

Child Protection (Safeguarding) Policy & Safeguarding Guidance
Including our Early Years Foundation Stage provision

KEY EXTERNAL CONTACT DETAILS

<p>Local Authority Designated Officer (West Berkshire)</p>	<p>Duty LADO (West Berkshire Council Contact Advice and Assessment Service (CAAS)) TEL: 01635 503090 EMAIL: LADO.LADO@westberks.gov.uk Out of Hours Emergency Duty Service (EDS)- 01344 351999</p>
<p>Local Authority Designated Officer (Hampshire)</p>	<p>Duty LADO available on 01962 876364 Hampshire Children's Services is 0300 555 1381 Childrens.services@hants.gov.uk The Emergency Duty Service (EDS) is available outside office hours on 0300 555 1373</p>
<p>Berkshire West Safeguarding Children Partnership – (West Berkshire Local Safeguarding Children Board)</p>	<p>West Berkshire Council, West Street House, Newbury, RG14 1BD BWSCP@brighterfuturesforchildren.org</p>
<p>Multi-Agency Safeguarding Hub</p> <p>Other useful contacts</p>	<p>Through West Berkshire Council Contact Advice and Assessment Service (CAAS) 01635 503090 (Parents) 01635 503190 (Professionals) Emergency Duty Team (outside of office hours) 01344 3519 EMAIL : child@westberks.gov.uk</p> <p>Service Manager for Early Years, Vulnerable Learners and Families Avril Allenby/ Melissa Perry 01635 519044 Avril.Allenby@westberks.gov.uk</p> <p>Principal Education Welfare and Safeguarding Officer, and PREVENT Link for Education Melissa Perry 01635 519788 EWSS@westberks.gov.uk</p> <p>Senior Education Welfare Officer Sally-Ann Looker 01635 519788 sal.looker@westberks.gov.uk</p> <p>Exclusions Officer Roslyn Arthur 01635 503409 Roslyn.Arthur@westberks.gov.uk</p>
<p>Support and Advice about Extremism</p>	<p>Police Prevent Officer, Thames Valley Police Preventreferrals@thamesvalley.pnn.police.uk</p>

	<p>ACT (Action Counters Terrorism) Early Support Line 0800 011 3764</p> <p>Department for Education NON EMERGENCY NUMBER: 020 7340 7264 EMAIL: counter.extremism@education.gsi.gov.uk</p>
<p>NSPCC Whistleblowing Advice Line</p> <p>NSPCC Report Abuse in Education Advice Line</p>	<p>ADDRESS: Weston House, 42 Curtain Road London EC2A 3NH TEL: 0800 028 0285 EMAIL: help@nspcc.org.uk</p> <p>TEL: 0800 136 663 EMAIL: help@nspcc.org.uk</p>
<p>Disclosure and Barring Service</p>	<p>ADDRESS: DBS customer services PO Box 3961, Royal Wootton Bassett SN4 4HF TEL: 03000 200 190 EMAIL: customerservices@dbb.gov.uk</p>
<p>Teaching Regulation Agency</p>	<p>ADDRESS: Teacher Misconduct Ground Floor South Cheylesmore House 5 Quinton Road Coventry CV1 2WT TEL: 0207 593 5393 https://www.gov.uk/report-teacher-misconduct EMAIL: misconduct.teacher@education.gov.uk</p>
<p>OFSTED Safeguarding Children</p>	<p>TEL: 0300 123 4666 (Monday to Friday from 8am to 5pm) EMAIL: CIE@ofsted.gov.uk</p>
<p>Independent Schools Inspectorate</p>	<p>TEL: 0207 6000100 EMAIL: concerns@isi.net</p>

KEY SCHOOL CONTACT DETAILS

<p>Governors</p>	<p>Chairman of Governors Nigel Garland, c/o St Gabriel's 01635 555680 EMAIL: Chairman@stgabriels.co.uk</p> <p>Nominated Safeguarding Governor Simon Barrett c/o St Gabriel's 01635 555680</p>
<p>Designated Safeguarding Lead (DSL) {and Deputy Designed Safeguarding Lead (DDSL)}</p>	<p>Main DSL for the School Emma Hammons 01635 555680 EMAIL: ehammons@stgabriels.co.uk</p> <p>Deputy DSLs (Senior School) Rebecca Wright, Hannah Trevis and Jennifer Shillaw 01635 555680 EMAIL: rwright@stgabriels.co.uk Htrevis@stgabriels.co.uk Jshilaw@stgabriels.co.uk</p> <p>Deputy DSLs (Junior School) Pete Dove & Clare Lawrence 01635 555680 Pdove@stgabriels.co.uk clawrence@stgabriels.co.uk</p> <p>EYFS DSL Katie Noonan 01635 555680 or 01635 555696 knoonan@stgabriels.co.uk</p> <p>Deputy EYFS DSLs Naomi Kelly, Lisa Barrett and Katherine Lee 01635 555680 or 01635 555696</p>
<p>Designated Teacher for Looked After Children</p>	<p>Emma Hammons 01635 555680 ehammons@stgabriels.co.uk</p>
<p>Principal</p>	<p>Ricki Smith 01635 555680 rsmith@stgabriels.co.uk</p>

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Authorised by

Resolution of the Board of Governors

Reviewed

Autumn 2011 to Autumn 2016 – previous versions

Spring 2017 (1-0-3)

Summer 2017 (1-0-4)

Autumn 2017 (1-1-0)

Autumn 2017 (1-1-1)

November 2017 (1-1-2)

January 2018 (1-1-3)

September 2018 (1-2-0)

September 2019 (1-2-1)

November 2019 (1-2-2)

March 2020 (1-2-3)

September 2020(1-3-0)

September 2021 (1-4-0)

Spring 2022 (1-4-1)

September 2022 (1-5-0)

September 2023 (1-6-0) and (1-6-1)

January and March 2024 (1-6-2) and (1-6-3)

September 2024 (1-7-0)

POLICY STATEMENT

This policy applies to St Gabriel's ("the School") and includes the EYFS setting in the nursery. This policy is reviewed and updated annually (as a minimum) and is available on the School website.

This policy has regard to the following guidance and advice.

- **Keeping Children Safe in Education (September 2024), incorporating Disqualification under the Childcare Act (August 2018) ('KCSIE')**
- **What to do if you're worried a child is being abused: advice for practitioners (March 2015) which also refers to Information Sharing (July 2018)**
- **Working Together to Safeguard Children (December 2023)**
- **Information sharing: advice for practitioners providing safeguarding services (July 2018)**
- **Prevent Duty Guidance for England and Wales (Updated December 2023)**
- **The use of social media for on-line radicalisation (July 2015)**
- **Early Year Foundation Stage (EYFS) Statutory Framework September 2023**
- **Children Missing Education (September 2016)**
- **Multi-Agency Guidance on FGM (July 2020)**
- **Behaviour in Schools (September 2022)**
- **Working together to improve school attendance : statutory guidance for maintained schools, academies, independent schools and local authorities (February 2024)**
- **Keeping children safe in out-of-school settings (September 2023)**
- **Children's Social Care National Framework (December 2023)**
- **Digital and technology standards in schools and colleges (March 2023)**
- **After School clubs, community activities and tuition (March 2023)**
- **Relationships education, relationships and sex education (RSE) and Health Education (updated September 2021)**
- **The Charity Commission Guidance: Safeguarding and protecting people for charities and trustees (June 2022)**
- **Sharing nudes and semi-nudes: advice for education settings working with children and young people" guidance produced in December 2020 by the Department for Digital Culture, Media & Sport ("DDCMS") in conjunction with the UK Council for Internet Safety ("UKIS").**

This Child Protection (Safeguarding) Policy & Safeguarding Guidance should be read alongside the

- Staff Code of Conduct - Guidance on Interaction with Pupils
- Behaviour Policy
- Anti-Bullying Policy
- E-Safety and ICT Acceptable Use Policies for pupils and workers
- First Aid Policy
- Recruitment Selection & Disclosures Policy & Procedure
- Taking, Using and Storing Images of Pupils policy.
- Relationships and Sex Education Policy

The staff members referred to in this policy include paid employees and contractors of the school, governors and volunteers.

This policy also takes into account the procedures and practice of West Berkshire as part of the inter-agency safeguarding procedures set up by the Berkshire West Safeguarding Children Partnership.

EQUALITY ACT 2010

The School understands and recognises their obligations under the Equality Act and that the school must not discriminate against pupils because of a protected characteristic including sex, race, disability, religion or belief, gender reassignment, pregnancy, maternity, or sexual orientation. In the context of safeguarding, the School will consider how to support pupils with regard to particular protected characteristics in order to meet their specific needs. The School will also consider their duty to make reasonable adjustments for disabled pupils.

The School also complies with its legal duties under the Equality Act 2010, including putting special provision in place to support dialogue with children who may not be able to convey their wishes and feelings as they may want to. This might include, for example, those who have communication difficulties and those who do not speak English or for whom English is not their first language.

CONCERNS ABOUT A CHILD

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

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

The School has arrangements for listening to children and providing early help. Details of these arrangements can be found in detail in a separate section of this policy.

In summary, early help means providing support as soon as a problem emerges at any point in a child's life, from the Foundation Years through to the teenage years.

In the first instance, staff who consider that a pupil may benefit from early help should discuss this with the School's DSL. The DSL will consider the appropriate action to take in accordance with the Berkshire West Safeguarding Children Partnership referral threshold document ("Threshold Guidance"). 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.

Definitions of safeguarding and types and signs of abuse

Safeguarding and promoting the welfare of children is defined as providing help and support to meet the needs of children as soon as problems emerge; protecting children from maltreatment, whether that is within or outside the home, including online; preventing impairment of children's mental or physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes. Child protection is part of safeguarding and promoting the welfare of children and is defined as activity that is undertaken to protect children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may

be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (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.

Staff are referred to Appendix 1 of this policy for further detail of the types of abuse and possible signs of abuse, as well as further information regarding specific safeguarding issues such as child criminal and/or sexual exploitation.

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. Staff are reminded 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.

The guidance, Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers supports staff who have to make decisions about sharing information. The School recognises the importance of information sharing between practitioners and local agencies, including ensuring arrangements for sharing information within the School and with local authority children's social care, the safeguarding partners and other organisations, agencies, and practitioners as required. Fears regarding sharing information under the Data Protection Act 2018 and the UK General Data Protection Regulation ("UK GDPR") must not be allowed to stand in the way of safeguarding and promoting the welfare of children, and neither the DPA 2018 or the UK GDPR prevent the sharing of information for the purposes of keeping children safe. If in doubt about what information can and should be shared, staff should speak to the Designated Safeguarding Lead ("DSL").

The school will ensure that staff understand the relevant data protection principles which allow them to share (and withhold) personal information, including

- being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information, which is sensitive and personal and should be treated as 'special category personal data'
- understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows the sharing of special category personal data, including without consent where there is good reason to do so. For example, information may be shared without consent where: it is not possible to gain consent; it cannot be reasonably expected to gain consent; and, gaining consent would place a child at risk
- not providing pupils' personal data where the serious harm test is met.

All staff should

- listen carefully
- avoid asking leading questions

- observe their behaviour
- reassure the individual that the allegation/complaint will be taken seriously and that they will be supported and kept safe
- ensure that the individual is not made to feel ashamed for making the report or given the impression that they are creating a problem by making the report
- 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.
- be aware that the individual may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or may not recognise their experiences as harmful. Staff should exercise professional curiosity and speak to the DSL if they have concerns
- determine how best to build trusted relationships with children and young people which facilitate communication

All concerns, discussions, and decisions (including the rationale for those decisions) made under these procedures should be recorded in writing. This includes instances where referrals were or were not made to another agency, such as children's social care or the Prevent programme. This will help if or when responding to any complaint about the way a case has been handled. The record should include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved and a note of any action taken, the decision reached and the outcome. 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. The information should be kept confidential and stored securely, ensuring that the file is only accessible to those who need to see it, and is shared in accordance with the guidance set out in Parts one and two of *KCSIE*.

