



## **Safeguarding and Child Protection Policy**

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Reviewed by: Designated Safeguarding Lead, Deputy Head Student Engagement and Welfare and Headmistress

### **Table of Contents**

Policy statement and principles.....	3
Safeguarding legislation and guidance .....	5
Key personnel and contacts.....	6
Roles and responsibilities.....	8
Child protection procedures .....	12
Mental Health.....	12
If you are concerned about a student’s welfare .....	13
If a student discloses to you .....	14
Notifying parents.....	14
If a child's situation doesn't improve .....	15
If staff have concerns about safeguarding practices within the school.....	15
Summary of actions where there are concerns about a child .....	16
Four categories of abuse .....	16
Child on child abuse.....	17
Managing allegations of child on child abuse .....	18
Child Sexual Exploitation .....	22
Indicators of abuse .....	22
Impact of abuse .....	23
Support for those involved in a child protection issue.....	23
Good practice guidelines and staff code of conduct .....	23
Abuse of position of trust .....	24
Complaints procedure.....	24
Whistle blowing if you have concerns about a colleague .....	24
Allegations against staff.....	25
Managing allegations against staff .....	25
Low Level concerns .....	27
Specific forms of abuse and safeguarding issues.....	28
Children missing education.....	28
Children with a family member in prison .....	29
Homelessness .....	29

Child Sexual Exploitation .....	29
Children with sexually harmful behaviour .....	29
Child criminal exploitation: county lines.....	30
Domestic abuse.....	30
Honour-based Abuse .....	31
Female Genital Mutilation .....	31
Forced Marriage.....	31
Breast Ironing.....	31
Children who may be particularly vulnerable .....	32
Helping children to keep themselves safe .....	33
Photography and images .....	33
e-Safety .....	34
Child abduction and community safety events .....	35
Cybercrime .....	35
Radicalisation and Extremism .....	36
Staff training.....	37
Confidentiality and sharing information.....	38
Transfer or records when a student moves to a new school .....	39
Multi agency working .....	39
The use of "reasonable force" .....	39
Extended school and off-site arrangements.....	39
Private fostering arrangements .....	40
Special Circumstances.....	40
Looked after children .....	40
Work Experience .....	40
Children staying with host families .....	40
Appendix 1: Safeguarding policy summary.....	41
Appendix 2: Concern about a student form .....	41
Appendix 3: Children Missing Education Policy.....	43
Appendix 4: Use of force.....	44
Appendix 5: KCSIE Condensed Part One .....	47
Appendix 6: Child on child sexual violence and harassment policy .....	50

**Also reviewed by:**

Deputy Designated safeguarding lead(s): Carolyn Howe, Gemma Gibson and Helen Woolley  
Headteacher: Gemma Gibson  
Safeguarding Governor: Elizabeth Gray

## Policy statement and principles

This policy is one of a series in the school's integrated safeguarding portfolio. This portfolio includes policies for child protection, staff code of conduct, safer recruitment, allegations against staff, low level concerns, complaints, student behaviour, e-safety and new staff induction. This policy is available on the school website.

## Policy review

This policy will be reviewed at least annually by the DSL unless an incident or new legislation or guidance suggests the need for an interim review. The Headmistress will check it, the effectiveness of its procedures will be reviewed with the nominated safeguarding governor, notes of recommended amendments will be made, and the policy updated accordingly. The policy is fully reviewed annually by the school committee, including an update and review of the effectiveness of procedures and their implementation.

## Child protection statement

We recognise our moral and statutory responsibility to safeguard and promote the welfare of all students. We endeavour to provide a safe and welcoming environment where children are respected and valued. We have a culture of listening, and we take account of children's wishes and feelings. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice.

At Bedford Girls' School we create an environment where staff can raise concerns and feel supported in their safeguarding duty.

The procedures contained in this policy apply to all staff and governors and are consistent with those of the Bedford Borough Safeguarding Children's Board (BBSCB)

## Policy principles

1. Schools and colleges and their staff form part of the wider safeguarding system for children. This system is described in the statutory guidance Working together to safeguard children 2023. Bedford Girls' School recognises its role in the three safeguarding partner arrangements and will cooperate with published arrangements.
2. Safeguarding and promoting the welfare of children is **everyone's** responsibility. **Everyone** who comes into contact with children and their families and carers has a role to play in safeguarding children. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child centred. This means that they should consider, always, what is in the **best interests** of the child.
3. No single practitioner 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.
4. Safeguarding and promoting the welfare of children is defined as:
  - Providing help and support to meet the needs of children as soon as problems emerge
  - protecting children from maltreatment, whether that is within or outside the home, including online
  - preventing impairment of children's mental 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.

## Policy aims

- To provide all staff with the necessary information to enable them to understand and discharge their child protection responsibilities
- To ensure consistent good practice
- To demonstrate the school's commitment with regard to child protection to students, parents and other partners
- To contribute to the school's safeguarding portfolio
- To provide guidance for the successful implementation of our safeguarding practices which form part of our pastoral care system and are integral to our staff training.

### Terminology

**Safeguarding** and promoting the welfare of children refers to:

- Providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment; whether that is within or outside the home, including online
- preventing impairment of children's mental 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.

**Child protection** refers to the processes undertaken to protect children who have been identified as suffering, or being at risk of suffering significant harm.

**Staff** refers to all those working for or on behalf of the school, full time or part time, temporary or permanent, in either a paid or voluntary capacity.

## Safeguarding legislation and guidance

Section 157 of the Education Act 2002 and the Education (Independent Schools Standards) (England) Regulations 2003 require proprietors of independent schools (including academies and city technology colleges) to have arrangements to safeguard and promote the welfare of children who are students at the school.

- The **Teacher Standards 2012** state that teachers, including headteachers should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.
- The statutory guidance **Working Together to Safeguard Children 2023** covers the legislative requirements and expectations on individual services (including schools and colleges) to safeguard and promote the welfare of children.
- The statutory guidance **Keeping Children Safe in Education September 2025** is issued under Section 175 of the Education Act 2002, the Education (Independent School Standards) Regulations 2014 and the Non-Maintained Special Schools (England) Regulations 2015. Schools and colleges must have regard to this guidance when carrying out their duties to safeguard and promote the welfare of children. Unless otherwise stated, 'school' in this guidance means all schools, whether maintained, non-maintained or independent, including academies and free schools, alternative provision academies and student referral units. 'School' includes maintained nursery schools. 'College' means further education colleges and sixth form colleges as established under the Further and Higher Education Act 1992, and relates to their responsibilities to children under the age of 18 (but excludes 16-19 academies and free schools, which are required to comply with relevant safeguarding legislation by virtue of their funding agreement)
- All staff must read Part One of the **Keeping Children Safe in Education September 2025** guidance and **Annexe B** and staff can find a copy on the school website or in the policy section of The Eyrie. There is also a condensed version of Part one of this guidance, Annexe A, which might be recommended for some staff.  
This is available in a number of different languages at <https://national.lgfl.net/digisafe/kcsietranslate>
- **What to do if you're worried a child is being abused 2015 - Advice for practitioners** is non-statutory advice which helps practitioners (everyone who works with children) to identify abuse and neglect and take appropriate action and staff can find a copy on the school intranet site (The Eyrie)
- **Prevent Duty Guidance: for England and Wales 2023** guidance which helps practitioners assess the risk of children being drawn into terrorism, including being drawn into support for extremist ideas.

## Key Personnel and Contacts

### Key personnel

**The Designated Safeguarding Lead (DSL) for child protection is:**

Luan Tink (DSL)

Email: [luan.tink@bedfordgirlsschool.co.uk](mailto:luan.tink@bedfordgirlsschool.co.uk) Tel: 01234 361900

**The Deputy Designated Lead(s) are:**

Matt Gracie (Deputy Headteacher)

Email: [Matt.gracie@bedfordgirlsschool.co.uk](mailto:Matt.gracie@bedfordgirlsschool.co.uk)

Gemma Gibson (Headteacher)

Email: [Gemma.gibson@bedfordgirlsschool.co.uk](mailto:Gemma.gibson@bedfordgirlsschool.co.uk) T

Carolyn Howe (Junior School Headteacher)

Email [Carolyn.Howe@bedfordgirlsschool.co.uk](mailto:Carolyn.Howe@bedfordgirlsschool.co.uk)

Helen Woolley (Head of Sixth Form)

Email: [helen.woolley@bedfordgirlsschool.co.uk](mailto:helen.woolley@bedfordgirlsschool.co.uk)

### Key external contacts

**Several boroughs are listed due to the varied locations at which BGS students reside.**

Bedford Borough Integrated Front Door (IFD)	01234 718700 (office hours 8:45 am – 5:20pm) 0300 300 8123 (out of hours, emergency duty team) <a href="mailto:multiagency@bedford.gov.uk">multiagency@bedford.gov.uk</a>
LADO	Central Bedfordshire - Call 0300 300 4833 Bedford Borough- Call 01234 276693 <a href="mailto:LADO@bedford.gov.uk">LADO@bedford.gov.uk</a>
Children Missing Education & Child Employment Officer (Beds borough) (p/t mornings only)	Debi Momi (01234) 228178 (am) ext 42178
Bedfordshire borough Education Welfare Service	01234 267422
Central Beds MASH	0300 300 8123 <a href="mailto:cs.accessandreferral@centralbedfordshire.gov.uk">cs.accessandreferral@centralbedfordshire.gov.uk</a>
Luton Safeguarding Partners	01582 547653 Out of hours: 0300 300 8123 E-mail: <a href="mailto:mash@luton.gcsx.gov.uk">mash@luton.gcsx.gov.uk</a>
Milton Keynes MASH	01908 253169 or 253170

	E-mail: <a href="mailto:children@milton-keynes.gov.uk">children@milton-keynes.gov.uk</a>
Prevent duty	020 7340 7264 <a href="mailto:counter.extremism@education.gsi.gov.uk">counter.extremism@education.gsi.gov.uk</a> Bedfordshire Police contact information: <a href="mailto:Prevent@bedfordshire.pnn.police.uk">Prevent@bedfordshire.pnn.police.uk</a> NSPCC Helpline: 0808 800 5000
Local Police Liaison (Beds)	Richard Denton Tel: 01234 275206 Email: <a href="mailto:richard.denton@beds.police.uk">richard.denton@beds.police.uk</a>
NSPCC Whistleblowing hotline	Tel: 0800 028 0285. 8am to 8pm Monday to Friday Email: <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>
Helpline for victims of sexual abuse in school	Tel: 0800 136 663

# Roles and Responsibilities

## The Designated Safeguarding Lead:

The designated safeguarding lead has the school's **lead responsibility** for safeguarding and child protection.

### 1. Manage referrals

The designated safeguarding lead is expected to:

- Refer cases of suspected abuse to the local authority children's social care as required;
- Support staff who make referrals to local authority children's social care;
- Refer cases to the Channel programme where there is a radicalisation concern as required;
- Support staff who make referrals to the Channel programme;
- Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- Refer cases where a crime may have been committed to the Police as required.

[When to call the police guidance](#) (NSPCC)

### 2. Work with others

- Liaise with the Headmistress to inform her of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance - [PACE Code C 2019](#).
- As required, liaise with the "case manager" (as per Part four) and the LADO(s) at the local authority for child protection concerns (all cases which concern a staff member); and
- Liaise with staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies. Act as a source of support, advice and expertise for staff.
- Meet weekly with the ICT manager on matters of online and digital safety.

### 3. Undertake training

The designated safeguarding lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years.

The designated safeguarding lead should undertake Prevent awareness training.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, but at least annually, to allow them to understand and keep up with any developments relevant to their role so they:

- Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments;
- Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- Ensure each member of staff has access to and understands the school's child protection policy and procedures, especially new and part time staff;
- Are alert to the specific needs of children in need, those with special educational needs and young carers;
- Are able to keep detailed, accurate, secure written records of concerns and referrals;

- Understand and support the school with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- Obtain access to resources and attend any relevant or refresher training courses; and
- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.

#### **4. Raise Awareness**

- The DSL should take lead responsibility for safeguarding and child protection (including online safety and the filtering and monitoring systems and processes in place)
- The designated safeguarding lead should ensure the school's child protection policies are known, understood and used appropriately;
- Ensure the school's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this;
- Ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school or college in this; and
- Link with the local LSCB to make sure staff are aware of training opportunities and the latest local policies on safeguarding.

#### **5. Child protection file**

- Where children leave the school, ensure their child protection file is transferred to the new school or college as soon as possible. This should be transferred separately from the main student file, ensuring secure transit and confirmation of receipt should be obtained.

#### **6. Availability**

- During term time the designated safeguarding lead (or a deputy) should always be available (during school or college hours) for staff in the school or college to discuss any safeguarding concerns.
- The designated and deputy designated safeguarding lead will arrange cover arrangements for any out of hours/out of term activities by ensuring one of them is available via email.

### **The Deputy Designated Lead(s):**

Are appropriately trained and, in the absence of the designated lead, carry out those functions necessary to ensure the ongoing safety and protection of students. In the event of the long-term absence of the designated lead, the deputy will assume all of the functions above.

### **The Nominated Governor:**

A full description of the responsibilities can be found in the Harpur Trust Safeguarding Policy 2025

- meets regularly with the school's Designated Safeguarding Lead (**DSL**) and any other relevant parties (such as the Nurse or HR Advisor) in order to monitor the effectiveness of the school's child protection and safeguarding policies and procedures and the implementation of these across the School;
- ensures that the DSL is part of the school's senior leadership team, and has sufficient time and resources at his/her disposal to carry out his/her duties effectively;
- ensures that the DSL (and Deputy DSLs) receive appropriate training to provide them with the knowledge and skills required to carry out the role at least every two years, and that their knowledge and skills are appropriately refreshed at regular intervals, as required, but at least annually, to allow them to understand and keep up with any developments relevant to their role.

- reviews the School's Single Central Register on at least a termly basis, after undertaking sufficient training to be able to interrogate the register and identify potential deficiencies. It is recommended that at least one review per year is on an unannounced basis;
- ensures that the identity of and contact details for the DSL(s) and Nominated Safeguarding Governor, together with an outline of duties, will be publicised widely within the School community to ensure that students, parents, staff and school committees understand the purpose and importance of the roles;
- ensures that the school has an effective and robust method of recording safeguarding concerns and that concerns are recorded in writing at the time the concern arises;
- is aware of how safeguarding and child protection issues, including guidance on adjusting behaviours to reduce risks, the safer use of electronic devices, social media and the internet and advice on who to turn to for help, are addressed through the curriculum and schemes of work;
- ensures that appropriate IT filters and monitoring systems are in place to prevent children from accessing harmful or inappropriate material, ensuring the DSL takes lead responsibility as part of their role.
- reviews the DfE's filtering and monitoring standards and discusses this with the DSL and IT staff what support the school may require.
- where applicable, ensures that staff have the necessary knowledge and understanding to keep looked after children safe, with identified staff tasked to promote the educational achievement of looked after children.
- works with the DSL to prepare an annual safeguarding report (to be sent by the School Committee to the Board of the Harpur Trust in the Autumn term for consideration at the January Trust Board Meeting) confirming that the safeguarding arrangements in the school have been formally reviewed and meet the statutory requirements, and drawing the Trustees' attention to any significant incidents or trends;
- supports the DSL by overseeing the annual review of the school's Safeguarding policies and arrangements and reporting to school committee on these matters in the Autumn Term, in accordance with the terms of reference set out in Appendix 4;
- work with the DSL to identify if any trends are developing that might give cause for concern and reporting these to the Trust Board via the school committee.

