



LORD
WANDSWORTH
COLLEGE

Safeguarding And Child Protection Policy

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RSRP	November 2022	Governors	30/11/22	Merged e-safety policy and PREVENT duty risk assessment and action plan
RSRP	June 2023	RSC	30/8/23	Updated in line with KCSIE 2023 – major enhancements to the Prevent and e-safety sections

TABLE OF CONTENTS

1.	INTRODUCTION	5
	1.1 Policy Statement	5
	1.2 Linked Policies	6
	1.3 Key External Contact Details	7
	1.4 Key School Contact Details.....	8
	1.5 The Safeguarding Team At Lord Wandsworth College	10
	1.6 The 4 Rs Document	11
2.	CONCERNS ABOUT A CHILD	12
	2.1 The College’s Role	12
	2.2 Procedures For Dealing With Concerns About A Child	13
	2.3 What Staff Should Do If A Child Is In Danger Or At Risk Of Harm	14
	2.4 Arrangements For Dealing With Allegations of Child-On-Child Abuse	14
	2.4.1 Child-On-Child Abuse - Sexual Violence and Sexual Harassment	15
	2.4.2 What Is Consent?	16
	2.4.3 Sexual Harassment	16
	2.4.4 Harmful Sexual Behaviour	16
	2.4.5 The College’s Role In Preventing Child-on-Child Abuse	17
	2.4.6 Response to Child-on-Child Abuse	17
	2.4.7 Risk Assessments	19
	2.4.8 Ongoing Response	19
	2.4.9 Physical Abuse	20
	2.5 Contextual Safeguarding.....	20
	2.6 What Staff Should Do If They Discover An Act Of Female Genital Mutilation (“FGM”).....	21
	2.7 What Staff Should Do If They Have Concerns That Children Are At Risk From Or Involved With Serious Violent Crime.....	21
	2.8 What Staff Should Do When A Pupil With A Mental Health Need Has Been Identified	21
	2.9 How Should Staff Respond To An Incident Of Nudes And Semi-Nudes Being Shared By Pupils.....	22
	2.10 What Staff Should Do If They Discover An Act Of Upskirting.....	22
	2.11 What Staff Should Do If A Child Goes Missing From Education.....	23
	2.12 What Staff Should Do If A Child Needs A Social Worker (Children In Need And Child Protection Plans).....	23
	2.13 Early Help	23
3.	STAFF AND ADULTS	24
	3.1 What An Adult Should Do If They Have Concerns About Another Adult.....	24
	3.2 What Adults Should Do If They Have Concerns About Safeguarding Practices In The College	24
	3.3 Arrangements For Dealing With Allegations Of Abuse By A Member Of Staff Or Adult That May Meet the Harm Threshold	24
	3.3.1 Allegations That May Meet The Harm Threshold	24
	3.3.2 Response To Allegations Of Harm By A Member Of Staff	25
	3.3.3 References and Personnel Records in Relation to Allegations	26
	3.3.4 Supporting Staff	27
	3.3.5 Supporting Families	27
	3.4 Arrangements For Dealing With Allegations or Concerns About a Member of Staff Or Adult That Do <i>Not</i> Meet The Threshold For Harm – Low-Level Concerns	27
	3.4.1 Allegations That Do Not Meet The Harm Threshold – Low-Level Concerns	27
	3.4.2 Sharing Low-Level Concerns	27
	3.4.3 Responding To Low-Level Concerns	28
	3.4.4 Recording Of Low-Level Concerns	28
	3.4.5 References and Personnel Records In Relation to Low-Level Concerns	28
	3.5 Code Of Conduct For College Staff Working With Young People	28
	3.6 Safer Recruitment	29
	3.7 Management Of Safeguarding.....	29
	3.8 Staff Training.....	30
	3.8.1 Staff Induction	30
	3.8.2 Current Staff	31
	3.8.3 DSL and DSLs	31

4.	E-SAFETY	31
	4.1 Introduction to e-safety at the College	31
	4.2 E-safety Roles and responsibilities	32
	4.3 Education and training	33
	4.3.1 Staff Awareness	33
	4.3.2 Pupil e-Safety in the curriculum	34
	4.3.3 Parents	34
	4.4 Use of College and personal devices.....	34
	4.4.1 Staff	34
	4.4.2 Pupils	34
	4.5 Use of internet and email	35
	4.5.1 Staff	35
	4.5.2 Pupils	35
	4.6 Filtering and monitoring	36
	4.6.1 Filtering	36
	4.6.2 Monitoring	36
	4.6.3 Logging of concerns	36
	4.7 Data storage.....	37
	4.8 Password security	37
	4.9 Safe use of digital and video images	37
	4.10 Misuse	38
	4.11 Complaints	38
5.	PREVENT DUTY	38
	5.1 Prevent Duty: What It Means For LWC.....	38
	5.2 Risk Assessment	39
	5.3 Staff training	39
	5.4 Online Safety.....	40
	5.5 What Staff Should Do If A Child Is Seen As At Risk Of Radicalisation.....	40
6.	THE SCHOOL’S ARRANGEMENTS TO FULFIL OTHER SAFEGUARDING RESPONSIBILITIES	40
	6.1 Teaching Children How To Keep Safe	40
	6.2 Relationships And Sex Education (“RSE”)	41
	6.3 Looked After Children	41
	6.4 Arrangements For Visiting Speakers	41
	6.5 Health and Safety.....	41
	6.6 Site Security	42
	6.7 Off-Site Visits.....	42
	6.8 First Aid	42
	6.9 Physical Intervention (Use Of Reasonable Force)	42
	6.10 Taking And The Use And Storage Of Images.....	43
	6.11 Transporting Pupils	43
	6.12 Duty To Notify Ofsted	43
	6.13 Oversight Of Safeguarding, Including Arrangements For Reviewing Policies And Procedures	43
	6.14 Major Incident Review	44
7.	APPENDIX 2: SIGNS AND TYPES OF ABUSE AND OTHER SAFEGUARDING ISSUES	45
8.	APPENDIX 3: FLOWCHART FOR ACTIONS WHERE THERE ARE CONCERNS ABOUT A CHILD	63
9.	APPENDIX 4: SEVEN GOLDEN RULES FOR INFORMATION SHARING	65
10.	APPENDIX 5: SEXTING DECISION-MAKING FLOWCHART (BASED ON APPENDIX A OF UKCCS SEXTING IN SCHOOLS AND COLLEGES)	66
	APPENDIX 6: NSPCC’S HARMFUL SEXUAL BEHAVIOURS CONINUUM	68
	69	
12.	APPENDIX 7: USEFUL TOOLKITS AND LINKS IN KCSIE	70
13.	APPENDIX 8: PREVENT DUTY RISK ASSESSMENT AND ACTION PLAN .ERROR! BOOKMARK NOT DEFINED.	

1. INTRODUCTION

1.1 Policy Statement

We recognise our moral and statutory responsibility to safeguard and promote the welfare of all children. We make every effort to provide a safe and welcoming environment underpinned by a culture of openness where both children and adults feel secure, able to talk and believe that they are being listened to.

We maintain an attitude of “it could happen here” where safeguarding is concerned. The purpose of this policy is to provide staff, volunteers, and governors with the framework they need to keep children safe and secure in our school and to inform parents and guardians how we will safeguard their children whilst they are in our care.

No single professional can have a full picture of a child’s needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information, and taking prompt action.

Staff are particularly important as they are able to identify concerns early, provide help for children, and prevent concerns from escalating.

This policy applies to Lord Wandsworth College. This policy is reviewed and updated annually (as a minimum) and is available on the College website and internally to staff via our online systems.

This policy has regard to external publications, and should be read in conjunction with the following guidance and advice:

- Keeping Children Safe in Education (“KCSIE”, which is updated annually)
- What to do if you're worried a child is being abused: advice for practitioners (March 2015)
- Working Together to Safeguard Children (July 2018) (“WT”) Information sharing: advice for practitioners providing safeguarding services (July 2018)
- Revised Prevent Duty Guidance for England and Wales (April 2021) The Prevent Duty: Departmental advice for schools and child care providers (June 2015) The use of social media for on-line radicalisation (July 2015)
- Review of Sexual Abuse in Schools and Colleges (Ofsted, June 2021)
- Mandatory Reporting of Female Genital Mutilation
- The DDCMS / UKIS guidance "Sharing nudes and semi-nudes: advice for education settings working with children and young people" (December 2020)
- This policy also takes into account the procedures and practice of Hampshire County Council as part of the inter-agency safeguarding procedures set up by the Hampshire Safeguarding Children Partnership.

Any links to local or national advice and guidance can be accessed via the safeguarding in education webpages:

www.hants.gov.uk/educationandlearning/safeguardingchildren/guidance

Links to online specific advice and guidance can be found at:

<https://www.hants.gov.uk/socialcareandhealth/childrenandfamilies/safeguardingchildren/onlinesafety>

and links to other pages from the local authority on safeguarding can be found at:

<https://www.hants.gov.uk/socialcareandhealth/childrenandfamilies/safeguardingchildren>

In 2022 the e-Safety Policy and Prevent Duty Risk Assessment and Action Plan were merged into this policy.

In 2023 a new section was created to reflect KCSIE's increased emphasis on Prevent.

Definitions

Child protection is an aspect of safeguarding but is focused on how we respond to children who have been significantly harmed or are at risk of significant harm.

The term **staff** applies to all those working for or on behalf of the school, full time, or part time, in either a paid or voluntary capacity. This also includes parents and governors.

Child refers to all young people who have not yet reached their 18th birthday. Overall, this will apply to pupils of our school; however, the policy will extend to visiting children and students from other establishments.

Parent refers to birth parents and other adults in a parenting role for example adoptive parents, stepparents, guardians, and foster carers.

Abuse could mean neglect, physical, emotional, or sexual abuse or any combination of these. Parents, carers, and other people can harm children either by direct acts and / or failure to provide proper care. Explanations of these are given within the procedure document.

Confidentiality

- We maintain that all matters relating to child protection are to be treated as confidential and only shared as per the 'Information Sharing Advice for Practitioners' (DfE 2018) guidance.
- There is a lawful basis for child protection concerns to be shared with agencies who have a statutory duty for child protection.
- Information will be shared with individuals within the College who 'need to know'.
- All staff are aware that they cannot promise a child to keep a disclosure confidential.

1.2 Linked Policies

The following policies form the core of the College's policies relating to safeguarding:

- Anti-Bullying Policy
- Arrangements For Searching Pupils & Their Possessions Policy
- Complaints Procedure
- Code of Conduct for Staff
- College Rules
- Disciplinary and Grievance (Staff) Policy
- Fire Safety Policy
- Good Behaviour, Rewards and Sanctions (Including Exclusions) Policy
- Health and Safety Policy
- Low-Level Concerns Policy
- Missing Pupil Policy
- Onboarding and Probation Policy
- Reasonable Force Policy
- Recruitment, Selection & Disclosures Policy & Procedures
- Risk Assessment Policy
- School Visits Policy

- Security & Access Control Policy
- Supervision of Pupils Policy
- Visitor and Visiting Speaker Policy
- Whistleblowers' Policy

1.3 Key External Contact Details

Local Authority Designated Officer	LADOs: Fiona Armfield and Barbara Piddington Tel: 01962 876364 EMAIL: Child.Protection@hants.gov.uk LADO service initial enquiry form: LADO service initial enquiry form- (office.com)
Local Authority Children's Social Services	TEL: 01329 225378 Children's Reception Team TEL: 0300 555 1384 EMAIL: mailto:childrens.services@hants.gov.uk OUT-OF-HOURS EMERGENCY DUTY TEAM TEL: 0300 555 1373
Multi-Agency Safeguarding Hub	TEL: 0300 555 1384 EMAIL: childrens.services@hants.gov.uk OUT-OF-HOURS EMERGENCY DUTY TEAM TEL: 0300 555 1373
Support and Advice about Extremism	Police EMERGENCY: 999 NON EMERGENCY NUMBER: 101 EMAIL: paul.franks@hampshire.pnn.police.uk Local Authority Hants Direct TEL: 0300 555 1384 EMAIL: childrens.services@hants.gov.uk Department for Education NON EMERGENCY NUMBER: 020 7340 7264 EMAIL: counter.extremism@education.gsi.gov.uk mailto:counter.extremism@education.gsi.gov.uk
NSPCC whistleblowing advice line	ADDRESS: Weston House, 42 Curtain Road London EC2A 3NH TEL: 0800 028 0285 EMAIL: help@nspcc.org.uk HELPLINE: https://www.nspcc.org.uk/what-you-can-do/report-abuse/dedicated-helplines/whistleblowing-advice-line/
Disclosure and Barring Service	ADDRESS: DBS Customer Services, PO Box 3961, Royal Wootton Bassett SN4 4HF TEL: 03000 200 190 EMAIL: customerservices@db.gov.uk
Teaching Regulation Agency	ADDRESS: Teacher Misconduct, Ground Floor South Cheylesmore House, 5 Quinton Road, Coventry CV1 2WT TEL: 0207 593 5393 EMAIL: misconduct.teacher@education.gov.uk
OFSTED Safeguarding Children	TEL: 0300 123 4666 (Mon to Fri from 8am to 6pm) EMAIL: Whistleblowing@ofsted.gov.uk

Independent Schools Inspectorate	TEL: 0207 6000100 EMAIL: concerns@isi.net
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1.4 Key School Contact Details

Governors	<p>Chair of Governors Robert Hannington TEL: available from the Chief Operating Officer EMAIL: available from the Chief Operating Officer</p> <p>Nominated Safeguarding Governors Lucinda Fleming TEL: 07717 437831 EMAIL: lucinda@rangershouse.co.uk</p> <p>Caroline Cazenove TEL: 07980 280360 EMAIL: caroline@brocaz.com</p>
Designated Safeguarding Lead (DSL) and Deputy Designed Safeguarding Leads (DDSLs)	<p>DSL for the School Alexandra Cocksworth TEL: 07719 085600 EMAIL: cockswortha@lordwandsworth.org</p> <p>Louis Yates – Head of E-Safety yatesl@lordwandsworth.org</p> <p>Kirsty Jackman – Senior Mental Health Lead jackmank@lordwandsworth.org</p> <p>Deputy DSLs</p> <p>Pete Maidment (Junior Team) chaplain@lordwandsworth.org maidmentp@lordwandsworth.org</p> <p>Helen Shedden (Junior Team) sheddenh@lordwandsworth.org</p> <p>Tom Shedden (3rd-5th Form) sheddent@lordwandsworth.org</p> <p>Chris Radmann (3rd-5th Form) radmannc@lordwandsworth.org</p> <p>Jack Malden (3rd-5th Form) maldenj@lordwandsworth.org</p> <p>Kate Henley (3rd-5th Form) henleyk@lordwandsworth.org</p> <p>Jeni Loud (Sixth Form) loudj@lordwandsworth.org</p>

	<p>Ed Firth (Sixth Form) firthe@lordwandsworth.org</p> <p>David Beven (Sixth Form) bevend@lordwandsworth.org</p>
Designated Teachers for Looked After Children	<p>Pete Maidment EMAIL: chaplain@lordwandsworth.org maidmentp@lordwandsworth.org</p>
Headmaster	<p>Adam Williams TEL: 07766 751055 EMAIL: headmaster@lordwandsworth.org</p>

1.5 The Safeguarding Team At Lord Wandsworth College



Safeguarding Team 2023-2024



Ali Cocksworth
Designated Safeguarding Lead (DSL)
07719 085600

Junior DSL Team



Pete Maldment



Helen Shedden

3rd – 5th Form DSL Team



Tom Shedden



Chris Radmann



Jack Malden



Kate Henley

Sixth Form DSL Team



Jeni Loud



Ed Firth



Dave Beven



Louis Yates
Head of E-
Safety



**Kirsty
Jackman**
Senior
Mental
Health Lead

1.6 The 4 Rs Document

Refer

You are not expected to be an expert in these areas so refer on.

ALL ALLEGATIONS AND DISCLOSURES MUST BE REFERRED TO THE DSL UNLESS THEY RELATE TO A MEMBER OF STAFF IN WHICH CASE THEY MUST BE REFERRED TO THE HEADMASTER. IF THE DISCLOSURE REFERS TO THE HEADMASTER THEN THE CONCERN MUST BE REFERRED TO THE CHAIR OF GOVERNORS.

All disclosures, allegations, concerns about pupils should be referred initially to the DSL, who will inform others as appropriate.

In exceptional circumstances, and if a child is at immediate risk of harm but you are unable to contact the DSL or any Deputy DSL you should speak to a senior member of staff or make a referral to Children's Service or the Police.

No concern is too small – all disclosures, issues or concerns seen or that you are made aware of must be acted on as soon as possible. Do not investigate yourself.