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 their deputy).

Where there is a safeguarding concern, the School will ensure the pupil's wishes and feelings are taken into account 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 manages this by ensuring that there are systems in place, that are well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback. The School manages this by discussion between the DSL and the pupil where appropriate.

The School implements a child-centred approach to safeguarding. Whilst the School are committed to working collaboratively, and in partnership, with parents and carers as far as possible the wishes and feelings of the child and what is in their best interest is always central to the School's decision-making process.

Contextual Safeguarding

Safeguarding incidents and or behaviours can be associated with factors outside the school and or can occur between children outside the school. All staff, but especially the DSL and DDSLs should be considering the context within which such incidents and or behaviours occur.

The School will as part of the wider assessment of children, consider whether environmental factors are present in a child's life that are a threat to their safety and/or welfare. The School will share as much information with Children's Social Care as possible as part of the referral process to enable consideration of all the available evidence and the full context of any abuse.

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

Early help is support for children of all ages that improves resilience and outcomes or reduces the chance of a problem getting worse. Early help may be appropriate for children who have several needs, or whose circumstances might make them more vulnerable.

The School has effective measures in place to identify emerging problems and potential unmet needs of individual pupils. All staff undertake appropriate training to ensure that they know when to share information with other agencies and what action to take to support early identification and assessments.

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 work with the Berkshire West Safeguarding Partnership to undertake an assessment of the need for early help. The DSL will support staff in liaising with external agencies and professionals in an inter-agency assessment, as appropriate. Further guidance on effective assessment of the need for early help can be found in Working Together to Safeguard Children (December 2023) ("WT").

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, supply staff, 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**. Parental consent is not needed to make a referral.

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; they should maintain an attitude of "it could happen here". 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**. Any such referral must be made immediately and in any event within 24 hours (one working day) of staff being aware of the risk. Parental consent is not needed for referrals to statutory agencies such as the police and children's social care. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. The local authority social worker should acknowledge receipt to the referrer within 24 hours and make a decision about the next steps and type of response required. Staff should challenge any inaction and follow this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

The School's Local Safeguarding Children Executive is Berkshire West Safeguarding Children Partnership. A full copy of their local procedures can be found on https://www.proceduresonline.com/berks/west_berk/contents.html

The Staff Code of Conduct gives guidelines that all staff should follow when in contact with a pupil in a one-on-one situation, and these are reproduced below.

One-to-one meetings

For their own safety and protection, staff should exercise caution in situations where they are alone with pupils, ensuring, wherever practicable, that another member of staff is within earshot. If such a meeting or teaching session has been planned, staff should take particular care in the following ways:

- * when working alone with a pupil is an integral part of your role for example in specialist settings such as peripatetic music lessons, sport, creative or performing arts, be aware of the contents of the School's risk assessment for one-to-one teaching.
- * use a room that has sufficient windows onto a corridor so the occupants can be seen, or keep the door open, or inform a colleague that the lesson/meeting is taking place
- * arrange the meeting during normal school hours when there are plenty of other people about. If a meeting out of school hours is required, a member of the Senior or Junior School Leadership Team should be informed
- * do not continue the meeting for any longer than is necessary to achieve its purposes
- * avoid sitting or standing in close proximity to the pupil, except as necessary to check work
- * avoid using "engaged" or equivalent signs on doors or windows
- * avoid idle discussion
- * avoid all unnecessary physical contact and apologise straight away if there is accidental physical contact
- * avoid any conduct that could be taken as a sexual advance

- * report any incident that causes you concern to the Designated Person under the School's child protection procedures, and make a written record (signed and dated)
- * report any situation where a pupil becomes distressed or angry to a senior colleague.

Staff should also ensure that they are aware of the contents of the school's ICT Acceptable Use Policy for Workers, the E-Safety policy and the Remote Learning Agreements for parents and pupils, which give details of the safeguards that should be put in place if a member of staff has a one to one meeting or lesson using online technology, as part of necessary remote teaching.

Use of Reasonable Force

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

Staff should report any use of reasonable force to the DSL as soon as possible.

What staff should do if they have safeguarding concerns about another staff member

If staff have safeguarding concerns about another staff member (including volunteer or other temporary staff), then this should be referred to the Principal. Where there are concerns about the Principal, this should be referred to the Chairman of Governors. In the event of allegations of abuse being made against the Principal, staff are referred to the procedures below regarding managing allegations of abuse against staff (including supply staff, contractors and volunteers) and refer the matter directly to the designated officer(s) at the West Berkshire local authority.

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 Prevent 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 or contact West Berkshire Council Contact Advice and Assessment Service (CAAS) 01635 503090. Advice and support can also be sought from children's social care.

The School, in recognition that pupils may be at risk of being drawn into terrorism or other forms of extremism, carries out an appropriate risk assessment of the potential risk in the local area (attached as Appendix 2). Such risk assessments are discussed with the Principal, DSL and DDSLs 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. Unless the member of staff has a good reason not to, they should still consider and discuss any such case with 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 they have concerns that children are at risk from or involved with serious violent crime

All staff should be aware of indicators which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence 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, signs of assault or unexplained injuries.

If staff 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.

How should staff respond to an incident of nudes and semi-nudes being shared by pupils

All members of staff in an education setting have a duty to recognise and refer any incidents involving nudes and semi-nudes and will be equipped with the necessary safeguarding training and support to enable them to recognise concerns.

For this purpose, 'sharing nudes/semi-nudes' means the sending or posting of nude or semi-nude images, videos, or live streams by children under the age of 18 online. This could be via social media (including Snapchat), gaming platforms, chat apps (including WhatsApp and iMessage) or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. The sharing of nudes and semi-nudes may happen publicly online, in 1:1 messaging or via group chats and/or via closed social media accounts. The images, videos or live streams may include more than one child. The term 'nudes' is used as it is most commonly recognised by young people and more appropriately covers all types of image sharing incidents. Alternative terms used by children and young people may include 'dick pics' or 'pics'.

Many professionals may refer to 'nudes and semi-nudes' as:

- youth produced sexual imagery or 'youth involved' sexual imagery
- indecent imagery. This is the legal term used to define nude or semi-nude images and videos of children and young people under the age of 18.
- 'sexting'. Many adults may use this term, however some young people interpret sexting as 'writing and sharing explicit messages with people they know' rather than sharing images
- image-based sexual abuse. This term may be used when referring to the nonconsensual sharing of nudes and semi-nudes

Terms such as 'revenge porn' and 'upskirting' are also used to refer to specific incidents of nudes and semi-nudes being shared. However, these terms are more often used in the context of adult-to-adult non-consensual image sharing offences outlined in s.33-35 of the Criminal Justice and Courts Act 2015, Voyeurism (Offences) Act 2019 and s.67A of the Sexual Offences Act 2003.

Terms such as 'deep fakes' and 'deep nudes' may also be used by adults and young people to refer to digitally manipulated and AI-generated nudes and semi-nudes.

Any direct disclosure by a child will be taken seriously and staff will ensure the child is feeling comfortable and will only ask appropriate and sensitive questions, in order to minimise further distress or trauma to them.

If staff are notified or become aware of an incident of nudes or semi-nudes being shared by a pupil or of a pupil, they should refer the incident to the DSL as soon as possible.

The DSL will follow the DDMSC / UKIS guidance "*Sharing nudes and semi-nudes: advice for education settings working with children and young people*" (February 2024) when responding to a report of sharing nudes and/or semi-nudes. This will include:

- Holding an initial review meeting with appropriate staff. This may include the staff member(s) who heard the disclosure and the safeguarding team who deal with safeguarding concerns.
- Carrying out interviews with the children involved (if appropriate).
- Informing parents and carers at an early stage and keep them involved in the process in order to best support the pupil unless there is good reason to believe that involving them would put the child at risk of harm. Any decision not to inform them should be made in conjunction with other services such as children's social care and/or the police, who would take the lead in deciding when they should be informed.
- Carrying out a risk assessment to determine whether there is a concern that a child has been harmed or is at risk of immediate harm at any point in the process
- If not, the incident can be handled in school in accordance with the "sharing nudes" guidance and the School's Child Protection, Behaviour and ICT Acceptable Use policies.
- If it is determined that there is a risk of harm, the DSL must make a referral to children's social care and/or the police immediately.

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

This guidance does not apply to the sharing of images of children under 18 by an adult over 18 as this constitutes child sexual abuse. In the event that staff become aware of such an incident, they should notify the DSL immediately, who should always inform the Police as a matter of urgency.

What staff should do if a child is absent from education

Children who are absent from education particularly on repeat occasions and/or for prolonged periods, and children missing education can act as a vital warning sign to a range of safeguarding issues, including neglect and child sexual and/or criminal exploitation, particularly county lines. It is important that the School's response to persistently absent pupils and children missing education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future.

The School's procedures for unauthorised absence and for dealing with children who are absent, repeatedly and/or for prolonged periods, and children missing from education are below. Further detail can also be found at Appendix 1 of this policy.

- The form tutor or class teacher will mark the pupil as absent (unauthorised) if that pupil is not present during a registration period or lesson.
- The school office will check to see if a parent or guardian has provided a suitable reason (for example illness or medical appointment) that enables them to amend this mark to authorised absence, or if the pupil was registered at an activity, such as a sporting practice or music lesson.
- If no information has been provided, the school office will attempt to contact the parent or guardian of the pupil to ascertain a reason for this absence. If this is successful, a note will be added to the register to indicate this reason and the absence can be marked as authorised.
- The Vice Principal (together with the DSL) formally reviews and signs off the attendance register for the school once a week, and they are responsible for reporting absence, when required to West Berkshire.

- A confidential note will be added to the MIS should absence be reported to West Berkshire.
- See also the school's Missing Child Policy which details the procedures for searching for a pupil who has been registered as present at school but cannot subsequently be located.

Where reasonably possible, the School will hold more than one emergency contact number for each pupil to provide the School with additional options to make contact with a responsible adult particularly when a child who is repeatedly absent and/or absent for prolonged periods is also identified as a welfare and/or safeguarding concern.

The School will report to West Berkshire 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.

When working with local authority children's services where school absence indicates safeguarding concerns the School will have regard to the DfE guidance 'Working together to improve school attendance: statutory guidance for maintained schools, academies, independent schools and local authorities.' (February 2024)

What staff should do if a child needs a social worker (Children in Need and Child Protection Plans)

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect, exploitation and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.

Local authorities should share the fact a child has a social worker, and the DSL should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This should be considered as a matter of routine.

Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

What staff should do if a child requires mental health support

The School has an important role to play in supporting the mental health and wellbeing of its pupils. 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. The school will use its own internal and other external resources to support children.

Staff can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies. More information can be found in the DfE Mental Health and Behaviour in Schools guidance. Public Health England has produced a range of resources to support school teachers to promote positive health, wellbeing and resilience among young people.

Staff should speak to the Heads of School and DSL if they have concerns about a pupil.

What staff should do if they have concerns about safeguarding practices in the school

The School aims to ensure there is a culture of safety and raising concerns and an attitude of 'it could happen here'. Where staff have concerns about poor or unsafe practices and potential failures in the School's safeguarding systems, these should be raised in accordance with the School's whistleblowing procedures which

can be found in the Whistleblowing Policy on the school website. 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 (INCLUDING CHILD ON CHILD SEXUAL VIOLENCE AND HARASSMENT)

Child on child abuse is abuse by one or more children against another child. It can be standalone or as part of wider abuse and can happen both inside and outside of school, and online. It can manifest itself in many ways and can include abuse within intimate partner relationships, bullying (including cyber bullying, prejudice-based and discriminatory bullying), abuse within intimate partner relationships between children (sometimes known as "teenage relationship abuse"), physical abuse (such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm. This may include an online element which facilitates, threatens and/or encourages physical abuse), initiation/hazing type violence and rituals, upskirting, sexting, consensual and non-consensual sharing of nudes and/or semi-nudes, sexual assault, gender-based issues, sexual behaviours including child on child sexual violence and sexual harassment, 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.