The governing body nominates a member (normally the chair) to be responsible for liaising with the local authority and other agencies in the event of an allegation being made against the headteacher.

It is the responsibility of the governing body to ensure that the school's safeguarding, recruitment and managing allegations procedures take into account the procedures and practice of the local authority and LSCB and national guidance. An annual report will be submitted, as required, to the local authority about how the governing body's duties have been carried out. Any weaknesses will be rectified without delay.

### **The Headteacher:**

- ensures that the child protection policy and procedures are implemented and followed by all staff
- allocates sufficient time, training, support and resources, including cover arrangements when necessary, to enable the DSL and deputies to carry out their roles effectively, including the assessment of students and attendance at strategy discussions and other necessary meetings
- ensures that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistle blowing procedures

- ensures that students are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online
- School leaders and governors ensure that the child's wishes are taken into account when determining action to be taken or services to be provided
- liaises with the LADO or team in the local authority where an allegation is made against a member of staff
- ensures that anyone who has harmed or may pose a risk to a child is referred to the Disclosure and Barring Service.
- ensures that all staff have undergone safeguarding and child protection training including online safety.

## Child protection procedures

In the UK, more than 58,000 children are annually subject to a child protection plan (NSPCC). Research suggests that one child a week dies from abuse and one child in six is exposed to violence in the home. The prevalence of neglect continues to be a major concern and online abuse is increasing. The sexual exploitation of children is a growing problem and disabled children are three times more likely to be abused and neglected.

Due to their day-to-day contact with students, school staff are uniquely placed to observe changes in children's behaviour and the outward signs of abuse. Children may also turn to a trusted adult in school when they are in distress or at risk. It is vital that all school staff are alert to the signs of abuse and understand the procedures for reporting their concerns. The school will always act on identified concerns.

The DSL or deputy should always be available to discuss safeguarding concerns. If in exceptional circumstances, the DSL or deputies are not available; this should not delay appropriate action being taken. Staff should consider speaking to any member of the SLT and/or take advice from Bedford Borough Children's Safeguarding Board. In these circumstances, any action taken should be shared with the DSL as soon as is practically possible.

## Mental Health

Mental health problems might indicate that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Diagnoses can only be made by trained professionals, but school staff can observe behaviours that are suggestive of mental ill health. If staff have a mental health concern that is also a safeguarding concern, immediate action should be taken, following the procedures in the safeguarding policy and speaking to the DSL.

Adverse childhood experiences can have a lasting impact and staff should be aware of how these children's experiences can impact on their mental health, behaviour and education.

[Mental Health and behaviour in schools. Gov.UK](#)

[Promoting children and young people's emotional health and wellbeing. Gov.UK](#)

[Public Health England, Rise Above, PSHE resources for 10 - 16 year olds](#)

## What staff should do if they have concerns about a child

Any child, in any family, in any school could become a victim of abuse. Staff should always maintain an attitude of **"it could happen here"** and they should always keep the **best interests** of the child at the centre of their decision making. If staff have **any concerns** about a child's welfare, they should act on them immediately.

**Concerns about a child will fall into two areas:**

- 1. when staff may suspect that a student may be at risk but have no 'real' evidence.**
- 2. when a student has made a disclosure of abuse or neglect**

**If you consider a child to be in immediate danger or at risk of harm, a referral should be made to children's social care and/or the police immediately.** Anyone can make the referral. When referrals are not made by the DSL, the DSL should be informed as soon as possible that a referral has been made. The student (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child.

## 1. If you are concerned about a student's welfare

There will be occasions when staff may suspect that a student may be at risk but have no 'real' evidence. The student's behaviour may have changed, their work might reveal confusion or distress, or physical but inconclusive signs may have been noticed. In these circumstances, staff will try to give the student the opportunity to talk. The signs they have noticed may be due to a variety of factors, for example, a parent has moved out, a pet has died, a grandparent is very ill or an accident has occurred. It is fine for staff to ask the student if they are OK or if they can help in any way.

Staff should use **My Concern** (<https://www.myconcern.education/Account/Login?ReturnUrl=%2f>) to report these early concerns. Supply teachers, temporary staff, Harpur Trust shared staff and exam invigilators can report a concern via their line manager or using a gold paper **Concern about a student form**. These paper forms are available in the room next to the staff room in the grey, metal drawers. If the student does begin to reveal that they are being harmed, staff should follow the advice below in the section "If a child discloses to you". Following an initial conversation with the student, if the member of staff remains concerned, they should discuss their concerns with the DSL.

**All staff** should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or they may be being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child.

Concerns which do not meet the threshold for child protection intervention will be managed through the Early Help process.

### Early Help

All staff should be aware of the early help process and understand their role in it.

Children may experience emerging problems which result in them not achieving outcomes. The early help process uses interventions for a time limited period to move them back into a position where they are progressing well and achieving expected outcomes.

Early help might involve the services of health visitors, school nurses, therapy services, an early help team, children's centres, schools and colleges, educational psychologists and GPs. A member of staff at BGS may be required to complete or assist the DSL in completing an Early Help Assessment form. They may also be part of the Team around the family (TAF) where they contribute to gathering information and implementing strategies to support the family. In some cases, they may act as the lead professional who acts as the single point of contact for the family, coordinates support and regularly shares the outcomes. They will be supported by the DSL.

All staff should be particularly alert to the potential need for early help for a child who:

- is disabled or has specific additional needs
- has special educational needs (regardless of whether they have an EHCP)
- 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 education, home or care
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- is misusing drugs or alcohol themselves
- is in a family circumstance challenging for the child, such as substance abuse, adult mental health

- problems or domestic abuse
- has returned to their family from care
- is showing early signs and/or at risk of abuse or neglect and exploitation
- is at risk of being radicalised or exploited
- is a privately fostered child

The BBSCB threshold document aims to help identify when a child or young person may need additional support to achieve their full potential. It introduces a continuum of help and support, provides information on the levels of need and gives examples of some of the factors that may indicate a child or young person needs additional support.

[http://www.bedford.gov.uk/health\\_and\\_social\\_care/children\\_young\\_people/safeguarding\\_children\\_board/professionals/thresholds.aspx](http://www.bedford.gov.uk/health_and_social_care/children_young_people/safeguarding_children_board/professionals/thresholds.aspx)

## 2. If a child discloses to you

It takes a lot of courage for a child to disclose that they are being abused. They may feel ashamed, particularly if the abuse is sexual; their abuser may have threatened what will happen if they tell; they may have lost all trust in adults; or they may believe, or have been told, that the abuse is their own fault. Sometimes they may not be aware that what is happening is abusive.

If a student talks to a member of staff about any risks to their safety or wellbeing, **the staff member will need to let the student know that they must pass the information on** – staff are not allowed to keep secrets. The point at which they tell the student this is a matter for professional judgement. If they jump in immediately the student may think that they do not want to listen, if left until the very end of the conversation, the student may feel that they have been misled into revealing more than they would have otherwise.

During their conversations with the students, staff will:

- allow them to speak freely
- remain calm and not overreact – the student may stop talking if they feel they are upsetting their listener
- give reassuring nods or words of comfort – ‘I’m so sorry this has happened’, ‘I want to help’, ‘This isn’t your fault’, ‘You are doing the right thing in talking to me’
- not be afraid of silences – staff must remember how hard this must be for the student
- **under no circumstances** ask investigative questions – such as how many times this has happened, whether it happens to siblings too, or what does the student’s mother think about all this
- at an appropriate time tell the student that in order to help them, the member of staff must pass the information on and explain to whom and why
- not automatically offer any physical touch as comfort. It may be anything but comforting to a child who has been abused
- avoid admonishing the child for not disclosing earlier. Saying things such as ‘I do wish you had told me about this when it started’ or ‘I can’t believe what I’m hearing’ may be the staff member’s way of being supportive but may be interpreted by the child to mean that they have done something wrong
- tell the student what will happen next. The student may agree to go to see the designated safeguarding lead. Otherwise let them know that someone will come to see them before the end of the day.
- report verbally to the DSL even if the child has promised to do it by themselves
- write up their conversation as soon as possible in My Concern.
- seek support if they feel distressed.

## Notifying parents

The school will normally seek to discuss any concerns about a student with their parents. This must be handled sensitively, and the DSL will contact the parent in the event of a concern, suspicion or disclosure.

However, if the school believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children's social care.

### **If the child's situation doesn't improve**

If after referral the child's situation doesn't seem to be improving, the DSL or the referrer should press for reconsideration.

### **If staff have concerns about safeguarding practices within the school**

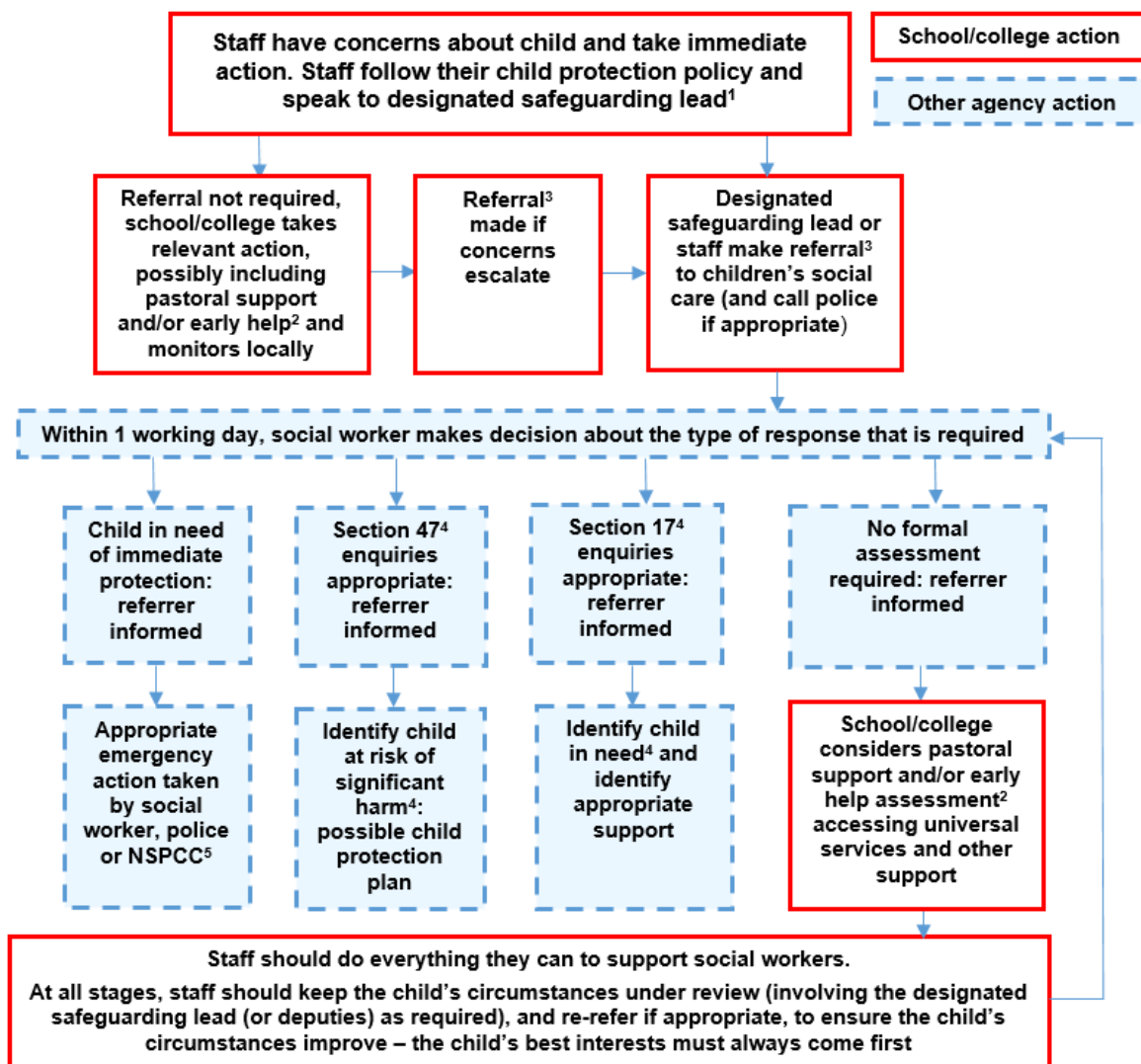
If staff or volunteers are concerned about poor or unsafe practice in the safeguarding regime then they should report this to the senior leadership team. The NSPCC whistleblowing advice line is available for staff who do not feel able to raise concerns regarding child protection failures internally. You should call the Whistleblowing Advice Line if:

- your organisation doesn't have clear safeguarding procedures to follow
- you think your concern won't be dealt with properly or may be covered-up
- you've raised a concern but it hasn't been acted upon
- you're worried about being treated unfairly

Staff can call 0800 028 0285. The line is available from 8am to 8pm Monday to Friday or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

## Summary of actions where there are concerns about a child

(from KCSIE Sept 2025)



## Four categories of abuse

To ensure that our students are protected from harm, we need to understand what types of behaviour constitute abuse and neglect. 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 one another. Staff who work directly with children should ensure that sufficient consideration has been given to the list of specific safeguarding issues as listed in Annexe B (KCSIE 2024)

**Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or another child or children. Behaviours linked to issues such as drug taking and/or alcohol misuse, unexplainable and/or persistent absence from education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nudes and semi-nudes and/or videos.

**Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

**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. The sexual abuse of children by other children is a specific safeguarding issue in education.

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

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

Definitions taken from *Keeping Children Safe in Education* September 2024.

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

Children can abuse other children and it can happen inside or outside of school and online. Safeguarding issues can manifest themselves via child-on-child abuse. This is most likely to include:

- bullying (including cyberbullying);
- abuse in intimate personal relationships between peers;
- physical abuse, such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence, such as rape, assault by penetration and sexual assault;

- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand alone or part of a broader picture of abuse;
- consensual or non-consensual sharing of nudes and semi-nudes (also known as sexting or youth produced sexual imagery);
- initiation/hazing type violence and rituals;
- emotional abuse
- Upskirting, which involves taking a picture under a person’s clothing without their knowing with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Upskirting is a criminal offence.

Evidence suggests girls, children with SEND and LGBT children are a greater risk. As part of the Harpur trust group of schools, we work with DSLs within the trust where there have been incidences of child-on-child abuse between different genders. We are also alert to the fact that inappropriate sexual behaviours can occur between students of the same gender. When there is reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm, any such abuse will be referred to local agencies and all children involved, whether perpetrator or victim, are treated as being “at risk”. We have a zero-tolerance approach to abuse and it should never be passed off as “banter” or “just having a laugh” or part of “growing up” or “boys will be boys” as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.