If you consider that the College has not dealt with a disclosure appropriately you should contact Children's Services or the Police.

Children's Services: 0300 555 1384

Email: childrens.services@hants.gov.uk

Recognise

The main forms of abuse are:

Physical: deliberately hurting a child causing injuries such as bruises, broken bones, burns or cuts.

Emotional: emotional maltreatment or neglect. It's sometimes called psychological abuse and can cause children serious harm.

Neglect: the ongoing failure to meet a child's basic needs. It's dangerous and children can suffer serious and long-term harm.

Sexual: a child is forced or persuaded to take part in sexual activities.

Domestic: any type of controlling, bullying, threatening or violent behaviour between people in a relationship.

Online: any type of abuse that happens on the web, whether through social networks, playing online games or using mobile phones.

Child Sexual Exploitation: children are sexually exploited for money, power or status.

Peer on peer abuse: any of the above can be perpetrated by other young people just as they can be perpetrated by adults

We may become aware of abuse in a number of ways:

- A disclosure from a young person
- An allegation about someone's conduct

Contacts

Designated Safeguarding Lead (DSL)

Alexandra Cocksworth
cockswortha@lordwandsworth.org | 07719 085600

Louis Yates—Head of E-Safety
yatesl@lordwandsworth.org

Kirsty Jackman—Senior Mental Health Lead
jackmanj@lordwandsworth.org

Deputy DSL Team:

Pete Maidment (Junior Team)
chaplain@lordwandsworth.org

Helen Shedden (Junior Team)
sheddenh@lordwandsworth.org

Tom Shedden (3rd-5th Form)
sheddent@lordwandsworth.org

Chris Radmann (3rd-5th Form)
radmannc@lordwandsworth.org

Jack Malden (3rd-5th Form)
maldenj@lordwandsworth.org

Kate Henley (3rd-5th Form)
henleyk@lordwandsworth.org

Jeni Loud (Sixth Form)
loudj@lordwandsworth.org

Ed Firth (Sixth Form)
firthe@lordwandsworth.org

David Beven (Sixth Form)
bevend@lordwandsworth.org

In an emergency dial 999. If you do you should contact the DSL as soon as possible. Remember, the safety of children at LWC is the responsibility of all staff, not just those with a specific safeguarding remit.

September 2023

- A concern about someone's behaviour
All must be taken seriously and acted on.

Spotting signs of abuse: watch out for any unusual behaviour as it may be a sign that a child is being abused or may be in need of help:

sudden changes in behaviour | *anxious* |
clingy | *secretive* | unexplained injuries |
misses school | self-harm | *eating disorder* |
overly tired | *age inappropriate sexual*
behaviour | risk taking | *poor appearance* or
hygiene | changes in appetite | *aggressive* |
obsessive
thoughts about suicide

Any concerns you have should be shared with the DSL or a deputy DSL

Respond

DO:

Listen non judgementally.

React calmly, aware of non verbal messages and body language.

Assure the child that they have done the right thing and that you believe them.

Tell the child that it is not their fault.

Explain what you will do next.

DO NOT:

Promise to keep a secret.

Ask leading questions.

Attempt to investigate yourself or speak to the accused.

Safeguarding Aide Memoire

Recognise Respond Record Refer



Discuss the case with anyone other than the DSL/deputy DSL.

Delay in reporting the abuse.

Record

Make full notes of what you are told – including names, the person making the disclosure / referral, and date and time. Date and sign your notes.

Use the words the child used – do not 'translate' into proper names, etc. As far as possible use the exact words used in the disclosure.

If someone else is making an allegation or raising a concern you will need to include their contact details.

The original document should be kept safely and a copy forwarded to the DSL/ deputy DSL. If you type up the notes keep a copy of the hand written notes.

Consider the following as headings for your notes:

- * Date and time of incident/concern
- * Your name
- * Name(s) and age(s) of child(ren) related to the concern or present at the time of the disclosure
- * Nature and details of incident/concern in chronological order if appropriate
- * Is there a risk of immediate danger to the child? (if 'yes' speak to DSL *immediately*)
- * Date and time that notes were recorded
- * Signature

2. CONCERNS ABOUT A CHILD

2.1 The College's Role

The College has a duty to always consider 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.

All staff have a key role in prevention of harm and an equal responsibility to act on any suspicion or disclosure that may indicate a child is at risk of harm, either in the College or in the community, taking into account contextual safeguarding, in accordance with the guidance.

Parents are encouraged to raise any concerns directly with the College, 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 College has arrangements for listening to children and providing early help. All pupils in our College are able to talk to any member of staff to share concerns or talk about situations which are giving them worries. The staff will listen to the pupil, take their worries seriously and share the information with the DSL or one of his/her deputies.

Additionally, we provide pupils with information about who they can talk to outside of College, both within the community and with local or national organisations who can provide support or help.

The Designated Safeguarding Lead and any deputies liaise with the three safeguarding partners and work with other agencies in line with Working Together to Safeguard Children.

NPCC- When to call the police:

<https://www.npcc.police.uk/SysSiteAssets/media/downloads/publications/publications-log/2020/when-to-call-the-police--guidance-for-schools-and-colleges.pdf> is used to help designated safeguarding leads understand when they should consider calling the police and what to expect when they do.

Additionally, Hampshire and Isle of Wight Safeguarding Children Partnership and Children's Trust Threshold Charts:

<https://www.hampshirescp.org.uk/wp-content/uploads/2019/08/Hampshire-IOW-Thresholds-Chart-July-2019-1.pdf> is used to inform decisions relating to Child Protection and Safeguarding (see APPENDIX 1)

Definitions of Safeguarding and Types and Signs of Abuse

Safeguarding and promoting the welfare of children is defined as:

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

Children includes everyone under the age of 18.

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or

community setting by those known to them or, more rarely, by others (e.g., via the internet). Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children.

Abuse can be:

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

Staff are referred to APPENDIX 2 of this policy for further detail of the types of abuse and possible signs of abuse.

2.2 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 act immediately and follow the relevant procedures as set out in this policy. Staff should not assume that somebody else will act and share information that might be critical in keeping children safe.

The guidance, Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers supports staff who must make decisions about sharing information. Fears regarding sharing information under the Data Protection Act 2018 and the GDPR should not be allowed to stand in the way of the need to promote the welfare and protect the safety of children. If in doubt about what information can and should be shared, staff should speak to the Designated Safeguarding Lead (DSL).

All staff should:

- listen carefully and non-judgementally.
- reassure the child they have done the right thing by coming forward.
- avoid asking leading questions.
- reassure the individual that the allegation/complaint will be taken seriously.
- not guarantee absolute confidentiality (as this may ultimately not be in the best interests of the child) and explain that the information needs to be passed to the appropriate person who will ensure that the correct action is taken.
- tell them what your next steps are going to be.

The software CPOMS is used by LWC as the primary method for recording potential safeguarding breaches. To ensure proficiency in utilizing CPOMS for logging and addressing safeguarding incidents, staff members undergo regular professional development. This training is provided during both onboarding sessions and throughout the year.

All concerns, discussions, and decisions (together with reasons) made under these procedures should be recorded in writing on CPOMS. The record should include the date, time and place of the conversation and detail of what was said (including the nature of the allegation, the date and time of the alleged incident, any potential witness) and done by whom and in whose presence. 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 a deputy); where practical, the pupil should be allowed to identify a member of staff they feel most comfortable being present.

Where there is a safeguarding concern, the College 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 sexual behaviours, such as sexual harassment and violence. As stated in KCSIE, there will be times when the DSL (or deputy) will have to balance the wishes of the victim against their duty to protect the victim and other children. That said the College's processes always place the pupil at the heart of their decisions.

Even if a pupil has not been harmed or is not at immediate risk of harm, the above procedures should be followed. If staff or visitors have any concerns about a child, including a child's mental health, (as opposed to a child being in immediate danger), they should, where possible, speak with a member of the College's Safeguarding Team (which includes the Houseparents and the Health Centre) to agree a course of action. As set out above, staff should not assume that somebody else will act and share information that might be critical in keeping children safe.

Staff should not assume a colleague or another professional will act and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment, and allocation of appropriate service provision. The following document supports staff who must make decisions about sharing information:

2.3 What Staff Should Do If A Child Is In Danger Or At Risk Of Harm

If staff or visitors 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 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. The local authority social worker should acknowledge receipt to the referrer within 24 hours and decide about the next steps and type of response required. If anyone other than a member of the DSL Team 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 Team and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing on CPOMS. A useful flowchart can be found in APPENDIX 3: Flowchart For Actions Where There Are Concerns About A Child.

It is likely that if a referral is made to children's social care, then a member of the College's DSL team will be allocated as a case worker to that pupil. This is an internal mechanism that is aimed at coordinating the College's response to ensure the best possible care for the pupil and their family.

If the College is concerned about the welfare or safety of a pupil and unsure of what to do, the LADO will be consulted.

Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers. This advice includes the seven golden rules for sharing information. See APPENDIX 4 for details -

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1062969/Information_sharing_advice_practitioners_safeguarding_services.pdf

The College's Local Safeguarding Children Board is Hampshire Safeguarding Children Partnership. A full copy of their local procedures can be found on the Hampshire County Council website:

<https://www.hants.gov.uk/socialcareandhealth/childrenandfamilies/safeguardingchildren>

2.4 Arrangements For Dealing With Allegations of Child-On-Child Abuse

Child-on-child abuse (previously known as peer-on-peer abuse) is abuse by one or more pupils against another pupil. It can be standalone or as part of wider abuse. It can manifest itself in many ways and can include abuse within intimate partner relationships, bullying (including cyber bullying), physical abuse, initiation/hazing violence and rituals, upskirting, sexting, consensual and non-consensual sharing of nudes and/or semi-nudes, sexual assault, gender-based issues and harmful sexual behaviours including sexual violence and sexual harassment. Abusive comments and interactions should never be passed off or dismissed as “banter” or “part of growing up”. Nor will harmful sexual behaviours be dismissed as the same or “just having a laugh” or “boys being boys”. The College 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 College recognises that children with special educational needs, those who are members of the LGBT community and those with disabilities can be more prone to child-on-child abuse than other children and will consider extra pastoral support for those children. Additionally, the College recognises that children can be particularly vulnerable in residential settings and are alert to the potential for child-on-child abuse.

2.4.1 Child-On-Child Abuse - Sexual Violence and Sexual Harassment

A particularly prevalent area of child-on-child abuse is sexual violence and sexual harassment. Child-on-child sexual violence and/or sexual harassment can occur between two children of any age and sex. Evidence shows that girls are at greater risk than boys. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, likely, adversely affect their educational attainment as well as their emotional well-being. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and offline (both physically and verbally) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support.

When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

- **Rape:** A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.
- **Assault by Penetration:** A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.
- **Sexual Assault:** A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. (NOTE- Schools and colleges 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.)
- **Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that

B consents. (NOTE – this could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

2.4.2 What Is Consent?

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. consent can be given to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice:

- a child under the age of 13 can never consent to any sexual activity;
- the age of consent is 16;
- sexual intercourse without consent is rape.

2.4.3 Sexual Harassment

When referring to sexual harassment we mean ‘unwanted conduct of a sexual nature’ that can occur online and offline and both inside and outside of school/college. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment. Sexual harassment is likely to: violate a child’s dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance, and calling someone sexualised names;
- sexual “jokes” or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes. Schools and colleges should be considering when any of this crosses a line into sexual violence – it is important to talk to and consider the experience of the victim;
- displaying pictures, photos or drawings of a sexual nature;
- upskirting (this is a criminal offence), and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
 - consensual and non-consensual sharing of nude and semi-nude images and/or videos. Taking and sharing nude photographs of U18s is a criminal offence. [UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) provides detailed advice for schools and colleges (see APPENDIX 5).
 - sharing of unwanted explicit content;
 - sexualised online bullying;
 - unwanted sexual comments and messages, including, on social media or sexual exploitation; coercion and threats, and
 - coercing others into sharing images of themselves or performing acts they’re not comfortable with online. It is important that schools and colleges consider sexual harassment in broad terms. Sexual harassment (as set out above) creates a culture that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence.

2.4.4 Harmful Sexual Behaviour

Children’s sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is “harmful sexual behaviour” (HSB). The term has been widely adopted in child protection and

is used in this advice. HSB can occur online and/or face-to-face and can also occur simultaneously between the two. HSB should be considered in a child protection context.

When considering HSB, both ages and the stages of development of the children are critical factors. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' 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. Confidential specialist support and advice on HSB is available from the specialist sexual violence sector and sources are listed in KCSIE (Annex B).

It is effective safeguarding practice for the DSL (and their deputies) to have a good understanding of HSB. This could form part of their safeguarding training. This will aid in planning preventative education, implementing preventative measures, drafting and implementing an effective child protection policy and incorporating the approach to sexual violence and sexual harassment into the whole school or college approach to safeguarding.

HSB can, in some cases, progress on a continuum. Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Children displaying HSB have often experienced their own abuse and trauma. It is important that they are offered appropriate support. See APPENDIX 6 for NSPCC's HSB Continuum.

2.4.5 The College's Role In Preventing Child-on-Child Abuse

The College takes the following steps to minimise the risk of all forms of child-on-child abuse:

- Taking a whole school approach to safeguarding & child protection.
- Engaging with our local safeguarding partners and being aware of local processes.
- Challenging inappropriate behaviours.
- Providing training to staff.
- Providing staff and pupils with a clear set of values and standards, underpinned by the school's behaviour policy and pastoral support system, and by a planned programme of evidence-based content delivered through the curriculum.
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up.
- Challenging and dealing with physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.
- Not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys".
- Engaging with specialist support and interventions.

Time is allocated in assemblies and PSHEE to discussions of what constitutes appropriate behaviour and on why bullying, a lack of respect for others and harmful sexual behaviours are never right. All lessons, co-curricular activities and any other on-site activity (including time when pupils are socialising informally) are used to promote tolerance and mutual respect and understanding.

2.4.6 Response to Child-on-Child Abuse

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

A pupil against whom an allegation of abuse has been made may be suspended without prejudice from the College during the investigation. The College will take advice from Hampshire Safeguarding Children Partnership (HSCP) on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the alleged victim and perpetrator. If it is necessary for a pupil to be interviewed by the Police in relation to allegations of abuse, the College will ensure that, subject to the advice of the HSCP, 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 College and advice will be sought as necessary from the HSCP and/ or the Police as appropriate.

Reports of sexual violence and sexual harassment are extremely complex to manage. It is essential that victims are protected, offered appropriate support and every effort is made to ensure their education is not disrupted. It is also important that other children, adult students and college staff are supported and protected as appropriate.

The College will respond to a report of child-on-child abuse in the following way:

- Children making a report of sexual violence or sexual harassment will be taken seriously, kept safe and be well supported; they should be listened to and reassured that they have done the right thing by coming forward and that their concern is being taken seriously.
- If the report includes an online element staff will be mindful of the Searching, Screening and Confiscation: advice for schools (DfE 2018) guidance.
- Staff taking the report will inform the DSL or their Deputy as soon as practicably possible but at least within 24 hours.
- Staff taking a report will never promise confidentiality.
- Parents or carers will normally be informed (unless this would put the child at greater risk).
- If a child is at risk of harm, is in immediate danger, or has been harmed, the Police may be informed.
- Each situation is dealt with on a case-by-case basis.

Police may be informed of any harmful sexual behaviours including sexual violence and sexual harassment which are potentially criminal in nature, such as grabbing bottoms, breasts and genitalia. Rape, assault by penetration and sexual assaults will be passed to the Police. If the DSL decides to make a referral to Children's Social Care and the Police against a victim's wishes, the reasons should be explained to the pupil and appropriate specialist support offered.

The College's response to sexting is informed by use of the Sexting Decision-Making Flowchart (APPENDIX 5) and above. The College will follow the DDMSC/UKCIS 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 relevant pastoral team (e.g. DSL, Tutor and Houseparent) and support from external agencies will be sought, as appropriate. Victims will be reassured that they are being taken seriously and that they will be supported and kept safe. The School will consider whether it is appropriate to suspend without prejudice the alleged perpetrator. Reasons for this may include concerns over the alleged victim's safety or comfortableness around school.

Upon receiving a disclosure about child-on-child abuse, the following options are available to the DSL:

- Manage internally.
- Refer to Early Help.

- Refer to Children's Social Care.
- Report to the Police (generally in parallel with a referral to Social Care).

2.4.7 Risk Assessments

When there has been a report of sexual violence, the DSL (or a deputy DSL) should make an immediate risk 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 assessment should consider:

- The victim, especially their wishes, protection and support.
- The alleged perpetrator, their support needs and any discipline action.
- All other children at the school.
- The victim and the alleged perpetrator sharing classes and space at school.