These arrangements apply to all reports and concerns of child on child abuse, whether they have happened in school or outside of it, and/or online. Abuse that occurs online or outside of school should not be downplayed and should be treated equally seriously.

The school has a zero-tolerance approach to child on child abuse. Staff will address inappropriate behaviour (even if it appears to be relatively innocuous) to help prevent problematic, abusive and/or violent behaviour in the future. Abusive comments and interactions should never be passed off or dismissed as "banter" or "part of growing up". Nor will harmful sexual behaviours, including sexual comments, remarks or jokes and online sexual harassment, be dismissed as the same or "just having a laugh" or "boys being boys". Staff will also challenge physical behaviours (that are potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

The School acknowledges that even if there have been no reported cases of child on child abuse in relation to pupils within the School, such abuse may still be taking place and is simply not being reported. The School will ensure that children are aware of how they can report abuse, and that they are aware of the procedures that the School will follow once a report has been made. These procedures will be well promoted and in a format that is easily accessible and easily understood by 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. The School also recognises that children may not find it easy to tell staff about their abuse verbally and that instead they may show signs or act in ways they hope adults will notice and react to. It is also recognised that an incident may come to a member of staff's attention through a report of a friend, or by overhearing conversations. It is therefore important that all staff are clear on the School's policy and procedures with regards to child on child abuse and can recognise the indicators and signs of child on child abuse and know how to identify it and how to respond to reports.

The School recognises that a first disclosure to a trusted adult may only be the first incident reported. It is not necessarily representative of a singular incident. Staff will take all reports of abuse seriously regardless of how long it has taken for the child to come forward. Staff will act immediately and will support the victim when they raise a concern. Details of a disclosure will be recorded and reported to the DSL.

The School recognises that children with special educational needs and disabilities (SEND) or certain health conditions can face additional safeguarding challenges and may be more prone to child-on-child group isolation or bullying (including prejudice-based bullying) than other children. The School will consider extra pastoral support for those children. The Individual Needs Coordinator and the Heads of School will ensure that staff are aware of the needs of these children and will be instrumental in providing support, in addition to the support

offered by the child's form tutor. The School also recognises that certain children may face additional barriers to reporting an incident of abuse because of their vulnerability, disability, sex, ethnicity and/or sexual orientation.

The School takes the following steps to minimise the risk of child on child abuse:

- The school encourages an open and tolerant environment, where pupils or teachers can report their concerns. The form tutors and Heads of School respond promptly to any such reports offering support to all concerned.
- The PSHE programme contains material aimed at promoting tolerance and kindness, and informing pupils how to respond to any unkind incidents. Sessions are delivered around cyberbullying and appropriate use of ICT and social media.
- There are separate anti-bullying and ICT acceptable use policies available on the school website and the school will take all bullying seriously, especially where it appears to be based on an individual who has protected characteristics under the Equality Act 2010.
- The school planner details the definitions and consequences of bullying and summarises the school rules on behaviour and use of ICT. There is information on support available inside and outside school.

Where an issue of pupil behaviour or bullying gives 'reasonable cause to suspect that a child is suffering, or is likely to suffer, 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 the Berkshire West Safeguarding Children Partnership 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(s). 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 the Berkshire West Safeguarding Children Partnership, 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 the Berkshire West Safeguarding Children Partnership and/ or the Police as appropriate. The School will have regard to the procedures set out in *KCSIE*, including Part 5, which details how to respond to reports of child on child sexual violence and sexual harassment, and the *SVSH* at all times.

The victim may ask the School not to tell anyone about the sexual violence or sexual harassment. Advice should be sought from the DSL who should consider that

- parents or carers should normally be informed unless doing so would put the victim at greater risk
- the basic safeguarding principle that if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care;
- and whether a crime has been committed.

Ultimately, the DSL {or DDSL} will balance the victim's wishes against their duty to protect the victim and other children.

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. Where a report has been made to the police, the School will consult the police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator(s) and their parents or carers. 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 DSL may also decide that the children involved may benefit from early help, and may make the necessary referral in accordance with the Berkshire West Safeguarding Children Partnership referral process.

The School's approach to sexting is as follows;

Sexting is defined as the production and or sharing of sexual photos and videos of and by young people under the age of 18. It is also referred to as "youth produced sexual imagery". Sexting does not include the sharing of sexual photos and videos of under 18 year olds with or by adults. This is a form of child sexual abuse and must be referred to the police. If an incident involving "sexting" comes to the attention of a member of staff they must

- Report it to the Designated Safeguarding Lead immediately
- Never view, download or share the imagery themselves, or ask the child to share and download the imagery as this is illegal.
- If the member of staff has viewed the imagery by accident (for example, if the young person has showed the imagery to the member of staff before they could ask them not to), this should also be reported to the DSL
- The member of staff should not delete the imagery and should not ask the young person to delete it
- The member of staff should not ask the young person(s) involved in the incident to disclose information regarding the imagery, this is the responsibility of the DSL
- Information about the incident should not be shared with other members of staff, the young people involved, or their, or others', parents and carers.
- It is important that the member of staff involved does nothing that would blame or shame the young people involved
- The member of staff must explain to the young person involved that they need to report it and reassure them that they will receive support and help from the DSL

In addition, the School's PSHE programme seeks to educate young people about the risks and dangers of sexting.

The School will follow the DDMSC / UKIS guidance "Sharing nudes and semi-nudes: advice for education settings working with children and young people" (December 2020) when responding to an allegation that nudes and/or semi-nudes have been shared.

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 Heads of School and support from external agencies will be sought, as 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;
- whether there may have been other victims;
- the alleged perpetrator(s); and
- all the other children (and, if appropriate, staff) at the School especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms.

Risk assessments will be recorded (written or electronic) and kept under review. In relation to a report of sexual violence or sexual harassment, the DSL (and indeed all staff) will reassure any victim that they are being taken seriously and that they will be supported and kept safe. The victim will never be made to feel ashamed for making a report nor will they 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 or have

their experience minimised. The DSL will consider the risks posed to pupils and put adequate measures in place to protect them and keep them safe and to ensure their educational attainment is not adversely affected as far as is possible. This may include careful consideration of the proximity of the victim and alleged perpetrator and considerations regarding shared classes, sharing School premises (including during any before or after school-based activities), and School transport. The School will also consider the risks posed to the victim from other health needs, including physical, mental and sexual health problems, as well as unwanted pregnancy which may arise as a result of the incident, and will consider recommending additional support.

The School will keep a written record of all concerns, discussions and decisions made.

The School will consider intra familial harms and whether any support for siblings is necessary following an incident.

The School will reflect on reported concerns, including the decisions made and actions taken, in order to identify any patterns of concerning, problematic or inappropriate behaviour which may indicate an unacceptable culture, or any weaknesses in the School's safeguarding system which may require additional training or amendments to relevant policies. Where a pattern is identified the School will decide on an appropriate course of action.

In the event that a report is proven to be false, unsubstantiated, unfounded or malicious, the DSL will consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the Principal will consider whether any disciplinary action is appropriate against the individual who made it in accordance with the School's behaviour policy.

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

The School's procedures for managing allegations against staff (including the Principal, the DSL, teaching and support staff, volunteers and contractors) who are currently working in the School follows Department for Education statutory guidance and Berkshire West Safeguarding Children Partnership arrangements and applies when staff (including volunteers) have (or are alleged to have):

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

Allegations that do not meet the above harms test should be dealt with using the School's procedure for handling low level concerns set out below.

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. Non-recent allegations made by a child will be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations. The LADO will coordinate with children social care and the Police.

If an allegation is made against anyone working with children in the School, before contacting the LADO, the School will conduct a basic enquiry in line with local procedures to establish the facts in order to determine whether there appears to be any foundation to the allegation. The School should not undertake their own investigation of the allegation/s without prior consultation with the Local Authority 'designated officer' or, in the most serious cases, the Police, so as not to jeopardise statutory investigations.

When dealing with allegations about a staff member the School will apply common sense and judgment, deal with allegations quickly, fairly, and consistently and will support the person subject to the allegation.

1. Concerns including allegations which appear to meet the above reporting criteria are to be reported straight away to the 'case manager' who is the DSL. If an allegation is reported to the DSL, the DSL will keep the Principal informed. Where the DSL is absent or a report cannot be made to the Principal or they are the subject of the allegation or concern, reports should be made to the Chair of Governors. Where the Principal is the subject of the allegation or concern, they must not be informed of the allegation prior to contact with the Chair of Governors and LA designated officer. Any allegation that cannot be reported to the Principal because of a conflict of interest should be reported to the Local Authority Designated Officer direct. 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, or it is an emergency situation, the case manager should contact children's social care and as appropriate 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 children's social care. The DSL is responsible for ensuring the child is not at risk.
3. Where the case manager is concerned about the welfare of other children in the community, or the member of staff's family, they will discuss these concerns with the designated officer and make a risk assessment of the situation. It may be necessary for the designated officer to make a referral to children's social care.
4. When to inform the individual, who is the subject of the allegation will be considered on a case by case basis and with guidance from the designated officer, and if appropriate, the police and/or children's social care. Subject to any objection, the case manager will ensure that the individual who is subject of the allegation is informed as soon as possible and given an explanation of the likely course or action. 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.
5. The case manager should give careful consideration as to whether the circumstances of the case warrant suspension from contact with children at the School or whether alternative arrangements should be put in place until the allegation is resolved. The following alternative arrangements should be considered by the case manager before suspending a member of staff:
 - redeployment within the School so that the individual does not have direct contact with the child or children concerned;
 - providing an assistant to be present when the individual has contact with children;
 - redeploying to alternative work in the School so the individual does not have unsupervised access to children;
 - moving the child or children to classes where they will not come into contact with the member of staff, but this decision should only be made if it is in the best interest of the child or children concerned and

takes account of their views. It should be made making it clear that this is not a punishment and parents have been consulted; or,

- temporarily redeploying the member of staff to another role in a different location, for example to an alternative school where available.

These alternatives allow time for an informed decision regarding the suspension, this will, however, depend upon the nature of the allegation.

Suspension should not be an automatic response when an allegation is reported. It should be considered only in cases where there is cause to suspect a child or other children at the School is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. The case manager will give due weight to the views of the designated officer, *WT* and *KCSIE* when making a decision about suspension. Where the individual is suspended, the case manager will confirm the decision within one working day, and will ensure they know who their point of contact is in the School and shall provide them with their contact details. The case manager will also record the rationale and justification for the suspension, including what alternatives were considered and why they were rejected.

6. Where further enquiries are required to enable a decision about how to proceed, the designated officer and case manager should discuss how and by whom the investigation will be undertaken. In straightforward cases, the investigation should usually be undertaken by a senior member of staff at the School. Where there is lack of resource, or the nature or complexity of the allegation requires it, an independent investigator may be appointed to undertake the investigation.
7. 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 children's social care or the Police. Parents and others will be made aware that there are restrictions on publishing information which may lead to the identification of the teacher subject to the allegation.
8. The case manager will monitor the progress of cases to ensure they are dealt with as quickly as possible in a thorough and fair process. The outcome of the investigation of an allegation will record whether it is substantiated (sufficient evidence to prove it), unsubstantiated (insufficient evidence either to prove or disprove it), false (sufficient evidence to disprove it), malicious (sufficient evidence to disprove it and that there has been a deliberate act to deceive or cause harm to the person subject of the allegation) or unfounded (to reflect cases where there is no evidence or proper basis which supports the allegation being made).
9. Reviews are conducted at fortnightly or monthly intervals, depending on the complexity of the case. The first review will take place no later than four weeks after the initial assessment and subsequent review dates will be set at the review meeting.
10. The case manager will discuss with the designated officer (LADO) 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).

