



SAFEGUARDING POLICY

ADOPTED :

N/A

DATE OF LAST REVIEW :

September 2024

REVIEWED BY :

Governing Body

DATE OF NEXT REVIEW :

September 2025

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KEY CONTACTS

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Deputy Designated Persons for Safeguarding	Becca Dreesden Deputy Head	rdreesden@gorseride-inf.wokingham.sch.uk 0118 973 4880	<ul style="list-style-type: none"> Refresher for Designated Person for Child Protection in Education-Sept. 2023 PREVENT Training-September 2023 NSPCC Safer Recruitment Training –June 2024
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Local Authority Designated Officer (LADO)	Nicola Vines	LADO@wokingham.gov.uk 0118 974 6141	
Wokingham Emergency Duty Team		01344 786 543	

Referral and Assessment Team – Wokingham Children’s Social Care		R&ATeam@wokingham.gov.uk 0118 908 8002	
Chair Wokingham Channel Panel	Lorna Pearce	lorna.pearce@wokingham.gov.uk	
Prevent and Channel lead:	Zoe Hanim	zoe.hanim@wokingham.gov.uk	
Queries, referrals/ Advice: Thames Valley Prevent Team or the Prevent Gateway team:		PreventGateway@thamesvalley.pnn.police.uk	

Berkshire West Safeguarding Partnership		https://www.berkshirerwestsafeguardingchildrenpartnership.org.uk/scp	
ARC Information and Counselling Service		www.arcweb.org.uk 35 Reading Road Wokingham Berkshire RG41 1EG	

AIMS

Gorse Ride Schools aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children’s welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues.

INTRODUCTION

All parents are made aware of the school’s responsibilities in regard to safeguarding procedures through publication of the school’s safeguarding policy on the school’s website. Reference is also made to the policy on our website, the newsletter and the school prospectus. The Safeguarding and Child Protection page also

includes a range of information for parents and hyperlinks to guidance on a range of topics on keeping children safe.

What is the difference between Safeguarding and Child Protection?

Safeguarding and promoting the welfare of children is defined as:

- protecting children from maltreatment
- preventing impairment of children's and learners' health or development
- ensuring children are growing up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

Definitions

Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

Abuse is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm.

Neglect is a form of abuse and is 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.

Sharing of nudes and semi-nudes (also known as sexting or youth produced sexual imagery) is where children share nude or semi-nude images, videos or live streams.

Children includes everyone under the age of 18.

The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The local authority (LA)
- Integrated Care Boards for an area within the LA-Berkshire West Safeguarding Partnership
- The chief officer of police for a police area in the LA area

SCHOOL COMMITMENT

Our School is committed to creating and maintaining a safe learning environment for children and young people, identifying where there are welfare concerns and taking action to address them, in partnership with other agencies. The Governing body ensures that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. Ultimately, all systems, processes and policies operate with the best interests of the child at their heart. This policy reflects the policies of the Wokingham Safeguarding Children Board (WSCB) who are responsible for developing policies and procedures for safeguarding and promoting the welfare of children in the area of the authority, including policies and procedures in relation to:

- training of persons who work with children or in services affecting the safety and welfare of children;

- the action to be taken where there are concerns about a child's safety or welfare, including thresholds for intervention;
- safety and welfare of children who are privately fostered;
- recruitment and supervision of persons who work with children
- investigation of allegations concerning persons who work with children;
- co-operation with neighbouring children's services authorities and their Board partners.

LEGISLATION AND STATUTORY GUIDANCE

This policy is based on the Department for Education's statutory guidance https://assets.publishing.service.gov.uk/media/6650a1967b792ffff71a83e8/Keeping_children_safe_in_education_2024.pdf and [Working Together to Safeguard Children \(2023\)](#), and the [Governance Handbook](#). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- Section 175 of the Education Act 2002 <https://www.legislation.gov.uk/ukpga/2002/32/section/175>, which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- The School Staffing (England) Regulations 2009, <https://www.legislation.gov.uk/uksi/2009/2680/contents/made> which set out what must be recorded on the single central record and the requirement for at least 1 person conducting an interview to be trained in safer recruitment techniques
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
- [Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the "2018 Childcare Disqualification Regulations") and [Childcare Act 2006](#), which set out who is disqualified from working with children
- This policy also meets requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#)

EQUALITY STATEMENT

Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and

recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs (SEN) or disabilities or health conditions (see section 10)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after (see section 12)
- Are missing from education
- Whose parent/carer has expressed an intention to remove them from school to be home educated.