Risk assessments will be recorded and kept under review. In relation to a report of sexual violence or sexual harassment, the DSL will reassure any victim that they are being taken seriously and that they will be supported and kept safe. The victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment; nor would a victim ever be made to feel ashamed for making a report. The DSL Team will consider the risks posed to all pupils and put adequate measures in place to protect them and keep them safe. This may include consideration of the proximity of the victim and alleged perpetrator and considerations regarding shared classes, sharing College premises and College transport.

The DSL Team will consider:

- The wishes of the victim.
- The nature of the incident including whether a crime has been committed and the harm caused.
- Ages of the children involved.
- Developmental stages of the children.
- Any power imbalance between the children.
- Any previous incidents.
- Ongoing risks.
- Other related issues or wider context.

Any response and action will, as always, have at the centre the best interests of the child.

2.4.8 Ongoing Response

The College's ongoing response to a case of child-on-child abuse will consider the following:

- The DSL team will manage each report on a case-by-case basis and will keep the risk assessment under review.
- Where there is a criminal investigation into a rape, assault by penetration or sexual assault, the alleged perpetrator should at the very least be removed from any classes they share with the victim. This will only not happen if the victim indicates they do not want this.
- The DSL will consider how best to keep the victim and perpetrator a reasonable distance apart on school premises and on transport where appropriate.
- Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, the school will take suitable action. In all but the most exceptional of circumstances, the rape or assault is likely to constitute a serious breach of discipline and lead to the view that allowing the perpetrator to remain in the same school would seriously harm the education or welfare of the victim (and potentially other pupils).
- Where a criminal investigation into sexual assault leads to a conviction or caution, the school will, if it has not already, consider any suitable sanctions in light of their behaviour policy,

including consideration of permanent exclusion. Where the perpetrator is going to remain at the school, the principle would be to continue keeping the victim and perpetrator in separate classes and continue to consider the most appropriate way to manage potential contact on school premises and transport. The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases.

- The victim, alleged perpetrator, and other witnesses (children & adults) will receive appropriate support and safeguards on a case-by-case basis.
- The College will take any disciplinary action against the alleged perpetrator in line with behaviour and discipline in schools.
- The College recognises that taking disciplinary action and providing appropriate support are not mutually exclusive actions and will occur at the same time if necessary.

2.4.9 Physical Abuse

While a clear focus of child-on-child abuse is around sexual abuse and harassment, physical assaults and initiation violence and rituals from pupils to pupils can also be abusive. These are equally not tolerated and if it is believed that a crime has been committed, will be reported to the police. The principles from the anti-bullying policy will be applied in these cases, with recognition that any police investigation will need to take priority.

2.5 Contextual Safeguarding

Contextual Safeguarding is an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships. Contextual Safeguarding, therefore, expands the objectives of child protection systems in recognition that young people are vulnerable to abuse in a range of social contexts.

All staff should be aware and alert to the risks presented by contextual safeguarding. All staff, but especially the DSL (and deputies) should consider the context within which such incidents and/or behaviours occur. 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, and serious youth violence. The College will share as much information with Children's Social Care as is required as part of the referral process to enable consideration of all the available evidence and the full context of any abuse.

As a boarding school there are additional factors to consider with regards to safeguarding and child protection. These are set out in the National Minimum Standards (NMS) for boarding. For example, the College is alert to inappropriate pupil relationships, initiation-type behaviours and the potential for child-on-child abuse (formerly known as peer-on-peer abuse), particularly if there is a significant gender imbalance.

To meet the additional needs of boarders, Houseparents, resident tutors and non-resident tutors undergo specific Safeguarding and Child Protection training every year. New Houseparents and resident tutors are given specific Safeguarding and Child Protection training on induction. Further training is provided in the event of a change to nationally recognised procedures or legislation. Each boarding house has its own handbook with procedures for pupils and arrangements for visitors.

In boarding houses, our house prefect system is regularly supervised by boarding staff. The boarding prefects have been trained to ensure that they are suitable for their duties and do not abuse their roles, which are specified clearly in writing. In particular, Prefects are given induction on appointment

which includes how to contribute to the College's anti-bullying practice, how to respond to allegations of serious bullying or abuse and how to act if they hear allegations of abuse.

For boarding appointments, appropriate checks will be made pursuant to the ISSRs, linked to NMS 20.

Within Lord Wandsworth College, specific safeguarding issues might include:

- Bullying, including cyber-bullying and “banter”.
- Use of Drugs.
- Sexual violence and harassment, including sexist name calling, misogynistic comments, youth produced sexual imagery (sexting), coercion of a sexual nature (including online), upskirting, unwanted touching, sexual assault and rape.
- Initiations and hazing rituals.
- Radicalisation.
- Child Missing from Education.
- Child Sexual Exploitation (CSE).
- Mental Health, including self-harm, eating disorders, suicide ideation.
- Difficult home backgrounds.

2.6 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 2 of this policy for the procedure to be followed where they suspect that a pupil may be at risk of FGM.

2.7 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.

2.8 What Staff Should Do When A Pupil With A Mental Health Need Has Been Identified

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, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children’s experiences, can impact on their mental health, behaviour, and education.

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. When a diagnosis has happened 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.

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.

2.9 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, 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 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.

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, 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 Team 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 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 or leadership 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 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 and Behaviour policies.
- If it is determined that there is a risk of harm, the DSL must make a referral to Children's Social Care and 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 DSL. 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 Police immediately, either via the DSL or directly themselves.

2.10 What Staff Should Do If They Discover An Act Of Upskirting

Upskirting 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. It is a criminal offence and should be reported to the DSL. Staff can also refer directly to Children's Social Care and the Police. Anyone of any gender, can be a victim. Staff should be careful not to view any image that could constitute child pornography, instead a phone or device that is suspected to have images stored on it should be handed to the DSL who will in turn liaise with external agencies.

2.11 What Staff Should Do If A Child Goes Missing From Education

Children who go missing from education, particularly on repeat occasions, is a potential indicator of abuse or neglect. The College's procedures for unauthorised absence and for dealing with children who go missing from education are detailed in the Missing Pupil Policy. Further details can also be found at APPENDIX 2 of this policy.

The College will report to Hampshire County Council a pupil who fails to attend school regularly or has been absent from school without the College's permission for a continuous period of 20 school days or more.

The College will hold more than one emergency contact number for each pupil to provide the College with additional options to contact a responsible adult particularly when a child missing from education is also identified as a welfare and/or safeguarding concern.

2.12 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 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 Team 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. The College will allocate a member of the DSL team as a case worker to any pupil who has a social worker. This is an internal mechanism and is designed to help coordinate the College's approach to ensure the best possible care for the pupil.

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).

2.13 Early Help

Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.

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

- Is disabled and has specific additional needs.
- Has special educational needs (whether they have a statutory education, health, and care plan).

- Is a young carer.
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups.
- Is frequently missing/goes missing from care or from home.
- Is misusing drugs or alcohol themselves.
- Is at risk of modern slavery, trafficking or exploitation.
- Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse.
- Has returned home to their family from care.
- Is showing early signs of abuse and/or neglect.
- Is at risk of being radicalised or exploited.
- Is experiencing or is at risk of experiencing family ostracism.
- Is a privately fostered child.

In the first instance, staff who consider that a pupil may benefit from early help should discuss this with the College's DSL. The DSL will consider the appropriate action to take in accordance with the Hampshire Safeguarding Children Partnership and Children's Trust referral threshold document (APPENDIX 1). 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.

3. Staff and Adults

3.1 What An Adult Should Do If They Have Concerns About Another Adult

If staff have concerns about another staff member (including supply staff and volunteers), then this should be referred to the Headmaster. Where there are concerns about the Headmaster, this should be referred to the Chair of Governors. In the event of allegations of abuse being made against the Headmaster, staff are referred to the procedures below regarding managing allegations of abuse against staff (including volunteers) and refer the matter directly to the LADO.

3.2 What Adults Should Do If They Have Concerns About Safeguarding Practices In The College

The College 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 College's safeguarding systems, these should be raised in accordance with the College's Whistleblower's Policy. There will be no disciplinary action taken against a member of staff for making such a report if it is done in good faith.

If staff and volunteers feel unable to raise an issue with the College 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.

3.3 Arrangements For Dealing With Allegations Of Abuse By A Member of Staff Or Adult That May Meet the Harm Threshold

3.3.1 Allegations That May Meet The Harm Threshold

The College's procedures for managing concerns and allegations against staff (including supply staff) who are currently working in the College follows Department for Education statutory guidance and HSCP 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 pupil.
- Possibly committed a criminal offence against or related to a pupil.
- Behaved towards a child or children in a way that indicates that they may pose a risk of harm to children; or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children. This is known as transferrable risk (where a member of staff or volunteer is involved in an incident outside of school which did not involve children but could have an impact on their suitability to work with children (e.g., involved in domestic abuse)).

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

If an allegation is made against anyone working or volunteering at the College, the College should not undertake their own investigation of allegations without prior consultation with the LADO and, depending on the guidance from the LADO, the Police, so as not to jeopardise statutory investigations. In borderline cases, the College may discuss informally with the LADO on a no-names basis.

3.3.2 Response To Allegations Of Harm By A Member Of Staff

All allegations should be investigated as a priority to avoid any delay. Of immediate concern is ensuring the welfare of the child(ren), making sure they are not at risk of further harm; this is the responsibility of the DSL.

Concerns including allegations which appear to meet the above reporting criteria are to be reported straight away to the 'case manager' who is the Headmaster. The Headmaster may decide to make the DSL or Senior Deputy Head the case manager and request that Headmaster is kept up to date with developments. Where the Headmaster is absent or is the subject of the allegation or concern, reports should be made to the Chair of Governors. Where the Headmaster is the subject of the allegation or concern, the Headmaster must not be informed of the allegation prior to contact with the Chair of Governors and LADO. However, staff may consider discussing any low-level concerns about the Headmaster with the DSL.

The case manager should immediately discuss the allegation with the LADO and consider the nature, content and context of the allegation and agree a course of action including any involvement of the Police. Where the case manager deems there to be an immediate risk to children or there is evidence of a possible criminal offence, the case manager may involve the Police immediately. All discussions should be recorded in writing, and any communication with both the individual and the parents of the child(ren) agreed. The LADO should be informed within one working day of all allegations that come to the College's attention and appear to meet the criteria or that are made directly to the Police and/or children's social care.

The case manager will ensure that the individual who is the subject of the allegation is informed as soon as possible and explained the likely course or action unless there is an objection by children's social care or the Police. The case manager will appoint a named representative to keep the individual informed of the progress of the case and will consider what other support is appropriate for the individual.

The case manager should give careful consideration as to whether the circumstances of the case warrant suspension without prejudice of the adult or whether alternative arrangements should be put in place until the allegation is resolved. The case manager will give due weight to the views of the LADO, the Headmaster (when the Headmaster is not the case manager) and the Director of People, in addition to Working Together to Safeguard Children and KCSIE when making a decision about

suspension. The suspension without prejudice of a member of staff should only be considered where there is cause to suspect a child or other children at the school are at risk of harm, or the case is so serious that there might be grounds for dismissal (see Disciplinary and Grievance (Staff) Policy). Where the individual is suspended, the case manager will ensure they know who their point of contact is in the College and shall provide them with their contact details.

Where a member of boarding staff is suspended pending an investigation, the case manager will consider whether arrangements for alternative accommodation away from children should be made.

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.

The case manager will discuss with the LADO whether a referral to the Disclosure and Barring Service or Teacher Regulation Agency should be made where an allegation is substantiated and the person is dismissed or the College ceases to use their services, or the person resigns or otherwise ceases to provide their services. The College 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 College must consider making a referral to the Teacher Regulation Agency (TRA) 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).

On conclusion of the case, the case manager should review the circumstances of the case with the LADO to determine whether there are any improvements to be made to the College's safeguarding procedures or practices to help prevent similar events in the future.

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

3.3.3 References and Personnel Records in Relation to Allegations

Allegations found to be malicious will be removed from the individual's personnel records. In all other circumstances a written record will be made of the decision and retained on the individual's personnel file in accordance with KCSIE and a copy will only be provided to the individual concerned. When discussions between the case manager and the LADO leads to no further action, this should be recorded in writing and include the rationale for that decision. 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 Headmaster will consider whether any disciplinary action is appropriate against the person who made it; or whether the Police should be asked to consider if the action might be appropriate against the person responsible even if they are not a pupil.

In all cases where there is a substantiated case of abuse, the College will make a serious incident report to the Charity Commission whenever the Commission's guidelines deem it appropriate to do so.

3.3.4 Supporting Staff

The College recognises that allegations against a member of staff can be particularly stressful and upsetting. The College will:

- manage and minimise the stress caused by the allegation;
- inform the individual as soon as possible, explaining the likely course of action, guided by the LADO, and the police where necessary;
- advise the individual to contact their trade union representative, or a colleague for support;
- appoint a named representative to keep the person informed about the progress of the case;
- provide access to counselling or medical advice where appropriate;
- not prevent social contact with work colleagues and friends, when staff are suspended without prejudice, unless there is evidence to suggest this may prejudice the gathering of evidence.

3.3.5 Supporting Families

Parents or carers of the child or children involved should be:

- formally told about the allegation as soon as possible. The case manager should consult the LADO and where involved local authority children's social care and/or the police on what information can be disclosed;
- kept informed about the progress of the case, only in relation to their child - no information can be shared regarding the staff member, and,
- made aware of the requirement to maintain confidentiality and unwanted publicity about any allegations made against teachers in schools whilst investigations are in progress as set out in section 141F of the Education Act 2002.

3.4 Arrangements For Dealing With Allegations or Concerns About a Member of Staff Or Adult That Do *Not* Meet The Threshold For Harm – Low-Level Concerns

3.4.1 Allegations That Do Not Meet The Harm Threshold – Low-Level Concerns

A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work.
- does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.
- is inappropriate but does not meet the formal LWC disciplinary process.

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

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone, contrary to school policy
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
- humiliating pupils.

If in doubt, the LADO will be consulted.

3.4.2 Sharing Low-Level Concerns

The College recognises the importance of creating a culture of openness, trust and transparency to encourage all staff to share any concerns so that they can be addressed appropriately. This is achieved through:

- Empowering staff to share any low-level concerns.
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage.
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised.
- Ensuring staff are clear about what appropriate behaviour is and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others.
- Helping to identify any weakness in the College's safeguarding system.

3.4.3 Responding To Low-Level Concerns

If there is any doubt, the College will consult with the LADO. In most cases low-level concerns will be overseen by a member of the SLT (with the Headmaster being kept up to date); they may decide to delegate some of the work to the employee's line manager. All low-level concerns should be recorded in writing.

The Headmaster, the Senior Deputy Head and the DSL will use the information collected to determine any further action, in line with the LWC's staff code of conduct or disciplinary policy.

3.4.4 Recording Of Low-Level Concerns

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR.
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, LWC will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in KCSIE, we will refer it to the designated officer at the local authority.
- Retained at least until the individual leaves employment at the College.

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

3.4.5 References and Personnel Records In Relation to Low-Level Concerns

As stated in KCSIE, the College should only provide substantiated safeguarding concerns/allegations that meet the harm threshold in references. Low-level concerns should not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) should not be referred to in a reference. However, where a low-level concern (or group of concerns) meets the harm threshold for referral to the LADO and found to be substantiated, it should be referred to in a reference.

3.5 Code Of Conduct For College Staff Working With Young People

The aim of the College's Code of Conduct for College Staff Working with Young People is to provide clear guidance about behavior and actions so as to not place pupils or staff at risk of harm or of allegation of harm to a pupil.

3.6 Safer Recruitment

The College is committed to safer recruitment processes. Members of the teaching and non-teaching staff at the College including part-time staff, temporary and supply staff, and visiting staff, such as musicians and sports coaches are subject to the necessary statutory child protection checks before starting work, for example, right to work checks, additional overseas checks (if necessary), verifying identity, taking up references, checking work history and confirming medical fitness for the role. For most appointments, an enhanced DBS check with 'barred list' information will be appropriate. A DBS certificate will be obtained from the candidate before or as soon as practicable after appointment. Alternatively, if the applicant has subscribed to it and gives permission, the College may undertake an online update check through the DBS Update Service.

Full details of the College'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 College's Recruitment Selection and Disclosures Policy and Procedures. On all recruitment panels there is at least one member who has undertaken safer recruitment training.

Further to the DBS check, anyone appointed to carry out teaching work will require an additional check to ensure they are not prohibited from teaching by order of the Secretary of State. Further checks will also include a check for information about any teacher sanction or restrictions that a European Economic Area (EEA) professional regulating authority has imposed. Those undertaking management posts will be subject to prohibition from management of independent schools' checks. Online searches will also be carried out to determine the suitability of candidates who are shortlisted. Candidates will be informed in advance.