11. On conclusion of the case, in which an allegation is substantiated, the LADO should review the circumstances of the case with the case manager 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. This should include issues arising from any decision to suspend the member of staff, the duration of the suspension and whether or not suspension was justified. Lessons should also be learnt from the use of suspension when the individual is subsequently reinstated. The LADO and case manager should consider how future investigations of a similar nature could be carried out without suspending the individual. For all other cases, where the allegation concluded to be either, unfounded, false, malicious or unsubstantiated the case manager (and if they have been involved the LADO) should consider the facts and determine whether any lessons can be learned and if improvements can be made.

Where an individual is removed from regulated activity, or would have been removed had the individual not left, including when they are suspended, redeployed to work that is not regulated activity, are dismissed, or have resigned, and the individual has engaged in relevant conduct in relation to children and/or adults, and/or satisfied the harm test in relation to children and/or vulnerable adults, and/or been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence, the School will make a referral to the DBS.

The School has a duty of care to its staff, and whilst the welfare of a child is paramount, the School must offer appropriate welfare support to the adult subject to the investigation and potentially their family. The School will also make every reasonable effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered. Information will also not ordinarily be shared with other staff or with children or parents who are not directly involved in the investigation.

Where initial discussions lead to no further action, the case manager and the designated officer should record the decision and justification for it and agree on what information should be put in writing to the individual concerned, and by whom.

Allegations found to be malicious or false will be removed from the individual's personnel records unless the individual gives consent for retention of the information. 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. Schools have an obligation to preserve records which contain information about allegations of sexual abuse for the duration of the inquiry in accordance with the guidelines of the Independent Inquiry into Child Sexual Abuse ("IICSA"). All other records should be retained until the accused has reached pension age, or for a period of 10 years from the date of the allegation, whichever is longer.

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 DSL should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the Head will consider whether any disciplinary action is appropriate against a pupil who made it in accordance with the School's behaviour policy; 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 deem it appropriate to do so.

ARRANGEMENTS FOR DEALING WITH SAFEGUARDING CONCERNS OR ALLEGATIONS OF ABUSE ABOUT SUPPLY TEACHERS AND CONTRACTED STAFF

The School's procedures for managing allegations against staff above also apply to staff not directly employed by the School, for example, supply teachers provided by an employment agency or business ('the agency'). The School will usually take the lead, but agencies should be fully involved (because they have their own policies and procedures) and co-operate with any enquiries from the LADO, police and/or children's social care.

In no circumstances will the School decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. The School will discuss with the agency (or agencies where the supply teacher is working across a number of schools) whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation.

The School will advise supply teachers being investigated to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting which is often arranged by the LADO should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the School during the investigation.

When using an agency, the School should inform the agency of its process for managing allegations but also take account of the agency's policies and their duty to refer to the DBS as personnel suppliers. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

Where the agency dismisses or ceases to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left first, the School must consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency).

DEALING WITH SAFEGUARDING CONCERNS AND ALLEGATIONS ABOUT ORGANISATIONS OR INDIVIDUALS USING SCHOOL PREMISES

The School may receive an allegation or concern relating to an incident that happened when an individual or organisation was using the school premises for the purposes of running activities for children and/or vulnerable adults (for example community groups, sports associations, or service providers that run extra-curricular activities). As with any safeguarding allegation, the School will follow their safeguarding policy and procedures, including informing the LADO.

When services or activities at the School are provided under the direct supervision or management of school staff, this Policy will apply in relation to any safeguarding concerns or allegations. Where services or activities are not under the direct supervision or management of the School, the School will seek assurance that any individual or organisation has appropriate safeguarding and child protection policies and procedures in place (and the School will inspect these as needed); and ensure that there are arrangements in place for the provider to liaise with the School on these matters where appropriate. The School will expect, where appropriate, providers to fully comply with the DfE guidance After school clubs, community activities, and tuition (safeguarding guidance for providers) (September 2023) and will seek assurance in this regard.

The School has arrangements in place for the use of school premises for non-school activities including the availability of the DSL or DDSL and how they can be contacted.

LOW LEVEL CONCERNS SUB POLICY -

ARRANGEMENTS FOR DEALING WITH LOW LEVEL CONCERNS OR ALLEGATIONS (I.E. THAT DO NOT MEET THE HARMS TEST) ABOUT TEACHERS AND OTHER STAFF (INCLUDING THE HEAD, GOVERNORS, SUPPLY STAFF, VOLUNTEERS AND CONTRACTORS)

St Gabriel's understands the importance of a positive culture where concerns can be identified and spoken about openly and acknowledges that this is a key element of a strong safeguarding system. This Low-Level Concerns Policy seeks to ensure that all staff who work with children behave appropriately and to enable the early identification and prompt and appropriate management of concerns.

A low-level concern is any concern that an adult working in or on behalf of the School may have acted in a way that:

1. is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
2. does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

As part of its whole school approach to safeguarding, the School will ensure that it promotes an open and transparent culture in which all concerns about all adults working in or on behalf of the School (including supply teachers, volunteers, governors and contractors) are dealt with promptly and appropriately. Creating a culture in which **all** concerns about adults (including allegations that do not meet the harm threshold) are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. If implemented correctly, this should encourage an open and transparent culture; enable the School to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the School are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the School.

This Low-Level Concerns Policy operates in conjunction (as appropriate) with the following (which can be found on the school website or staff intranet)

1. The School's Staff Code of Conduct
2. The Acceptable Use of ICT for Workers
3. The School's Disciplinary Procedure
4. Whistleblowing Policy
5. Data Protection Policy and Privacy Notice for Workers

Behaviour which is not consistent with the standards and values of the school, and which does not meet the organisational expectations encapsulated in the School's Staff Code of Conduct, needs to be addressed. Such behaviour can exist on a wide spectrum – from the inadvertent or thoughtless, through to that which is ultimately intended to enable abuse.

All staff need to be informed about and be able to identify concerning, problematic or inappropriate behaviour and understand the importance of sharing concerns when they observe behaviour which violates the School's Staff Code of Conduct.

The Low-Level Concerns Policy enables all staff to share any concerns – no matter how small – about their own or another member of staff's behaviour with the DSL and/or Principal. Safeguarding and promoting the welfare of children is everyone's responsibility.

The aims of the Low-Level Concerns Policy are to:

- ensure that staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour – in themselves and others, and the delineation of professional boundaries and reporting lines;
- empower staff to share any low-level concerns with the DSL and Principal, and to help all staff to interpret the sharing of such concerns as a neutral act;
- address unprofessional behaviour and support the individual to correct it at an early stage;
- identify concerning, problematic or inappropriate behaviour – including any patterns – that may need to be consulted upon with or referred to, the Local Authority Designated Officer (“LADO”);
- provide for responsive, sensitive and proportionate handling of such concerns when they are raised; and
- help identify any weaknesses in the School's safeguarding system.

A 'low-level' concern does not mean that it is insignificant. A concern may be a low-level concern, no matter how small, even if it does no more than give a sense of unease or a 'nagging doubt'. Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse (for example, grooming-type behaviours). Examples could include being overfriendly with children or having favourites, taking photographs of children on a personal mobile phone, engaging with a child in a secluded area, or using sexualised, intimidating or offensive language. (See Appendix 3 for Spectrum of Behaviour documentation)

The School's Staff Code of Conduct policy can be found on the school website. The aim of this policy is to provide clear guidance about the standards of appropriate behaviour and actions of its staff so as to not place pupils or staff at risk of harm or of allegation of harm to a pupil. All staff are expected to comply with the standards contained within this code of conduct at all times.

Staff must share all concerns with the DSL (or a deputy) without delay so that it can be recorded and dealt with appropriately, sensitively, and proportionately and in a timely manner. A copy of the form that can be used to report concerns is attached in Annex 4 of this policy. Where a low-level concern is raised about the DSL, it should be shared with the Principal. If the low-level concern relates to the Principal, it should be shared with the Chair of Governors. The DSL will report all concerns (where allowed by KCSIE legislation) to the Principal who will determine what further action may be needed.

Although it is important that staff feel comfortable with, and are clear about, the concept of low-level concerns, and know what to do if they have such a concern, they do not need to be able to determine in each case whether their concern is a low-level concern, or if it is not serious enough to consider a referral to the LADO, or whether it 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 DSL and Principal.

Staff are also encouraged to self-refer in the event that they have found themselves in a situation which may be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in a way that may be considered to fall below the expected professional standard. All concerns will be handled sensitively and will be dealt with appropriately and proportionately. Self-reporting should be viewed as self-protective as it enables a potentially difficult situation to be dealt with at the earliest opportunity, and allows

the staff member to demonstrate an awareness of the expected behaviour standards. The school's aim is to create an environment where staff are encouraged and feel confident to self-refer.

The reporting procedure to be followed will be as follows

If a concern is raised by a third party, the Principal will collect as much evidence as possible by speaking to the person who has raised the concern. The concern will be recorded in accordance with this policy, in the usual way. The Principal is the ultimate decision-maker in respect of all low-level concerns.

The School will address unprofessional behaviour at an early stage and will support the individual to correct it.

All low-level concerns will be recorded in writing and shared with the Principal. The record will include details of the concern, the context within which the concern arose, and details of the action taken. The name of the reporting individual should also be included, unless they have asked to remain anonymous, which will be respected as far as reasonably possible (see below). The records will be kept confidential, will be held securely and in compliance with the Data Protection Act 2018 and the UK GDPR at all times. This detailed information will be retained until the individual's employment file is destroyed or until any pupils involved have left the school (whichever is longer.) A summary record of the concern will be held on the School's secure and access controlled central low-level concerns file unless and until further guidance determines otherwise.

Low-level concerns will not be included in references unless they relate to issues which would normally be disclosed, for example, misconduct or poor performance, or where the concern has met the threshold for a referral to the LADO and found to be substantiated.

The school will respond as follows

Once the Principal has received the low level concern they will (in an appropriate order)

- Speak to the person who raised the concern (where possible)
- Speak to any potential witnesses (unless advised not to do so by the LADO/other relevant external agencies, where they have been contacted).
- 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).
- If they are in any doubt, seek advice from the LADO – on a no-names basis if necessary.
- Review the information and determine whether the behaviour in question:
 - a. is entirely consistent with the School's Staff Code of Conduct and the law;
 - b. constitutes a low-level concern;
 - c. is not serious enough to consider a referral to the LADO but may merit consulting with and seeking advice from the LADO, and on a no-names basis if necessary;
 - d. when considered with any other low-level concerns previously raised about the same person, could now meet the threshold of an allegation, and should be referred to the LADO/other relevant external agencies, and in accordance with the School's Safeguarding Policy, KCSIE 2024, and the relevant procedures and practice guidance stipulated by the School's Local Safeguarding Partnership; or
 - e. in and of itself meets the threshold of an allegation and should be referred to the LADO/other relevant external agencies, and in accordance with the School's Safeguarding Policy, KCSIE 2024, and the relevant procedures and practice guidance stipulated by the School's Local Safeguarding Partnership.

- Ensure that appropriate and detailed records are kept of all internal and external conversations regarding the concern, their determination, the rationale for their decision and any actions taken, and retain records in accordance with the Low-Level Concerns Policy.
- Consider whether the concern also potentially raises misconduct or capability issues

If the Principal's decision is that the behaviour is entirely consistent with the School's Staff Code of Conduct and the law, they will update the individual in question and inform them of any action taken. The Principal will also 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 School's Staff Code of Conduct and the law.

Staff are also encouraged to self-refer in the event that they have found themselves in a situation which may be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in a way that may be considered to fall below the expected professional standard. All concerns will be handled sensitively and will be dealt with appropriately and proportionately.

If the Principal's decision is that the behaviour constitutes a low level concern the Principal will respond in a sensitive and proportionate way – on the one hand maintaining confidence that such concerns when raised will be handled promptly and effectively, whilst on the other hand protecting staff from any potential false allegations or misunderstandings. Any investigation of low-level concerns will be done discreetly and on a need-to-know basis.

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. In many cases, a low-level concern will simply require a conversation with the individual about whom the concern has been raised.

Any such conversation with individuals in these circumstances will include being clear with them 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.