ROLES AND RESPONSIBILITIES

Safeguarding and child protection is everyone's responsibility. This policy applies to all staff, volunteers and governors in the school and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

All staff

All Staff who work at Gorse Ride Schools are expected to read and understand part 1 of the most recent [Keeping Children Safe in Education](#), (KCSIE), annex A of KCSIE (a condensed version of part 1) and attend training at least annually. All staff sign a declaration at the beginning of each academic year to say that they have reviewed the guidance.

Staff who work directly with children are also expected to read annex B of KCSIE (about specific safeguarding issues).

All staff will be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, the staff Code of Conduct, the role and identity of the designated safeguarding lead (DSL) and deputy the behaviour policy, our online safety procedures and the safeguarding response to children who go missing from education.
- The early help process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals

- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as Child on Child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe

THE ROLES AND RESPONSIBILITIES OF THE SENIOR DESIGNATED PERSON AND THE DEPUTY DESIGNATED PERSON

Members of the School's Leadership Team have been assigned to the roles of Senior Designated Person and Deputy Designated Persons for Safeguarding children.

Miss Eileen Rogers, Executive Head Teacher, is the Senior Designated Person.

Mrs Becca Dreesden Deputy Head, Mrs Laura Hodgson EYFS Lead & Deputy Head, Mrs Kathryn Dewey- Inclusion Manager, Sian Biggar and Sarah Copperthwaite Assistant Head teachers are the Deputy Designated Persons.

They have received appropriate training and support for the roles.

The Deputy Heads will provide additional support to ensure the responsibilities for Safeguarding children are fully embedded within the school ethos and that specific duties are discharged. This will entail supporting the Senior Designated Person in dealing with referrals, attending Case Conferences and supporting the child/children.

We acknowledge the need for effective and appropriate communication between all members of staff in relation to safeguarding pupils. The Designated Person will ensure a structured procedure within the school, which will be followed in cases of suspected abuse.

That procedure is:

- Staff complete an alert via CPOMS, an online reporting tool
- If not available Alert forms to record any concerns are available in the Safeguarding area of the staff room. These should be completed and discussed with either the Senior or Deputy designated person as soon as possible and uploaded to CPOMS.

During term time, the designated safeguarding lead or deputies are always available, during school hours, for staff in the school to discuss any safeguarding concerns, either in person, via email or phone. The same applies to out of hours and out of term activities- all staff have contact details for Safeguarding Lead and deputies.

The Designated Safeguarding Lead must liaise and work with the three safeguarding partners (the local authority, the BWSP and the Police).

The Senior Designated Person and the Deputy Designated Persons are responsible for the following:

Referrals

- Referring cases of suspected abuse or allegations to the relevant investigating agencies; Concerns about a child not involving allegations of abuse by a member of staff should be

referred to the relevant body (local authority children's social care, Channel programme, and/or police), and support staff who make such referrals directly.

- The Deputy Designated Person is not responsible for dealing with allegations made against members of staff. This is the responsibility of the Head teacher who will inform the LA Local Authority Designated Officer (LADO).
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Acting as a source of support, advice and expertise within the school when deciding whether to make a referral by liaising with relevant agencies;
- Ensuring that a systematic means of monitoring children known or thought to be at risk of harm, is in place and that the school contributes to assessments of need and supports multi agency plans for those children.
- Ensure all staff understand the expectations, applicable to their roles and responsibilities in relation to filtering and monitoring.