All Governors, volunteers and contractors working regularly during term-time (such as contract cleaning staff) are also subject to the statutory DBS checks. Confirmation is obtained that appropriate Child Protection checks and procedures apply to any staff employed by another organisation and working with the College's pupils at school or on another site.

Anyone over 16 who lives in the same premises as boarders is subject to the checks as set out in NMS 2022.

Should the College develop concerns about an existing staff member's suitability to work with children, it will carry out all relevant checks as if the individual were a new member of staff. The College will consider what further action is appropriate whilst the checks are being conducted.

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

3.7 Management Of Safeguarding

The College's DSL is Ali Cocksworth who is a member of the leadership team. They are supported by a team of DDSLs and the people to whom reports should be made in the absence of the DSL. This ensures there is always the required cover for the role.

The DSL and DDSLs 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 College. The DSL's responsibility is to maintain an overview of safeguarding within the College, to open channels of communication with local statutory agencies, support staff in carrying out their safeguarding duties and to monitor the effectiveness of the College's policies and procedures in practice. The DSL works with the governors and Headmaster to review and update the College's safeguarding policy. Where a pupil leaves the College, the DSL will also ensure their child protection file is transferred to the new school (separately from the main pupil file) as soon as possible. The DSL will ensure secure transit.

The DSL regularly reviews the College'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.

The DSL or a Deputy DSL will always be available to discuss safeguarding concerns. During term time, at least one person from the DSL team (DSL and DDSLs) will always be available for staff in the College to discuss any safeguarding concerns. If in exceptional circumstances, the DSL and DDSLs are all unavailable, this should not delay appropriate action being taken. Staff should consider speaking to a member of the SLT and/or take advice from local children's social care. In these circumstances, any action taken should be shared with the DSL (or deputy) as soon as is practically possible.

For out of term activities, the DSL team routinely check CPOMS and are available on the phone or email should a concern be raised. Out of term, if a member of staff becomes aware of a safeguarding issue involving a pupil, they should report their concerns directly to Children's Services.

Full details of the DSL's role can be found at Annex B of KCSIE.

Whilst 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.

3.8 Staff Training

Induction and training are in line with advice from Hampshire Safeguarding Children Partnership.

3.8.1 Staff Induction

Every new member of staff, including part-timers, temporary, visiting, volunteers and contract staff working in the College, receives appropriate induction training, including on their responsibilities in being alert to the signs of abuse, bullying or children at risk of radicalisation and on the procedures for recording and referring any concerns to the DSL or the Headmaster and, if required, to the main points of local procedures or, in certain circumstances, the Police. Child Protection training is also given to new governors and volunteers.

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

- the Safeguarding and Child Protection Policy (which includes the e-Safety policy, including the College's approach to filtering and monitoring).
- the role and identity of the DSL and DDSLs.
- the behaviour policy.
- the Code of Conduct for College Staff Working With Young People.
- the College's Whistleblower's Policy.
- the safeguarding response to children who go missing from education.
- College Rules which incorporates the Use of IT and Devices Policy.

- a copy of Part 1 of KCSIE (or Annex A where appropriate).
- College leaders and staff who work directly with children will also be provided with and required to read Annex A of KCSIE.

Copies of the above documents are provided to all staff, via the VLE, during induction. See College Induction Policy which is available on the VLE or a copy can be obtained from Reception.

3.8.2 Current Staff

All staff are also required to:

- Read Part One (or Annex A where appropriate) of KCSIE and confirm that they have read and understood it. Each time Part One of KCSIE is updated by the Department for Education, staff will be updated on the changes via update training which may be part of the annual training in September or additional training sessions.
- Understand key information contained in Part One/Annex A of KCSIE. The College will ensure staff understanding through discussions with staff and the annual staff quiz on child protection and through 'DSL pop ups' which occur weekly for teaching staff.
- Receive training in safeguarding and child protection regularly, in line with advice from Hampshire Safeguarding Children Partnership. Training will include online safety and harmful sexual behaviours, including 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. The College provides these via, for example, emails, e-bulletins, and staff meetings.

3.8.3 DSL and DDSLs

The DSL and DDSLs receive 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 HSCP's approach to *Prevent* duties and harmful sexual behaviours. Further details of the required training content for the DSL are set out in Annex B of KCSIE.

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

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

4. E-Safety

4.1 Introduction to e-safety at the College

It is the duty of Lord Wandsworth College to ensure that every pupil in its care is safe; the same principles apply to the digital world as apply to the real world. IT and online communications provide unrivalled opportunities for enhanced learning in addition to traditional methods, but also pose greater and more subtle risks to young people. Our pupils are therefore taught how to stay safe in the

online environment and how to mitigate risks, including but not limited to the risk of identity theft, bullying, harassment, grooming, stalking, abuse and radicalisation. This is done through:

- The Personal, Social, Health, Economic Education (PSHEE) programme
- House, year group and school assemblies
- Tutor groups
- Providing pupils with relevant information
- When online content is used in lessons: teachers reiterate the need to stay safe on-line
- Induction programmes at the beginning of each academic year
- ICT lessons

Emerging technologies are consistently improving communication, peer-to-peer information sharing, social interaction, and leisure activities for students. Students are engaging with innovative technologies such as AI-generated text or images and augmented reality, which enhance their learning experiences and provide new avenues for exploration. Furthermore, social media has become a primary method of communication for students outside of school, facilitating connections and interactions with their peers.

E-safety measures, supported by the Use of IT and Devices Policy for all staff, visitors and pupils, are implemented to protect the interests and safety of the whole College community. It aims to provide clear guidance on how to minimise risks and how to deal with any infringements.

Whilst exciting and beneficial both in and out of the context of education, much IT, particularly online resources, are not consistently policed. All users need to be aware of the range of risks associated with the use of these internet technologies.

At Lord Wandsworth College, we understand the responsibility to educate our pupils on e-safety issues through teaching them the appropriate behaviours and critical thinking skills necessary to enable them to remain both safe and within the law when using the internet and related technologies in and beyond the classroom. We also understand the importance of involving pupils in discussion about e-safety and listening to their fears and anxieties as well as their thoughts and ideas.

This policy applies to all members of the College community, including staff, pupils, parents and visitors, who have access to and are users of the College IT systems. In this policy 'staff' includes teaching and non-teaching staff, governors, and regular volunteers. 'Parents' includes pupils' carers and guardians. 'Visitors' includes anyone else who comes to the College, including occasional volunteers.

Both this policy and the Use of IT and Devices Policy cover both fixed and mobile internet devices provided by the College such as PCs, laptops, webcams, tablets, whiteboards, digital video equipment, etc., as well as all devices owned by pupils, staff and visitors brought onto College premises (personal laptops, tablets, smart phones, etc.).

4.2 E-safety Roles and responsibilities

The governing body of the College is responsible for the approval of this policy and for reviewing its effectiveness. The governing body will review this policy at least annually.

The Senior Leadership Team has responsibility for ensuring this policy is upheld by all members of the College community through INSET and timely updates at staff meetings.

The DSL is also the overall Head of E-Safety. However, the day to day running of E-Safety is currently undertaken by the DDSL E-Safety. This is so the DSL team remains well versed on the developments in

the field and can keep up-to-speed with safeguarding developments in relation to this area within the school.

In their role as Head of E-Safety the DSL has overall responsibility for keeping up to date on current e-safety issues and guidance issued by organisations such as the Local Authority, CEOP (Child Exploitation and Online Protection), Childnet International and the Local Authority Safeguarding Children Board. As with all issues of safety at the College, staff are encouraged to create a talking culture in order to address any e-safety issues which may arise in classrooms on a daily basis. This information can be provided via the DDSL E-Safety in regular meetings and updates sent via e-mail or CPOMS.

The College's technical staff have a key role in maintaining a safe technical infrastructure at the College and in keeping abreast with the rapid succession of technical developments. They are responsible for the security of the College's hardware system, its data and for training the College's teaching and administrative staff in the use of IT. In conjunction with the Head of E-Safety they monitor the use of the internet and emails, maintain content filters, and will report inappropriate usage to the DSL.

Teaching and support staff are required to agree to the Use of IT and Devices Policy when they first log on to the College system. As with all issues of safety at the College, staff are encouraged to create a talking and listening culture in order to address any e-safety issues which may arise in classrooms on a daily basis.

Pupils are responsible for using the College IT systems in accordance with the Use of IT and Devices Policy, and for letting staff know if they see IT systems being misused.

Lord Wandsworth College believes that it is essential for parents to be fully involved with promoting e-safety both in and outside of school. We regularly consult and discuss e-safety with parents and seek to promote a wide understanding of the benefits and risks related to internet usage. The College will always contact parents if it has any concerns about pupils' behaviour in this area and likewise it hopes that parents will feel able to share any concerns with the College.

Parents and carers are responsible for endorsing the College's Use of IT and Devices Policy.

4.3 Education and training

4.3.1 Staff Awareness

New staff receive information on Lord Wandsworth College's e-Safety and Acceptable Use policies as part of their induction. All staff receive regular information and training on e-safety issues in the form of INSET training and internal meeting time, and are made aware of their individual responsibilities relating to the safeguarding of children within the context of e-safety.

All staff working with children are responsible for demonstrating, promoting and supporting safe behaviours in their classrooms and following school e-Safety procedures. These behaviours are summarised in the Use of IT and Devices Policy, which must be agreed to before use of technologies in College. When pupils use College computers, the IT staff should make sure that pupils are fully aware of the agreement they are making to follow the College's IT guidelines through accepting the Use of Mobile Phones and Devices Policy.

Teaching staff are encouraged to incorporate e-safety activities and awareness within their subject areas and through a culture of talking about issues as they arise. They should know what to do in the event of misuse of technology by any member of the College community.

Any incidents or concerns relating to e-safety must be reported to the safeguarding team as soon as possible.

4.3.2 Pupil e-Safety in the curriculum

IT and online resources are used increasingly across the curriculum. We believe it is essential for e-safety guidance to be given to pupils on a regular and meaningful basis. We continually look for new opportunities to promote e-safety and regularly monitor and assess our pupils' understanding of it.

The College provides opportunities to teach about e-safety within a range of curriculum areas and IT lessons. Educating pupils on the dangers of technologies that may be encountered outside school will also be carried out via PSHEE, assemblies etc., as well as informally when opportunities arise.

Throughout their College career, and usually via PSHEE, pupils are taught to look after their own online safety. Pupils are taught about recognising online sexual exploitation, stalking and grooming, the risks, and of their duty to report any such instances they or their peers come across. Pupils can report concerns to the DSL and any member of staff at the College. They also have access to the CEOP button via the College's VLE and they have access to Tootoot.

Pupils are also taught about relevant laws applicable to using the internet; such as data protection and intellectual property. Pupils are taught about respecting other people's information and images, etc.

Pupils should be aware of the impact of cyber-bullying and know how to seek help if they are affected by these issues (see also the school's Anti-Bullying Policy). Pupils should approach the DSL as well as parents, peers and other College staff for advice or help if they experience problems when using the internet and related technologies.

4.3.3 Parents

The College recognises that not all parents and guardians may feel equipped to protect their son or daughter when they use electronic equipment at home. The College therefore provides information for parents via newsletters, talks etc. about e-safety and the practical steps that parents can take to minimise the potential dangers to their sons and daughters without curbing their natural enthusiasm and curiosity.

4.4 Use of College and personal devices

4.4.1 Staff

Any device, College or personal that can potentially access College information and data must have a password or device lock so that unauthorised people cannot access the content. When they are not using a device, staff should ensure that it is locked to prevent unauthorised access. Staff at Lord Wandsworth College are permitted to bring in personal devices for their own use.

College trip mobile phones or work mobile phones (which some staff have) must be used for educational visits and as they are school devices the number can be shared with pupils for health and safety reasons.

Staff and pupils must not share personal mobile numbers unless in exceptional (i.e. it is the only effective method of safeguarding the pupils) or emergency circumstances. In this case pupil and staff mobile numbers must be deleted as soon as possible (i.e. as soon as the visit has ended).

4.4.2 Pupils

Pupils can bring their own devices onto school site and can connect to the College's BYOD network.

Pupil access to on-line content via the College network is monitored and the College educates pupils about appropriate use and behaviour when using 3/4G when discussing e-safety topics.

4.5 Use of internet and email

4.5.1 Staff

When accessed from any devices on/off College premises, staff must use social networking sites with extreme caution, being aware of the nature of what is published online and its potential impact on their professional position, reputation and that of Lord Wandsworth College. There is strong anti-virus and firewall protection on our network and, it may be regarded as safe and secure.

Staff should be aware that email communications are monitored. Staff should not make contact or accept contact with/from former pupils via social media within three years of the individual having left the final year of 6th Form/turning 18 if they were not at LWC 6th Form.

Staff must immediately report to the safeguarding team the receipt of any communication that makes them feel uncomfortable, is offensive, discriminatory, threatening or bullying in nature and must not respond to any such communication. Staff must remain alert to the risk of fraudulent emails and should report emails they suspect to be fraudulent to the IT Manager. Any online communications must not either knowingly or recklessly:

- place a child or young person at risk of harm;
- bring Lord Wandsworth College into disrepute;
- breach confidentiality;
- breach copyright;
- breach data protection legislation; or do anything that could be considered discriminatory against, or bullying or harassment of, any individual, for example by:
 - making offensive or derogatory comments relating to sex, gender reassignment, race (including nationality), disability, sexual orientation, religion or belief or age;
 - using social media to bully another individual; or
 - posting links or material which is discriminatory or offensive.

Any digital communication between staff and pupils or parents / carers must be professional in tone and content. Under no circumstances may staff contact a pupil or parent / guardian using the staff member's personal email address. The College ensures that staff have access to their work email address when offsite; it must be used for all College business.

4.5.2 Pupils

All pupils are issued with their own personal College e-mail addresses for use on our network and by remote access. Access is via a personal login, which is password protected. This official email service may be regarded as safe and secure, and must be used for all College work.

Pupils should be aware that email communications are monitored.

There is strong anti-virus and firewall protection on our network named Palo Alto. Spam emails and certain attachments will be blocked automatically by the email system. If this causes problems for school work purposes, pupils should contact the IT team for assistance.

Pupils should immediately report, to a member of staff the receipt of any communication that makes them feel uncomfortable, is offensive, discriminatory, threatening or bullying in nature and they must not respond to any such communication. The CEOP button is available for reporting incidents which make people feel uncomfortable.

The College expects pupils to think carefully before they post any information online, or repost or endorse content created by other people. Content posted should not be able to be deemed inappropriate or offensive, or likely to cause embarrassment to the individual or others.

Pupils must report any accidental access to materials of a violent or sexual nature directly to the IT Manager or another member of staff who will then report it. Deliberate access to any inappropriate materials by a pupil will lead to the incident being recorded on their school record and will be dealt with under the College's Good Behaviour, Discipline, Rewards and Sanctions (Including Exclusions) Policy. Pupils and staff should be aware that all internet usage via the College's systems and its WIFI network is monitored. Access via 3/4G cannot be monitored but appropriate behaviour is expected in-line with the College's Use of IT and Devices Policy.

Certain websites are automatically blocked by the College's filtering system. If this causes problems for schoolwork/research purposes, pupils should contact the IT team for assistance.

4.6 Filtering and monitoring

4.6.1 Filtering

To comply with the DFE's filtering and monitoring requirements, our current software, known as "Palo Alto," actively filters and blocks unauthorized websites and content it is a firewall, that monitors websites accessed, using deep packet inspection. It generates logs when students attempt to access unauthorized content, which provide a link showing the student's name, the content they tried to access, and the time of the breach. The software Palo Alto is affiliated with the Internet Watch Foundation (IWF) as recommended by the DFE. The DSL E-Safety team reviews and distributes the logs, and if a potential safeguarding issue is detected, it is entered into our safeguarding software: CPOMS. This process is overseen by the DSL.

4.6.2 Monitoring

We encourage staff members to maintain excellent classroom management by monitoring screen usage during lessons. This can be achieved through various methods, such as temporarily lowering screens during specific tasks or rearranging/circulating the classroom while teaching.

If any staff member has a safeguarding concern related to E-Safety, it is crucial to log it through CPOMS, following the standard procedure for any safeguarding concern. This logging process also includes reporting incidents of child-on-child abuse, sextortion, sharing of nude images, or online bullying. By selecting the "E-safety" category within CPOMS, the concern will automatically be directed to the email address esafety@lordwandsworth.org. The designated staff member (DDSL-ESafety) will then provide guidance on the subsequent steps and action points within the application. This process will be overseen by the DSL.