Some low-level concerns may also raise issues of misconduct or poor performance. The Principal will also consider whether this is the case – by referring to the School's disciplinary and/or capability procedures. The individual will have a full opportunity to respond to any factual allegations which form the basis of capability concerns or a disciplinary case against them.

Staff should be aware that when they share what they believe to be a low-level concern, the Principal will speak to the adult who is the subject of that concern (unless advised not to do so by the LADO/other relevant external agencies, where they have been contacted) – no matter how 'low' level the concern may be perceived to be, to gain the subject's account – and to make appropriate records (as above), which may be referenced in any subsequent disciplinary proceedings.

The Principal will review the low level concerns periodically to ensure that all such concerns are being dealt with promptly and appropriately. The School will also reflect on reported concerns in order to identify any patterns of concerning, problematic or inappropriate behaviour which may indicate an unacceptable culture, or any weaknesses in the School's safeguarding system which may require additional training or modified policies. Where a pattern is identified, the School will decide on a course of action, either through its disciplinary

procedures, or, where the pattern moved from a concern to meeting the harms threshold, it will follow the above procedure and refer the matter to the designated officer.

Where a low-level concern relates to a person employed by a supply agency or a contractor, staff should share that concern with the DSL (or deputy), and/or the Principal. The concern will be recorded in accordance with the School's low-level concern procedure, and the individual's employer will be notified about the concern, so that any potential patterns of inappropriate behaviour can be identified.

The Data protection and recording keeping considerations of this policy are detailed below.

The School will always respect the personal data of staff (and others, where they may be identifiable) in implementing the Low-Level Concerns Policy and in keeping records of low-level concerns secure.

The Data Protection Act 2018 includes a specific provision which permits organisations to process even the most sensitive personal data where necessary for the purposes of protecting children from harm. Although sharing of low-level concerns will not always involve legally sensitive categories of data, the safeguarding purpose is the same as that under the School's main Child Protection and Safeguarding Policy.

A proportionate approach must be taken by all to considering what personal data is in fact necessary to share and record by way of low-level concern(s) in each case in order to support the safeguarding purpose and to ensure the information is accurate, fair and as far as possible recorded in neutral terms.

If a member of staff who raises a low-level concern does not wish to be named, then the School will respect their wishes as far as possible. However, staff should be aware that there may be circumstances where the staff member will need to be named (for example, where disclosure is required by a court or local authority, or under a fair disciplinary process) and, for this reason, the School will not promise anonymity to members of staff who share low-level concerns.

All staff are entitled, under data protection law, to ask to see the content of any low-level concern(s) retained by the School under the Low-Level Concerns Policy as it relates to them personally and to make any reasonable objection as to the fairness or accuracy of that content. The School will process such requests within the period prescribed by law, subject always to any necessary protection of the rights of third parties and unless any other relevant exemptions apply (including if complying with the request would be likely to prejudice the safeguarding purpose of the Low-Level Concerns Policy).

The School has undertaken a Data Protection Impact Assessment ("DPIA") in relation to the processing of low-level concerns, subject to ongoing review and any necessary updates from time to time. All personal data processed in connection with the Low-Level Concerns Policy will be processed in accordance with the School's Privacy Notices and its Data Protection Policy.

This policy and the records of low level concerns will be monitored by the Board of Governors as part of their oversight of the School's safeguarding. Low Level concerns will be reported in the termly safeguarding report to governors and a sample of records will be checked periodically. The School will also reflect on reported concerns in order to identify any patterns of concerning, problematic or inappropriate behaviour which may indicate a unacceptable culture, or any weaknesses in the School's safeguarding system which may require additional training or modified policies. Where a pattern is identified, the School will decide on a course of action, either through its disciplinary procedures, or, where the pattern moved from a concern to meeting the harms threshold, it will follow the above procedure and refer the matter to the LADO.

Where a low-level concern relates to a person employed by a supply agency or a contractor, the individual's employer will be notified about the concern, so that any potential patterns of inappropriate behaviour can be identified.

If the School is in any doubt as to whether a low-level concern in fact meets the harm threshold, the Head will consult with the LADO and take a more collaborative decision-making approach.

See Annex 3 for a flowchart detailing the reporting and decision making procedure.

SAFER RECRUITMENT

The School is committed to safer recruitment processes to create a culture that safeguards and promotes the welfare of children in the School whilst deterring and preventing people who are unsuitable to work with children from applying or securing employment, or volunteering opportunities, within the School.

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, scrutiny of a completed application form, initial online searches, 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.

As part of the shortlisting process, the School will also consider carrying out an online search on shortlisted candidates as part of its due diligence. This may help to identify any incidents or issues that have happened and are publicly available online, which the School may want to explore with an applicant at interview. This forms part of the School's wider safeguarding due diligence which aims to prevent and/or deter individuals who may be unsuitable to work with children from working in a school environment.

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, Selection and Disclosures Policy, which is available on the school website.

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

The School's procedures for managing contractors attending the School site can be found in the School's Recruitment, Selection and Disclosures Policy and the Bursary oversees contractors visiting the site.

MANAGEMENT OF SAFEGUARDING

The School's DSL is Emma Hammons who is a member of the leadership team as Deputy Head (Pastoral).

Rebecca Wright, Hannah Trevis, Jennifer Shillaw, Pete Dove, Clare Lawrence, Katie Noonan, Naomi Kelly and Lisa Barrett are the DDSLs and the people to whom reports should be made in the absence of the DSL. This ensures there is the required cover for the role at all times.

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. The DSL's responsibility is to maintain an overview of safeguarding within the School, to open channels of communication with local statutory agencies, refer incidents to third parties (including the local authority children's services, the DBS, Channel and the police) where appropriate, to support staff in carrying out their safeguarding duties and to monitor the effectiveness of the School's policies and procedures in practice. The DSL (in conjunction with the Bursar) will also take lead responsibility for online safety and understanding the filtering and monitoring systems and processes the School have in place. The DSL works with the Head of Compliance to review and update the School's safeguarding policy. This is then ratified by the Governing body.

The DSL liaises with the Principal to inform them of issues- especially ongoing enquiries under Section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult.

Where a pupil leaves the School, including for in-year transfers, 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 and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. The DSL will ensure secure transit and obtain confirmation of receipt. In addition to the child protection file, the DSL should also consider if it would be appropriate to share any additional information with the new school in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school.

The DSL regularly reviews the School's and their own practices and concerns about welfare and safeguarding matters. 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.

During term time, the DSL and/ or a DDSL will always be available (during school hours) for staff in the School to discuss any safeguarding concerns. If a DSL or DDSL is not available in person, they can be contacted on the mobile numbers given in the contact details at the beginning of this policy. For out of hours/out of term activities, the School's arrangements are that the DSL or DDSL will be contactable by phone.

The DSL or Deputy DSL should liaise with the Berkshire West Safeguarding Children Partnership and work with other agencies in line with *WT*. "*NSPCC - When to call the police*" can assist the DSL or Deputy DSL understand when they should consider calling the police and what to expect when they do. The DSL or DDSL will also be responsible for liaising with the senior mental health lead and, where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health. The DSL {and DDSL} should be confident as to what local specialist support is available to support all children involved in sexual violence and sexual harassment and be confident as to how to access this support when required.

Whilst the Principal should ensure that the policies and procedures adopted are understood and followed by all staff, and the Governors are ultimately responsible for ensuring staff are competent, supported and regularly reviewed in relation to safeguarding, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility should not be delegated.

Full details of the DSL's role can be found at Annex C of *KCSIE*. Governors should be aware of all provisions of Annex C.

TRAINING

Induction and training are in line with advice from the Berkshire West Safeguarding Children Partnership.

All Staff

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

- the child protection policy (including the policy and procedures to deal with child on child abuse, children who go Missing from Education and the low level concerns sub policies)
- the role and identity of the DSL and DDSLs
- the Behaviour and Anti-Bullying policies (including measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying);
- the Staff Code of Conduct, the Whistleblowing Policy and the ICT Acceptable Use Policies which detail staff/pupil relationships and communications including the use of social media and online safety
- the safeguarding response to children who go missing from education
- a copy of Part one of *KCSIE* at least or, for staff that do not work directly with children, Annex A
- School leaders and staff who work directly with children will also be required to read Annex B of *KCSIE* (and Part five of *KCSIE*).

Copies of the above documents are provided to all staff during induction.

Temporary staff and volunteers are also provided with the above information.

All staff are also required to:

- Read at least Part one of *KCSIE* (or, for staff that do not work directly with children, Annex A) and confirm that they have done so. Each time Part one of *KCSIE* is updated by the Department for Education, staff will be updated on the changes via face to face or online training.
- Understand key information contained in Part one or, for staff that do not work directly with children, Annex A of *KCSIE*. The School will ensure staff understanding by requiring staff to confirm their understanding in writing and by holding regular refresher training.
- Receive training in safeguarding and child protection regularly, in line with advice from the Berkshire West Safeguarding Children Partnership. Training will include online safety (including the expectations, applicable roles and responsibilities and harmful sexual behaviours (including child on child sexual violence and harassment) and how to manage a report of child-on-child 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, including online. The School provides these via, for example, staff meetings and briefing emails.

The governing body will ensure that all governors receive appropriate safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring and an understanding of the school's e-safety policy) at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in the School are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated.

The governing body are aware of their obligations under the Human Rights Act 1998 (HRA), the Equality Act 2010, the Data Protection Act 2018, the UK GDPR, and their local multi-agency safeguarding arrangements. Under the Human Rights Act 1998, it is unlawful for the School to act in a way that is incompatible with the European Convention on Human Rights (ECHR) Convention. Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach conventions set out in the European Convention on Human Rights (ECHR) Convention. The Data Protection Act 2018 and the UK GDPR place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.

DSL

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 and promoting a culture of listening to children, training in the Berkshire West Safeguarding Children Partnership approach to *Prevent* duties and harmful sexual behaviours. The DSL also receives more in-depth training, including on extremist and terrorist ideologies, how to make referrals and how to work with Channel panels. This training is updated at least every two years, enabling the DSL to support other staff on *Prevent* matters and update them on relevant issues Further details of the required training content for the DSL are set out in Annex C of *KCSIE*.

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. In particular, the School will support the DSL in developing their

knowledge and skills to understand the views of children including to encourage a culture of listening to children and taking account of their wishes, as well as having an awareness of the difficulties children may face in approaching staff with a disclosure.

The DDSLs are trained to the same level as the DSL.

OVERSIGHT OF SAFEGUARDING, INCLUDING ARRANGEMENTS FOR REVIEWING POLICIES AND PROCEDURES

Simon Barrett is the board-level lead designated to take a lead in relation to responsibility for the safeguarding arrangements in the School. He is a member of the governing body.

The School considers its obligation to review safeguarding practices a matter of its everyday concerns. 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, including lessons learnt. The DSL reports termly to the meeting of the full Governing body giving appropriate details of any safeguarding issues and the school's response to these. The Governors' discussion of this report is documented in the minutes of these meetings, including their approval of any updated policies and procedures. The School draws on the expertise of staff, including the DSL, DDSLs, in shaping the School's safeguarding arrangements and policies, and opportunities will be provided for staff to contribute to and shape safeguarding arrangements and child protection policy. The School and the Governors will consider the safeguarding and equality implications of this and other policies during their review.

The School's safeguarding policies and procedures should be transparent, clear, and easy to understand for staff, pupils, students, parents, and carers.

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'S ARRANGEMENTS TO FULFIL OTHER SAFEGUARDING RESPONSIBILITIES

Internet Safety Summary and Teaching children how to keep safe

The School and its Governors ensure that there is a whole school approach to teaching pupils how to keep themselves and others safe, including online safety, through the curriculum and PSHE to help children to adjust their behaviours, both inside and outside of school, in order to reduce risks and build resilience, including to radicalisation. This includes teaching pupils about the safe use of electronic equipment and the internet and the risks posed by adults or young people, who use the internet and social media to bully, groom, abuse or radicalise other people, especially children, young people and vulnerable adults. The School recognises that a "one size fits all" approach may not be appropriate for all children, and a more personalised or contextualised approach for more vulnerable children, victims of abuse and some SEND children might be needed.