Raising Awareness

- Working with the governing body to ensure that the School's Safeguarding Policy is updated and reviewed annually;
- Ensuring that, in order to avoid conflict later, parents are aware that referrals may be made and of the role of the School;
- Ensuring that when children leave the school, their Child Protection File is discussed as soon as possible with the Senior Designated Person at the new school;
- Making sure that the Child Protection File is transferred separately from the main pupil file. It should be posted recorded delivery to the Senior Designated Person at the new school, within **5 days for an in-year transfer or within the first 5 days of the start of a new term** to allow the new school or college to have support in place for when the child arrives. If the child is leaving year 11 to go to a further education setting, in which case the file should be retained by the current school for a period stipulated in current statutory guidance;
- Where the new school is not known, alerting the Education Welfare Officer at WBC so that the child's name can be included on the data base for missing pupils;
- Cascading safeguarding advice and guidance issued by the BWSP which can be found at: <https://www.berkshirerwestsafeguardingchildrenpartnership.org.uk/scp>

Training

The Senior Designated Person and the Deputy Designated Person will attend appropriate training within the timeframes as noted in Keeping Children Safe in Education and other relevant guidance, currently initial two-day Child Protection training and a **one-day refresher every 2 years**, in order to:

- Recognise how to identify signs of abuse and when it is appropriate to make a referral;
- Have a working knowledge of the Wokingham Children's Services - Levels of Need and Intervention Thresholds Document;
- Know how to make a referral to WBC Referral and Assessment Team and what to include;
- Understand how a child protection case conference is conducted, how to provide a report and be able to contribute effectively to these when required to do so;
- Be able to keep detailed, accurate and secure written records of referrals/concerns.

The Senior and Deputy Designated Persons will ensure staff receive appropriate Safeguarding training, if necessary from an external provider. Safeguarding is a regular agenda item on all staff meetings to ensure that up to date information with regard to strategies such as Prevent are shared and discussed in open forums. On line training is also used to further enhance knowledge and understanding.

Free on line training can be accessed at:

- PREVENT <https://www.elearning.prevent.homeoffice.gov.uk/la2/screen1.html>
https://www.elearning.prevent.homeoffice.gov.uk/channel_awareness/01-welcome.html
- CSE <http://www.safeguardingchildren.co.uk/resources/keep-them-safe/>
- FGM <https://www.virtual-college.co.uk/resources/free-courses/recognising-and-preventing-fgm>

All staff will be expected to undergo induction training on Safeguarding and refresher **training annually**, all staff should receive regular safeguarding and child protection updates, including whistleblowing and online safety to enable them to fulfil their safeguarding responsibilities effectively:

Induction training will ensure that staff:

- understand the schools safeguarding systems and their responsibilities;
- are able to recognise/identify signs of abuse or neglect;
- recognise potential for **Early help** for children;
- know that they must report any concerns immediately they arise; understand confidentiality issues. (See Confidentiality Policy)

All staff and volunteers, especially new or part-time staff who may work with different educational settings, will receive basic safeguarding information in accordance with "What to do if you're worried a child is being abused" document:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf

and a copy of part 1- Keeping Children Safe in Education 2024:

https://assets.publishing.service.gov.uk/media/6650a1967b792ffff71a83e8/Keeping_children_safe_in_education_2024.pdf

- All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.
- Staff will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually (for example, through emails, e-bulletins and staff meetings).

Roles and responsibilities of the Executive Head Teacher

The EHT will ensure that staff (including temporary staff) and volunteers:

- Are informed of our systems which support safeguarding, including this policy, as part of their induction
- Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect

In addition:

- Communicate this policy to parents/carers when their child joins the school and via the school website
- Ensure that the DSLs has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Ensure that all staff undertake appropriate safeguarding and child protection training, and updating the content of the training regularly
- Act as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate

- Ensure the relevant staffing ratios are met, where applicable

Roles and responsibilities of the Governing Body

The Governing Body is collectively responsible for the school's safeguarding arrangements. The Designated Safeguarding Governor, Mrs Joanne Gogerly, has undertaken Safeguarding training and refresher training every 3 years. All governors will undertake appropriate Safeguarding training.

Allegations of abuse made against the Head teacher are reported to the Chair or Vice Chair of Governors, and referred to the NOLA (formerly LADO).

The Governing Body will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the head teacher to account for its implementation
- Appoint a senior board level (or equivalent) governor to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL
- The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the head teacher
- All governors will read Keeping Children Safe in Education in its entirety.

IDENTIFYING CONCERNS

If a child makes a disclosure to you

All members of staff, volunteers and governors must know how to respond to a pupil who discloses abuse, and they must be familiar with procedures to be followed. See Appendix 1.