4.6.3 Logging of concerns

At LWC, all personnel are required to familiarize themselves with the filtering and monitoring systems in place to ensure that internet usage aligns with safeguarding measures. Teachers have the responsibility of identifying and appropriately logging any potential safeguarding issues related to internet use during lessons, using CPOMS.

Knowledge of LWC's filtering and monitoring process is communicated through ongoing professional development sessions, announcements, emails, and during the onboarding process.

4.7 Data storage

The College takes its compliance with the Data Protection Act seriously. Please refer to the Data Protection Policies for further details. Staff and pupils are expected to save all data relating to their work to their College device or to the College's central server / One Drive Account.

Staff may only take information offsite when authorised to do so, and only when it is necessary and required in order to fulfil their role. No personal data of staff or pupils should be stored on personal memory sticks. Staff devices should be encrypted if any data (see above) or passwords are stored on them.

Any security breaches or attempts, loss of equipment and any unauthorised use or suspected misuse of IT must be immediately reported to the IT Manager.

New members of staff who require access to the College database for the fulfilment of their role before the commencement of their contract must sign a letter accepting their responsibilities under the Data Protection Policy, Safeguarding and Child Protection Policy and Use of IT and Devices Policy.

4.8 Password security

Pupils and staff have individual College network logins, email addresses and storage folders on the server. Staff and pupils are regularly reminded of the need for password security.

All pupils and members of staff should:

- use a strong password (eight alpha numeric characters or more, and containing upper and lower case letters), which should be changed 3 times per year;
- not write passwords down; and
- should not share passwords with other pupils or staff;
- devices should always be locked when not in use.

4.9 Safe use of digital and video images

The development of digital imaging technologies has created significant benefits to learning, allowing staff and pupils instant use of images that they have recorded themselves or downloaded from the internet. However, staff, parents / carers and pupils need to be aware of the risks associated with publishing digital images on the internet. Such images may provide avenues for cyberbullying, stalking or grooming to take place. Digital images may remain available on the internet forever and may cause harm or embarrassment to individuals in the short or longer term.

When using digital images, staff should inform and educate pupils about the risks associated with the taking, use, sharing, publication and distribution of images. In particular they should recognise the risks attached to publishing their own images on the internet (e.g. on social networking sites).

In accordance with guidance from the Information Commissioner's Office, parents / carers are welcome to take videos and digital images of their children at College events for their own personal use (as such use is not covered by the Data Protection Act). To respect everyone's privacy and in some cases protection, these images should be used with extreme caution on blogs or social networking sites etc. These aspects are covered by the College's Taking, Storing & Use of Images Policy.

Staff are allowed to take digital / video images using a College device to support educational aims, but must follow this policy and the Use of IT and Devices Policy and the Taking, Storing & Use of Images

Policy concerning the sharing, distribution and publication of those images. Those images should only be taken on College equipment. Personal equipment must not be used for taking images of pupils.

Pupils who take, use, share, publish or distribute images of others must do so with their permission.

Care should be taken when taking digital / video images that pupils are appropriately dressed and are not participating in activities that might bring the individuals or the College into disrepute. It is unacceptable to take photos in changing rooms, for example.

The publication of photographs, that include pupils on the College website, twitter or on College managed social media, must be done so in-line with the Taking, Storing & Use of Images Policy.

Photographs published on the College website, or displayed elsewhere, that include pupils, will be selected carefully and will comply with good practice guidance on the use of such images. Pupils' full surnames will not be used anywhere on a website or blog, particularly in association with photographs.

4.10 Misuse

Lord Wandsworth College will not tolerate illegal activities or activities that are inappropriate in a school context, and will report illegal activity to the police and/or the LSCB. If the College discovers that a child or young person is at risk as a consequence of online activity, it may seek assistance from the CEOP.

Incidents of misuse or suspected misuse must be dealt with by staff in accordance with the appropriate College policy e.g. Good Behaviour, Discipline, Rewards and Sanctions (Including Exclusions) Policy or the Safeguarding and Child Protection Policy etc.

The College will impose a range of sanctions on any pupil who misuses technology to bully, harass or abuse another pupil in line with our Anti-Bullying Policy.

4.11 Complaints

As with all issues of safety at Lord Wandsworth College, if a member of staff, a pupil or a parent / carer has a complaint or concern relating to e-safety prompt action will be taken to deal with it. Complaints should be addressed to an appropriate member of staff in the first instance, who will undertake an immediate investigation and liaise with the leadership team and any members of staff or pupils involved. Please see the Complaints Policy for further information.

Incidents of or concerns around safeguarding and e-safety must be reported by any member of staff to the DSL who will record all events, in accordance with the College's Safeguarding and Child Protection Policy.

5. PREVENT DUTY

5.1 Prevent Duty: What It Means For LWC

In order for LWC to fulfil the Prevent duty, it is essential that staff are able to identify children who may be vulnerable to radicalisation and know what to do when they are identified. Protecting children from the risk of radicalisation is part of LWC's wider safeguarding duties, and is similar in nature to protecting children from other harms (e.g. drugs, gangs, neglect, sexual exploitation), whether these come from within their family or are the product of outside influences.

The School builds pupils' resilience to radicalisation by promoting Fundamental British Values and enabling them to challenge extremist views. The Prevent duty is not intended to stop pupils debating controversial issues. On the contrary, the School aims to provide a safe space in which children, young people and staff can understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments.

LWC promotes the spiritual, moral, social and cultural development of pupils and, within this, Fundamental British Values. Personal, Social Health and Economic Education (PSHEE) is an effective way of providing pupils with time to explore sensitive or controversial issues, and equipping them with the knowledge and skills to understand and manage difficult situations.

The subject is used to teach pupils to recognise and manage risk, make safer choices, and recognise when pressure from others threatens their personal safety and wellbeing. It also allows our pupils to develop effective ways of resisting pressures, including knowing when, where and how to get help. LWC encourages pupils to develop positive character traits such as resilience, determination, self-esteem, and confidence. Religious Studies also plays a key role in helping pupils better understand different faiths and religions, leading to greater levels of inclusivity.

5.2 Risk Assessment

The statutory guidance makes clear that LWC is expected to assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. In order to do this the School demonstrates both a general understanding of the risks affecting children and young people in the area and a specific understanding of how to identify individual children who may be at risk of radicalisation and what to do to support them. The general risks affecting children and young people vary in different parts of the country, and according to their age; understanding the local context is an important part of safeguarding our young people. Staff should be able to understand these risks so that they can respond in an appropriate and proportionate way. At the same time we remain aware of the increased risk of online radicalisation, as terrorist organisations seek to radicalise young people through the use of social media and the internet.

There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology. As with managing 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. Children at risk of radicalisation may display different signs or seek to hide their views. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately.

The Prevent duty does not require teachers or childcare providers to carry out unnecessary intrusion into family life but as with any other safeguarding risk, they must take action when they observe behaviour of concern.

The School's response to concerns about radicalisation follow the general safeguarding principles as laid out in other parts of this document. Strong leadership, working in partnership and good information sharing are especially important in preventing radicalisation, extremism and acts of terrorism.

5.3 Staff training

The statutory guidance refers to the importance of Prevent awareness training to equip staff to identify children at risk of being drawn into terrorism and to challenge extremist ideas. At LWC we aim to train all staff and governors in Prevent principles and approaches every two years. Moreover the

DSL needs to undertake the government's Prevent awareness training. The DSL is able to provide advice and support to other members of staff on protecting children from the risk of radicalisation.

5.4 Online Safety

As stated in the e-safety section of this policy, we have robust filtering and monitoring processes in place to spot the early signs of potential radicalisation.

5.5 What Staff Should Do If A Child Is Seen As At Risk Of Radicalisation

The Prevent duty requires that all staff are aware of the signs that a child may be vulnerable to radicalisation. The risks will need to be considered for political; environmental; animal rights; or faith-based extremism that may lead to a child becoming radicalised. All staff have received awareness training in order that they can identify the signs of children being radicalised.

Any child who is considered vulnerable to radicalisation will be referred by the DSL Team to Hampshire children's social care, where the concerns will be considered in the Multi Agency Support Hub (MASH) process. If the Police Prevent officer considers the information to be indicating a level of risk a "channel panel" will be convened and the College will attend and support this process.

Staff should follow the College'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 Channel referral or children's social care depending on the level of risk. Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages. Detailed guidance on Channel is available.

If staff have concerns that there is an immediate/significant risk of a child being drawn into terrorism they must call 999 and follow it up with a MASH referral. Advice and support can also be sought from children's social care.

The College, in recognition that pupils may be at risk of being drawn into terrorism or other forms of extremism, carries out appropriate risk assessments (following consultation with local partners, such as the Police) of the potential risk in the local area. Such risk assessments are discussed with the Headmaster, DSL, deputy DSLs and governors responsible for safeguarding to ensure the College's safeguarding arrangements are sufficiently robust to help prevent and protect children from being drawn into terrorism and are regularly revised.

The College annually completes the ISBA Prevent Duty Risk Assessment.

6. The School's Arrangements To Fulfil Other Safeguarding Responsibilities

6.1 Teaching Children How To Keep Safe

The governing body ensures that all pupils are taught about safeguarding, including online, through the curriculum, PSHEE and Relationships and Sex Education (RSE) to help children to adjust their behaviours, both inside and outside of school life, 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.

Internet safety is an integral part of the College's curriculum and is embedded in PSHEE and relationships and sex education (RSE). Relevant information is provided to pupils and discussed in assemblies, tutor groups and Houses.

The College has appropriate filters and monitoring systems in place to safeguard children from potentially harmful and inappropriate material online (see above). Such systems aim to reduce the risk of children being exposed to illegal, inappropriate and harmful materials online; reduce the risk of children being subjected to harmful online interaction with others; and help manage online behaviour that can increase a child's likelihood of, or causes, harm.

6.2 Relationships And Sex Education ("RSE")

RSE is compulsory from September 2020. The School has 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. RSE forms a key part of the School's PSHEE programme. For more information, please see the PSHEE Policy

6.3 Looked After Children

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

Pete Maidment, Junior Houseparent, is the designated teacher that has responsibility for their welfare and progress. The College ensures that the designated member of staff receives appropriate training in order to carry out their role.

6.4 Arrangements For Visiting Speakers

The College has clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable. These are detailed in the Visitor Policy. The College'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 College and British values.

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

Visiting speakers will be expected to understand that, where appropriate, their session should actively promote the British values of democracy, the rule of law, individual liberty, mutual respect and tolerance of those with different faiths and beliefs and at no point undermine these. In some cases, the College 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 College site, will be escorted by a College employee. On attending the College, visiting speakers may be required to show original current identification documents including a photograph such as a passport or photo card driving licence. The College shall also keep a formal register of visiting speakers retained in line with its Data Protection Policy.

6.5 Health and Safety

www.gov.uk/government/publications/health-and-safety-advice-for-schools
<http://www.hse.gov.uk/services/education/>

The College works to a separate Health and Safety Policy.

The site, the equipment and the activities carried out as part of the curriculum are all required to comply with the Health and Safety at Work act 1974 and regulations made under the Act.

All risks are required to be assessed and recorded plans of how to manage the risk are in place. The plans should always take a common sense and proportionate approach to allow activities to be safe rather than preventing them from taking place. The College has several related policies e.g., Health and Safety Policy, Risk Assessment Policy etc. (available on the VLE or from Reception) which detail the actions that we take in more detail.

6.6 Site Security

www.gov.uk/government/publications/school-security

The College works to several separate policies relating to security e.g., Security and Access Control, Visitor Policy, Pupil Access to Areas of Risk Within the College Policy.

We aim to provide a secure site but recognise that the site is only as secure as the people who use it. Therefore, all people on the site must adhere to the rules which govern it. These are:

- Doors are kept closed to prevent intrusion.
- Visitors and volunteers report to Reception and must sign in.
- Visitors and volunteers are identified by a Visitor Badge.
- Children are only allowed home during the school day with adults/carers with parental responsibility or permission being given.
- All children leaving or returning during the school day must sign out and in.
- Empty classrooms have windows closed.

The College employs a night porter who performs routine checks during term time after dark.

6.7 Off-Site Visits

www.hants.gov.uk/outdoor_education

www.hampshireoutdoors.com

<http://oeapng.info/evc/>

The College works to a separate School Visits and Activities Outside School Policy.

A particular strand of health and safety is to consider risks when undertaking off-site visits. Some activities, especially those happening away from the College and on residential visits, can involve higher levels of risk. If these are annual or infrequent activities, a review of an existing assessment may be all that is needed. If it is a new activity, a visit involving adventure activities, residential, overseas or an 'Open Country' visit, a specific assessment of significant risks must be carried out. The College has an educational visits coordinator (EVC) who liaises with the local authority's outdoor education adviser through the use of the local authority's Evolve process which staff in schools use to manage risks and support with their off-site visits. It also provides training in the management of groups during off-site visits as well as First Aid in an outdoor context.

6.8 First Aid

www.gov.uk/government/publications/first-aid-in-schools

The College works to a separate First Aid Policy.

6.9 Physical Intervention (Use Of Reasonable Force)

<https://www.gov.uk/government/publications/use-of-reasonable-force-in-schools> guidelines for the use of restrictive physical intervention in Hampshire maintained schools

The College works to a separate Reasonable Force Policy.

6.10 Taking And The Use And Storage Of Images

<https://ico.org.uk/for-the-public/schools/photos>

The College works to a separate Taking, Storing and Use of Images Policy.

As a school we will seek consent from the parent of a pupil and from teachers and other adults before taking and publishing photographs or videos that contain images that are sufficiently detailed to identify the individual in College publications, printed media or on electronic publications.

We will not seek consent for photos where you would not be able to identify the individual.

We will seek consent for the period the pupil remains registered with us and, unless we have specific written permission, we will remove photographs after a child (or teacher) appearing in them leaves the College or if consent is withdrawn.

Photographs will only be taken on College-owned equipment and stored on the College network. No images of pupils will be taken or stored on privately owned equipment by staff members.

6.11 Transporting Pupils

<http://documents.hants.gov.uk/education/LADOSafeguardingchildrenineducation2014templateletterforparent.doc>

On occasions, parents and volunteers support with the task of transporting children to visits and off-site activities arranged by the College (this is in addition to any informal arrangements made directly between parents for after school clubs etc.). In managing these arrangements, we put in place measures to ensure the safety and welfare of young people carried in parents' and volunteers' cars.

6.12 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).

6.13 Oversight Of Safeguarding, Including Arrangements For Reviewing Policies And Procedures

Lucinda Fleming and Caroline Cazenove are the board-level leads designated to take a lead in relation to responsibility for the safeguarding arrangements in the College. They are members of the Governing Body.

The College considers its obligation to review safeguarding practices a matter of its everyday concerns. A review of the College's child protection policies takes place at least annually, including an update and review of the effectiveness of procedures and their implementation.

Safeguarding and child protection procedures are reviewed by the nominated governor and the DSL before each governors' Regulatory and Safeguarding Committee meeting (at least once per term). Minutes from the committee meetings are discussed at each meeting of the full board of governors and in addition the Headmaster and DSL discuss safeguarding with the full board of governors (at least once a term). The annual review by governors of safeguarding and child protection occurs during their October meeting when the Hampshire Safeguarding Audit Tool is discussed amongst other things. An external audit of safeguarding arrangements and their effectiveness is commissioned regularly.

The College draws on the expertise of staff, including the DSL and DDSLs, in shaping the College's safeguarding arrangements and policies.

If there has been a substantiated allegation against a member of staff, the College will work with the LADO to determine whether there are any improvements to be made to the College's procedures or practice to help prevent similar events in the future.

The College monitors and evaluates its Safeguarding and Child Protection policies and procedures through the following activities:

- Governing Body visits to the College.
- Governing Body Regulatory and Safeguarding Committee (R&SC).
- Senior Leadership Team leadership, provision of resources, monitoring and appointments.
- Pupil questionnaires;
- Frequent scrutiny of attendance data;
- Regular analysis of a range of risk assessments;
- Regular analysis of appropriate provision for the fulfilment of Safeguarding responsibilities relevant to the College.
- Frequent scrutiny by the Governing Body at its meetings.
- Logs of bullying and/or racist behaviour incidents are reviewed regularly by members of SLT.
- Regular review of parental concerns and parental questionnaires.
- Regular review of the use of pupil-specific leisure rooms and clubs at lunchtime and after school.
- Regular review of training offered to staff, including e-safety training.

6.14 Major Incident Review

When there is a serious incident of a safeguarding nature, the DSL will consider whether a Major Incident Review should be conducted. The purpose of the Major Incident Review is to look at the College's processes in relation to the incident and ascertain what lessons could be learned. Where possible the person conducting the Major Incident Review has not had direct involvement in the College's response to the incident itself.