Internet safety (including when children are online at home) is an integral part of the School's IT curriculum and also embedded in PSHE and Relationships Education and Relationships and Sex Education. The School will have regard to the DfE's statutory guidance *Relationships Education, Relationships and Sex Education (RSE) and Health Education* when making arrangements for and teaching Relationships Education and RSE.

The School has appropriate filters and monitoring systems in place to safeguard children from potentially harmful and inappropriate material online including material of a terrorist or extremist nature when using the School's IT resources. Such systems aim to reduce the risk of children being exposed to illegal, inappropriate and harmful materials (including advertisements) online; reduce the risk of children being subjected to harmful online interaction with others; restrict access to online risks such as online gambling, phishing or financial scams and help manage online behaviour that can increase a child's likelihood of, or causes, harm. The School uses

“Smoothwall” web filtering software, with Government recommended settings, to reduce the risk of pupils being exposed to illegal, inappropriate and harmful materials. Internet usage is monitored and any attempt to access such material is reported automatically to the IT Systems Manager and to the Bursar. The School recognises however that children have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G) which means that children may consensually and/or non-consensually share indecent images, sexually harass their other children via mobile and smart technology, and view and share pornography and other harmful content whilst at school undetected. This section should be read in conjunction with the School’s E-Safety policy.

The School ensures compliance with the DfE’s ‘filtering and monitoring standards for schools’ by;

- Identifying and assigning roles and responsibilities to manage filtering and monitoring systems.
- Reviewing the filtering and monitoring provision at least annually.
- Blocking harmful and inappropriate content without unreasonably impacting teaching and learning.
- Having effective monitoring strategies in place that meet our safeguarding needs.

Further detail of the School’s approach to online safety using devices connected to the school network or using the School’s wifi capabilities can be found in the School’s E-Safety Policy and the Acceptable Use of ICT policy for pupils and the Acceptable Use of ICT Policy for Workers, which also includes details on the use of mobile and smart technology in School, including the School’s management of the associated risks, and the School’s IT arrangements to ensure that children are safe from harmful and inappropriate content, including terrorist and extremist material when accessing internet through the School’s systems.

The School will liaise with parents to reinforce the importance of children being safe online and the systems the School uses to filter and monitor online use. Parents and carers will be made aware of what their children are being asked to do online when undertaking remote learning, including the sites they will be asked to access and who from the School their child is going to be interacting with online.

The governing body will review the effectiveness of these systems periodically and will ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place. These staff will know how to manage the systems effectively and know how to escalate concerns when identified.

Looked after children

The School and its governors ensure that staff have the skills, knowledge and understanding necessary to keep safe any children on roll who are looked after by a local authority.

E Hammons (Deputy Head, Pastoral), 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.

Relationships Education and Relationships and Sex Education (“RSE”)

Relationships Education and RSE is compulsory from September 2020. The School understands that preventative education is most effective in the context of a whole-school approach that prepares children for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobia, and sexual violence/harassment. The School will have regard to the DfE’s statutory guidance *Relationships Education, Relationships and Sex Education (RSE) and Health Education* when making arrangements for and teaching Relationships Education and RSE.

Relationships Education and RSE will form part of the School's PSHE programme, and further details can be found in the Relationships and Sex Education Policy.

Arrangements for visiting speakers

The School has clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable and these are detailed in the separate Visiting Speaker's Policy which can be found on the school website. 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 (which will be recorded on the school's Single Central Register.)

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 will also keep a formal register of visiting speakers retained in line with its Data Protection Policy.

Arrangements for use of school premises for non-school activities

When services or activities at the School are provided under the direct supervision or management of school staff, this Policy will apply in relation to any safeguarding concerns or allegations.

Where services or activities are not under the direct supervision or management of the School, the School will seek assurance that any individual or organisation has appropriate safeguarding and child protection policies and procedures in place (and the School will inspect these as needed); and ensure that there are arrangements in place for the provider to liaise with the School on these matters where appropriate. This applies regardless of whether or not the children who attend any of these services or activities are children on the school roll.

The School will ensure that the DSL or DDSL can be contacted and/or is available at all times the school premises is in use, whether that activity is a school or non-school activity and regardless as to whether the children attending are on the school roll.

The School will ensure that safeguarding requirements are included in any agreement for use of the school premises (such as a lease or hire agreement) as a condition of use and occupation of the premises and that failure to do so by the provider to comply with this will lead to termination of the agreement.

When considering the safeguarding arrangements any providers have in place the School will have regard to the DfE's non statutory guidance '*Keeping children safe in out-of-school settings*' (September 2023).

EARLY YEARS PROVISION SAFEGUARDING ARRANGEMENTS

Disqualification from working in childcare

Where staff work in, or are involved in the management of, the School's early years or provision of care of pupils under the age of eight, the School will take steps to check whether those staff are disqualified under the Childcare Act 2006. These checks will be undertaken pre-appointment, and from time to time during employment. This forms part of the School's safer recruitment practices, further details of which can be found in the School's Recruitment, Selection Policy and Disclosure Policy.

The School records all checks of staff employed to work in or manage relevant childcare on the Single Central Register. This includes the date disqualification checks were completed.

Where a member of staff is found to be disqualified or if there is doubt over that issue then, pending resolution, the School will remove them from the work from which they are or may be disqualified. Suspension or dismissal will not be an automatic response; the School will consider if there is scope in principle to redeploy them with other age groups or in other work from which they are not disqualified, subject to assessing the risks and taking advice from the designated officer when appropriate.

Use of mobile phones, cameras and other devices.

The School does not permit the use of mobile phones and cameras (including any device with the capability of taking images) in the nursery, our Early Years Foundation Stage and further details of these restrictions are contained in the Taking, Storing and Using Images of Pupils policy on the school website. The ICT Acceptable Use policies for Pupils and Workers and the E-Safety policy give further details of the permitted use of these devices in the rest of the school. Parents are also subject to restrictions on the use of phones and cameras within the school, at events and within the nursery.

All members of staff in the nursery are required to store their devices securely in the Manager's Office during working hours.

DSL for the EYFS

The practitioner designated to take lead responsibility for safeguarding children in the Early Years settings is Katie Noonan.

Duty to notify Ofsted

The School will inform Ofsted of any significant event which is likely to affect the suitability of any person who is in regular contact with children on the premises where childcare is provided, for example, where the School is satisfied that a person working in a relevant setting falls within one of the disqualification criteria. Any significant event must be notified to Ofsted as soon as reasonably practicable, but at the latest within 14 days of the date the School became aware (or ought reasonably to have become aware) of it.

The School will notify Ofsted within 14 days of any allegations of serious harm or abuse by any person living, working or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere).

APPENDIX 1 –SIGNS AND TYPES OF ABUSE

All School staff should be aware that abuse, neglect, and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap with one another therefore staff should always be vigilant and always raise any concerns with the DSL (or deputy).

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. All staff, but especially the DSL and deputies, should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines.

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues and should recognise that children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently online and in daily life. Staff should be aware that children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

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

Physical abuse:

a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child. The use of corporal punishment or the encouragement of corporal punishment by parents is a safeguarding concern.

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 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 (see below) which can occur between two children of any sex (also known as child on child abuse). This 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. Schools

should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault. Children under 16 years of age cannot lawfully consent to any sexual activity occurring, although in practice young people may be involved in sexual contact to which, as individuals, they may have agreed.

Sexual harassment:

is 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school. 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 deliberating brushing against someone, interfering with someone's clothes, or upskirting, and sharing of unwanted explicit content (for example displaying pictures, photos or drawings of a sexual nature); and online sexual harassment, which might include consensual or non-consensual sharing of sexual images and videos (often referred to as the sharing of nudes/semi-nudes, or sexting – see below); 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. Further information can be found in the *SVSH* advice.

Sexual violence:

refers to sexual offences under the Sexual Offences Act 2003, including rape, assault by penetration, sexual assault, and/or causing someone to engage in sexual activity without consent. Consent to sexual activity may be given to one sort of sexual activity, but not another, or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. A child under the age of 13 can never consent to any sexual activity. The age of consent is 16, and sexual intercourse without consent is rape.

Child-on-child sexual violence and/or harassment

: Sexual violence and sexual harassment (as defined above) can occur between two children of any age and sex, from primary through to secondary stage and into colleges. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. It is more likely that girls will be the victims of sexual violence and harassment, and it is more likely that it will be perpetrated by boys. It can however occur between children of any sex. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. Children who are victims of sexual violence and/or sexual harassment wherever it happens, will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college. Further information can be found in the *SVSH* advice.

Harmful sexual behaviour:

problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is "harmful sexual behaviour". Harmful sexual behaviour can occur online and/or face-to-face and can also occur simultaneously between the two. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' age difference, or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature.

Sharing of nudes and/or semi-nudes:

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

Alternative terms used by children and young people may include 'dick pics' or 'pics' or may be referred to by adults or professionals as 'youth produced/involved sexual imagery', 'indecent imagery', 'image based sexual abuse' or 'sexting'. Terms such as 'deep fakes' and 'deep nudes' may also be used by adults and young people to refer to digitally manipulated and AI-generated nudes and semi-nudes.

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

- children and young people find nudes and semi-nudes online and share them claiming to be from another child
- children and young people digitally manipulate an image of a young person into an existing nude online or use artificial intelligence (AI) to generate a new nude or semi-nude image of a young person
- images created or shared are used to abuse other children Situations could include:
 - o children and young people selling nudes or semi-nudes of others online
 - o children and young people coercing a peer into sharing a nude or semi-nude to blackmail them for money, further images, or force them into illegal activity
 - o children and young people hacking a peer's account to share images more widely without consent to publicly shame
- children and young people create and share a nude or semi-nude with an adult who has presented themselves as someone under the age of 18 to groom, sexually abuse or blackmail them.

For this reason, incidents can either be classified as 'aggravated' or 'experimental'. The DDCMS / UKIS guidance "*Sharing nudes and semi-nudes: advice for education settings working with children and young people*" sets out the classification of incidents, and how each should be handled.

Upskirting:

is a criminal offence and typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Anyone of any sex or gender can be a victim.

Neglect:

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

Serious violence

Indicators which may signal that children are at risk from, or are involved with serious violent crime 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 and may be at risk of criminal exploitation. All staff should be aware of the associated risks which increase the likelihood of involvement in serious violence (for example, being male, frequent absence from school or permanently excluded from school, experienced child maltreatment or having been involved in offending) and understand the measures in place to manage these.

Specific safeguarding issues:

behaviours linked to drug taking, alcohol abuse, unexplainable and/or persistent absences from education and sexting put children in danger. Safeguarding issues can also manifest themselves via child on child abuse, such as abuse within intimate partner relationships, bullying (including cyberbullying), gender-based violence/sexual assaults, sexting and upskirting. Safeguarding issues can also be linked to, for example, children being absent, repeatedly and/or for prolonged periods, children missing education; child sexual exploitation; domestic violence; fabricated or induced illness; faith abuse (including ostracism of families); 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; consensual and non-consensual sharing of nudes and semi-nudes; and trafficking.

Child sexual exploitation (CSE):

CSE is a form of child sexual abuse (see above) which occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years (including 16 and 17 year olds who can legally consent to have sex) who has been coerced into engaging in sexual activities. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media). Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

The below CCE indicators can also be indicators of CSE, as can:

- children who have older boyfriends or girlfriends, and
- children who suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

The DfE has published guidance on this entitled "*Child sexual exploitation: guide for practitioners*".

CSE may occur alone, or may overlap with CCE, and/or county lines, as well as other forms of abuse.

Child criminal exploitation (CCE):

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or (b) for the financial or other advantage (such as increased status) of the perpetrator or facilitator and/or (c) through violence or the threat of violence. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines, see below), forced to shoplift or pickpocket. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, their vulnerability as victims is not always recognised by adults and professionals (especially when they are older children). It is important in these circumstances that the child perpetrator is also recognised as a victim.