Procedures to minimise the risk of child-on-child abuse include creating a school culture of respect, actively promoting equality, positive values and healthy relationships. Work on child-on-child abuse is part of the PSHE curriculum and the tutor programme. It is essential that all staff understand the importance of challenging inappropriate behaviour between peers. Staff should also recognise that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and is simply not being reported.

## **Managing allegations of child-on-child abuse**

To an extent, there is no clear boundary between incidents that should be regarded as child-on-child abuse and incidents that are more properly dealt with as bullying, sexual experimentation, etc. For this reason, a staff member’s professional judgement plays a vital role in the identification process.

It may be appropriate to regard a child’s behaviour as abusive if:

- There is a large difference in power between the people involved.
- The perpetrator has repeatedly tried to harm one or more people.
- There are concerns about the intention of the alleged perpetrator.

If it is believed that the perpetrator intended to cause harm to the victim, this should be regarded as abuse even if severe harm was not actually caused.

Procedures for managing allegations of child-on-child abuse are outlined in the BGS anti-bullying policy and specifically for sexting, in the e-safety policy. Students are encouraged to speak to a trusted adult to report abuse who will take their report seriously.

In the first instance, it is important to investigate the concern raised and this will involve interviewing both the perpetrator and the victim, as well as any witnesses deemed relevant to the concern. Written statements are often asked for. Reports relevant to the investigation will be recorded in iSAMS or MyConcern. We make it clear to the victim that revenge is not appropriate, and to the perpetrator that their behaviour is unacceptable and has caused distress. Every effort is made to resolve the problem through ongoing counselling or mentoring of both parties, where an understanding of the perpetrator’s

motivation should be sought and addressed. The perpetrator should be helped to face up to and accept responsibility for the harm she has caused and both perpetrator and victim are encouraged to develop resistance to unacceptable behaviour and attitudes.

At this stage, it is usual for the parents of both parties to be informed of what has happened, and how it has been dealt with. It is vital that everything that happens is carefully recorded by the member of staff dealing with the incident in a clear, factual way as documents to be stored in the files of perpetrator and victim. Conversations with parents should also be noted and added to the students' files.

If the abuse continues, then sanctions (such as removal of the perpetrator from social time at break and lunch, exclusion from lessons while being kept in isolation, or in more serious cases, fixed term or permanent exclusion) will follow and the situation will continue to be monitored over a period of time.

## **Bullying**

While bullying between children is not a separate category of abuse and neglect, it is a very serious issue that can cause considerable anxiety and distress. At its most serious level, bullying can have a disastrous effect on a child's wellbeing and in very rare cases has been a feature in the suicide of some young people.

All incidences of bullying, including cyber-bullying and prejudice-based bullying should be reported and will be managed through our anti-bullying procedures. The subject of bullying is addressed at regular intervals in PSHE education. If the bullying is particularly serious, the Headmistress and the DSL will consider implementing child protection procedures.

## **Sharing of nudes and semi-nude images (Also known as sexting or youth produced sexual imagery)**

Sexting is dealt with more comprehensively in the e-safety policy.

Sexting is defined as images or videos generated

- by children under the age of 18, or
- of children under the age of 18 that are of a sexual nature or are indecent.

These images are shared between young people and/or adults via a mobile phone, handheld device or website with people they may not even know. Sexting can be seen as harmless, but creating or sharing explicit images of a child is illegal, even if the person doing it is a child. Sharing nudes or semi-nudes may happen consensually or non-consensually. A young person is breaking the law if they:

- take an explicit photo or video of themselves or a friend
- share an explicit image or video of a child, even if it's shared between children of the same age
- possess, download or store an explicit image or video of a child, even if the child gave their permission for it to be created.

As of January 2016, if a young person is found creating or sharing images, the police can choose to record that a crime has been committed but that taking formal action isn't in the public interest.

Sexting disclosures should follow the normal safeguarding practices and protocols.

Sharing nudes and semi-nudes: advice for education settings

<https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people>

## Child-on-child sexual violence and sexual harassment

See the *Child-on-child sexual violence and harassment policy* included in Appendix 6 for full details.

Sexual violence and sexual harassment can occur between two children of **any** age. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that **all** victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.

Staff should be aware of the importance of:

- making clear that there is a **zero-tolerance** approach to sexual violence and sexual harassment, it is never acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and
- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

It is important that staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. It can happen both inside and outside school. If a child makes a disclosure of sexual violence or harassment, it is essential that staff reassure victims, that the report is taken seriously and that the victim is kept safe so that no victim will be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment and no victim ever made to feel ashamed making a report. 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.

**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.)

**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. 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.

### **Sexual harassment**

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. 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) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
  - non-consensual sharing of sexual images and videos;
  - sexualised online bullying;
  - unwanted sexual comments and messages, including, on social media; and
  - sexual exploitation; coercion and threats

Reports of sexual violence and sexual harassment are likely to be complex and decisions will be made on a case by case basis with the DSL (or a deputy) taking a leading role, using their professional judgement and being supported by other agencies, such as children's services and the police. Ideally reports are managed with two members of staff present if possible. **If there is an online element, it is key that staff do not view or forward illegal images of a child.**

### **Serious violence**

All staff must be aware of the indicators which may signal that a child is at risk of or is involved in serious crime. These may include:

- increased absence from school
- change in friendships or relationships with older individuals or groups
- a significant decline in performance
- self-harm or a deterioration in wellbeing
- signs of assault or unexplained injuries
- unexplained gifts could indicate involvement with criminal gangs

## Child Sexual Exploitation and Child Criminal Exploitation

CSE and CCE are forms of abuse. Both occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual or criminal activity. The power imbalance can be due to age, gender, sexual identity, cognitive ability, physical strength, status and access to economic or other resources. The abuse might be in exchange for something the victim needs or wants. As well as being physical, the exploitation can be facilitated and/or take place online. The perpetrator might be an individual or a group, a male or female, an adult or another child. The abuse can be a one-off occurrence or a series of incidents over time and can be opportunistic or complex in nature. Victims can be exploited even if the activity appears consensual.

### Indicators of abuse

Physical signs define some types of abuse, for example, bruising, bleeding or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The identification of physical signs is complicated, as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or trauma if they 'tell'. It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty. For these reasons it is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the designated safeguarding lead.

**It is the responsibility of staff to report their concerns. It is not their responsibility to investigate or decide whether a child has been abused.**

A child who is being abused, neglected or exploited may:

- have bruises, bleeding, burns, fractures or other injuries
- show signs of pain or discomfort
- keep arms and legs covered, even in warm weather
- be concerned about changing for PE or swimming
- look unkempt and uncared for
- change their eating habits
- have difficulty in making or sustaining friendships
- appear fearful
- be reckless with regard to their own or other's safety
- self-harm
- frequently miss school, arrive late or leave the school for part of the day
- show signs of not wanting to go home
- display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn
- challenge authority
- become disinterested in their school work
- be constantly tired or preoccupied
- be wary of physical contact
- be involved in, or particularly knowledgeable about drugs or alcohol
- display sexual knowledge or behaviour beyond that normally expected for their age
- acquire gifts such as money or a mobile phone from new 'friends'

Individual indicators considered in isolation will rarely provide conclusive evidence of abuse. They should be viewed as part of a jigsaw, and each small piece of information will help the DSL to decide how to proceed. All staff should be aware that safeguarding incidents can be associated with factors outside of school and can occur between children outside of these environments. All staff, but especially the DSLs and deputies should consider the context within which incidents or behaviours occur and whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of forms including amongst others sexual exploitation, criminal exploitation and serious youth violence.

This is called **contextual safeguarding** and involves considering whether wider environmental factors are a threat to the safety or welfare of a child.

<https://www.contextualsafeguarding.org.uk/resources/toolkit-overview/what-is-contextual-safeguarding/>)

The NSPCC website provides useful additional information. <https://www.nspcc.org.uk/preventing-abuse/signs-symptoms-effects/>

**It is very important that staff report their concerns – they do not need ‘absolute proof’ that the child is at risk.**

## Impact of abuse

The impact of child abuse, neglect and exploitation should not be underestimated. Many children do recover well and go on to lead healthy, happy and productive lives, although most adult survivors agree that the emotional scars remain, however well buried. For some children, full recovery is beyond their reach, and the rest of their childhood and their adulthood may be characterised by anxiety or depression, self-harm, eating disorders, alcohol and substance misuse, unequal and destructive relationships and long-term medical or psychiatric difficulties.

## Support for those involved in a child protection issue

Child abuse is devastating for the child and can also result in distress and anxiety for staff who become involved.

We will support students, their families, and staff by:

- taking all suspicions and disclosures seriously
- nominating a link person who will keep all parties informed and be the central point of contact
- Where a member of staff is the subject of an allegation made by a student, separate link people will be nominated to avoid any conflict of interest
- responding sympathetically to any request from students or staff for time out to deal with distress or anxiety
- maintaining confidentiality and sharing information on a need-to-know basis only with relevant individuals and agencies
- storing records securely
- offering details of helplines, counselling or other avenues of external support
- following the procedures laid down in our child protection, whistleblowing, complaints and disciplinary procedures
- cooperating fully with relevant statutory agencies.

## Good practice guidelines and staff code of conduct

To meet and maintain our responsibilities towards students we need to agree standards of good practice which form a code of conduct for all staff. **The staff code of conduct must be read by all staff** and is available on The Eyrle. Good practice includes:

- treating all students with respect
- setting a good example by conducting ourselves appropriately
- involving students in decisions that affect them
- encouraging positive, respectful and safe behaviour among students
- being a good listener
- being alert to changes in students’ behaviour and to signs of abuse, neglect and exploitation
- recognising that challenging behaviour may be an indicator of abuse
- reading and understanding the school’s child protection policy, staff code of conduct policy and

- guidance on wider safeguarding issues as outlined in the anti-bullying, behaviour and e-safety policy.
- asking the student's permission before initiating physical contact, such as assisting with dressing, physical support during PE or administering first aid
  - maintaining appropriate standards of conversation and interaction with and between students and avoiding the use of sexualised or derogatory language
  - being aware that the personal and family circumstances and lifestyles of some students lead to an increased risk of abuse
  - applying the use of reasonable force only as a last resort and in compliance with school and LSCB procedures
  - referring all concerns about a student's safety and welfare to the DSL, or, if necessary directly to police or children's social care
  - following the school's rules with regard to relationships with students and communication with students, including on social media.

## **Abuse of position of trust**

All school staff are aware that inappropriate behaviour towards students is unacceptable and that their conduct towards students must be beyond reproach.

In addition, staff should understand that, under the Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of the school staff and a student under 18 may be a criminal offence, even if that student is over the age of consent.

The school's Staff Code of Conduct sets out our expectations of staff behaviour.

## **Complaints procedure**

Our complaints procedure will be followed where a student or parent raises a concern about poor practice towards a student that initially does not reach the threshold for child protection action. Poor practice examples include unfairly singling out a student or attempting to humiliate them, bullying or belittling a student or discriminating against them in some way. Complaints are managed by senior staff, the headteacher and governors. An explanation of the complaints procedure is included in the Complaints policy on the school website.

Complaints from staff are dealt with under the school's complaints and disciplinary and grievance procedures. Complaints which escalate into a child protection concern will automatically be managed under the school's child protection procedures.

## **Whistle blowing if you have concerns about a colleague**

At BGS we have a culture of safety and of raising concerns. Staff who are concerned about the conduct of a colleague towards a student are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood the situation, and they will wonder whether a report could jeopardise their colleague's career. All staff must remember that the welfare of the child is paramount. The school's whistleblowing code available on The Eyrie enables staff to raise concerns or allegations, initially in confidence and for a sensitive enquiry to take place.

All concerns of poor practice or possible child abuse by another member of staff, including supply staff and volunteers should be reported to the Headmistress. Complaints about the Headmistress should be reported to the chair of governors, Neil Harris.

Staff may also report their concerns directly to children's social care or the police if they believe direct reporting is necessary to secure action.

The NSPCC whistleblowing advice line is available for staff who do not feel able to raise concerns regarding child protection failures internally. You should call the Whistleblowing Advice Line if:

- your organisation doesn't have clear safeguarding procedures to follow
- you think your concern won't be dealt with properly or may be covered-up
- you've raised a concern but it hasn't been acted upon
- you're worried about being treated unfairly

Staff can call 0800 028 0285. The line is available from 8am to 8pm Monday to Friday or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

## **Allegations against staff**

When an allegation is made against a member of staff, set procedures must be followed. It is rare for a child to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events do happen.

A child may also make an allegation against an innocent party because they are too afraid to name the real perpetrator. Even so, we must accept that some professionals do pose a serious risk to students and we must act on every allegation.

Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress. Suspension is not the default option and alternatives to suspension will always be considered. In some cases, staff may be suspended where this is deemed to be the best way to ensure that children are protected. In the event of suspension the school will provide support and a named contact for the member of staff.

Staff, parents and governors are reminded that publication of material that may lead to the identification of a teacher who is the subject of an allegation is prohibited by law. Publication includes verbal conversations or writing, including content placed on social media sites.

Allegations concerning staff who no longer work at the school, or historical allegations will be reported to the police.

## **Managing allegations against staff**

Any allegation against an adult working in our school is taken seriously. It is essential that the situation is dealt with fairly, quickly and consistently. Any allegation against an adult in the school is a sensitive issue, both for the child and the adult. There are two levels of allegations/concern: those that meet the harms threshold and those that do not, those that do not are referred to as "low level concerns". The school's procedure will be followed where it is alleged that anyone working in the school has:

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

It is important that policies and procedures make clear to whom allegations should be reported and that this should be done without delay. A “case manager” will lead any investigation. This will be either the Headmistress or, where the Headmistress is the subject of an allegation, the chair of governors.

When an allegation is made against a member of staff, the DSL, supply staff or volunteers, the matter should be reported to the Headmistress who will then inform the Chair or Vice Chair of Governors. Allegations against a teacher who is no longer teaching will be referred to the police, as will historical allegations of abuse. Whilst BGS is not the employer of supply staff, the school will ensure any allegation is dealt with properly and will fully cooperate with the LADO. If supply staff are provided by an agency, the agency will be fully involved. Reports about supply staff and contractors will be notified to their employers so any potential patterns of inappropriate behaviour can be identified.

If there has been a substantiated allegation against a member of staff, the school will work with the LADO to determine any improvements in school procedures.

If a student makes an allegation against the DSL the member of staff receiving the allegation must immediately inform the Headmistress who will then inform the Chairman of Governors, the governor with specific responsibility for Safeguarding Children and Child Protection.

If the allegation is against the Headmistress, the person receiving the allegation will inform the Chair of Governors, without informing the Headmistress.

Where there is a conflict of interest in reporting the matter to the Headmistress, the concern will be reported to the LADO directly.