APPENDIX 1: Hampshire Safeguarding Children Partnership And Children’s Trust Thresholds Chart



**Hampshire and Isle of Wight Safeguarding Children Partnership and Children’s Trust
Thresholds Chart – July 2019**



Threshold:	1. Universal	2. Early Help	3. Targeted Early Help	4. Children’s Social Care
The Child or Young Person (maybe unborn):	Has needs met within universal provision. May need limited intervention within the setting to avoid needs arising.	Has additional needs identified within the setting that can be met within identified resources through a single-agency response and partnership working.	Has multiple needs requiring a multi-agency coordinated response.	Has a high level of unmet and complex needs or is in need of protection.
	<p>←→ ←→ ←→</p> <p>The following circumstances and key features are for guidance and should always be considered in respect of the impact on the child or young person including unborn and newly born. Each child’s case will be individually considered taking into account the child’s circumstances and the strengths of the family.</p>			
Circumstances and Key Features:	<p>Developmental Needs of child</p> <ul style="list-style-type: none"> Achieving learning targets Good attendance at school Meeting developmental milestones Has psychological wellbeing Socially interactive and skilled Ability to protect self and be protected 	<p>Developmental Needs of Child</p> <ul style="list-style-type: none"> Absence/truancy from school Incidence of absence/missing from home Has special educational needs (whether or not they have a statutory Education, Health and Care Plan) Is disabled and has specific additional needs Is a young carer Is showing signs of being drawn into antisocial or criminal behaviour including gang involvement and association with organised crime groups Is misusing drugs or alcohol Has previously been in care/returned home to their family from care Subject to fixed-term exclusions At risk of social exclusion Has poor attachments Language and communication difficulties Reduced access to core services Potential for becoming NEET (not in education, employment or training) Potential not to attain Slow in meeting developmental milestones Missing health checks/immunisations Minor health problems Poor self-esteem Low level emotional/mental health issues Inappropriate use of social media (e.g. sexting/use of inappropriate images) 	<p>Developmental Needs of Child</p> <ul style="list-style-type: none"> Persistent absence from school Missing from school/home regularly Has special educational needs (whether or not they have a statutory Education, Health and Care Plan) No access to core services Social exclusion Poor attachments Is disabled and has specific additional needs Is subject to permanent exclusions/no school place Not in education, employment or training (NEET) Has returned home to their family from care Developmental milestones not being met due to persistent parental failure/inability Chronic/recurring health problems Regular missed appointments affecting developmental progress Teenage pregnancy Is misusing drugs or alcohol Risky sexual behaviour/underage sexual activity Offending/antisocial behaviour resulting in risk of entering the Youth Justice System Emotional/mental health issues including self-harm Is showing signs of being drawn into antisocial or criminal behaviour including gang involvement and association with organised crime groups 	<p>Developmental Needs of Child</p> <ul style="list-style-type: none"> Chronic persistent absence, permanent exclusions or no school place that risks entry to the care system Is frequently missing/goes missing from care or from home Persistent social exclusion Poor attachments Complex/multiple disabilities Has special educational needs (whether or not they have a statutory Education, Health and Care Plan) Is a non-ambulant child with bruising or unexplained marks. Complex mental health issues affecting developmental needs including self-harm High level emotional health issues and very low self-esteem Has recently returned home to their family from care Non-organic failure to thrive Sexually inappropriate behaviour Sexually aggressive behaviour Teenage parent/pregnancy under the age of 13 Drug/alcohol use severely impairing development Relationship breakdown between child and parent/carer that risks entry to the care system Offending/antisocial behaviour and in the Youth Justice System Unaccompanied asylum-seeking children (UASC) Is at risk of modern slavery, trafficking or exploitation Is at risk of being radicalised or exploited
	<p>Family and Environment</p> <ul style="list-style-type: none"> Supportive relationships Housed, good diet and kept healthy Supportive networks Access to positive activities 	<p>Family and Environment</p> <ul style="list-style-type: none"> Family or household member relies on child for some care Poor parent/child relationships Children of prisoners/parent subject to community order(s) Child exposed to bullying environment Poor housing and poor home environment impacting on child’s health Community harassment/discrimination Low income affects achievement Parenting advice needed to prevent needs escalating Poor access to core services Risk of relationship breakdown Concerns about possible domestic abuse 	<p>Family and Environment</p> <ul style="list-style-type: none"> Housing tenancy at risk Imminent risk of homelessness Community harassment/discrimination Domestic abuse Relationship breakdown Transient family Is in a family circumstance presenting challenges for the child such as drug and alcohol misuse, adult mental health issues and domestic abuse Community harassment/discrimination 	<p>Family and Environment</p> <ul style="list-style-type: none"> Suspicion of physical, emotional or sexual abuse, or neglect Domestic abuse resulting in child being at risk of significant harm Homeless child/young person Family intentionally homeless Extreme poverty affecting child’s wellbeing Forced marriage, Honour-Based Violence, Female Genital Mutilation, Fabricated or Induced Illness (FII)
	<p>Parents and Carers</p> <ul style="list-style-type: none"> Protected by carers Secure and caring home Receive and act on information, advice and guidance Appropriate boundaries maintained 	<p>Parents and Carers</p> <ul style="list-style-type: none"> Inconsistent care arrangements Poor supervision by parent/carer Inconsistent parenting Poor response to emerging needs Historic context of parents/carers own childhood Parent or other family member involved in offending behaviour/subject to supervision within the criminal justice system 	<p>Parents and Carers</p> <ul style="list-style-type: none"> Parental learning or physical disability, substance misuse or mental health issues impact on parenting Inconsistent care arrangements Poor supervision by parent/carer Inconsistent parenting Poor response to identified needs Historic context of parents/carers own childhood Parent or other family member involved in offending behaviour/subject to supervision within the criminal justice system 	<p>Parents and Carers</p> <ul style="list-style-type: none"> Previous history of child/ren of one or more adult in the household being in care or subject to child protection plans Parental encouragement of abusive/offending behaviour Continuing poor supervision in the home resulting in significant harm or risk of significant harm Parental non-compliance/disguised compliance or cooperation Inconsistent parenting affects child’s developmental progress
What Do I Do Next?	Go direct to the family information site: www.iwight.com/iwightchyps https://fish.hants.gov.uk/kb5/hampshire/directory/home.page	Consider Early Help checklist. Referral to agency for support to meet identified needs. For further advice or guidance in respect of Early Help, contact your local Family Support Service.	Early Help assessment to be considered. If you require advice or guidance in respect of the child or young person’s needs, submit an Inter-Agency Referral Form to the Children’s Reception Team.	Use the Inter-Agency Referral Form to refer to the Children’s Reception Team or phone on 0300 300 0117 if the matter is an urgent safeguarding issue. Alternatively, ring police on 999 if at immediate risk.
Level of Assessment:	No formal assessment	Early Help checklist to be considered	Early Help assessment	Child and Family assessment / child protection (S47) investigation

Refer via [Inter-Agency Referral Form \(IARF\)](#)

Hampshire Professionals Number: 01329 225379
Hampshire Public Number: 0300 555 1384

Isle of Wight Professionals Number: 0300 300 0901
Isle of Wight Public Number: 0300 300 0117

Emergencies: 999

7. APPENDIX 2: SIGNS AND TYPES OF ABUSE AND OTHER SAFEGUARDING ISSUES

All College staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

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, and serious youth violence.

- **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, including through corporal punishment. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
- **Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
- **Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Sexual abuse also includes sexual violence and sexual harassment which can occur between two children of any sex. They can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence are sexual offences under the Sexual Offences Act 2003, such as rape, sexual assault and assault by penetration. Sexual harassment is 'unwanted conduct of a sexual nature' that can occur online and offline. Sexual harassment is likely to violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Sexual harassment can include sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names; sexual "jokes" or taunting; physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes and displaying pictures, photos or drawings of a sexual nature; and online sexual harassment, which might include non-consensual sharing of sexual images and videos and sharing sexual images and videos (both often referred to as sexting);

inappropriate sexual comments on social media; exploitation; coercion and threats. Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

- **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 because of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

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. All staff should be aware of the associated risks and understand the measures in place to manage these.

Specific safeguarding issues: behaviours linked to drug taking, alcohol abuse, truanting and sexting put children in danger. Safeguarding issues can also manifest themselves via child-on-child abuse, such as bullying (including cyberbullying), gender-based violence/sexual assaults, sexting and upskirting. Safeguarding issues can also be linked to, for example, 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; and trafficking.

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

- Exploitation can be isolated (one-on-one) or organised group/criminal activity.
- There can be a big age gap between victim and perpetrator, but it can also be child-on-child.
- Boys can be targeted just as easily as girls – this is not gender specific.
- Perpetrators can be women and not just men.
- Exploitation can be between males and females or between the same genders.
- Children with learning difficulties can be particularly vulnerable to exploitation as can children from particular groups, e.g. looked after children, young carers, children who have a history of physical, sexual emotional abuse or neglect or mental health problems; children who use drugs or alcohol, children who go missing from home or school, children involved in crime, children with parents/carers who have mental health problems, learning difficulties/other issues, children who associate with other children involved in exploitation. However, it is important to recognise that any child can be targeted.

Some of the following signs may be indicators of sexual exploitation:

- Children who appear with unexplained gifts or new possessions.
- Children who associate with other young people involved in exploitation.
- Children who have older boyfriends or girlfriends.
- Children who suffer from sexually transmitted infections or become pregnant.
- Children who suffer from changes in emotional well-being.
- Children who misuse drugs and alcohol.
- Children who go missing for periods of time or regularly come home late; and
- Children who regularly miss school or education or do not take part in education.

CSE can happen to a child of any age, gender, ability or social status. Often the victim of CSE is not aware that they are being exploited and do not see themselves as a victim.

As a school we educate all staff in the signs and indicators of sexual exploitation. The DSL will share information as appropriate with children's social care.

We recognise that we may have information or intelligence that could be used to both protect children and prevent risk. Any relevant information that we have will be shared on the community partnership information (CPI) form.

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

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, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. 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 page 27 for more information), forced to shoplift or pickpocket, or to threaten other young people.

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts or new possessions.
- children who associate with other young people 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.

County Lines: is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line".

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to 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 several locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes. Children are often recruited to move drugs and money between locations and are known

to be exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

Like other forms of abuse and exploitation, county lines exploitation:

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

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: Honour based abuse is a violent crime or incident which may have been committed to protect or defend the honour of the family or community.

It is often linked to family or community members who believe someone has brought shame to their family or community by doing something that is not in keeping with their unwritten rule of conduct. For example, honour based abuse might be committed against people who:

- become involved with a boyfriend or girlfriend from a different culture or religion;
- want to get out of an arranged marriage;
- want to get out of a forced marriage;
- wear clothes or take part in activities that might not be considered traditional within a particular culture;
- convert to a different faith from the family.

Women and girls are the most common victims of Honour based abuse however it can also affect men and boys. Crimes of 'honour' do not always include violence. Crimes committed in the name of 'honour' might include:

- domestic abuse
- threats of violence
- sexual or psychological abuse
- FGM
- breast ironing
- forced marriage
- being held against your will or taken somewhere you don't want to go
- assault

If staff believe that a pupil is at risk from Honour based abuse the DSL will follow the usual safeguarding referral process, however, if a crime has been committed or the pupil is at immediate risk the Police will be contacted in the first place. It is important that if honour based abuse is known or suspected that communities and family members are NOT spoken to prior to referral to the police or social care as this could increase risk to the child.

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.

Female Genital Mutilation (FGM): FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs for non-medical reasons. It has no health benefits and harms girls and women in many ways. It involves removing and damaging healthy and normal female genital tissue, and hence interferes with the natural function of girls' and women's bodies.

The age at which girls undergo FGM varies enormously according to the community. The procedure may be carried out when the girl is a new born, during childhood or adolescence, just before marriage or during the first pregnancy. However, most cases of FGM are thought to take place between the ages of 5 and 8 and therefore girls within this age bracket are at a higher risk.

FGM is illegal in the UK.

To give an example of indications that a girl has already been subjected to FGM:

- A pupil may have difficulty walking, sitting or standing and may even look uncomfortable.
- A pupil may have frequent urinary, menstrual or stomach problems or spend longer than normal in the bathroom due to difficulties urinating.
- There may be prolonged or repeated absences from school and/or noticeable behaviour changes (e.g., withdrawal or depression) on the pupil's return.

- A pupil is reluctant to undergo medical examination.

If staff have a concern that a pupil may be at risk of FGM, they should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with Police and Children's Social Care. If in any doubt, staff should speak to the DSL.

There is a statutory duty on teachers to personally report to the Police where they **discover** (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve 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 College's local safeguarding procedures. **At no time will staff examine pupils to confirm this.**

For cases where it is believed that a girl may be vulnerable to FGM or there is a concern that she may be about to be genitally mutilated the staff will inform the DSL who will report it as with any other child protection concern.

Forced marriage: forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture to coerce a person into marriage. 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 on pages 13-14 of the Multi-agency guidelines: Handling cases of forced marriage. School staff can also contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmufco.gov.uk.

Characteristics that may indicate forced marriage:

While individual cases of forced marriage, and attempted forced marriage, are often very particular, they are likely to share several common and important characteristics, including:

- an extended absence from school/college, including truancy.
- a drop in performance or sudden signs of low motivation.
- excessive parental restriction and control of movements.
- a history of siblings leaving education to marry early.
- poor performance, parental control of income and students being allowed only limited career choices.
- evidence of self-harm, treatment for depression, attempted suicide, social isolation, eating disorders or substance abuse; and/or
- evidence of family disputes/conflict, domestic violence/abuse or running away from home.

On their own, these characteristics may not indicate forced marriage. However, it is important to be satisfied that where these behaviours occur, they are not linked to forced marriage. It is also important to avoid making assumptions about an individual pupil's circumstances or act based on stereotyping. For example, an extended holiday may be taken for entirely legitimate reasons and may not necessarily represent a pretext for forced marriage.

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

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

Special Educational Needs and/or Disabilities

Pupils with SEND may not outwardly shown signs of abuse and/or may have difficulties in communication about abuse or neglect.

These can include:

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

Staff will support such pupils in expressing any concerns they may have and will be particularly vigilant to any signs or indicators of abuse, discussing this with the DSL as appropriate.

Lesbian, Gay, Bi, Trans and Queer/Questioning ("LGBTQ+"): children who are LGBTQ+ can be targeted by their peers. In some cases, a pupil who is perceived by their peers to be LGBTQ+ (whether they are or not) can be just as vulnerable as children who identify as LGBTQ+.

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

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

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

Children witnessing domestic abuse is recognised as 'significant harm' in law. These children may become aggressive; display anti-social behaviours; suffer from depression or anxiety; or fail to reach their educational potential.

Indicators that a child is living within a relationship with domestic abuse include:

- withdrawn
- suddenly behaves differently
- anxious
- clingy
- depressed
- aggressive
- problems sleeping
- eating disorders
- wets the bed
- soils clothes
- takes risks
- misses school
- changes in eating habits
- obsessive behaviour
- nightmares
- drugs
- alcohol
- self-harm
- thoughts about suicide

These behaviours themselves do not indicate that a child is living with domestic abuse but should be considered as indicators that this may be the case.

If staff believe that a child is living with domestic abuse, this will be reported to the designated safeguarding lead for referral to be considered to children's social care.

Homelessness: Being homeless, or at risk of homelessness presents a real risk to a child's welfare. The College 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 Social Services where a child has been harmed or is at risk of harm, in accordance with this policy.

Children Missing from Education: patterns of children missing education can be an indicator of either abuse or safeguarding risks. A relatively short length of time a child is missing does not reduce risk of harm to that child, and all absence or non-attendance should be considered with other known factors or concerns. All unexplained absences will be followed up in accordance with the Missing Pupil Policy.

The College shall inform the local authority of any pupil who is going to be added to or deleted from the College'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:

- fulfil its duty to identify children of compulsory school age who are missing from education; and

- 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.

College attendance registers are carefully monitored to identify any trends. The College will inform the local authority where the child is normally resident of any pupil who fails to attend school regularly or has been absent without the College's permission for a continuous period of 20 school days or more.

DSLs and staff should consider:

Missing lessons: Are there patterns in the lessons that are being missed? Is this more than avoidance of a subject or a teacher? Does the child remain on the school site or are they absent from the site?

- Is the child being sexually exploited during this time?
- Are they late because of a caring responsibility?
- Have they been directly or indirectly affected by substance misuse?
- Are other pupils routinely missing the same lessons, and does this raise other risks or concerns?
- Is the lesson being missed one that would cause bruising or injuries to become visible?