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts, money, or new possessions
- children who associate with other children involved in exploitation
- 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.

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

CCE may occur alone, or may overlap with CSE, and/or county lines, as well as other forms of abuse.

Children who have been exploited will need additional support to help maintain them in education.

County lines:

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs, using dedicated mobile phone lines or other form of “deal line”.

This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults exploited to sell drugs and move and store drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children’s homes, and care homes. Children are increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the ways of identifying indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- who go missing and are subsequently found in areas away from their home;
- that have been the victim or perpetrator of serious violence (e.g. knife crime);

- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection;
- are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity;
- owe a 'debt bond' to their exploiters;
- have their bank accounts used to facilitate drug dealing.

Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office.

Modern Slavery:

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the National Referral Mechanism is available in the statutory guidance "*Modern slavery: how to identify and support victims (May 2022)*"

Cybercrime:

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

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

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the DSL (or a deputy), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests. Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Additional advice can be found at: Cyber Choices, 'NPCC- When to call the Police' and National Cyber Security Centre - NCSC.gov.uk

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 that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or 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 this policy, and speaking to the DSL or a deputy.

The DfE has published advice and guidance on *Preventing and Tackling Bullying, and Mental Health and Behaviour in Schools*. In addition, Public Health England has produced a range of resources to support secondary and senior school teachers to promote positive health, wellbeing and resilience among young people including its guidance *Promoting Children and Young People's Emotional Health and Wellbeing*. Its resources include social media, forming positive relationships, smoking and alcohol.

So called 'honour based' abuse:

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

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

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 speak to the DSL (or deputy) who will (where appropriate) activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with Police and Children's Social Care.

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 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.

Further information can be found in the *Multi-agency statutory guidance on female genital mutilation and the FGM resource pack*, particularly section 13.

Forced marriage:

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage.²⁴³ 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. Since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their 18th birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial ‘marriages’ as well as legal marriages.

Schools and colleges can play an important role in safeguarding children from forced marriage. There are a range of potential indicators that a child may be at risk of forced marriage, details of which can be found in the Multi-agency guidelines: Handling cases of forced marriage (last updated April 2023) Further information on forced marriage is available in guidance published on gov.uk and by the Forced Marriage Unit. School staff can also contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmufcdo.gov.uk.

Radicalisation:

is the process of a person legitimising support for, or use of, terrorist violence.

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 whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child’s vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home). 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 Prevent referral. Designated safeguarding leads and other senior leaders should familiarise themselves with the Prevent duty guidance: Staff should contact the DSL or the Deputy DSL, who should be aware of the local procedures in place, before making a Prevent referral.

In the event of a child leaving, the DSL should consider if it would be appropriate to share any information with the new school or college. For example, information that would allow the new school or college to continue supporting victims of abuse or those who are currently receiving support through the ‘Channel’ programme and have that support in place for when the child arrives at the new school.

Special educational needs and/or disabilities (SEND), or pupils with certain health conditions:

Pupils with SEND or certain health conditions can face additional safeguarding challenges. These children may not outwardly show signs of abuse and/or may have difficulties in communication about abuse or neglect, or bullying.

These can include:

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

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.

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

When supporting a gender questioning child, the School will take a cautious approach and consider the broad range of the pupils individual needs, in partnership with the parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying. The School will adopt (to the extent that it is reflected in KCSIE), the draft DfE guidance for schools and colleges in relation to Gender Questioning Children, when deciding how to proceed.

Risks can be compounded where children lack trusted adults with whom they can be open. The School endeavours to reduce the additional barriers faced and create a culture where they can speak out or share their concerns with members of staff.

Domestic abuse:

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear, or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional, and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be “personally connected” (as defined in section 2 of the 2021 Act).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

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

Young people can also experience domestic abuse within their own intimate relationships. This form of child on child abuse is sometimes referred to as ‘teenage relationship abuse’. Depending on the age of the young people, this may not be recognised in law under the statutory definition of ‘domestic abuse’ (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support. The Act’s provisions, including the new definition, will be commenced over the coming months.

Domestic Abuse may lead to other safeguarding concerns and should therefore be managed under this policy.

School staff can contact Operation Encompass on 0204 513 9990 (8 am to 1pm, Monday to Friday) for advice in respect of children who have experienced domestic abuse.

Homelessness

: Being homeless, or 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.

Children who are absent from school:

A child being absent from School, particularly repeatedly and/or for prolonged periods and children missing education is a potential indicator of a range of safeguarding issues including abuse, neglect, sexual abuse, CSE and CCE. It can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM, so-called

'honour'-based abuse or risk of forced marriage. Staff must follow the School's procedures for dealing with children who go missing, particularly persistently.

The School's procedure for dealing with children who go missing can be found below and in the School's Missing Children-Sub Policy (above). All unexplained absences will be followed up in accordance with this.

The School shall inform the local authority (West Berkshire) 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 or more, at such intervals as are agreed between the School and the local authority. These intervals are weekly following scrutiny of the attendance register by the DSL.

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. The School's policy supports identification of abuse and provides preventative measures against the risk of the child going missing in the future. This applies when issues are first emerging as well as where children are already known to the local authority children's social care and need a social worker.

Child abduction and community safety incidents:

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

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff.

It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: www.actionagainstabduction.org and www.clevernevergoes.org.

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 5-11year 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 custody:

Approximately 200,000 children in England and Wales have a parent sent in custody 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

RISK ASSESSMENT OF PUPILS BEING DRAWN INTO EXTREMISM AND RADICALISATION

The DSL is the identified strategic PREVENT lead within School.

The strategic lead understands the expectations and key priorities to deliver PREVENT and this is embedded within safeguarding procedures and referred to specifically in the policy.

The senior leadership team are aware of the PREVENT strategy and its objectives.

Staff and governing body have been appropriately trained accordingly to their roles. This training will include providing knowledge of the factors leading to being drawn into extremism and radicalisation, and what action to take if they have concerns about any person.

All referrals follow the guidance here (<https://www.gov.uk/guidance/making-a-referral-to-prevent>) and follow-up communications and actions are logged and monitored and stored by the DSL.

Leads in partner agencies are known and stated in the Safeguarding Policy with all appropriate contact details.

The policy is on the website and reviewed and updated regularly.

Preventing radicalization training is delivered to staff as part of the annual safeguarding training and at other points of the year where appropriate.

All new staff receive training in this as part of their induction and appropriate governors will also attend appropriate training.

The school maintains an awareness of its event spaces and IT equipment, so that they are not used to facilitate the spread of extremist narratives.

The School has a broad and balanced curriculum that promotes British Values and helps protect students against extremism and promotes community cohesion. PSHE and other lessons and activities promote the spiritual, moral, social and emotional needs of children, aimed at protecting them from radicalisation and extremism influences. These lessons also help develop critical thinking skills around the power of influence, particularly on-line and through social media. Students are made aware of the benefits of community cohesion and the damaging effects of extremism on community relations.

Staff are able to provide appropriate challenge to students, parents and governors if opinions are expressed that are contrary to fundamental British values and promotion of community cohesion

Risk	Control Measures	Person Responsible
<p><u>Leadership</u></p> <p>The following people require a good understanding of their own and institutional responsibilities in relation to the "Prevent" Duty-</p> <ul style="list-style-type: none"> • Governors • Executive • SLT And JLT • Staff • Students 	<p>All staff and governors have annual training and the pupils have a programme of assemblies and PSHE lessons. The DSL briefs the Safeguarding team.</p>	<p>DSL</p>
<p><u>Partnerships</u></p> <p>The school has an identified single point of contact in relation to Prevent.</p> <p>The school engages with the Local Authority Police Prevent Officer.</p>	<p>The DSL in the Prevent Lead within school and this is made clear in the Safeguarding Policy.</p> <p>The Prevent Lead is familiar with the Police Prevent Officer and the contact details are documented in the Safeguarding Policy.</p>	<p>DSL</p>
<p><u>Staff Training</u></p> <p>All staff have sufficient knowledge and confidence to:</p> <ol style="list-style-type: none"> 1) exemplify British Values in their management, teaching and through general behaviours in the school 2) understand the factors that make people vulnerable to being drawn into terrorism and to challenge extremist ideas which are used by terrorist groups and can purport to legitimise terrorism 3) have sufficient training to be able to recognise this vulnerability and be aware of what action to take in response 	<p>All Heads of Department and Heads of School have examined how they promote British Values in their departments through their teaching and in PSHE lessons.</p> <p>Training is provided in this for all staff and the reporting and referral process is clear in the training and in the Safeguarding Policy.</p>	<p>HoS/HoD</p> <p>DSL</p>
<p><u>Welfare and pastoral support</u></p> <p>There are adequate arrangements and resources in place to provide pastoral care and support as required by the school.</p> <p>There are adequate monitoring arrangements to ensure that this support is effective and supports the school's welfare and equality policies.</p>	<p>There is a Pastoral Team of Vice-Principal, Deputy Head (Pastoral), Heads of School and Form tutors, School Nurse and a Counsellor within the School. Close monitoring of racist and bullying incidents by the Vice-Principal and Heads of School.</p> <p>Monitored by Deputy Head (Pastoral) and Heads of School in weekly meetings.</p>	<p>VP/DH(P)/ HOS</p>
<p><u>Speakers and Events</u></p> <p>There is a policy/framework for managing on site events i.e. charity events, visiting speakers. Site events, which are supported, endorsed, funded or organised through the school are subject to checks.</p>	<p>All on-site events and usage of the site are subject to Risk Assessment and follow the control measures in the Visiting Speaker Policy.</p>	<p>VP/ Head of Compliance</p>
<p><u>Safety Online</u></p> <p>The school has a policy relating to the use of IT.</p>	<p>The School has an E-safety and an ICT Acceptable Use Policy.</p>	<p>Bursar/DSL/ Head of Compliance</p>

<p>The school employs filtering/firewall systems to prevent staff/students/visitors from accessing websites and material.</p> <p>This also includes the use of using their own devices via Wi-Fi.</p>	<p>The School employs comprehensive filtering and firewall systems to prevent all users of our systems from accessing any inappropriate content.</p> <p>This includes anyone attaching personal devices to our wireless network.</p>	
<p>Site Security</p> <p>There are effective arrangements in place to manage access to the site by visitors and non-students/staff.</p> <p>Dangerous substances may be kept and stored on site. There is a Risk assessment policy in place.</p>	<p>All visitors report to reception and there is a sign in procedure. All staff and visitors are required to wear ID badges and pupils are briefed in what to do should they have any concerns about anyone on site.</p> <p>Where dangerous substances may be kept on site they are locked away.</p>	<p>Relevant HODs/Estate Manager</p>
<p>Safeguarding</p> <p>Protection against the risk of radicalisation and extremism is included within Safeguarding and other relevant policies.</p> <p>Safeguarding and welfare staff receive additional and ongoing training to enable the effective understanding and handling of referrals relating to radicalisation and extremism.</p> <p>The School utilises Channel as a support mechanism in cases of radicalisation and extremism.</p> <p>The School has a policy regarding referral to Channel identifying a recognised pathway and threshold for referral.</p>	<p>This is in place.</p> <p>This is in place.</p> <p>This is referred to in the Safeguarding Policy and the School would use this when required.</p> <p>This is referred to in the Safeguarding Policy.</p>	<p>DSL</p>
<p>Communications</p> <p>The School Prevent Lead and their role is widely known across the School.</p> <p>Staff and students are made aware of the Prevent Duty, current risks and appropriate activities in this area.</p> <p>There are information sharing protocols in place to facilitate information sharing with Prevent partners.</p>	<p>The School Prevent Lead is the DSL and they provides training for all staff across the School and all staff sign to say they have read and understood the key policies.</p> <p>This happens through the training.</p> <p>These are documented in the Safeguarding Policy and the School has links with appropriate contacts.</p>	<p>DSL</p>
<p>Incident Management</p> <p>The School has a Lockdown procedure which is capable of dealing with terrorist related issues.</p>	<p>The School has such a plan.</p>	<p>Bursar</p>
<p>Staff and Volunteers</p> <p>Awareness training extends to volunteers.</p>	<p>All volunteers receive training and sign to say they have read and understood the Safeguarding Policy.</p> <p>Volunteers and sub-contracted staff are closely monitored.</p>	<p>HR</p>

<p>The School is vigilant to the radicalisation of staff by sub-contracted staff and volunteers.</p>		
<p><u>Freedom of Expression</u></p> <p>The School has a freedom of speech/expression policy and this policy recognises and incorporates the risks associated with radicalisation and extremism.</p> <p>The need to protect vulnerable individuals is covered within this policy.</p>	<p>This is covered in the Safeguarding Policy and in the SEND Policy and the Visiting Speaker Policy.</p>	

Risk assessment reviewed 27th August 2022 (VV)

15th August 2023 (VV)

3rd January 2024 (VV)

1st September 2024 (VV)

Annex 3 -Low-Level Concerns Form

Please use this form to share any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ – that an adult may have acted in a way that:

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

You should provide a concise record – including brief context in which the low-level concern arose, and details which are chronological, and as precise and accurate as possible – of any such concern and relevant incident(s) (and please use a separate sheet if necessary). The record should be signed, timed and dated.