Immediate action, within 24 hours, should be taken to protect the child and any other children present, and advice must be sought from the LADO or Team of Officers 01234 276693, email: [LADO@bedford.gcsx.gov.uk](mailto:LADO@bedford.gcsx.gov.uk) All unnecessary delays should be eradicated. The school will not undertake its own investigation of allegations without prior consultation with the LADO, or Team of Officers or in the most serious cases, the police so as not to jeopardise statutory investigations. In borderline cases, disclosures with the LADO, or Team of Officers will be held informally.

A decision whether to suspend or not a member of staff or volunteer will be taken by the Headmistress, in consultation with the Chair or Vice Chair of Governors, and giving due weight to the LADO, or Team of Officers. A course of action will be agreed, including any involvement with the police. Discussions will be recorded in writing and communication with both the individual and the parents of the child agreed. Suspension is not an automatic response, and the decision will be taken according to the circumstance of each particular case. Staff who are the subject of an allegation are advised to contact their professional association. An individual should be suspended if there is no reasonable alternative. If suspension is deemed appropriate all action must be carefully recorded by the school and the individual notified.

In case of serious harm, the police should be notified from the outset.

Any criminal enquiry takes precedence in order to discover if a crime has been committed. If it is found that no crime has been committed, it is still possible for the school to undertake a disciplinary action against the adult.

Any member of staff facing an allegation will be provided with a named contact if they are suspended. It is essential that any allegation of abuse made against a teacher or other member of staff or volunteer in a school or college is dealt with very quickly, in a fair and consistent way that provides effective protection

for the child and at the same time supports the person who is the subject of the allegation. It is extremely important that when an allegation is made, the school makes every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. The Education Act 2011 introduced reporting restrictions preventing the publication of any material that may lead to the identification of a teacher who has been accused by, or on behalf of, a student from the same school (where that identification would identify the teacher as the subject of the allegation).

If a member of staff or volunteer is dismissed, the DBS will be reported to promptly regarding any person leaving the school whether employed, contracted, a volunteer or student whose services are no longer used because he or she is considered unsuitable to work with children.

Where qualified teachers are registered with the Teaching Regulation Agency (TRA) their dismissal (or would have been dismissed if resignation had not taken place) for misconduct (unacceptable professional conduct/ conduct that may bring the professions into disrepute/conviction at any time for a relevant offence) will be referred to the TRA. It is not necessary for a referral also to be made to TRA, as information is shared between the two bodies. Where a dismissal does not reach the threshold for DBS referral, separate consideration must always be given to a TRA referral.

Ceasing to use a person's services includes: dismissal; non-renewal of a fixed-term contract; no longer engaging/refusing to engage a supply teacher provided by an employment agency; terminating the placement of a student teacher or other trainee; no longer using staff employed by contractors; no longer using volunteers; resignation; and voluntary withdrawal from supply teaching, contract working, a course of initial teacher training, or volunteering. It is important that reports include as much evidence about the circumstances of the case as possible. Failure to make a report constitutes an offence. 'Compromise agreements' cannot apply in this connection, or where the individual refuses to cooperate with an investigation. Proprietors of independent schools have a legal duty to respond to requests from the DBS for information they hold already, but they do not have to find it from other sources.

**We operate Safer Recruitment Procedures. See our Recruitment, Selection and Disclosure Policy and Procedure.** The DBS check (with effect from 1 December 2012) is documented in a single central record. This record shows whether the following checks have taken place:

- Identity checks
- Qualification checks for any qualifications legally required for the job
- Checks on an individual's right to work in the United Kingdom
- Barred list
- Enhanced DBS checks
- Checks on an individual's disqualification under Childcare Act 2006, including by association with others
- Overseas records checks where appropriate
- References
- Medical checks
- Pre-employment checks (i.e. application forms)
- Prohibition order checks

See also: **Recruitment, Selection and Disclosure Policy and Procedures**

## **Low Level Concerns**

A low-level concern is any concern that an adult may have acted in a way that is inconsistent with the staff code of conduct. The behaviour does not meet the allegation threshold for referral to the LADO.

Such behaviour can exist on a spectrum between inadvertent to intentional with the view to enable abuse. Low level concerns should be shared with the Headmistress. Such concerns will be dealt with sensitively and proportionately. Staff should self-refer if they find themselves in a situation which they feel could be misinterpreted or where they feel compromised. Records will be kept in the member of staff's HR file. The **Low-level Concerns Policy** details how the school will handle Low Level concerns and staff members should make themselves aware of its content.

## Specific forms of abuse and safeguarding issues

### Children missing education

Children being absent from education for prolonged periods and/or repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation – particularly county lines. It is important the school or college's response to persistently absent pupils and children missing education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks with the family or in the community. Further information and support includes:

- Statutory guidance <https://www.gov.uk/government/publications/working-together-to-improve-school-attendance> which sets out how schools must work with local authority children's services where school absence indicates safeguarding.
- Information regarding schools' duties regarding children missing education, including information **must** provide to the local authority when removing a child from the school roll at standard and non-standard transition points, can be found in the Department of Education's <https://www.gov.uk/government/publications/children-missing-education>
- Further information for colleges providing education for a child of compulsory school age can be found in: <https://www.gov.uk/guidance/full-time-enrolment-of-14-to-16-year-olds-in-further-education-and-sixth-form-colleges>
- General information and advice for schools and colleges can be found in the Government's <https://www.gov.uk/government/publications/missing-children-and-adults-strategy>

The DSL will monitor unauthorised absence and take appropriate action including notifying the local authority, particularly where children go missing on repeated occasions and/or are missing for periods during the school day. We will hold more than one emergency contact number for students in ISAMs.

The DSL will inform the local authority of any student who has been absent for a continuous period of **10 days** or more (sooner if there are child protection issues). Admissions at BGS will notify the local authority **within five days** when a student's name is added to the admission register at a non-standard transition point. Staff must be alert to signs of children at risk of travelling to conflict zones, female genital mutilation and forced marriage.

[https://www.bedford.gov.uk/education\\_and\\_learning/education\\_welfare\\_service/children\\_missing\\_education.aspx](https://www.bedford.gov.uk/education_and_learning/education_welfare_service/children_missing_education.aspx)

## Children with family members in prison

Children with family members in prison are at risk of poor outcomes. Information about working with children of offenders is available at [www.nicco.org.uk](http://www.nicco.org.uk).

## Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) will be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

## Child Sexual Exploitation

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

Sexual exploitation is a serious crime and can have a long-lasting adverse impact on a child's physical and emotional health. It may also be linked to child trafficking.

The school includes the risks of sexual exploitation in the PSHE and RSE curriculum. A common feature of sexual exploitation is that the child often doesn't recognise the coercive nature of the relationship and doesn't see themselves as a victim. The child may initially resent what they perceive as interference by staff, but staff must act on their concerns, as they would for any other type of abuse.

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.

<https://www.childrensociety.org.uk/what-we-do/our-work/preventing-child-sexual-exploitation>

<http://www.bedfordshirelscb.org.uk/lscb-website/professionals/child-sexual-exploitation>

## Children with sexually harmful behaviour

Harmful sexual behaviour includes:

- using sexually explicit words and phrases
- inappropriate touching
- using sexual violence or threats

- full penetrative sex with other children or adults.

Children and young people who develop harmful sexual behaviour harm themselves and others.

Sexual behaviour between children is also considered harmful if one of the children is much older – particularly if there is more than two years’ difference in age or if one of the children is pre-pubescent and the other isn’t

Children may be harmed by other children or young people. Staff will be aware of the harm caused by bullying and will use the school’s **anti-bullying procedures** where necessary. However, there will be occasions when a student’s behaviour warrants a response under child protection rather than anti-bullying procedures. In particular, research suggests that up to 30 per cent of child sexual abuse is committed by someone under the age of 18.

The management of children and young people with sexually harmful behaviour is complex and the school will work with other relevant agencies to maintain the safety of the whole school community. Young people who display such behaviour may be victims of abuse themselves and the child protection procedures will be followed for both victim and perpetrator. Staff who become concerned about a student’s sexual behaviour, including any known online sexual behaviour, should speak to the DSL as soon as possible and make a referral via My Concern. More information is available in Appendix 6.

### **Child criminal exploitation: County Lines**

Criminal exploitation of children is a form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Signs that a child might be involved in county lines include: persistently going missing from home or school, unexplained new clothes, money or phones; being associated with older people; and a significant change in behaviour or mental state.

A Home office document giving further guidance can be found here:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/741194/HOCountyLinesGuidanceSept2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/741194/HOCountyLinesGuidanceSept2018.pdf)

### **Domestic abuse**

Definition: 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.

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

Advice is available at <https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/domestic-abuse/signs-symptoms-effects/>

The National Domestic Abuse Helpline 0808 2000 247 (24 hrs) offers support to victims and those concerned about friends.

<http://www.safelives.org.uk/knowledge-hub/spotlights/spotlight-3-young-people-and-domestic-abuse>

## **Honour-Based Abuse (HBA)**

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

## **Female Genital Mutilation**

FGM is the collective name given to a range of procedures involving the partial or total removal of external female genitalia for non-medical reasons. It has no health benefits and harms girls and women in many ways. The practice, which is most commonly carried out without anaesthetic, can cause intense pain and distress and long-term health consequences, including difficulties in childbirth.

FGM is carried out on girls of any age, from young babies to older teenagers and adult women, so school staff are trained to be aware of risk indicators. Many such procedures are carried out abroad and staff should be particularly alert to suspicions or concerns expressed by female students about going on a long holiday during the summer vacation period.

In England, Wales and Northern Ireland, the practice is illegal under the Female Genital Mutilation Act 2003. Any person found guilty of an offence under the Female Genital Mutilation Act 2003 is liable to a maximum penalty of 14 years imprisonment or a fine, or both.

**If a teacher discovers an act of FGM under the age of 18 they must personally report this to the police.**

Summary of FGM mandatory reporting duty:

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/496415/6\\_1639\\_HO\\_SP\\_FGM\\_mandatory\\_reporting\\_Fact\\_sheet\\_Web.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/496415/6_1639_HO_SP_FGM_mandatory_reporting_Fact_sheet_Web.pdf)

<https://www.bedford.gov.uk/social-care-and-health/children-and-families/safeguarding-children-partnership/practitioners-1>

## **Forced Marriage**

A forced marriage is a marriage in which a female (and sometimes a male) does not consent to the marriage but is coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse.

A forced marriage is not the same as an arranged marriage. In an arranged marriage, which is common in several cultures, the families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the prospective spouses.

Children may be married at a very young age, and well below the age of consent in England. School staff receive training and should be particularly alert to suspicions or concerns raised by a student about being taken abroad and not be allowed to return to England.

Since June 2014 forcing someone to marry has become a criminal offence in England and Wales under the Anti-Social Behaviour, Crime and Policing Act 2014. One can contact the Forced marriage unit on 020 7008 0151 or [fmu@fco.gov.uk](mailto:fmu@fco.gov.uk)

[https://www.bedford.gov.uk/health\\_and\\_social\\_care/children\\_young\\_people/safeguarding\\_children\\_board/practitioners/forced\\_marriage.aspx](https://www.bedford.gov.uk/health_and_social_care/children_young_people/safeguarding_children_board/practitioners/forced_marriage.aspx)

<https://www.gov.uk/government/publications/the-right-to-choose-government-guidance-on-forced-marriage>

## **Breast Ironing**

Breast Ironing, also known as “Breast Flattening”, is the process whereby young pubescent girls’ breasts are ironed, massaged and/or pounded down through the use of hard or heated objects in order for the breasts to disappear or delay the development of the breasts entirely. It is believed that by carrying out this act, young girls will be protected from harassment, rape, abduction and early forced marriage and therefore be kept in education.

Much like Female Genital Mutilation (FGM), Breast Ironing is a harmful cultural practice and is child abuse. Professionals working with children and young people must be able to identify the signs and symptoms of girls who are at risk of or have undergone breast ironing.

Breast ironing is a well-kept secret between the young girl and her mother. Often the father remains completely unaware. Some indicators that a girl has undergone breast ironing are as follows:

- Unusual behaviour after an absence from school or college including depression, anxiety, aggression, withdrawn etc.;
- Reluctance in undergoing normal medical examinations;
- Some girls may ask for help, but may not be explicit about the problem due to embarrassment or fear;
- Fear of changing for physical activities due to scars showing or bandages being visible.

If staff have a concern they should submit a referral to the DSL via My Concern.

## **Children who may be particularly vulnerable**

Some children may have an increased risk of abuse. It is important to understand that this increase in risk is due more to societal attitudes and assumptions or child protection procedures that fail to acknowledge children’s diverse circumstances, rather than the individual child’s personality, impairment or circumstances. Signs of abuse can be failed to be recognised due to communication difficulties or the misinterpretation of the child’s behaviour. Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and a reluctance on the part of some adults to accept that abuse can occur. Some children need a social worker due to complex safeguarding needs, a child’s experience of trauma and adversity can leave them vulnerable to further harm. This information will guide decisions about safeguarding the child in school, for example, pastoral and/or academic support.

Provisions within the Equality Act allow schools to take positive action, where it can be shown that it is proportionate, to deal with disadvantages affecting pupils or students with a particular protected characteristic in order to meet their specific need, this includes a duty to make reasonable adjustments for disabled children and young people, including those with long term conditions.

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

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

To ensure that all our students receive equal protection, we will give special consideration to children who are:

- disabled or have special educational needs

- subject to a Child in Need or Child Protection Plan
- young carers
- affected by parental substance misuse, domestic violence or parental mental health needs
- asylum seekers
- living away from home
- vulnerable to being bullied, or engaging in bullying
- living in temporary accommodation
- live transient lifestyles
- living in chaotic and unsupportive home situations
- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability or sexuality
- at risk of sexual exploitation
- do not have English as a first language
- at risk of female genital mutilation (FGM)
- at risk of forced marriage
- at risk of being drawn into extremism.
- Identifying as LGBTQ+ and/or gender questioning

The fact that a child or a young person may be LGBTQ+ is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBTQ+ (whether they are or not) can be just as vulnerable as children who identify as LGBTQ+. Risks can be compounded where children who are LGBTQ+ lack a trusted adult with whom they can be open. At BGS, staff endeavour to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of staff.

LGBTQ+ inclusion is part of the statutory [Relationships Education, Relationship and Sex Education and Health Education](#) curriculum and outlined further in the relevant separate policies.

## Helping children to keep themselves safe

Children are taught to understand and manage risk through our personal, social, health and economic (PSHE) education and sex and relationships lessons and through all aspects of school life. Relationships, Sex and Health Education is compulsory and the PSHE curriculum at BGS is continually reviewed to incorporate and relevant issues.

Our approach is designed to help children to think about risks they may encounter and with the support of staff work out how those risks might be reduced or managed. Discussions about risk are empowering and enabling for all children and promote sensible behaviour rather than fear or anxiety. Children are taught how to conduct themselves and how to behave in a responsible manner. Children are also reminded regularly about e-safety, the risks of sharing content and images online and tackling bullying, including cyber bullying procedures. The school continually promotes an ethos of respect for children, and students are encouraged to speak to a member of staff of their choosing about any worries they may have.

## Photography and images

The vast majority of people who take or view photographs or videos of children do so for entirely innocent and legitimate reasons. Sadly, some people abuse children through taking or distributing images, so we must ensure that we have some safeguards in place.