Where a child discloses abuse, they must be familiar with procedures to be followed as below:

If a child chooses to tell someone in school about alleged abuse, that person will support the child as follows:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it
- Sign and date the write-up and pass it on to the DSL via CPOMS. Alternatively, if appropriate, make a referral to children's social care by calling the WBC Referral and Assessment Team (Children's Safeguarding and Social Care Team) on telephone 0118 908 8002 or by email: triage@wokingham.gov.uk and/or the police directly
- Tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

CONFIDENTIALITY

- While it is recognised that all matters relating to safeguarding individual children are confidential, a member of staff, governor or volunteer, if confided in by a pupil, must never guarantee confidentiality to that pupil, as this may not be in the child's best interests.
- Where there is a Child Protection concern it will be passed immediately to the Senior Designated Person who will contact the NOLA (Nominated Officer for LA formerly LADO) if appropriate- see page 2 for contact details.
- The parents of the child should be informed immediately unless it is felt that this would not be in the best interests of the child, would place them at further risk or where it is believed a crime may have been committed.
- The Head teacher or Senior or Deputy Designated Person will disclose personal information about a pupil, including the level of involvement of other agencies, to other members of staff only on a 'need to know' basis. (Consent to share information is not required if a child is suffering, or at risk of, serious harm.)
- All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children. (See Confidentiality Policy)
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk
- The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information (See Appendix 7)
- If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy)

RECORDS AND MONITORING

We will hold records in line with our records retention schedule as directed by the local authority. We use CPOMS (Child Protection Online Monitoring System) as an electronic system for managing all our child protection concerns. CPOMS is a password protected monitoring system that has two levels of authentication. The records are cloud based. All other Child Protection documents are stored on the DSL's personal drive with password protected access. All paper copies are stored in a locked cupboard in the DSLs office.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will include:

- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- A note of any action taken, decisions reached and the outcome
- Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Safeguarding records relating to individual children will be passed on to the next school securely and separately from the main pupil file within **5 days** for an in-year transfer or within the **first 5 days** of the start of a new term to allow the new school to have support in place for when the child arrives. All records will be transferred via CPOMS management systems when a child leaves to go to another school unless the school is not compatible. Hardcopy records will be sent recorded delivery. A transfer record sheet is sent with the files and the receiving school must sign for receipt of the records and return this to our school. Soft copies held on CPOMS will be transferred electronically via the CPOMS secure transfer if the receiving school uses this system. Where the new school is not known the Educational Welfare Officer at WBC should be informed so that the child can be included on the data base for missing pupils.

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

Safeguarding records which contain information about allegations of sexual abuse will be retained for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry.

Any concerns about a child will be recorded in writing within 24 hours. All records must provide a factual, evidence-based account. Accurate recording of actions should be made. Records will be signed, dated and where appropriate witnessed.

The school processes any personal data collected during the safeguarding process in accordance with its data protection policy. Further details can be found in the Privacy Notice on the school's website. Any data collected is held securely and accessed by, and disclosed to, individuals only for the purposes of completing the safeguarding procedure.

NOTIFYING PARENTS/CARERS

- Where appropriate, we will discuss any concerns about a child with the child's parents or carers. In the first instance the class teacher will discuss low level concerns ie ill-fitting uniform, dirty clothes, pupil complaining they are hungry, cuts or bruises where the child has not given an appropriate explanation. The DSL will normally contact parents/carer in the event of a suspicion or disclosure.
- Other staff will only talk to parents or carers about any such concerns following consultation with the DSL.
- If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.
- In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved.

SUPPORTING CHILDREN

We recognise that the school plays a significant part in the prevention of harm to our children by providing good lines of communication with trusted adults, supportive friends and an ethos of protection. We recognise that children who are abused or witness violence may feel helplessness, humiliation and some sense of blame and that their behaviour may be challenging or defiant, or they may be withdrawn. We appreciate that school may be the only stable, secure and predictable element in the lives of children at risk.