Details of concern

Name of staff member:	Department & Role:
Signed:	Time & Date:

Received by	At: (Time)	On: (Date)
Action Taken: (Specify)		

Signed:	Time & Date:
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This record will be held securely in accordance with the School's Low-Level Concerns Policy. Please note that low-level concerns will be treated in confidence as far as possible, but the School may in certain circumstances be subject to legal reporting requirements or other legal obligations to share information with appropriate persons, including legal claims and formal investigations.

Allegation

Behaviour which indicates that an adult who works with children has:

- behaved in a way that has harmed a child, or may have harmed a child; and/or
- possibly committed a criminal offence against or related to a child; and/or
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Low-Level Concern

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

- is inconsistent with the School's Staff Code of Conduct, including inappropriate conduct outside of work; and
- does not meet the allegation threshold or is otherwise not serious enough to consider a referral to the LADO – but may merit consulting with and seeking advice from the LADO, and on a no-names basis if necessary.

Appropriate Conduct

Behaviour which is entirely consistent with the School's Staff Code of Conduct, and the law.

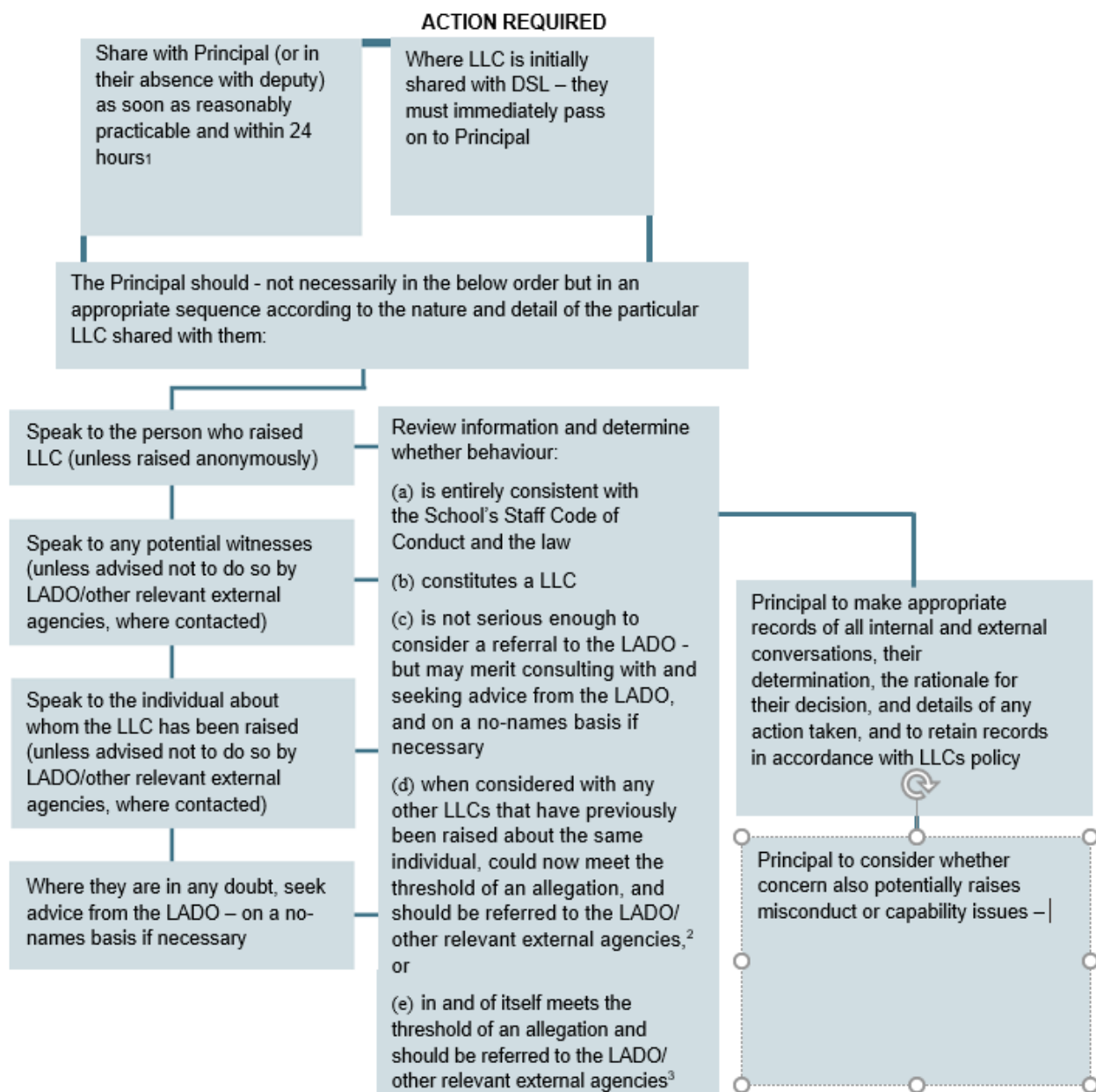
Annex 3 Continued –

Action required by Staff, DSL and Principal

If a member of staff has an allegation that may meet the harms threshold they should follow the procedure for reporting an allegation against a member of staff in the main section of this policy.

If a member of staff has what they believe to be a concern that does not meet the harm threshold i.e. a low level concern they should follow the below procedure.

Keeping Children Safe in Education 2021 now requires low level concerns to be shared with the Principal unless they relate to the Principal – as per paragraph 74 of KCSIE 2021



¹ Where the LLC relates to a particular incident

² And in accordance with the [[Safeguarding Policy] [Managing Allegations Against Staff Policy]], and Part 4 of KCSIE, and/or relevant procedures and practice guidance stipulated by Local Safeguarding Partnership

Change History

August 2017 (1-0-04)	Contact numbers updated, further details of staff response to early help and prevent duty.
September 2017 (1-1-0)	Prevent duty risk assessment added
September 2017 (1-1-1)	Details of the Staff interaction policy amended, requirement for visitor photographs removed and details of the Visiting Speaker policy added.
November 2017 (1-1-2)	No names enquiry removed from 6.4 Michelle Bullock added as Deputy in Sandleford
January 2018 (1-1-3)	Mobile number for Becky Wright added
September 2018 (1-2-0)	Redrafted for KCSIE 2018 and WT 2018.
September 2019 (1-2-1)	Redrafted for KCSIE 2019 LCSB renamed as Berkshire West Safeguarding Children Partnership Clarification of local authorities to be informed if pupil is added or removed from admissions register at non-standard transitions Response to Children involved in Serious Crime added Requirement to hold more than one contact number for each pupil added Clarification of record retention relating to allegations against staff EYFS disqualification requirements clarified Added to Appendix 1 – Upskirting, Serious Violence, County Lines, Domestic Abuse, Homelessness, Children and the Court System and Children with Family Members in Prison
November 2019 (1-2-2)	Location of Sandleford staff mobiles during working hours clarified.
March 2020 (1-2-3)	Covid –19 appendix added
September 2020 (1-3-0)	Redrafted for KCSIE 2020, list of referred legislation updated Contact names and numbers table updated Definition of safeguarding and contextual safeguarding updated. Family ostracism added to Early Help. Paragraphs about Children in Need & Child Protection Plans and Mental Health Support added Reference to DfE guidance Relationships Education, Relationships and Sex Education (RSE) and Health Education added Annex 1 -Further details of specific safeguarding issues added, including corporal punishment in physical abuse
September 2021 (1-4-0)	Redrafted for KCSIE 2021, list of referred legislation updated. Contact names and numbers table updated Guidance on nude and semi-nude pictures added. Further details of peer on peer abuse added Arrangements for Low Level concerns updated including Annex 4 Use of Mobile Data added to Teaching Children to stay safe Relationships Education and Relationships and Sex Education added

	<p>Signs and Types of abuse updated</p> <p>Sexual Harassment, Child-on-child sexual violence and/or harassment, Sharing of nudes and/or semi-nudes added to signs and types of abuse</p> <p>Child Sexual Exploitation, Child Criminal Exploitation and County Lines, Domestic Abuse paragraphs updated</p> <p>Modern Slavery, Cybercrime, Mental Health, Child abduction and community safety incidents paragraphs added</p>
April 2022 (!-4-1)	<p>Low Level Concerns section retitled as a sub-policy</p> <p>Clarification as to roles within school within Allegation against staff paragraph.</p>
September 2022 (1-5-0)	<p>Contact details for Local Authority Pan Berkshire Safeguarding Procedures updated.</p> <p>DDSL for the nursery updated. The nursery replaces all references to Sandleford</p> <p>Reference to KCSIE 2022</p> <p>Sexual Violence and Sexual Harassment 2021 removed from legislation reference content</p> <p>Peer on peer changed to child on child</p> <p>Pg 20 Confirmation of procedures for “lessons learned” at the conclusion of an investigation.</p> <p>Pg 26 Listing of application form and online searches as part of the recruitment process.</p> <p>Pg 27 Awareness of Appropriate Adult added to DSL role. Governors should be aware of all provisions of Annex C.</p> <p>Pg 29 There is a whole school approach to teaching Pupils “how to keep themselves and others safe” replaces taught “about safeguarding”. Details of informing parents about online learning added.</p> <p>Pg 30 – requirement of governing body to monitor effectiveness of IT filtering systems.</p>
September 2023 (1-6-0)	<p>Legislation updated – including KCSIE 2023</p> <p>Responsibilities of Deputy Head (Pastoral) as DSL added, including online monitoring and filtering</p> <p>Content added in relation to Safeguarding for 3rd party users of school premises</p> <p>Remote education and Covid appendix removed</p> <p>Prevent risk assessment reviewed</p>
October 2023 (1-6-1)	<p>Addition of E-safety policy</p>
January 2024 (1-6-2)	<p>Prevent risk assessment reviewed considering revised Prevent Duty Guidance as at 31/12/2023 – details of training and National Referral form added</p>

	Working Together to Safeguard Children included as updated Dec 2023
March 2024 (1-6-3)	Contact details for West Berkshire contacts changed
September 2024 (1-7-0)	<p>Legislation updated – including KCSIE 2024</p> <p>Further details of school's responsibilities under Equality Act 2010 included</p> <p>Definitions of safeguarding and abuse updated.</p> <p>Further examples given in Early Help section</p> <p>Section on nudes and semi nudes – definitions and terms updated from legislation of Feb 2024, reference of AI involvement</p> <p>Further details of online Safer recruitment added</p> <p>Further detail added to LGBTQ+ section</p> <p>Operation Encompass contact details added to Domestic Abuse section</p> <p>Prevent risk assessment reviewed.</p>