To protect students we will:

- seek parental consent for photographs to be taken or published (for example, on our website or in newspapers or publications)
- ensure students are appropriately dressed
- encourage students to tell us if they are worried about any photographs that are taken of them.

Our staff code of conduct outlines expectations for staff about taking photographs and videos of students.

## E-Safety

Our students increasingly use electronic equipment on a daily basis to access the internet and share content and images via social networking sites such as Snapchat, Twitter, Tiktok and Instagram. Schools and colleges are also increasingly working online.

Unfortunately, some adults and young people will use these technologies to harm children. The harm might range from sending hurtful or abusive texts and emails, to grooming and enticing children to engage in sexually harmful conversations, webcam photography or face-to-face meetings. Students may also be distressed or harmed by accessing inappropriate websites that promote unhealthy lifestyles, extremist behaviour and criminal activity. Abuse can take place wholly online and may be used to facilitate offline abuse.

There are four main areas of risk associated with online safety:

**Content:** being exposed to illegal, inappropriate or harmful material; for example, pornography, racist, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.

**Contact:** being subjected to harmful online interaction with other users; for example, peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

**Conduct:** online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi nudes and/or pornography, sharing other explicit images and online bullying, and

**Commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report to the Anti-Phishing Working Group. <https://apwg.org/>

The school's **e-safety policy**, available on the BGS website, explains how we try to keep students safe in school and protect and educate students in the safe use of technology. It outlines our use of filters and how we monitor the usage of technology in school. The DSL has overall responsibility for e-safety but will work with the Director of Digital Strategy, Enterprise and Sustainability to support with some of the education and training aspects of this responsibility. The DSL meets the ICT manager weekly to review any e-safety incidents. Incidents of concern are logged, and appropriate follow up measures decided.

The governing body ensures BGS has appropriate filters and monitoring systems in place and regularly reviews their effectiveness through feedback from the ICT Manager. They ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified.

Many students own or have access to handheld devices and will have unrestricted access to the internet via 3G and 4G. Cyberbullying and sexting by students will be treated as seriously as any other type of bullying and will be managed through our anti-bullying procedures. Serious incidents may be managed in line with our sexual exploitation policy or child protection procedures.

Schools are in regular contact with parents and carers. Parents are encouraged to consider measures to keep their children safe when using the internet and social media at home and in the community and the systems we use at school to monitor and filter online use maybe described to parents to help them understand how their child is kept safe at school.

The Technology for Learning Acceptable Use Policy outlines the guidelines and behaviours that students are expected to follow when using school technologies or when using personally owned devices in the school grounds.

- The school network is intended for educational purposes.
- Activity over the network will be appropriately monitored and filtered.
- Access to the Internet will be restricted by our firewall in accordance with our policies and regulations.
- Students are expected to follow the same rules for good behaviour and respectful conduct online as offline.
- Misuse of school resources can result in suspension of access and disciplinary consequences.
- Digital citizens are expected to alert IT staff immediately of any concerns for safety or security of themselves or others.

The Technology for Learning Acceptable Use Policy can be found on the website and the e-safety policy can be found on The Eyrie. Staff receive e-safety training.

## **Child abduction and community safety incidents**

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

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation. PSHE lessons and tutorial periods will include advice for students on how to keep safe whilst they become increasingly independent.

## **Cybercrime**

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

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

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

If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the National Crime Agency's <http://www.ceopeducation.co.uk/parents> - which provides information for parents and carers to help protect their child from online child sexual abuse,

including <https://www.ceopeducation.co.uk/parents/ask-the-awkward/> - Guidance on how to talk to their children about online relationships.

## **Radicalisation and Extremism**

### **The Counter Terrorism & Security Act (2015) & the Prevent duty**

Prevent is one of the four elements of CONTEST, the government's counter-terrorism strategy. It aims to stop people becoming terrorists or supporting terrorism. Children are vulnerable to extremist ideology and radicalisation.

Extremism: the vocal or active opposition to our fundamental British values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of those with different faiths and beliefs.

Radicalisation: the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Terrorism: 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.

### **The Prevent duty**

- Responds to the ideological challenge we face from terrorism and aspects of extremism, and the threat we face from those who promote these views.
- Provides practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support.
- Works with a wide range of sectors (including education, criminal justice, faith, charities, online and health) where there are risks of radicalisation that we need to deal with.

The strategy covers all forms of terrorism, including far right extremism and some aspects of non-violent extremism.

### **The Counter Terrorism & Security Act (2015):**

This Act places a duty on specified authorities including schools, Further and Higher Education, to have due regard to the need to prevent people from being drawn into terrorism (the Prevent duty). At BGS, we are committed to supporting vulnerable students through our safeguarding policies and procedures and recognise that this will support the school's contribution to the Prevent duty.

At BGS, we build students' resilience to radicalisation by promoting fundamental British values and enabling our students to challenge extremist views. Opportunities are provided in the curriculum to enable students to discuss issues of religion, ethnicity and culture and the school follows the DfE advice Promoting fundamental British Values as part of SMCS (spiritual, moral, social and cultural education) in Schools (2014).

The school has engaged positively with appropriate training to ensure all staff have the skills and knowledge to refer any concerns appropriately.

Referral for any issue concerning potential radicalisation to extremism should be managed as any other safeguarding referral. The DSL provides the lead for the school on Prevent.

## Channel

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. In addition to information sharing, if a staff member makes a referral to Channel, they may be asked to attend a Channel panel to discuss the individual referred to determine whether support is required. Channel guidance is available at:

<https://www.support-people-susceptible-to-radicalisation.service.gov.uk/portal>

<http://www.bedfordshirelscb.org.uk/lscb-website/professionals/radicalisation-and-extremism>

## Staff training

It is important that all staff receive training including online safety to enable them to recognise the possible signs of abuse, neglect and exploitation and to know what to do if they have a concern and to understand their roles and responsibilities in relation to filtering and monitoring.

All staff working directly with children must read Part One of KCSIE.. Each time Part One of KCSIE is updated by the DfE, existing staff will be updated. Staff will take an e-learning module on KCSIE which tests their understanding of the document. All staff working directly with children must also read Annex B of KCSIE 2024 and are tested by an online quiz. Specific staff will be directed to the condensed version of Annexe A which is available in a number of different languages at <https://national.lgfl.net/digisafe/kcsietranslate>

All staff will be trained in safeguarding and child protection regularly and at least annually, in line with advice from the LSCB. Prevent awareness training will be part of this and staff take an e-learning module (iHasco) about the Prevent duty. Regular updates for staff will be available via staff meetings and on-line communication, for example emails which include information from CASPAR (NSPCC) and Andrew Hall's Safeguarding Briefing. Staff training might include analysing scenarios and reviewing procedures.

All new staff, including governors, temporary staff and volunteers, will be provided with induction training that includes:

1. the school's child protection policy (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring);
2. the positive behaviour policy
3. the safeguarding response to children who go missing from education
4. the safeguarding response to children absent from education, particularly on repeat occasions and/or prolonged periods
5. the staff code of conduct including the whistleblowing procedure;
6. the role of the designated safeguarding lead (including the identity of the designated lead and any deputies)
7. a copy of Part 1 of KCSIE 2024 and Annexe A.
8. e-safety training delivered by a member of staff from the ICT department.
9. training in the use of safeguarding software My Concern to report serious safeguarding matters.

The DSL and deputy DSLs will update their training every two years and in addition to this formal training

their knowledge and skills will be updated at regular intervals, at least annually, to keep up with any developments in the role. The DSL has termly meetings with the DSLs from the other Harpur Trust Schools.

All staff will be made aware of the increased risk to abuse of certain groups, including disabled and SEN children, looked after children and young carers. Training also raises staff awareness of online safety and harmful sexual behaviours and honour-based violence.

All staff are trained in the use of My Concern – safeguarding reporting and recording software.

All governors and trustees receive appropriate safeguarding and child protection (including online) training at induction. This training will equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated. Part of this training will be an iHASCO online course on KCSIE 2024.

## Confidentiality and sharing information

All staff will understand that child protection issues warrant a high level of confidentiality, not only out of respect for the student and staff involved but also to ensure that information being released into the public domain does not compromise evidence.

Staff should only discuss concerns with the designated safeguarding lead, Headmistress or chair of governors (depending on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

However, following a number of cases where senior leaders in schools had failed to act upon concerns raised by staff, *Keeping Children Safe in Education 2024* emphasises that **any** member of staff can contact children's social care if they are concerned about a child.

Child protection information will be stored and handled in line with the Data Protection Act 2018 and the GDPR.

Information sharing is guided by the following principles. The information is:

- necessary and proportionate
- relevant
- adequate
- accurate
- timely
- secure

Information sharing decisions will be recorded, whether or not the decision is taken to share.

Records of concern forms and other written information will be stored in a locked facility or recorded digitally (after September 2018).

Every effort will be made to prevent unauthorised access, and sensitive information should not routinely be stored on laptop computers, which, by the nature of their portability, could be lost or stolen. Child protection information will be stored separately from the student's school file and the school file will be 'tagged' to indicate that separate information is held.

The DSL will normally obtain consent from the student and/or parents to share sensitive information within the school or with outside agencies. Where there is good reason to do so, the DSL may share information *without* consent providing it enhances the safeguarding of the child and will record the reason for not obtaining consent.

Child protection records are normally exempt from the disclosure provisions of the Data Protection Act, which means that children and parents do not have an automatic right to see them. If any member of staff receives a request from a student or parent to see child protection records, they will refer the request to the headteacher or the DSL. Where in doubt, independent legal advice may be sought.

The Data Protection Act does not prevent school staff from sharing information with relevant agencies, where that information may help to protect a child. The school's confidentiality and information-sharing policy is available to parents and students on request from the Harpur Trust

<https://www.gov.uk/government/publications/data-protection-toolkit-for-schools> (Gov.UK 2018)

## **Transfer of records when a child moves to a new school**

The child protection file will be shared with the new school to allow the school to look for patterns or repeat concerns when new information is received. The file is passed over as soon as possible once the child is on roll so that the receiving school is aware of any issues or on-going concerns. This is ideally within the first week of attendance at the new setting when it has been confirmed that the pupil has moved school. The DSL can also consider providing information to the receiving school prior to the child starting where there is a need for support or awareness to be in place.

## **Multi-agency working**

Bedford Girls' School will contribute to multi-agency working where required. Working Together 2023 sets out requirements for collaborative working arrangements for safeguarding and promoting the welfare of children, young people and families which will lead to improved outcomes and experiences. The arrangements in Bedford Borough are the Bedford Borough Safeguarding Children Board (BBSCB) and includes Multi-Agency Safeguarding Arrangements (MASAs).

The MASA sets out the arrangements for safeguarding partners to work together with other agencies to identify and respond to the needs of children in Bedford Borough and the three safeguarding partners Bedford Borough Council, Bedfordshire Police and the Bedfordshire Clinical Commissioning Group have equal and joint responsibility for local safeguarding arrangements.

## **The use of reasonable force**

There are circumstances when it is appropriate for staff to use reasonable force to safeguard children and young people. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between students or blocking a student's path, or active physical contact such as leading a student by the arm out of the classroom. Seclusion is a non-disciplinary intervention involving keeping a pupil confined to a place away from others and prevented from leaving and should only be used as a safety measure to protect others from harm when a pupil is experiencing high levels of emotional or behavioural dysregulation. The place should be safe, and the student should not feel threatened or intimidated. See Appendix 4.

## **Extended school and off-site arrangements**

All extended and off-site activities are subject to a risk assessment to satisfy health and safety and safeguarding requirements. Where extended school activities are provided by and managed by the school, our own child protection policy and procedures apply. If other organisations provide services or activities on our site, we will check that they have appropriate procedures in place, including safer recruitment procedures.

When our students attend off-site activities, including day and residential visits and work-related activities, we will check that effective child protection arrangements are in place. Should we receive an allegation relating to an incident where an individual or organisation using the school premises for the purpose of running and activity, we will follow our safeguarding policies and procedures and inform the local authority designated officer (LADO).

## **Private fostering arrangements**

A private fostering arrangement occurs when someone other than a parent or a close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16, or aged under 18 if the child is disabled. Children looked after by the local authority or who are placed in a residential school, children's home or hospital are not considered to be privately fostered.

Private fostering occurs in all cultures, including British culture and children may be privately fostered at any age. Most privately fostered children remain safe and well but safeguarding concerns have been raised in some cases, so it is important that schools are alert to possible safeguarding issues, including the possibility that a child has been trafficked into the country.

By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify children's services as soon as possible. Where a member of staff becomes aware that a student may be in a private fostering arrangement they will raise this with the DSL and the school should notify the local authority of the circumstances.

<http://www.bedfordshirelscb.org.uk/lscb-website/professionals/private-fostering-1>

## **Special Circumstances**

### **Looked after children**

The most common reason for children becoming looked after is as a result of abuse and/or neglect. The school will ensure that staff have the skills, knowledge and understanding to keep looked after children safe.

School will ensure that staff have information about a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order) and the child's contact arrangements with birth parents or those with parental responsibility.

They should also have information about the child's care arrangements and the levels of authority delegated to the carer by the local authority after her. The DSL should have details of the child's social worker and the name of the Virtual School Head in the authority that looks after the child.

In September 2024, the role of the Virtual School Heads was further extended to include a non- statutory responsibility to promote the educational achievement of all children in kinship care. Non-statutory guidance on <https://www.gov.uk/government/publications/virtual-school-head-role-extension-to-children-with-a-social-worker> and children in kinship care arrangements contains further information on the roles and responsibilities of the Virtual School Heads.

### **Work Experience**

The school has detailed procedures to safeguard students undertaking work experience, including arrangements for checking people who provide placements and supervise students on work experience which are in accordance with the guidance in *Keeping Children Safe in Education 2024*.

## Children staying with host families

The school may make arrangements for students to stay with a host family during a foreign exchange trip or sports tour. In such circumstances the school follows the guidance in *Keeping Children Safe in Education (2024)*, Annex E to ensure that hosting arrangements are as safe as possible.

Some overseas students may reside with host families during school terms and we will work with the local authority to check that such arrangements are safe and suitable.

## Appendix 1 – Safeguarding policy summary

**If you consider a child to be in immediate danger or at risk of harm, a referral should be made to children's social care and/or the police immediately.** Anyone can make the referral. When referrals are not made by the DSL the DSL should be informed, as soon as possible, that a referral has been made. The student (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child.

If you **know** or **suspect** that a child is being abused but you don't know for sure, speak to the Designated Safeguarding Lead, Luan Tink, who will advise on the best course of action. In the **Designated Safeguarding Lead's absence**, you should speak on of the DDSL's Matt Gracie Deputy Headteacher Gemma Gibson Headmistress, Carolyn Howe Head of the Junior School, or Helen Woolley Director of Sixth Form. You will subsequently need to document your concern in MyConcern. If the abuse has been perpetrated by another child, refer both children. You should then continue to monitor the situation and report any developments. **Do not delay your report.**

If a child wants to make a disclosure, receive the account, and pass on the details, as above. Reassure the child but never probe. Write down what happened, very soon after the disclosure.