We will endeavour to support our pupils through:

- Working to establish and maintain an ethos where children feel secure and are encouraged to talk and are always listened to;
- Ensuring that all pupils know there is an adult in the school whom they can approach if they are worried or in difficulty;
- 1:1 nurture work with an ELSA or Learning Mentors and the opportunity to talk to an adult of their choice at any time;
- Regular consultation with children e.g. through questionnaires, participation in anti-bullying assemblies and presentations, monitor playground incidents;
- Including safeguarding across the curriculum, including PSH, opportunities which equip children with the skills they need to stay safe from harm and to know to whom they should turn for help. In particular, this will include anti-bullying work, online safety, Relationship and Sex education, health education, mental health and well-being, road safety, pedestrian and cycle training. Also focussed work in Year 6 to prepare for transition to Secondary school and more personal safety/independent travel;
- Liaison with other agencies that support the pupil, such as Social Services, Foundry College and Education Psychology Service;
- Ensuring all staff are aware of school guidance for their use of mobile technology and have discussed safeguarding issues around the use of mobile technologies and their associated risks.
- Implementation of the school Behaviour Policy, underpinned by restorative practice and work on Zones of Regulation supports the children's understanding and learning in how to keep safe and is particularly aimed at supporting vulnerable pupils. The school will ensure that the pupil knows that some behaviour is unacceptable but they are nonetheless valued and are not to be blamed for any abuse which has occurred;
- Ensuring that, where a pupil subject to a child protection plan leaves, their information is transferred to the new school immediately and that the child's social worker is informed.

PUPILS WITH SPECIAL EDUCATIONAL NEEDS, DISABILITIES OR HEALTH ISSUES

We recognise that pupils with special educational needs (SEN) or disabilities or certain health conditions can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, including:

Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration

Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils

The potential for pupils with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs

Communication barriers and difficulties in managing or reporting these challenges

We offer extra pastoral support for these pupils. This could include:

- Access to equine/canine Assisted Learning via outside agencies ie JAC
- Nurture Assistants
- ELSA
- 1 to 1 support from our SEND team

PUPILS WITH A SOCIAL WORKER

Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

- Responding to unauthorised absence or missing education where there are known safeguarding risks
- The provision of pastoral and/or academic support

LOOKED-AFTER AND PREVIOUSLY LOOKED-AFTER CHILDREN

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- The DSL has details of children's social workers and relevant virtual school heads
- We have appointed a designated teacher, Eileen Rogers, who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with [statutory guidance](#).
- The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

- Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans

COMPLAINTS AND CONCERNS ABOUT SCHOOL SAFEGUARDING POLICIES

Complaints Against Staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff.

Other Complaints

All other complaints relating to pupil's behaviour or the behaviour of their families should be brought to the attention of the Head teacher as soon as possible, or in the absence of the Head teacher, the Deputy Head teacher.

Whistle-blowing

We have a robust Whistle-blowing Policy, adapted from Wokingham Borough Council. This is on the website for parents/carers and team members to access easily if they have a concern or complaint about a member of staff in school.

RECOGNISING ABUSE AND TAKING ACTION

If a Child is in Immediate Danger

Make a referral to children's social care and/or the police **immediately** if a child is in immediate danger or at risk of harm. Anyone can make a referral.

Tell the Designated Safeguarding Lead as soon as possible if you make a referral directly.

If you have any worries about a child or young person who you feel is being ill-treated, abused or neglected you should speak with the School's Designated Safeguarding Lead or their Deputy in the first instance. If it is an immediate concern and they are unavailable, Children's Services should be contacted directly as children and their parents may need help urgently.

All immediate concerns should be discussed with a social worker by calling the WBC Referral and Assessment Team (Children's Safeguarding and Social Care Team) on telephone **0118 908 8002** or by email: triage@wokingham.gov.uk

- We use CPOMS for all our reporting procedures.
- Follow our Safeguarding flowchart – Appendix 2
- <https://www.gov.uk/report-child-abuse-to-local-council>

IF YOU ARE CONCERNED ABOUT A CHILD

- Follow our Safeguarding flowchart – Appendix 2
- Where possible, speak to the DSL first to agree a course of action.

If, in exceptional circumstances, the DSL is not available, this should not delay appropriate action being taken.

- Speak to a member of the senior leadership team and/or take advice from local authority children's social care.
- You can also seek advice at any time from the NSPCC helpline on 0808 800 5000.
- Share details of any actions you take with the DSL as soon as practically possible.
- Make a referral to local authority children's social care directly, if appropriate (see 'Referral' below).
- Share any action taken with the DSL as soon as possible.