Single missing days: Is there a pattern in the day missed? Is it before or after the weekend suggesting the child is away from the area? Are there specific lessons or members of staff on these days? Is the parent informing the school of the absence on the day? Are missing days reported back to parents to confirm their awareness?

- Is the child being sexually exploited during this day?
- Do the parents appear to be aware?
- Are the pupil's peers making comments or suggestions as to where the pupil is at?

Continuous missing days: Has the school been able to contact the parent? Is medical evidence being provided? Are siblings attending school (either our or local schools)?

- Did we have any concerns about radicalisation, FGM, forced marriage, Honour based abuse, sexual exploitation?
- Have we had any concerns about physical or sexual abuse?

The College will view absence as both a safeguarding issue and an educational outcomes issue. The College may take steps that could result in legal action for attendance, or a referral to children's social care, or both.

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

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

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

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online

child arrangements information tool with clear and concise information on the dispute resolution service. The College may refer some parents and carers to this service where appropriate.

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

The Toxic Trio: the term 'Toxic Trio' has been used to describe the issues of domestic violence, mental ill-health and substance misuse which have been identified as common features of families where harm to women and children has occurred. They are viewed as indicators of increased risk of harm to children and young people. In a review of Serious Cases Reviews undertaken by Ofsted in 2011, they found that in nearly 75% of these cases two or more of the issues were present.

Parental mental health: the term "mental ill health" is used to cover a wide range of conditions, from eating disorders, mild depression and anxiety to psychotic illnesses such as schizophrenia or bipolar disorder. Parental mental illness does not necessarily have an adverse impact on a child's developmental needs, but it is essential to always assess its implications for each child in the family. It is essential that the diagnosis of a parent/carer's mental health is not seen as defining the level of risk. Similarly, the absence of a diagnosis does not equate to there being little or no risk.

For children the impact of parental mental health can include:

- The parent / carer's needs or illnesses taking precedence over the child's needs;
- Child's physical and emotional needs neglected;
- A child acting as a young carer for a parent or a sibling;
- Child having restricted social and recreational activities;
- Child finds it difficult to concentrate- impacting on educational achievement;
- A child missing school regularly as (s)he is being kept home as a companion for a parent / carer;
- Adopt paranoid or suspicious behaviour as they believe their parent's delusions;
- Witnessing self-harming behaviour and suicide attempts (including attempts that involve the child);
- Obsessional compulsive behaviours involving the child.

If staff become aware of any of the above indicators, or others that suggest a child is suffering due to parental mental health, the information will be shared with the DSL to consider a referral to children's social care.

Parental Substance misuse: substance misuse applies to the misuse of alcohol as well as 'problem drug use', defined by the Advisory Council on the Misuse of Drugs as drug use which has: 'serious negative consequences of a physical, psychological, social and interpersonal, financial or legal nature for users and those around them.

Parental substance misuse of drugs or alcohol becomes relevant to child protection when substance misuse and personal circumstances indicate that their parenting capacity is likely to be seriously impaired or that undue caring responsibilities are likely to be falling on a child in the family.

For children the impact of parental substance misuse can include:

- Inadequate food, heat and clothing for children (family finances used to fund adult's dependency);

- Lack of engagement or interest from parents in their development, education or wellbeing;
- Behavioural difficulties- inappropriate display of sexual and/or aggressive behaviour;
- Bullying (including due to poor physical appearance);
- Isolation – finding it hard to socialise, make friends or invite them home;
- Tiredness or lack of concentration;
- Child talking of or bringing into school drugs or related paraphernalia;
- Injuries /accidents (due to inadequate adult supervision);
- Taking on a caring role;
- Continued poor academic performance including difficulties completing homework on time;
- Poor attendance or late arrival.

These behaviours themselves do not indicate that a child's parent is misusing substances, but should be considered as indicators that this may be the case.

If staff believe that a child is living with parental substance misuse, this will be reported to the designated safeguarding lead for referral to be considered for children's social care.

Missing, Exploited and Trafficked Children (MET): within Hampshire, the acronym MET is used to identify all children who are missing; believed to be at risk of or being sexually exploited; or who are at risk of or are being trafficked. Given the close links between all these issues, there has been a considered response to join all three issues so that cross over of risk is not missed.

Children Missing from Home or Care: children who run away from home or from care, provide a clear behavioural indication that they are either unhappy or do not feel safe in the place that they are living. Research shows that children run away from conflict or problems at home or school, neglect or abuse, or because children are being groomed by predatory individuals who seek to exploit them. Many run away on numerous occasions.

The association of chief police officers has provided the following definitions and guidance. "Missing person is: 'Anyone whose whereabouts cannot be established and where the circumstances are out of character or the context suggests the person may be the subject of crime or at risk of harm to themselves or another.'

An absent person is: 'A person not at a place where they are expected or required to be'.

All cases classified as 'missing' by the police will receive an active police response – such as deployment of police officers to locate a child. Cases where the child was classified as 'absent' will be recorded by the police and risk assessed regularly but no active response will be deployed.

The absent cases will be resolved when a young person returns or new information comes to light suggesting that they are at risk. In the latter instance, the case is upgraded to 'missing'.

Within any case of children who are missing both push and pull factors will need to be considered.

Push factors include:

- Conflict with parents/carers
- Feeling powerless
- Being bullied/abused
- Being unhappy/not being listened to
- The Toxic Trio

Pull factors include:

- Wanting to be with family/friends
- Drugs, money and any exchangeable item
- Peer pressure
- For those who have been trafficked into the United Kingdom as unaccompanied asylum-seeking children there will be pressure to contact their trafficker

As a school we will inform all parents of children who are absent (unless the parent has informed us). If the parent is also unaware of the location of their child, and the definition of missing is met, we will either support the parent to/directly contact the police to inform them.

Trafficked Children: human trafficking is defined by the UNHCR in respect of children as a process that is a combination of:

- Movement (including within the UK).
- For the purpose of exploitation.

Any child transported for exploitative reasons is a trafficking victim. There is significant evidence that children (both of UK and other citizenship) are being trafficked internally within the UK and this is regarded as a more common form of trafficking in the UK.

There are a number of indicators which suggest that a child may have been trafficked into the UK, and may still be controlled by the traffickers or receiving adults. These are as follows:

- Shows signs of physical or sexual abuse, and/or has contracted a sexually transmitted infection or has an unwanted pregnancy.
- Has a history with missing links and unexplained moves.
- Is required to earn a minimum amount of money every day.
- Works in various locations.
- Has limited freedom of movement.
- Appears to be missing for periods.
- Is known to beg for money.
- Is being cared for by adult/s who are not their parents and the quality of the relationship between the child and their adult carers is not good.
- Is one among several unrelated children found at one address.
- Has not been registered with or attended a GP practice.
- Is excessively afraid of being deported.

For those children who are internally trafficked within the UK indicators include:

- Physical symptoms (bruising indicating either physical or sexual assault).
- Prevalence of a sexually transmitted infection or unwanted pregnancy.
- Reports from reliable sources suggesting the likelihood of involvement in sexual exploitation / the child has been seen in places known to be used for sexual exploitation.
- Evidence of drug, alcohol or substance misuse.
- Being in the community in clothing unusual for a child i.e., inappropriate for age, or borrowing clothing from older people
- Relationship with a significantly older partner.
- Accounts of social activities, expensive clothes, mobile phones or other possessions with no plausible explanation of the source of necessary funding.
- Persistently missing, staying out overnight or returning late with no plausible explanation.
- Returning after having been missing, looking well cared for despite having not been at home.

- Having keys to premises other than those known about.
- Low self-image, low self-esteem, self-harming behaviour including cutting, overdosing, eating disorder, promiscuity.
- Truancy / disengagement with education.
- Entering or leaving vehicles driven by unknown adults.
- Going missing and being found in areas where the child or young person has no known links; and/or
- Possible inappropriate use of the internet and forming on-line relationships, particularly with adults.

These behaviours themselves do not indicate that a child is being trafficked, but should be considered as indicators that this may be the case.

If staff believe that a child is being trafficked, this will be reported to the designated safeguarding lead for referral to be considered to children's social care.

Technologies: technological hardware and software is developing continuously with an increase in functionality of devices that people use. Most children use online tools to communicate with others locally, nationally and internationally. Access to the Internet and other tools that technology provides is an invaluable way of finding, sharing and communicating information. While technology itself is not harmful, it can be used by others to make children vulnerable and to abuse them.

Online Safety: With the current speed of on-line change, some parents and carers have only a limited understanding of online risks and issues. Parents may underestimate how often their children come across potentially harmful and inappropriate material on the internet and may be unsure about how to respond. Some of the risks could be:

- unwanted contact
- grooming
- online bullying including sexting
- digital footprint

The College will therefore seek to provide information and awareness to both pupils and their parents through:

- Acceptable use agreements for children, teachers, parents/carers and governors
- Curriculum activities involving raising awareness around staying safe online
- Information included in letters, newsletters, web site
- Parental Engagement Programme
- High profile events / campaigns e.g., Safer Internet Day
- Building awareness around information that is held on relevant web sites and or publications.

Cyberbullying: central to the College's Anti-Bullying Policy is the principle that '*bullying is always unacceptable*' and that '*all pupils have a right not to be bullied*'.

The College also recognises that it must take note of bullying perpetrated outside College which spills over into the College and so we will respond to any cyber-bullying we become aware of carried out by pupils when they are away from the site. Cyber-bullying is defined as "an aggressive, intentional act carried out by a group or individual using electronic forms of contact repeatedly over time against a victim who cannot easily defend himself/herself."

By cyber-bullying, we mean bullying by electronic media:

Bullying by texts, messages, calls or social media on mobile phones

- The use of mobile phone cameras to cause distress, fear or humiliation
- Posting threatening, abusive, defamatory or humiliating material on websites, to include blogs, personal websites, social networking sites
- Using e-mail to message others
- Hijacking/cloning e-mail accounts
- Making threatening, abusive, defamatory or humiliating remarks in on-line forums

Cyber-bullying may be at a level where it is criminal in character. It is unlawful to disseminate defamatory information in any media including internet sites. Section 127 of the Communications Act 2003 makes it an offence to send, by public means of a public electronic communications network, a message or other matter that is grossly offensive or one of an indecent, obscene or menacing character. The Protection from Harassment Act 1997 makes it an offence to knowingly pursue any course of conduct amounting to harassment.

If we become aware of any incidents of cyberbullying, we will need to consider each case individually as to any criminal act that may have been committed. The College will pass on information to the Police if it feels that it is appropriate or are required to do so.

Gaming: online gaming is an activity that most children and many adults get involved in. The College strives to raise awareness:

- By talking to parents and carers about the games their children play and help them identify whether they are appropriate.
- By support parents in identifying the most effective way of safeguarding their children by using parental controls and child safety mode.
- By talking to parents about setting boundaries and time limits when games are played.
- By highlighting relevant resources.

Online Reputation: online reputation is the opinion others get of a person when they encounter them online. It is formed by posts, photos that have been uploaded and comments made by others on people's profiles. It is important that children and staff are aware that anything that is posted could influence their future professional reputation. Most organizations and work establishments now check digital footprint before considering applications for positions or places on courses.

Grooming: online grooming is the process by which one person with an inappropriate sexual interest in children will approach a child online, with the intention of developing a relationship with that child, to be able to meet them in person and intentionally cause harm.

The College will build awareness amongst children and parents about ensuring that the child is aware that if they communicate with somebody that they have met online, that relationship should stay online

The College will raise awareness by:

- Parental Engagement Programme sessions
- Include awareness around grooming as part of the curriculum
- Identifying with parents and children how they can be safeguarded against grooming.

Fabricated or induced illness: there are three main ways that a carer could fabricate or induce illness in a child. These are not mutually exclusive and include:

- fabrication of signs and symptoms. This may include fabrication of past medical history.
- fabrication of signs and symptoms and falsification of hospital charts and records, and specimens of bodily fluids. This may also include falsification of letters and documents.
- induction of illness by a variety of means.

If we are concerned that a child may be suffering from fabricated or induced illness, we will follow the established procedures of the Hampshire Safeguarding Children Partnership.

Prejudice based abuse: prejudice based abuse or hate crime is any criminal offence which is perceived by the victim or any other person to be motivated by a hostility or prejudice based on a person's real or perceived:

- Disability
- Race
- Religion
- Gender identity
- Sexual orientation

Although this sort of incident is collectively known as a 'Hate Incident' the offender doesn't have to go as far as being motivated by 'hate', they only must exhibit 'hostility'.

This can be evidenced by:

- threatened or actual physical assault
- derogatory name calling, insults, for example racist jokes or homophobic language
- hate graffiti (e.g., on College furniture, walls or books)
- provocative behaviour e.g., wearing of badges or symbols belonging to known right wing, or extremist organisations
- distributing literature that may be offensive in relation to a protected characteristic
- verbal abuse
- inciting hatred or bullying against pupils who share a protected characteristic
- prejudiced or hostile comments during discussions within lessons
- teasing in relation to any protected characteristic e.g., sexuality, language, religion or cultural background
- refusal to co-operate with others because of their protected characteristic, whether real or perceived
- expressions of prejudice calculated to offend or influence the behaviour of others
- attempts to recruit other pupils to organisations and groups that sanction violence, terrorism or hatred.

The College will respond by:

- clearly identifying prejudice-based incidents and hate crimes and monitor the frequency and nature of them within the College
- taking preventative action to reduce the likelihood of such incidents occurring
- recognising the wider implications of such incidents for the school and local community
- providing regular reports of these incidents to the Governing Body
- ensuring that staff are familiar with formal procedures for recording and dealing with prejudice-based incidents and hate crimes
- dealing with perpetrators of prejudice-based abuse effectively
- supporting victims of prejudice-based incidents and hate crimes
- ensuring that staff are familiar with a range of restorative practices to address bullying and prevent it happening again

Faith Abuse: the number of known cases of child abuse linked to accusations of "possession" or "witchcraft" is small, but children involved can suffer damage to their physical and mental health, their capacity to learn, their ability to form relationships and to their self-esteem.

Such abuse generally occurs when a carer views a child as being “different”, attributes this difference to the child being “possessed” or involved in “witchcraft” and attempts to exorcise him or her.

A child could be viewed as “different” for a variety of reasons such as, disobedience; independence; bed-wetting; nightmares; illness; or disability. There is often a weak bond of attachment between the carer and the child.

There are various social reasons that make a child more vulnerable to an accusation of “possession” or “witchcraft”. These include family stress and/or a change in the family structure.

The attempt to “exorcise” may involve severe beating, burning, starvation, cutting or stabbing and isolation, and usually occurs in the household where the child lives.

If the College becomes aware of a child who is being abused in this context, the DSL will follow the normal referral route into children’s social care.

Gangs and Youth Violence: most young people will not be affected by serious violence or gangs. However, where these problems do occur, even at low levels there will almost certainly be a significant impact.

Indicators of serious violent crime may include:

- Increased absence from school.
- A change of 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.
- Unexplained gifts or new possessions.

As a school we have a duty and a responsibility to protect our pupils. It is also well established that success in learning is one of the most powerful indicators in the prevention of youth crime. Dealing with violence also helps attainment. While pupils generally see educational establishments as safe places, even low levels of youth violence can have a disproportionate impact on any education.

The College will:

- develop skills and knowledge to resolve conflict as part of the curriculum.
- challenge aggressive behaviour in ways that prevent the recurrence of such behaviour.
- understand risks for specific groups, including those that are gender-based, and target interventions.
- safeguard, and specifically organise child protection, when needed.
- make referrals to appropriate external agencies.
- carefully manage individual transitions between educational establishments, especially into Pupil Referral Units (PRUs) or alternative provision; and
- work with local partners to prevent anti-social behaviour or crime.

Private fostering: private fostering is an arrangement by a child’s parents for their child (under 16 or 18 if disabled) to be cared for by another adult who is not closely related and is not a legal guardian with parental responsibility for 28 days or more. It is not private fostering if the carer is a close relative to the child such as grandparent, brother, sister, uncle or aunt.

The Law requires that the carers and parents must notify the children’s services department of any private fostering arrangement.