Never guarantee confidentiality and never refuse to hear parts of disclosures.

Avoid giving physical comfort, especially if you are alone with the child.

**Teachers should never contact parents.** There may be information that you do not know. It is likely that parents will be spoken to before referral but only the DSL, the Headmistress or the Head of the Junior School should speak to parents, although you may be required to be present at interviews with parents. The Headmistress will liaise with external agencies as appropriate.

Don't overlook the trivial: report all concerns so that we can see patterns when necessary.

**Be vigilant and listen well: abuse can and does happen to children in all types of schools. The child's welfare is the single most important factor.**

**Pass on information promptly.**

The school's full policy and more detailed information and advice can be found on the staff intranet and the school website.

## Appendix 2 – Concern about a student form

For use by supply teachers, temporary staff, Harpur Trust shared staff and exam invigilators. All other staff should use the My Concern portal.

Please give this referral to the DSL or in her absence GMG (Deputy DSL) or CH (if Junior School matter)

Name of student:		Tutor group:	
Date:		Time referral given to DSL:	
Nature of concern (include where, when, how. Use child's words. Other people involved):			
Action taken so far: (What did you say to the child?)			
Following a disclosure, what happened next? Where did the child go?			
Actions you feel might be appropriate to support the student:			
Name of member of staff reporting concern:		Signature of member of staff:	
Discussion, recommended actions (with justification & who else knows) by: EET/JCM/CH			
Signature of DSL/Deputy DSL:	Feedback given to referrer	Date:	

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*Continue over if needed*

## **Appendix 3: Children Missing Education Policy**

Children missing education are children of compulsory school age who are not registered students at a school and are not receiving suitable education otherwise than at a school. This policy has regard to the DfE statutory guidance Children Missing Education (2016); the Education (Independent Schools Standards) Regulation 2014, Part 3, paragraph 15; section 175 of the Education Act 2002; Keeping Children Safe in Education 2024 and Working Together to Safeguard Children (2023).

The school recognises its duty to act with the Local Authority to identify children missing education and shares a belief that all children are entitled to an efficient, full time education which is suitable to their age, ability, aptitude and any special educational needs they may have. Children go missing for a range of reasons and they may be at risk of significant harm.

### **Procedures to identify and respond to children who go missing**

In line with the whole school attendance policy, the school maintains an Admissions Register. If a student fails to attend school on the first agreed day of attendance, the school will undertake reasonable enquiries to establish the child's whereabouts and consider notifying the local authority at the earliest opportunity, especially if the child's whereabouts cannot be ascertained.

The school has safeguarding duties under section 175 of the Education Act 2002, and as part of this must investigate any unexplained absences. Students' attendance is monitored through its daily Attendance Register by tutors, Heads of Year and the DSL. The school registers all students at the start of every lesson except those Sixth Form students who have a study period. All students are registered for the morning and afternoon sessions. If a student is absent from registration during period 1, the school office will call home to ascertain the reason for absence. If a student is inexplicably absent from a subsequent lesson, the school office should be informed immediately. Staff should report any concerns about a student's extended absence immediately to the Head of Year or the DSL.

The school follows Bedford Borough's guidance on reporting the details of students who fail to attend school regularly. The school must report any continuous student absences, greater than 10 school days, where no reason is given, but may report sooner if there are child protection concerns.

The school will hold more than one emergency contact number for each student wherever reasonably possible. This will be monitored using the school's database and parent or guardian of any student with fewer than two contacts numbers will be requested to provide an additional number.

### **Notifying the Local Authority**

The school will inform the Local Authority where a student's name is going to be deleted from the admission register in cases:

- when the child has been taken out of school to be home educated
- when the family has apparently moved away;
- when the child has been certified as medically unfit to attend;
- when the child is in custody for more than four months;
- when the child has been permanently excluded.

The Local Authority will also be notified within 5 days when the School removes or adds a student's name

to the admissions register at non-standard transitions, and will also provide information to the local authority for standard transitions if requested. The school recognises children missing education as a safeguarding issue, particularly when a child leaves school with no known destination.

## **Appendix 4: Use of reasonable force**

### **1) The use of reasonable force**

The use of reasonable force may be used to prevent a pupil from doing, or continuing to do, any of the following:

- Committing a criminal offence (including behaving in a way that would be an offence if the pupil were not under the age of criminal responsibility);
- Injuring themselves or others (pupils or staff).
- Causing damage to property (including the pupil's own property).
- Engaging in any behaviour prejudicial to maintaining good order and discipline at the school or among any of its pupils, whether that behaviour occurs in a classroom during a teaching session or elsewhere.

The above applies when a teacher, or other authorized person is on the School premises, and when he or she has lawful control or charge of the pupil concerned elsewhere, e.g. on a field trip or other authorized out of School activity.

### **2) When is force appropriate?**

Everyone, whether authorized by the Headmistress or not, has the right to defend themselves against an attack, provided they do not use a disproportionate degree of force. Similarly, in an emergency, for example, if a pupil was at immediate risk of injury or on the point of inflicting injury on someone else, any member of staff would be entitled to intervene. The purpose of this provision is to make it clear that teachers and other authorized staff are also entitled to intervene in other, less extreme situations.

### **3) What is reasonable force?**

It is hard to give a precise answer because there is no legal definition of 'unreasonable force'. The use of any degree of force is unlawful if the particular circumstances do not warrant the use of physical force. Any force used should always be the minimum needed to achieve the desired result.

Ask the following questions:

- Did the incident warrant the degree of force used?
- Was the degree of force proportionate to the seriousness of the behaviour or consequences it was intended to prevent?
- Was the degree of force appropriate, bearing in mind the age, understanding and sex of the pupil concerned?

Force used should always be the minimum necessary to achieve the desired result.

Before intervening physically, a teacher should, wherever practicable, tell the pupil who is misbehaving to stop and what will happen if they do not. The teacher should continue attempting to communicate with the pupil throughout the incident and should make it clear that physical contact or restraint will stop as soon as it ceases to be necessary. A calm and measured approach to a situation is needed and teachers should never give the impression that they have lost their temper or are acting out of anger or frustration or to punish the pupil.

#### **4) Acceptable forms of force**

Physical intervention can take several forms. It might involve:

- physically interposing between pupils;
- blocking a pupil's path;
- holding;
- pushing;
- pulling;
- leading a pupil by the hand or arm;
- shepherding a pupil away by placing a hand in the centre of the back;
- in extreme circumstances only, using more restrictive holds.

DO NOT:

- hold a pupil around the neck or by the collar in any other way that might restrict the pupil's airway, breathing or circulation;
- slap, punch or kick a pupil
- twist or force limbs against a joint; trip up a pupil;
- hold or pull a pupil by the hair or ear; hold a pupil face down on the ground.

ALWAYS AVOID TOUCHING OR HOLDING A PUPIL IN A WAY THAT MIGHT BE CONSIDERED INDECENT.

#### **5) What the School should do if staff have used force during an incident**

There must be a detailed, contemporaneous report of any occasion where force is used. (If in doubt of the necessity for a report, please consult the Headmistress). This report, containing the following information, should be handed to the Headmistress as soon as possible after the incident:

- the name(s) of the pupil(s) involved and when and where the incident took place; • the name(s) of any other staff or pupil(s) who witnessed the incident;
- the reason that force was necessary (e.g. to prevent injury to the pupil, another pupil or member of staff);
- how the incident began and progressed, including details of the pupil's behaviour, what was said by each of the parties, the steps taken to diffuse or calm the situation, the degree of force used, how that was applied and for how long;
- the pupil's response and the outcome of the incident;

- the details of any injury suffered by the pupil, or a member of staff and of any damage to property.

The parents will need to be informed.

The written report

- may help prevent later misunderstanding or misrepresentation of the incident
- will be useful if a child or parent makes a complaint against the School or teacher concerned
- could be important evidence if criminal or civil proceedings are brought against the School or a teacher

#### 6) Physical contact with pupils (general)

There are occasions when physical contact with a pupil may be proper or necessary other than those covered by Section 550A of the 1996 Act on which these notes are based. Some physical contact may be necessary to demonstrate exercises or techniques during PE lessons, sports coaching, music lessons, or DT or if a member of staff has to give first aid but a child should always be asked whether this is acceptable. Young children and those with special educational needs may need staff to provide physical prompts or help. Touching may also be appropriate where a pupil is in distress and needs comforting. Teachers will use their own professional judgement when they feel a pupil needs this kind of support. Physical contact with pupils becomes increasingly open to question as pupils reach and go through adolescence and staff should bear in mind that even innocent and well-intentioned physical contact can sometimes be misconstrued.

#### 7) Seclusion

Seclusion is a non-disciplinary safety measure used only when a pupil is experiencing severe emotional or behavioural dysregulation and poses a risk of harm to others, not as a punishment for deliberate behaviour. During seclusion, the pupil must be kept in a safe, non-threatening environment under constant supervision and allowed to leave as soon as the immediate risk has reduced. Any use of seclusion must be recorded and reported according to school procedures, and schools should distinguish it from disciplinary actions such as removal from the classroom.

#### 8) Legal implications

Teachers faced with a situation where a pupil needs to be restrained or where force is necessary are particularly vulnerable to accusations by pupils or parents of assault.

Allegations may be made in the heat of the moment; because of misrepresentations and misunderstandings - or they may be false, malicious or misplaced.

School staff must bear in mind that it is a criminal offence to use or threaten physical force (for example by raising a fist or making a verbal threat) - unless there is lawful excuse, or justification, for the use of force. A court that sees staff have acted within the guidelines on using force is likely to conclude that there was lawful excuse for that force to have been used.

Similarly, it is an offence to lock an adult or child in a room without a court order (even if they are not aware that they are locked in) except in an emergency when, for example, locking someone in while seeking help would be justified.

Physical intervention may also lead to a civil negligence action if it results in injury, including psychological trauma, to the person concerned.

## 8) When School staff are the victims

No matter how good staff are at diffusing situations, they will not always be successful. Occasionally a pupil will vent their anger on a teacher. This is a traumatic experience, and staff may suffer serious injury, requiring time off work. In a small number of cases, incidents lead to long-term ill-health; and occasionally a teacher cannot, or does not wish to, return to work at all.

What can we do if a pupil assaults a teacher?

Permanent exclusion is a serious step and will usually be the final stage in the disciplinary process after other strategies have been tried without success. DFE guidance does, however, state that: ...there will be exceptional circumstances where, in the head teacher's judgement, it is appropriate to permanently exclude a child for a first or 'one-off' offence. These might include:

- Serious actual or threatened violence against another pupil or member of staff
- Serious abuse or assault
- Supplying an illegal drug or carrying an offensive weapon

Before excluding the Head must

- Ensure an appropriate investigation has been carried out
- Consider all the evidence available to support the allegations, taking the School's positive behaviour policy into account

## Appendix 5: KCSIE Condensed Part One

**The following is a condensed version of Part one of Keeping children safe in education. It can be provided (instead of Part one) to those staff who do not directly work with children, if the governing body or proprietor think it will provide a better basis for those staff to promote the welfare and safeguard children.**

### The role of school and college staff

1. Safeguarding and promoting the welfare of children is **everyone's** responsibility. **Everyone** who comes into contact with children has an important role to play.
2. School and college staff are particularly important as they are in a position to identify concerns early, provide help for children, promote children's welfare and prevent concerns from escalating. It is important all staff (including those who do not work directly with children) recognise the important role they play in protecting children.

### What school and college staff need to know

3. For the purposes of safeguarding, a child is anyone under the age of 18. Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:
  - protecting children from maltreatment;
  - preventing impairment of children's mental and physical health or development;
  - ensuring that children grow up in circumstances consistent with the provision of safe and effective care;
  - taking action to enable all children to have the best outcomes.

### All staff should:

- be aware of the systems in their school or college which support safeguarding, and these should be explained to them as part of staff induction. As a minimum this Annex and the child protection policy should be shared with staff at induction;
- receive appropriate safeguarding and child protection training (including online safety) which is regularly updated. In addition, all staff should receive safeguarding and child protection updates (including online safety) (for example, via emails, e-bulletins and staff meetings), as required, and at least annually, to provide them with the skills and knowledge to safeguard children effectively;
- know the identity of the designated safeguarding lead (and any deputies) and how to contact them;
- know what to do if a child tells them they are being abused or neglected. This includes understanding they should never promise a child that they will not tell anyone else about a report of abuse, as this is unlikely to be in the best interests of the child; and,
- Should be able to reassure all victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

### What school and college staff should look out for Abuse and neglect

4. Knowing what to look for is vital to the early identification of abuse and neglect. **All** staff should be aware of indicators of abuse and neglect, including exploitation, so that they are able to identify cases of children who may be in need of help or protection.

5. If staff are unsure, they should always speak to the designated safeguarding lead (or deputy).

### Forms of abuse and neglect

6. **Abuse:** 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 by other children or adults, in a family or in an institutional or community setting by those known to them or, more rarely, by others.

7. **Physical abuse:** a form of abuse that may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child.

8. **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. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

9. **Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Females can also be abusers as can other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as child-

on-child abuse) in education and all staff should be aware of it and their school or colleges policy and procedures for dealing with it.

Centre of Expertise on Child Sexual Abuse has introduced new resources to help education professionals identify and respond to <https://www.csacentre.org.uk/research-resources/practice-resources/helping-education-settings-identify-and-respond-to-concerns/>

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

11. All staff should be aware that child sexual and child criminal exploitation are forms of child abuse.

### **Safeguarding issues**

12. All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking, alcohol misuse, deliberately missing education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nudes and semi-nudes (also known as youth produced sexual imagery) put children in danger.

*(Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive – but children still need to know it is illegal- whilst non-consensual is illegal and abusive. UKCIS provides detailed advice about sharing of nudes and semi-nude images and videos.)*

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

13. All staff should be aware that children can abuse other children (often referred to as child-on-child abuse). It can happen both inside and outside of school/college and online. It is important that all staff recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports.

14. All staff should be clear as to the school or college's policy and procedures with regards to child-on-child abuse. Child-on-child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence, such as rape, assault by penetration and sexual assault;
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment;
- non-consensual sharing of nudes and semi nudes images and/or videos;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element.

### **What school and college staff should do if they have concerns about a child**

15. Staff working with children should maintain an attitude of ‘**it could happen here**’ where safeguarding is concerned. When concerned about the welfare of a child, staff should always act in the **best interests** of the child.

16. Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe.

17. If staff have **any concerns** about a child’s welfare, they should act on them immediately. They should follow their school or college’s child protection policy and speak to the designated safeguarding lead (or deputy). In the absence of the designated safeguarding lead staff should speak to a member of the school or college’s senior leadership team.

18. The designated safeguarding lead (or deputy) will generally lead on next steps, including who else, if anyone, in the school or college should be informed and whether to pass a concern to children’s social care and/or the police. In some instances, staff may be expected to support the children social care assessment process. If this is the case, the designated safeguarding lead (or deputy) will support them.