EARLY HELP ASSESSMENT

If Early help is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an Early Help assessment, in some cases acting as the lead practitioner.

- The DSL will keep the case under constant review and the school will consider a referral to children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

REFERRAL

- If it is appropriate to refer the case to local authority children's social care 01189088002 or the police, the DSL will make the referral or support you to do so.
- If you make a referral directly you must tell the DSL as soon as possible.
- The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.
- If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

NON-COLLECTION OF CHILDREN

If a child is not collected at the end of the session/day, we will:

- Ensure the child stays safely with their class teacher
- Telephone all contacts
- Report to Children's Services if we have no contact and the child has not been collected within half an hour after the session has ended

CHILDREN MISSING IN EDUCATION

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will follow our Children Missing in Education Policy in Partnership with Wokingham Borough Council Children's Services.

A child being absent from education for prolonged periods and/or on repeat occasions (whether with an explanation or not) can act as a vital warning sign to a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may become missing from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school
- Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with children who are persistently absent or go missing from education, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

CHILDREN'S MENTAL HEALTH

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

- If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy and speaking to the designated safeguarding lead.
- Our Inclusion Manager and Mental Health Lead will be able to signpost all concerns. Refer to the Department for Education guidance on [mental health and behaviour in schools](#) for more information.
- The department has published advice and guidance on Preventing and Tackling Bullying https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/623895/Preventing_and_tackling_bullying_advice.pdf , and Mental Health and Behaviour in Schools https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/755135/Mental_health_and_behaviour_in_schools_.pdf .

DOMESTIC ABUSE

- April 2021 Domestic Abuse Act introduces a statutory definition of domestic abuse and recognises the impact on children, as victims in their own right, if they see, hear or experience the effects of abuse.
- Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs in different relationships including ex-partners and family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.
- Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home.
- Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children.
- If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day. This is the procedure where police forces are part of [Operation Encompass](#) .
(See further information in Appendix 3)

PARENTAL MENTAL HEALTH

<https://www.gov.uk/government/publications/the-mental-health-strategy-for-england>

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

For children the impact of parental mental health can include:

- The parent / carer's needs or illnesses taking precedence over the child's needs
- Child's physical and emotional needs neglected

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

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

PARENTAL SUBSTANCE MISUSE

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

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

For children the impact of parental substance misuse can include:

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

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

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

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

THE TOXIC TRIO

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

HOMELESSNESS

- Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.
- The DSL and Deputy DSLs will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).
- Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

CHILD ON CHILD ABUSE

Child on Child Sexual Abuse

Child on Child abuse is when children abuse other children. This type of abuse can take place inside and outside of school and online. We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up", as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils. We are also mindful that even when there are no reported cases this could be taking place but is not being reported.

We also recognise the gendered nature of Child on Child abuse. However, all Child on Child abuse is unacceptable and will be taken seriously.

Most cases of pupils hurting other pupils will be dealt with under our school's behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put pupils in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, up skirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

Child on Child abuse is most likely to include, but may not be limited to:

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between peers
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- 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
- Consensual and non-consensual sharing of nudes and semi nudes images and/or videos (also known as sexting or youth produced sexual imagery)

- Up skirting, 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
- 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)

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

Victims and alleged perpetrators

There are many different ways to describe children who have been subjected to sexual violence and/or sexual harassment and many ways to describe those who are alleged to have carried out any form of abuse.

For the purposes of this advice, we use the term 'victim'. It is a widely recognised and understood term. It is important that staff recognise that not everyone who has been subjected to sexual violence and/or sexual harassment considers themselves a victim or would want to be described in this way. Staff should be conscious of this when managing any incident and be prepared to use any term with which the individual child is most comfortable.

We use the term 'alleged perpetrator' and where appropriate 'perpetrator'. These are widely used and recognised terms and the most appropriate to aid effective record keeping, but may be modified on a case-by-case basis.

Procedures for dealing with allegations of Child on Child abuse

It is essential that all victims are reassured 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 sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

- You must tell the DSL and record the allegation, but do not investigate it
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all children involved – both the victim(s) and the child(ren) against whom the allegation has been made – with a named person they can talk to if needed
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

We will minimise the risk of Child on Child abuse by:

- Challenging any form of derogatory or sexualised language or behaviour
- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensuring pupils know they can talk to staff confidentially by making them aware through assemblies and Circle Time sessions
- Ensuring staff are trained to understand that a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy

Reporting systems for Pupils

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

- Put systems in place for pupils to confidently report abuse
- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback
- Teach children to share their concerns with an adult in school that they trust through assemblies and PSRHE.

