room where there is more space.

The DSL considers this to constitute a low-level concern and, as such, does not make a referral to the LADO (given it is not considered to meet the threshold of an allegation). The DSL retains a copy of the relevant paperwork (including the Head of Year’s record, and the DSL’s record of their conversation with Mrs. Brown, and of the subsequent action taken) in a central low-level concerns file.

This one-off low-level concern should not be referred to in any reference.

#### **Self-report of a low-level concern in a sports club context**

Mr. Oliver is a coach at a tennis club, and asks to speak to the SL about an incident that took place the previous evening. He tells the SL that, after a tennis tournament in a nearby town, the parents of Jamie Jones contacted him at the last minute to say that they would not be able to pick him up as they had to deal with an emergency at home. Mr. Oliver offered to take Jamie home in his own car, and the parents were pleased to agree to this.

However, Mr. Oliver subsequently realised that this was in breach of the tennis club’s Safeguarding Policy, and Code of Conduct – and he is therefore self-reporting this to the SL, and has filled out the club’s low-level concerns form.

The SL is of the opinion that this was the best option available to Mr. Oliver at the time, but reminds Mr. Oliver that, should he find himself in such a situation again in the future, he should seek his line manager’s or the SL’s prior approval to his proposed course of action.

The SL considers this to constitute a low-level concern and, as such, does not make a referral to the LADO (given it is not considered to meet the threshold of an allegation). The SL retains a copy of the relevant paperwork (including the low-level concerns form completed by Mr. Oliver, and the SL’s record of their conversation with him) in a central low-level concerns file.

This one-off low-level concern should not be referred to in any reference.

#### **A series of low-level concerns in a school context which result in response under disciplinary procedure**

Shortly after the start of the summer term, an initial concern is raised by a teacher with the DSL, that he has seen Mr. Stevens, the choir master, shouting at and deriding the young choristers in his care this week – which has led to a couple of them leaving their practice sessions in distress.

The DSL makes a record of the conversation, and shares the concern immediately with the Head. The DSL decides to contact the LADO, in the first instance, to seek their advice on a no-names basis on how best to respond. The LADO agrees that the behaviour is concerning but advises that the threshold of an allegation has not been met.

The DSL asks to speak to Mr. Stevens and informs him about the concern that has been shared about his behaviour. Mr. Stevens apologises profusely, and tells the DSL that over the past week he has been having a difficult time personally, has not been sleeping well, and has been feeling “a bit upset and short-tempered.” However, Mr. Stevens appreciates that his behaviour has not been appropriate, will rectify it, and tells the DSL that he also intends to apologise to the children “for his short-fuse.”

The DSL considers this to constitute a low-level concern and retains a copy of the relevant paperwork (including the DSL’s record of their conversations with the teacher, the LADO, and Mr. Stevens) in a central low-level concerns file. The DSL also refers the matter to the Head of HR who, considering Mr. Stevens’ response, notes the situation and does not consider any further action is required at this stage.

However, within a couple of weeks, the same teacher returns to share further concern with the DSL, having witnessed Mr. Stevens shouting at, and belittling, the young choristers again. The DSL makes a record of the conversation, and shares the concern immediately with the Head. The DSL contacts the LADO, who advises that whilst they agree that the behaviour is, again, concerning, it still does not meet the threshold of an allegation.

The DSL then asks to speak to Mr. Stevens and informs him about the further concern that has been shared about his behaviour. Mr. Stevens is less apologetic, claiming it’s not all his fault and expressing some frustration over the choristers’ capability. He recognises that his personal circumstances “have a part to play in this.”

The DSL considers this to constitute a further low-level concern, and retains a copy of the additional relevant paperwork (including the DSL’s record of their conversations with the teacher, the LADO, and Mr. Stevens) in a central low-level concerns file.

The DSL informs the Head of HR who decides to invoke the disciplinary procedure, which results in Mr. Stevens being issued with a warning which is placed on his file, and a management plan is put in place. At this point, the warning would need to be referred to in any reference should Mr. Stevens decide to leave the school before it expires.

Later that term, a parent contacts the DSL by email about Mr. Steven’s behaviour – once again relating to distress caused by him belittling the choristers, and telling them that they are not fit to be part of the next singing competition that they have been practising for.

The DSL shares the concern immediately with the Head. The DSL contacts the LADO again, who advises that the matter still does not meet the threshold of an allegation but that they are becoming increasingly concerned by Mr. Steven’s behaviour.

The DSL speaks again to Mr. Stevens, who states that the complaint is unfounded and has only been made because the parent’s child was not selected to be a soloist in the competition.

The DSL considers this to constitute a further low-level concern, and retains a copy of the additional relevant paperwork (including the email from the parent, and the DSL’s record of their conversation with the LADO, and Mr. Stevens) in a central low-level concerns file.

The DSL informs the Head of HR who, again, invokes a disciplinary investigation. As part of that investigation, Mr. Stevens is told that the school has consulted with the LADO and, while his behaviour does not meet the threshold of an allegation, the LADO has expressed increasing concern about his behaviour. Mr. Stevens is given a final written warning.