### **Why is all of this important?**

19. It is important for children to receive the right help at the right time to address risks and prevent issues escalating. Research and serious case reviews have

### **What school and college staff should do if they have safeguarding concerns about another staff member who may pose a risk of harm to children**

20. If staff have safeguarding concerns about another member of staff (including volunteers, supply staff, trades persons and visitors) they should speak to the headteacher or to another member of the school’s senior leadership team.

### **What school or college staff should do if they have concerns about safeguarding practices within the school or college**

21. All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school’s or college’s safeguarding regime, and know that such concerns will be taken seriously by the senior leadership team.

22. Appropriate whistleblowing procedures should be in place for concerns to be raised with the school or college’s senior leadership team. Where staff feel unable to raise an issue with their employer or feel that their genuine safeguarding concerns are not being addressed [NSPCC whistleblowing advice line](#) is available. Staff can call 0800028 0285 – 8:00 AM to 8:00 PM, Monday to Friday and email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk). Alternatively, staff can write to: National Society for the Prevention of Cruelty to Children (NSPCC), Weston House, 42 Curtain Road, London EC2A 3NH.

## **Appendix 6: Child-on-child sexual violence and harassment policy**

### **Contents:**

	Page
Introduction	47
What is child on child abuse?	47
Fundamental principles	48
Harmful Sexual Behaviours	50
How can pupils and parents/carers report abuse?	52

Responding to concerns or allegations	52
Handling online concerns	58
Monitoring, Raising Awareness and Liaison	59
Staff Training	59
Pupil Education	59

## Introduction

The sexual abuse of children by other children is a specific safeguarding issue (also known as child-on-child abuse) in education and all staff should be aware of it and of the School policy and procedures for dealing with it. This appendix to the Safeguarding Policy draws upon the guidance in KCSIE (September 2024) Part 5 and Sexual Violence and Sexual Harassment between Children in Schools and Colleges (DfE, September 2021). It should be read in conjunction with the rest of the Safeguarding and Child Protection Policy, Anti-bullying Policy, Positive Behaviour Policy and the IT Acceptable Use Policy and any additional relevant guidance issued by local Safeguarding Partners (Local Authority, Clinical Practitioners or Police). This policy has been updated to take account of the updates in KCSIE 2024 and the update to Sexual Violence and Sexual Harassment between Children in Schools and Colleges. Our approach to all child-on-child abuse and sexual violence and harassment has been developed in conjunction with the safeguarding leads at other Harpur Trust schools.

## What is child on child Abuse?

Child on child abuse, where a pupil's behaviour is likely to cause significant harm to other pupils, can take many forms:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages physical abuse) (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);
- sexual harassment such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- Consensual and non-consensual sharing of nudes and semi-nude images and/or videos
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;

- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

### **Fundamental Principles:**

- The starting point regarding any report should always be that there is a zero-tolerance approach to sexual violence and sexual harassment and it is never acceptable and it will not be tolerated.
- Children can confidently report abuse, knowing their concerns will be treated seriously and that they can safely express their views and give feedback. All systems, processes and policies operate with the best interests of the child at their heart.
- Children may not find it easy to tell staff about their abuse verbally. Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report or a member of School staff may overhear a conversation that suggests a child has been harmed or a child's own behaviour might indicate that something is wrong. If staff have any concerns about a child's welfare, they should act on them immediately rather than wait to be told.
- The School's initial response to a report from a child is incredibly important. How the school responds to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward. The Designated Safeguarding Lead (and their deputies) will understand what the Early Help process is and how and where to access support (schools can manage internally and seek early help).
- Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.
- It should be recognised that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory and so children may not be able to recall all details or timeline of abuse; keeping in mind that certain children may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity and/or sexual orientation. Sexual abuse may be accompanied by other forms of abuse.
- Although it is more common for girls to be the victims and boys the perpetrators, we will take an equally robust stance for incidents of sexual violence or sexual harassment between children of the same sex as it would if it occurred between different sexes.
- Technology is now a significant component in safeguarding and wellbeing issues, children are now at risk of online abuse as well as face to face, and the two may be concurrent.

All staff should:

- be aware that children can abuse other children (often referred to as child-on-child abuse). And that it can happen both inside and outside of school and online. They should be aware of the forms that it can take;

- be able to recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports;
- be clear as to the school's policy and procedures with regards to child-on-child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it. This includes understanding how allegations of child-on-child abuse will be recorded, investigated and dealt with and how alleged victims, perpetrators and any other child affected by the abuse will be supported;
- should understand, that even if there are no reports in their schools it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding child-on-child abuse they should speak to their Designated Safeguarding Lead (or Deputy). They should adopt an attitude that it could happen here;
- understand the importance of challenging inappropriate behaviours between peers, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and violent behaviour in future. Challenging physical behaviour (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts is also crucial to ensuring a zero-tolerance approach

- be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Explain that the law is in place to protect them and not criminalise them.

- be aware that while all children should be protected, it is important to recognise that some groups of children are potentially at greater risk of harm. Girls, children with SEND and LGBT children are at greater risk. Perpetrators are more likely to be boys.

The School is committed to the prevention, early identification and appropriate management of child-on-child abuse both within and beyond the School. In particular, we will:

- Take a contextual whole-school approach to preventing and responding to child-on-child abuse;
- Adopt an educational, preventative, pro-active approach in creating a culture that does not tolerate child-on-child abuse, rather than a solely reactive response to (alleged) incidents of child-on-child abuse;
- Respond to all reports and concerns including those that have happened outside of school and online.
- Promote this policy to pupils, staff and parents to ensure that our community is safe and that appropriate and prompt action is taken in response to any concerns or incidents;
- Review the policy, at least annually and with any updates in the interim as may be required, to ensure that it continually addresses the risks to which pupils are, or may be, exposed to.

A Safeguarding Approach:

- Reports of sexual violence and sexual harassment are complex to manage and it is essential that those children (allegedly) subject to abuse are supported and protected as a priority.
- The school's initial response to an allegation of abuse will reassure the child that they are being taken seriously, they will be supported and they will be kept safe. Staff will listen, respond and record such a disclosure in accordance with the School's Safeguarding policy.
- Many children who present with harmful behaviour towards others, in the context of child-on-child abuse are themselves vulnerable and any sanctions that may be applicable via the School's Behaviour policy will always be accompanied by consideration of appropriate pastoral support. That said, taking disciplinary action and still providing appropriate support are not mutually exclusive. They can, and will, occur at the same time if necessary.
- In accordance with the School's Safeguarding policy, the terms 'child' and 'children' in this appendix are defined as a person aged under 18 but the school's starting point is that the response to child-on-child abuse should be the same for all pupils, regardless of age. There is, however, likely to be a more significant Local Authority and / or criminal justice response in relation to any pupil responsible for abuse who is aged 18 or over.

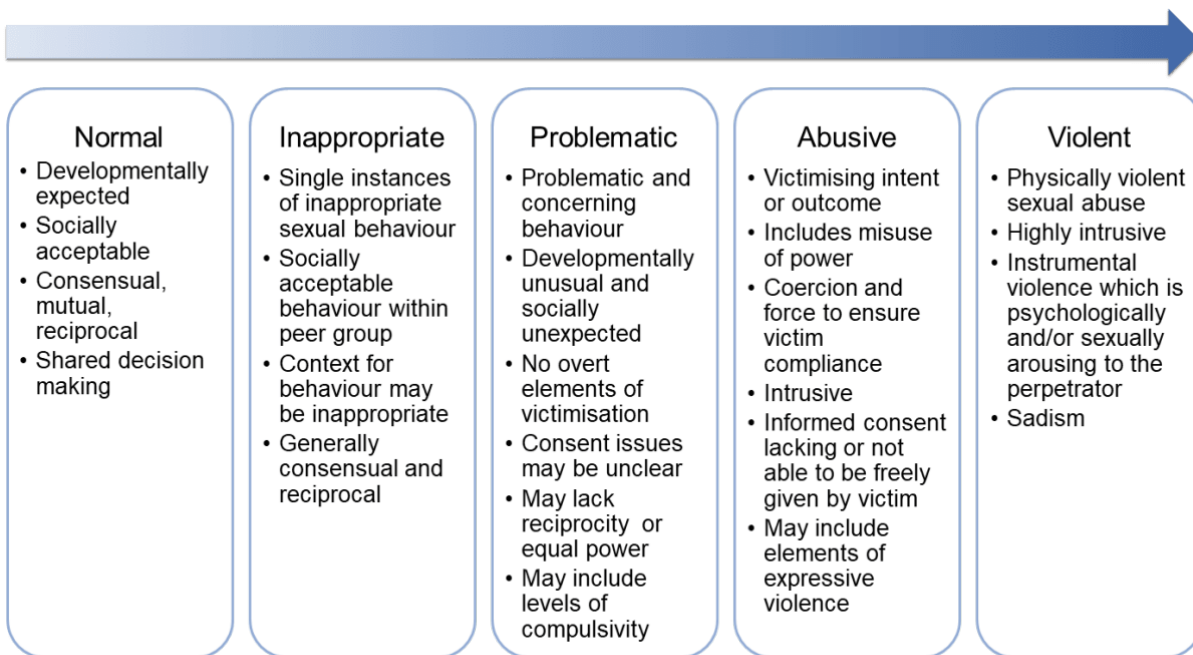
#### **Harmful Sexual Behaviours:**

Harmful sexual behaviour (HSB) is developmentally inappropriate sexual behaviour which is displayed by children and young people, and which may be harmful or abusive. It's harmful to the children and young people who display it, as well as those it is directed towards. All behaviour takes place on a spectrum and understanding where a child's behaviour falls on a spectrum is essential to being able to respond appropriately to it.

The school will regard any report of sexual violence or sexual harassment very seriously and staff should be aware of, and alert to, the statistically gendered nature of sexual abuse in that it is more likely that girls will be subject to sexual abuse and that boys are more likely to be responsible for that abuse. The NSPCC states that, "children's sexual behaviours exist on a wide continuum, from normal and developmentally expected to highly abnormal and abusive".

Staff should recognise the importance of distinguishing between problematic and abusive sexual behaviour. As both problematic and abusive sexual behaviours are developmentally inappropriate and may cause developmental damage, a useful umbrella term is "harmful sexual behaviours". For the purposes of this policy, harmful sexual behaviours can be defined as "Sexual behaviours expressed by children that are developmentally inappropriate, may be harmful towards self or others, or be abusive towards another child or adult."

A continuum model to demonstrate the range of sexual behaviours presented by children may be helpful when seeking to understand a pupil's sexual behaviour and deciding how to respond to it. See table below:



(Hackett, 2011)

Staff should always discuss any concerns regarding sexual violence or sexual harassment between children with a DSL.

#### Other Harmful Child on Child Behaviours

When dealing with other alleged behaviour which involves reports of, for example, emotional and/or physical abuse, staff can draw on aspects of the behaviour continuum to assess where the alleged behaviour falls on a spectrum and to decide how to respond. This could include, for example, whether the behaviour:

- is socially acceptable;
- involves a single incident or has occurred over a period of time;
- is socially acceptable within the peer group;
- is problematic and concerning;
- involves any overt elements of victimisation or discrimination e.g. related to race, gender, sexual orientation, physical, emotional, or intellectual vulnerability;
- involves an element of coercion or pre-planning;
- involves a power imbalance between the child/children allegedly responsible for the behaviour and the child/children allegedly the subject of that power;
- involves a misuse of power.

A behaviour continuum can be a useful tool but it is not definitive or exhaustive. Staff should bear in mind that there are some aspects which may not be relevant or appropriate to consider in response to other alleged behaviour involving reports of other types of abuse. In addition, the School could be required to deal with cases involving a range of alleged behaviours including sexual behaviour, emotional, physical

behaviour and digital behaviour. It should also be recognised that the same behaviour presented by different children may be understood at different points on a spectrum, depending on the particular context.

In all cases a contextual safeguarding approach should be adopted and staff should always discuss any concerns regarding other, or multiple, forms of child on child abuse with a DSL.

### **How can pupils or parents/carers report abuse?**

Pupils should contact any trusted adult in school to report child-on-child abuse. If they are worried about doing so, they could speak to a friend or parent/carer for support.

### **Responding to concerns or allegations:**

All concerns/allegations of child-on-child abuse will be handled sensitively, appropriately and promptly. If a child speaks to a member of staff about child-on-child abuse that they have witnessed or are a part of then the member of staff should:

- listen carefully to the child, reflecting back, using the child's language, being non-judgmental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions – where, when, what, etc. It is important to note that whilst leading questions should be avoided, staff can ask children if they have been harmed and what the nature of that harm was;
- not promise confidentiality at this initial stage as it is very likely a concern will have to be shared further (for example, with the designated safeguarding lead or children's social care) to discuss next steps. Staff should only share the report with those people who are necessary in order to progress it. It is important that the victim understands what the next steps will be and who the report will be passed to; wait until the end of the report and immediately write up a thorough summary. This allows the staff member to devote their full attention to the child and to listen to what they are saying. It may be appropriate to make notes during the report (especially if a second member of staff is present). However, if making notes, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking. Either way, it is essential a written record is made (including date, time, who present, where the disclosure took place and reasons for this). Only record the facts as the child presents them. The notes should not reflect the personal opinion of the note taker. Notes of such reports could become part of a statutory assessment by children's social care and/or part of a criminal investigation; and
- inform the Designated Safeguarding Lead (or Deputy), as soon as practically possible, if the DSL (or Deputy) is not involved in the initial report. Ideally a report will be managed with two members of staff present (preferably one who is a DSL).