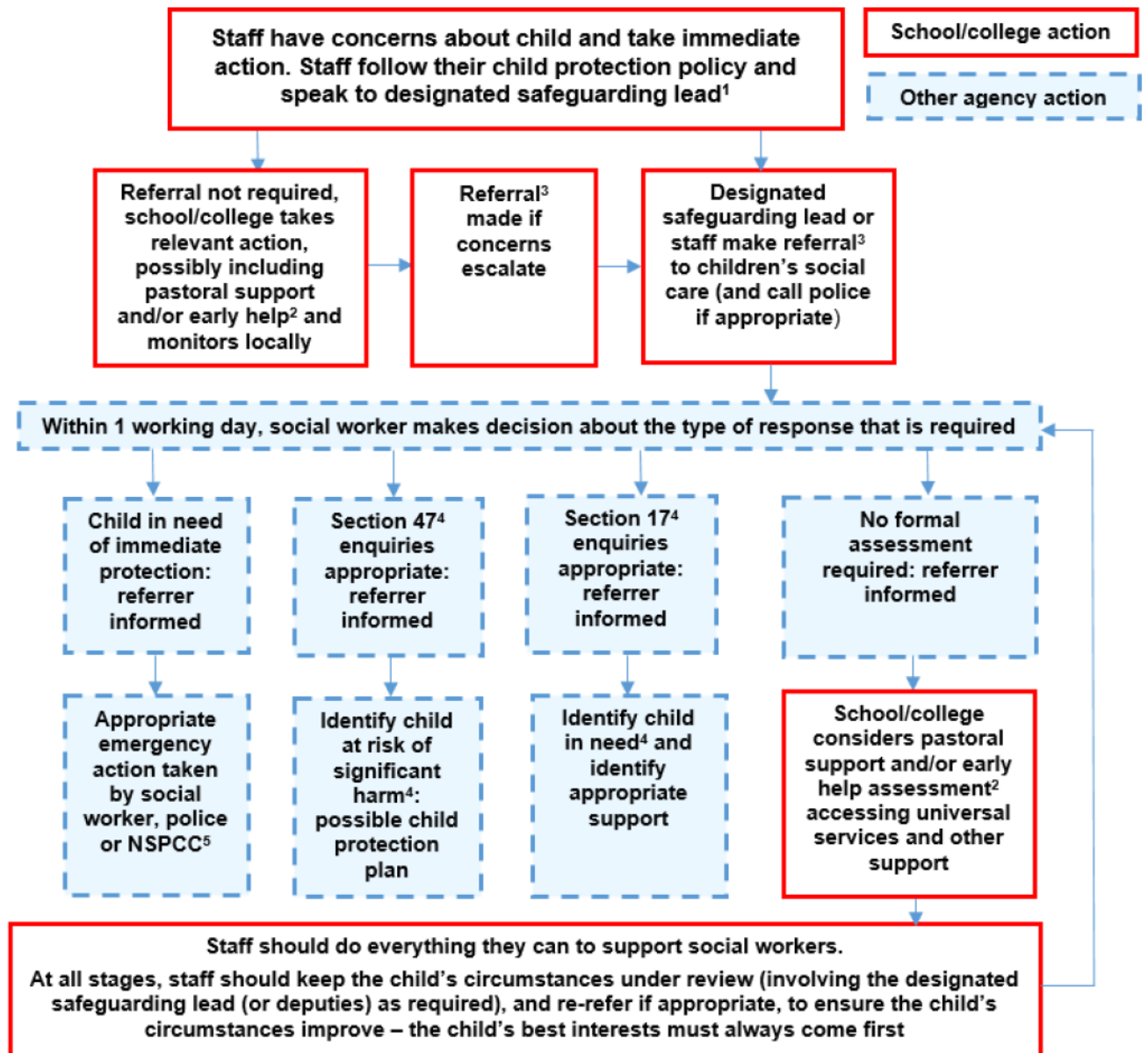
If the College becomes aware that a pupil is being privately fostered, we will inform the children's services department and inform both the parents and carers that we have done so.

Parenting: all parents will struggle with the behaviour of their child(ren) at some point. This does not make them poor parents or generate safeguarding concerns. Rather it makes them human and provides them with opportunities to learn and develop new skills and approaches to deal with their child(ren).

Some children have medical conditions and/or needs e.g., Tourette's, some autistic linked conditions, ADHD; that have a direct impact on behaviour and can cause challenges for parents in dealing with behaviours. This does not highlight poor parenting either.

Parenting becomes a safeguarding concern when the repeated lack of supervision, boundaries, basic care or medical treatment places the child(ren) in situations of risk or harm.

8. APPENDIX 3: Flowchart For Actions Where There Are Concerns About A Child



(1) In cases which also involve a concern or an allegation of abuse against a staff member, see Part four of this guidance.

(2) Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of [Working together to safeguard children](#) provides detailed guidance on the early help process.

(3) Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of [Working together to safeguard children](#)

(4) Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of [Working together to safeguard children](#)

(5) This could include applying for an Emergency Protection Order (EPO).

9. APPENDIX 4: Seven Golden Rules for Information Sharing

The seven golden rules to sharing information:

- Remember that the Data Protection Legislation and human rights law are not barriers to justified information sharing but provide a framework to ensure that personal information about living individuals is shared appropriately.
- Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
- Seek advice from other practitioners if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
- Share with informed consent where appropriate and, where possible, respect the wishes of those who do not consent to share confidential information. You may still share information without consent if, in your judgement, there is good reason to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be certain of the basis upon which you are doing so. Where you have consent, be mindful that an individual might not expect information to be shared.
- Consider safety and well-being: Base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
- Necessary, proportionate, relevant, adequate, accurate, timely and secure: Ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up to date, is shared in a timely fashion, and is shared securely (see principles).
- Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

10. APPENDIX 5: Sexting Decision-Making Flowchart (Based On Appendix A Of UKCCIS Sexting In Schools And Colleges)

“When deciding whether to involve the police and/or children’s social care, consideration should be given to the following questions. Answering these questions will support the DSL in considering whether a young person is at risk of harm, in which case a referral will be appropriate, whether additional information or support is needed from other agencies or whether the school can manage the incident and support the young people directly.”

Pupils Involved:

Date:

Questions	Thoughts
<p>Do you have any concerns about the young person’s vulnerability?</p> <p>Consideration should be given to whether a young person’s circumstances or background makes them additionally vulnerable. This could include being in care, having special educational needs or disability or having been a victim of abuse. Where there are wider concerns about the care and welfare of a young person then consideration should be given to referring to children’s social care.</p>	
<p>Why was the imagery shared? Was it consensual or was the young person put under pressure or coerced?</p> <p>Young people’s motivations for sharing sexual imagery include flirting, developing trust in a romantic relationship, seeking attention or as a joke. Though there are clearly risks when young people share imagery consensually, young people who have been pressured to share imagery are more likely to report negative consequences. A referral should be made to the police if a young person has been pressured or coerced into sharing an image, or imagery is being shared without consent and with malicious intent. Consideration should also be given to a young person’s level of maturity and the impact of any special educational needs on their understanding of the situation. You should take disciplinary action against pupils who pressure or coerce others into sharing sexual imagery. If this is part of pattern of behaviour then you should consider making a referral to a Harmful Sexual Behaviour service, such as the National Clinical Assessment and Treatment Service (an NSPCC service)</p>	
<p>Has the imagery been shared beyond its intended recipient? Was it shared without the consent of the young person who produced the imagery?</p> <p>The imagery may have been shared initially with consent but then passed on to others. A pupil may have shared the image further with malicious intent, or they may not have had a full understanding of the potential consequences. Consideration should also be given to a young person’s level of maturity and the impact of any special educational needs on their understanding of the situation. The police should be informed if there was a deliberate intent to cause harm by sharing the imagery or if the imagery has been used to bully or blackmail a pupil.</p>	

<p>Has the imagery been shared on social media or anywhere else online? If so, what steps have been taken to contain the spread of the imagery?</p> <p>If the image has been shared widely on social media, this could cause significant embarrassment for the pupil and have a long-term impact on their online reputation. It could also increase the risk of them being bullied or contacted by strangers online. You should support a young person to report the imagery to any sites it is hosted on. You can find information on reporting in Annex D. If the young person has tried to report the imagery and it has not been removed the young person should contact ChildLine who work in partnership with the Internet Watch Foundation (IWF) to have youth produced imagery removed from the internet. You could also contact the Professionals Online Safety Helpline for advice and support. If the young person is being contacted by people, they don't know who have viewed the image, then you should report to NCA-CEOP.</p>	
<p>How old is the young person or young people involved?</p> <p>Children under the age of 13 are unable to consent to sexual activity. Any imagery containing sexual activity by under 13s should be referred to the police. Being older can give someone power in a relationship so if there is a significant age difference it may indicate the young person felt under pressure to take the image/video or share it. Consideration should also be given to a young person's level of maturity and the impact of any special educational needs on their understanding of the situation. If you believe the imagery contains acts which you would not expect a young person of that age to engage in then you should refer to the police. The Brook Traffic Light tool provides guidance on harmful sexual behaviour at different ages.²²</p>	
<p>Did the young person send the image to more than one person?</p> <p>If a pupil is sharing sexual imagery with multiple people this may indicate that there are other issues which they need support with. Consideration should be given to their motivations for sharing. If you believe there are wider safeguarding concerns then you should make a referral to children's social care.</p>	
<p>Does the young person understand the possible implications of sharing the image?</p> <p>Young people may produce or share imagery without fully understanding the consequences of what they are doing. They may not, for example, understand how it may put them at risk or cause harm to another young person. They may also not understand consent. Exploring their understanding may help you plan an appropriate response helping you assess, for example, whether they passed on an image with deliberate intent to harm.</p>	

<p>Are there additional concerns if the parents or carers are informed?</p> <p>Parents should be informed of incidents of this nature unless there is good reason to believe that informing them will put the young person at risk. This may be due to concerns about parental abuse or cultural or religious factors which would affect how they or their community would respond. If a young person highlights concerns about involvement of their parents, then the DSL should use their professional judgement about whether it is appropriate to involve them and at what stage. If a school chooses not to involve a parent, they must clearly record the reasons for not doing so. Where possible young people should be supported to speak with their parents themselves about the concerns.</p>	
<p>Actions and outcomes:</p>	

APPENDIX 6: NSPCC's Harmful Sexual Behaviours Continuum

Responding to children who display sexualised behaviour

It's important to be able to distinguish developmentally typical sexual behaviours from those that may be problematic or harmful, and make sure children get appropriate support. Always consider the child's holistic needs and safeguarding concerns alongside any sexualised behaviour and follow due procedures accordingly. This guide is a tool to support objective decision making about a child or young person's sexual behaviour and does not replace professional judgement or policy and legislation. Visit nspcc.org.uk/hsb for more information.

Need advice?

- Contact our helpline for advice and support:
 - Call **0800 800 5000**
 - Email help@nspcc.org.uk
 - Visit nspcc.org.uk/helpline

Childline

- For children who need further support our free, confidential helpline is available 24/7:
 - Call **0800 1111**
 - Visit childline.org.uk

Developmentally typical

Normal

- Developmentally expected and socially acceptable behaviour
- Consensual, mutual and reciprocal
- Decision making is shared

How to respond

- Although green behaviours are not concerning, they still require a response
- Listen to what children and young people have to say and respond calmly and non-judgementally
- Talk to parents about developmentally typical sexualised behaviours
- Explain how parents can positively reinforce messages about appropriate sexual behaviour and act to keep their children safe from abuse
- Signpost helpful resources like our 'Talk PANTS' activity pack: nspcc.org.uk/pants
- Make sure young people know how to behave responsibly and safely

Problematic

Inappropriate

- Single instances of developmentally inappropriate sexual behaviour
- Behaviour that may be socially acceptable within a peer group but not in wider society
- May involve an inappropriate context for behaviour that would otherwise be considered normal

Problematic

- Developmentally unusual and socially unexpected behaviour
- May be compulsive
- Consent may be unclear and the behaviour may not be reciprocal
- May involve an imbalance of power
- Doesn't have an overt element of victimisation

How to respond

- Amber behaviours should not be ignored
- Listen to what children and young people have to say and respond calmly and non-judgementally
- Consider the child's developmental age as well as their chronological age, alongside wider holistic needs and safeguarding concerns about the problematic sexualised behaviour
- Follow your organisation's child protection procedures and make a report to the person responsible for child protection
- Your policy or procedure should guide you towards a nominated child protection lead who can be notified and will provide support
- Consider whether the child or young person needs therapeutic support and make referrals as appropriate

Harmful

Abusive

- Intrusive behaviour
- May involve a misuse of power
- May have an element of victimisation
- May use coercion and force
- May include elements of expressive violence
- Informed consent has not been given (or the victim was not able to consent freely)

Violent

- Physically violent sexual abuse
- Highly intrusive
- May involve instrumental violence which is physiologically and/or sexually arousing to the perpetrator
- May involve sadism

How to respond

- Red behaviours indicate a need for immediate intervention and action
- If a child is in immediate danger, call the police on 999
- Follow your organisation's child protection procedures and make a report to the person responsible for child protection
- Your policy or procedure should guide you towards a nominated child protection lead who should be notified and will provide support
- Typically referrals to children's social care and the police would be required. Referrals to therapeutic services should only be made once statutory services have been informed and followed due procedures

NSPCC
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11. APPENDIX 7: Useful Toolkits And Links In KCSIE

- Childnet - STAR SEND Toolkit equips, enables and empowers educators with the knowledge they need to support young people with special educational needs and disabilities.
- [Childnet - Just a joke?](#) provides lesson plans, activities, a quiz and teaching guide designed to explore problematic online sexual behaviour with 9–12-year-olds.
- [Childnet](#) - Step Up, Speak Up a practical campaign toolkit that addresses the issue of online sexual harassment amongst young people aged 13-17 years old.
- [Preventing Harmful Sexual Behaviour](#) toolkit by the Lucy Faithfull Foundation, the toolkit contains links to useful information, resources and support, including practical tips to prevent HSB.
- [NSPCC - Harmful sexual behaviour framework](#) An evidence-informed framework for children and young people displaying HSB.
- [Contextual Safeguarding Network](#) – Beyond Referrals - Schools levers for addressing HSB in schools.

Additional advice and support

Abuse

- What to do [if](#) you're worried a child is being abused – DfE advice
- [Domestic abuse](#): Various Information/Guidance - Home Office (HO)
- [Faith based abuse](#): National Action Plan - DfE advice
- Relationship [abuse](#): disrespect nobody - Home Office website
- [Tackling Child Sexual Abuse Strategy](#) – Home Office policy paper
- [Together we can stop child sexual abuse](#) – HM Government campaign

Bullying

- [Preventing](#) bullying including cyberbullying - DfE advice

Children missing from education, home or care

- [Children missing education](#) - DfE statutory guidance
- [Child missing from home or care](#) - DfE statutory guidance
- [Children and adults missing strategy](#) - Home Office strategy

Children with family members in prison

- [National Information Centre on Children of Offenders](#) - Barnardo's in partnership with HM Prison and Probation Service

Child Exploitation

- [Trafficking: safeguarding children](#) - DfE and HO guidance
- [Care of unaccompanied and trafficked children](#) – DfE statutory guidance
- [Modern slavery: how to identify and support victims](#) – HO statutory guidance

Drugs

- [Drug strategy 2017](#) - Home Office strategy
- [Information and advice on drugs](#) - Talk to Frank website
- [Drug and Alcohol education](#) – teacher guidance & evidence review – PSHE Association website

(so called) “Honour Based Abuse” including FGM and forced marriage

- [Female genital mutilation](#): information and resources- Home Office guidance

- [Female](#) genital mutilation: multi agency statutory guidance - DfE, DH, and HO statutory guidance
- [Forced marriage](#) - Forced Marriage Unit (FMU) statutory guidance
- [FGM resource pack](#) – HM Government guidance

Health and Well-being

- [Fabricated or induced illness](#): safeguarding children - DfE, DH, HO
- [Rise Above: Free PSHE resources on health, wellbeing and resilience](#) - Public Health England
- [Medical-conditions](#): supporting pupils at school - DfE statutory guidance
- [Mental health and behaviour](#) - DfE advice

Homelessness

- [Homelessness](#): How local authorities should exercise their functions - Ministry of Housing, Communities & Local Government guidance

Private fostering

- [Private fostering: local authorities](#) - DfE statutory guidance

Radicalisation

- [Prevent duty guidance](#)- Home Office guidance 142
- [Prevent duty](#): additional advice for schools and childcare providers - DfE advice
- [Educate Against Hate website](#) - DfE and Home Office advice
- [Prevent for FE and Training](#) - Education and Training Foundation (ETF)

Violence

- [Serious violence strategy](#) - Home Office Strategy
- [Factors linked to serious violence and how these factors can be used to identify individuals for intervention](#) – Home Office
- [Youth Endowment Fund](#) – Home Office
- [Gangs and youth violence](#): for schools and colleges - Home Office advice
- [Ending violence against women and girls 2016-2020 strategy](#) - Home Office strategy
- [Violence against women and girls](#): national statement of expectations for victims - Home Office guidance
- [Sexual violence and sexual harassment between children in schools and colleges DfE advice](#)