If Mr. Stevens were to leave the school prior to the expiry of the warning, this matter would be summarised in a reference making clear the nature of the concern and the action taken.

**A series of low-level concerns in a school context which cumulatively meet the threshold of an allegation, and result in referral to LADO**

Ms. Crompton is a Teaching Assistant (TA) who gives support to children with learning difficulties. Another TA verbally informs the DSL that Ms. Crompton seems to favour working with some children, and won’t always work with the others. The DSL shares the concern immediately with the Head.

The DSL speaks to Ms. Crompton who denies that she has done anything wrong. She says that she does exactly as she is directed by the teaching staff, and has no control over who she works with. The DSL considers that the information disclosed does not indicate any behaviour contrary to the school's Code of Conduct, and that no further action is required.

A few months later, a member of teaching staff verbally informs the DSL that Ms. Crompton sometimes makes excuses to take children out of his classroom to work quietly – and that he has already reminded her that this is against school policy.

The DSL shares the concern immediately with the Head. The DSL speaks to Ms. Crompton, who says that she didn't know it was contrary to the school policy and promises not to do it again. The DSL considers that the information shared is a low-level concern, and retains a record of their conversation with the member of teaching staff who shared the concern and Ms. Crompton, in a central low-level concerns file.

Two weeks later, a third member of staff submits a low-level concern form to the DSL stating that "they cannot be sure but think that Ms. Crompton applies make-up and perfume when she is working with teenage boys, and that her behaviour sometimes seems to cross the boundary."

The DSL shares the concern immediately with the Head. The DSL speaks to Ms. Crompton about this, who says she likes to look and smell nice, and "there shouldn't be a problem with that." She denies specifically applying make-up or perfume when working with teenage boys.

The DSL considers that the latest information shared is a low-level concern but is unsure whether, when combined with the previous low-level concern, the allegation threshold has been reached. The DSL contacts the LADO to discuss the two instances. The LADO advises that the threshold of an allegation is not met.

The DSL retains a record of their conversations with the member of staff that shared the concern, with Ms. Crompton and the LADO in a central low-level concerns file.

Six months later, a 17-year-old boy tells his Head of Year that Ms. Crompton always stands near the door of the changing room when they go swimming, and that she has her mobile phone with her. He thinks she may have taken some photos of them all, and of his friend Tom in particular. The Head of Year submits a low-level concern form to the DSL.

The DSL immediately informs the Head. The DSL recognises that the information shared by the Head of Year constitutes an allegation, and makes a referral to the LADO, referring to the allegation and the two previous low-level concerns.

The LADO decides that this pattern of behaviour meets the threshold for a strategy meeting and further investigation. Ms. Crompton is suspended pending an investigation but immediately resigns.

The investigation should continue notwithstanding the resignation, and a conclusion should be reached in the same way as if Ms. Crompton had continued in employment. If the allegation is substantiated it should be referred to in a reference, and consideration given to whether to refer to the Disclosure and Barring Service and Teaching Regulatory Agency.

If the investigation determines that the allegation is unsubstantiated, malicious or false, it should not be referred to in a reference.

### **An allegation in a school context with no history of low-level concerns, which leads to referral to LADO**

A male pupil aged 14 tells his form tutor that Mrs. Appleby, the chemistry teacher, has hurt him. He shows the tutor a red mark around his neck. When the tutor asks him what happened the pupil says that Mrs. Appleby had shouted at him, telling him that he should not be wearing a neck chain at school, Mrs. Appleby then approached the pupil telling him that he must take the neck chain off immediately – when he hesitated to do so Mrs. Appleby then grabbed the chain and pulled him to his feet. It is clear from the marks on his neck that force has been used and the boy is upset.



The form tutor records what the boy has said, and asks him to come with him to speak to the DSL. Mrs. Appleby has been at the school for five years and there have never been any previous concerns raised about her. The DSL immediately informs the Head, who decides that this is an allegation of physical assault which reaches the threshold, and the DSL contacts the LADO. The LADO advises that consideration is given to suspending Mrs. Appleby. The LADO also advises that they contact the police and that a strategy meeting will be held. The school is advised by police to ask pupils in the lesson that day to each write an account of what happened in that lesson. As a result, more witnesses come forward, and their accounts corroborate what the pupil said.

The DSL refers the allegation to the Head of HR who decides to suspend Mrs. Appleby (as a neutral act pending further investigation because, if true, the allegation amounts to gross misconduct). The Head of HR initiates an investigation. Mrs. Appleby denies using force, but a number of credible witnesses confirm the male pupil's account. Mrs. Appleby is found to have committed gross misconduct and is summarily dismissed. The school refers the case to the Teaching Regulatory Authority. The school subsequently receives a reference request for Mrs. Appleby to work as an assistant librarian.

The school refers to her dismissal for gross misconduct, and accurately reflects the circumstances surrounding it, in its reference.