Any response will:

- Immediately consider how best to support and protect the victim and the alleged perpetrator(s) (and any other children involved/impacted);
- Include a thorough investigation of the concerns/allegations and the wider context in which they may have occurred (as appropriate);

- Risk-assess and will treat all children involved as being at potential risk – while the child allegedly responsible for the abuse may pose a significant risk of harm to other children, s/he may also have considerable unmet needs and be at risk of harm themselves. We will ensure a safeguarding response is in place for both the child who has allegedly experienced the abuse, and the child who has allegedly been responsible for it, recognising that additional sanctioning work may be required for the latter at the appropriate point. We will also consider whether there may have been other victims;
- Take into account that the abuse may indicate wider safeguarding concerns for any of the children involved and consider and address the effect of wider socio-cultural contexts - such as the child's/children's peer group (both within and outside the School); family; the School environment; and the child/children's online presence. Consider the risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to), sexual exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines;
- Consider what changes may need to be made to these contexts to address the child's/children's needs and to mitigate risk; and the potential complexity of peer-on peer abuse and of children's experiences and consider the interplay between power, choice and consent. While children may appear to be making choices, if those choices are limited they are not consenting;
- Consider the views of the child/children affected. Unless it is considered unsafe to do so (for example, where a referral needs to be made immediately), the DSL should discuss the proposed action with the child/children and their parents and obtain consent to any referral before it is made. The School should manage the child/ expectations about information sharing, and keep them and their parents informed of developments, where appropriate and safe to do so;
- If a pupil is in immediate danger, or at risk of significant harm, a referral to children's social care and/or the Police will be made immediately. Staff are aware that anyone can make a referral. Where referrals are not made by the DSL, the DSL should be informed as soon as possible that a referral has been made;
- If a member of staff thinks for whatever reason that a child may be at risk of or experiencing abuse by their peer(s), or that a child may be at risk of abusing or may be abusing their peer(s), they should discuss their concern with the DSL without delay so that a course of action can be agreed;

#### **Risk and Needs Assessment:**

Where there is an incident of child-on-child abuse, the School will immediately carry out a robust risk and needs assessment in respect of each child affected by the abuse, consulting with local Safeguarding Partners as appropriate. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider:

- the victim, especially their protection and support;
- whether there may have been other victims,
- the alleged perpetrator(s); and
- all the other children (and, if appropriate, adult students and staff) at the school, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms. These risk assessments will:

- Assess and address the nature and level of risks that are posed and/or faced by the child acknowledging that the needs and wishes of the child should be paramount in any decisions so that they can feel as much control over the process as is reasonably possible;
- Engage with the child's parents and draw upon local services and agencies to ensure that the child's needs are met in the short and long-term;
- Consider whether any support is needed for siblings;
- Consider whether any targeted interventions are needed to address the underlying attitudes or behaviour of any child;
- Reviewed the agreed intervention and support at regular intervals in light of the child's on-going needs to ensure that real progress is being made which benefits the child and allows them to continue to safely access their education;
- A key consideration for the DSLs, alongside progressing the safeguarding report and process, will be the important question of the victim and alleged abuser sharing classes and space at School or in activities with our partner schools, taking into account the School's duties to both safeguard children and to educate them. These decisions are likely to be complex and difficult and will be considered on a case-by-case basis. Whilst the school establishes the facts of the and starts the process of liaising with children's social care and the police, the alleged perpetrator(s) should be removed from any classes they share with the victim;
- Where there is an allegation of rape, assault by penetration or sexual assault between peers, the alleged abuser may be temporarily excluded from School, pending further investigation by the Police and School. This may be in the best interests of both children and should not be perceived to be a judgement on the guilt of the alleged offender. Appropriate academic and pastoral support will be provided by the School during this period of temporary exclusion;
- The School will continue to liaise with the Police and Children's Social Care and adjust the risk assessment as necessary; it may be possible for the School to fulfil its duty to educate by removing the alleged abuser to alternative classes and activities from those that they share with the victim. Consideration would also be given to the circulation and routines of the children involved in order to keep them apart, as far as possible, on the School site (including during any before and after school activities) and on the journey to/from School;
- Victims of sexual harassment or violence, wherever it happens, are likely to find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the perpetrator(s) attend the same school. Risk management will take this into account;
- All of the discussions above will take place bearing in mind the needs and wishes of the victim at the heart of the process (supported by parents and carers as required); and
- Risk assessments should be recorded and stored with the pupil file in MyConcern or on iSAMS and should be kept under review. At all times, the school or college should be actively considering the risks posed to all their pupils and students and put adequate measures in place to protect them and keep them safe.

#### **How will the DSL team respond to concerns or allegations of child-on-child abuse?**

The DSL will discuss the concerns or allegations with the member of staff who has reported them and will, where necessary, take any immediate steps to ensure the safety of the child/all children affected. DSLs and

other senior Pastoral staff will always use their professional judgement to determine next steps. The DSL may wish to consult with children's social care and/or any other external agencies on a no-names basis to determine the most appropriate response. DSLs will record the advice and the rationale for such decisions.

Where the DSL and other senior pastoral staff confirm, consider or suspect that the behaviour in question might be rape, assault by penetration or a sexual assault and an offence may have been committed, the DSL will contact the local Safeguarding Partner, and with their support refer to the police. The School has a statutory duty to co-operate with safeguarding partners and will actively engage with its local partners in relation to child-on-child abuse.

The school will discuss concerns/allegations of child-on-child abuse with local Safeguarding Partners where necessary, and particularly where wider safeguarding concerns exist and the management of an incident may require additional expertise and effective partnership working. After consultation with the local Safeguarding Partner, the School will generally inform parents/carers of the referral, unless there are compelling safeguarding reasons not to (e.g. if informing a parent or carer may put the child at additional risk). The DSL will discuss the allegations/concerns with the local Safeguarding Partner and agree on a course of action, which may include:

A – Manage internally. In some cases of sexual harassment, for example, one-off incidents, the school or college may take the view that the children concerned are not in need of early help or require referrals to be made to statutory services and that it would be appropriate to handle the incident internally, perhaps through utilising their behaviour and anti-bullying policies and by providing pastoral support.

B – Early Help. The school may decide that the children involved do not require referral to statutory services but may benefit from early help from the local authority. Early help means providing support as soon as a problem emerges, at any point in a child's life. Providing early help is more effective in promoting the welfare of children than reacting later. Early help can be particularly useful to address nonviolent HSB and may prevent escalation of sexual violence. Early help and the option to manage a report internally do not need to be mutually exclusive: a school could manage internally and seek early help for both the victim and perpetrator(s).

C – Refer to children's social care (for a section 17 and/or 47 statutory assessment) Where a child has been harmed, is at risk of harm, or is in immediate danger, we will make a referral to local children's social care. At the point of referral to children's social care, we will generally inform parents or carers, unless there are compelling reasons not to (if informing a parent or carer is going to put the child at additional risk). Any such decision should be made with the support of children's social care.

If a referral is made, children's social care will then make enquiries to determine whether any of the children involved are in need of protection or other services. Where statutory assessments are appropriate, we (especially the designated safeguarding lead or a deputy) will work alongside, and cooperate with, the relevant lead social worker. Collaborative working will help ensure the best possible package of coordinated support is implemented for the victim and, where appropriate, the alleged perpetrator(s) and any other children that require support. We will not wait for the outcome (or even the start) of a children's social care investigation before protecting the victim and other children in the school or college.

It will be important for the designated safeguarding lead (or a deputy) to work closely with children's social care (and other agencies as required) to ensure any actions the school or college take do not jeopardise a statutory investigation. A risk assessment will help inform any decision. Consideration of safeguarding the

victim, the alleged perpetrator(s), any children directly involved in the reported incident and all children (and adult students) at the school or college should be immediate.

In some cases, children's social care will review the evidence and decide a statutory intervention is not appropriate. The school (generally led by the designated safeguarding lead or a deputy) will be prepared to refer again if they believe the child remains in immediate danger or at risk of harm. If a statutory assessment is not appropriate, the designated safeguarding lead (or a deputy) will consider other support mechanisms such as early help, specialist support and pastoral support.

D – Report to the Police. Any report to the police will generally be in parallel with a referral to children's social care (as above). Where a report of rape, assault by penetration or sexual assault is made, the starting point is this should be passed on to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of reporting to the police remains. The police will take a welfare, rather than a criminal justice, approach. At this stage, we will generally inform parents or carers unless there are compelling reasons not to, for example, if informing a parent or carer is likely to put a child at additional risk. In circumstances where parents or carers have not been informed, it will be especially important we are supporting the child in any decision they take. This should be with the support of children's social care and any appropriate specialist agencies.

Where a report has been made to the police, we will consult the police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator(s) and their parents or carers. We will also discuss the best way to protect the victim and their anonymity. In some cases, it may become clear very quickly, that the police (for whatever reason) will not take further action. In such circumstances, it is important that the school continues to engage with specialist support for the victim and alleged perpetrator(s) as required. While continuing to proceed with an internal investigative process, in accordance with the School's Behaviour policy.

If the allegation is progressed through the criminal justice system, the school will not wait for the outcome (or even the start) of the Police investigation to offer appropriate support to the children involved. Whilst protecting the children and / or taking any steps in accordance with the School's Behaviour policy, the DSLs will continue to work closely with the local Safeguarding partners to ensure that any actions taken by the school do not jeopardise the Police investigation. If we have any questions we will ask the police who will do as much as they can to help (within the constraints of any legal restrictions).

If a child is convicted or receives a caution for a sexual offence, the school will review its assessment of risk to the children involved and the wider School community and will, in accordance with the Behaviour policy, hold a formal disciplinary hearing where permanent exclusion from School is the likely outcome.

If a report is determined to be unsubstantiated, unfounded, false or malicious, the designated safeguarding lead should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate.

If a report is shown to be deliberately invented or malicious, the school or college, should consider whether any disciplinary action is appropriate against the individual who made it as per their own behaviour policy. Whatever the School's response, it should be underpinned by the principle that there is a zero-tolerance approach to sexual violence and sexual harassment and it is never acceptable and will not be tolerated. All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).

## Ongoing response Safeguarding and supporting the victim

Any response by the School will consider:

- the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however need to be balanced with the school or college's duty and responsibilities to protect other children;
- the nature of the alleged incident(s), including: whether a crime may have been committed and/or whether HSB has been displayed;
- the ages of the children involved;
- the developmental stages of the children involved;
- any power imbalance between the children. For example, is an alleged perpetrator significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?;
- if the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature);
- that sexual violence and sexual harassment can take place within intimate personal relationships between peers;
- are there ongoing risks to the victim, other children school staff?
- other health needs, including physical, mental, and sexual health problems and unwanted pregnancy. Children and young people that have a health need arising from sexual assault or abuse can access specialist NHS support from a Sexual Assault Referral Centre (SARC);
- Other support available including the Lucy Faithfull Foundation Shore Space <https://shorespace.org.uk/> which offers a confidential chat service supporting young people concerned about their own or someone else's sexual thoughts and behaviours.
- The victim will never be made to feel that they are a problem or that they should be ashamed for making a report.
- The needs and wishes of the victim should be paramount (along with protecting the child) in any response. It is important they feel in as much control of the process as is reasonably possible. Wherever possible, the victim if they wish, should be able to continue in their normal routine. Overall, the priority should be to make the victim's daily experience as normal as possible, so that School is a safe space for them.
- The School's next steps and responses will be carefully considered and proportionate, in accordance with our Safeguarding approach. Effective communication with, and appropriate support for, the child (and their parents / carers) will be a priority.

- Victims may not disclose all information immediately and ongoing dialogue will be kept open and encouraged. The School will offer the child the opportunity to nominate a 'designated trusted adult' on the staff to communicate with if that would be helpful.
- A victim of sexual violence or harassment may be traumatised and may struggle in a normal classroom environment. The School will avoid any actions that may serve to isolate the child, especially from supportive peer groups, but if the child wishes to withdraw from some activities or work in a separate space then the School will make every reasonable effort to meet these wishes, in both the short and, if necessary, longer-term.
- The School will do everything it can to protect the child from any bullying or harassment that occurs as a result of the report they have made. Safeguarding and supporting the alleged peer abuser and young people who have displayed harmful sexual behaviour
- The School will do all that it reasonably can to balance its statutory priority to safeguard and support the victim (and / or the wider pupil body), alongside its obligation to educate and safeguard the alleged abuser;
- The School will be mindful of the age and developmental stage of the alleged abuser and the resultant stress of being the subject of an allegation, in addition to potential negative reactions from other peers and members of the School community to the allegations;
- The School will respond proportionately, on a case-by-case basis. The alleged abuser may have unmet needs and may pose a risk of harm to other children. HSB in young children may be (and often are) a symptom of their own abuse or exposure to abusive practices or harmful materials. A child abusing another child may be a sign they have been abused themselves or a sign of wider issues that require addressing within the culture of the school. The School will seek the support and advice of children's social care, specialist sexual violence services and the Police in assessing how best to support the child concerned. Taking disciplinary action and providing appropriate support, can, and should, occur at the same time if necessary;
- If the alleged abuser moves to another educational institution then the DSLs will ensure that the child's educational progress and support, ongoing needs, potential risk of harm to others are communicated effectively to the new School or education provider. Safeguarding other children
- Consideration will be given to supporting children who have witnessed sexual violence, especially rape and assault by penetration. Witnessing such an event is likely to be traumatic and support may be required;
- Following any report of sexual violence or sexual harassment, it is likely that some children will take "sides". The school will do all we can to ensure both the victim and alleged perpetrator(s), and any witnesses, are not being bullied or harassed;
- A whole school or college approach to safeguarding, a culture that makes clear that there is a zero-tolerance approach to sexual violence and sexual harassment and that it is never acceptable, and it will not be tolerated, and a strong preventative education programme will help create an environment in which all children at the school are supportive and respectful of their peers when reports of sexual violence or sexual harassment are made.

#### **Handling Online Concerns:**

Consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery) is a form of child-on-child abuse. Consensual image sharing,

especially between older children of the same age, may require a different response. It might not be abusive – but children still need to know it is illegal- whilst non-consensual is illegal and abusive. Staff should pass on any concerns around this immediately to a DSL.

The key consideration is for staff not to view or forward illegal images of a child. Where a report includes an online element, the DSL will refer to searching screening and confiscation advice (for schools) and the UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people. The linked advice provides more details on what to do when viewing an image is unavoidable. In some cases, it may be more appropriate to confiscate any devices to preserve any evidence and hand them to the police for inspection.

### **Monitoring, Raising Awareness and Liaison:**

The School actively seeks to prevent all forms of child-on-child abuse by raising awareness among Governors, Staff, Pupils, and parents about this issue. This will include regular updates and information to the School community about the prevalence and effect of child-on-child abuse, and how to prevent, identify and respond to it promptly and appropriately. All scenarios that decisions and actions will be regularly reviewed by the Designated Safeguarding lead and relevant policies will be updated to reflect lessons learnt. It is particularly important to look out for potential patterns of concerning, problematic or inappropriate behaviour. Where a pattern is identified, we will decide on a course of action. Consideration will be given to whether there are wider cultural issues within the school or college that enabled the inappropriate behaviour to occur and where appropriate extra teaching time and/or staff training could be delivered to minimise the risk of it happening again. Pupils will be regularly informed of the School's approach to such issues, including its zero tolerance approach towards all forms of child-on-child abuse.

Pupils will be encouraged to contribute to the School's understanding of such issues and to contribute to policy development via direct feedback to pastoral staff and such forums as School Council and Form Head meetings.

Parents will be encouraged to talk to the School's pastoral staff on this issue, particularly on what they perceive the risks facing their children to be and how they would like to work with the School to address those risks, e.g. via questionnaires, discussion groups / workshops and policy reviews.

### **Staff Training:**

Regular training and policy updates will be provided to ensure that all staff are clear about the School's policy and procedures with regard to preventing, recognising and reporting child on child abuse. This will include scenario discussions, contextual safeguarding, the identification and classification of potentially harmful or risky behaviours and the importance of taking seriously all forms of child-on-child abuse. It will also cover online safety annually.

### **Pupil Education:**

The most effective preventative education programme will be through a whole-school approach that prepares pupils for their adult life. Relationships Education for all primary school age pupils, Relationships and Sex Education (RSE) for all secondary school age pupils, and Health Education for all pupils in state-funded schools is compulsory. Educating children about the nature and prevalence of child-on-child abuse

via PSHE, tutorials, assemblies, the wider curriculum and other appropriate forums. Pupils will be aware of what they can do to seek support if they witness or experience such abuse and the harmful effect that it can have on those who experience it.