Creating a supportive environment in school and minimising the risk of Child on Child abuse

We recognise the importance of taking proactive action to minimise the risk of Child on Child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them
- If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described below)
- Ensure staff reassure victims that they are being taken seriously
- Ensure staff are trained to understand:
 - How to recognise the indicators and signs of Child on Child abuse, and know how to identify it and respond to reports
 - That even if there are no reports of Child on Child abuse in school, it does not mean it is not happening – staff should maintain an attitude of "it could happen here"

- That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
 - Children can show signs or act in ways they hope adults will notice and react to
 - A friend may make a report
 - A member of staff may overhear a conversation
 - A child's behaviour might indicate that something is wrong
- That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
- That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- The important role they have to play in preventing Child on Child abuse and responding where they believe a child may be at risk from it
- That they should speak to the DSL if they have any concerns

Staff should be aware of:

Children with Special Educational Needs and Disabilities (SEND) are three times more likely to be abused than their peers. Additional barriers can sometimes exist when recognising abuse in SEND children. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- the potential for children with SEND being disproportionately impacted by behaviours such as bullying and harassment, without outwardly showing any signs; and
- communication barriers and difficulties overcoming these barriers.
- Any reports of abuse involving children with SEND will therefore require close liaison with the Designated Safeguarding Lead (or deputy) and often include discussion with the LADO and/or Wokingham Borough Council help centre.

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

Whilst not the focus of this advice, it is important to be aware that staff can be victims of sexual violence and sexual harassment. We encourage all staff to speak to someone they are comfortable speaking to who will provide advice and support. Staff must make reference to the Whistle Blowing Policy in these cases.

Sharing of nudes and semi-nudes ('sexting')

This is a suggested approach please follow this link for further information: [guidance from the UK Council for Internet Safety](#) for [all staff](#) and for [DSLs and senior leaders](#). All staff need to know what this is and what to do should they come across an example within school or are informed of the behaviour in a household by one of our pupils.

Your responsibilities when responding to an incident

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- Delete the imagery or ask the pupil to delete it
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved
- You should explain that you need to report the incident, and reassure the pupil(s) that they will receive support and help from the DSL.

Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- What further information is required to decide on the best response
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)

The DSL will make an immediate referral to police and/or children's social care if:

- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the images or videos is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

Further review by the DSL

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks.

They will hold interviews with the pupils involved (if appropriate).

If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

Informing parents/carers

The DSL will inform parents/carers at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm.

Referring to the police

If it is necessary to refer an incident to the police, this will be done through 101 (Thames Valley Police).

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Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in this policy also apply to recording these incidents.

Curriculum coverage

Pupils are taught about the issues surrounding the sharing of inappropriate images and computing programmes and to the sharing of nudes and semi-nudes: it is important for all stakeholders to know

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment
- Issues of legality
- The risk of damage to people's feelings and reputation

Pupils also learn the strategies and skills needed to manage:

- Specific requests or pressure to provide (or forward) such images
- The receipt of such images

This policy on the sharing of nudes and semi-nudes is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

Sexual Violence

It is important that staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence, we do so in the context of child on child sexual violence.

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.

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. 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;
- up-skirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; it is now a criminal offence.
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. 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. (UKCCIS sexting www.gov.uk/government/groups/uk-council-for-child-internet-safety-ukccis provides detailed advice for schools and colleges)
- sexualised online bullying;

- unwanted sexual comments and messages, including, on social media; and
- sexual exploitation; coercion and threats.

It is important that staff consider sexual harassment in broad terms. Sexual harassment (as set out above) creates an atmosphere that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence.

Harmful Sexual Behaviour

Children's sexual behaviour exists on a wide continuum, from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is "harmful sexual behaviour". The term has been widely adopted in child protection and is used in this policy.

- Harmful sexual behaviour can occur online and/or offline and can also occur simultaneously between the two.
- Harmful sexual behaviour should be considered in a child protection context. When considering harmful sexual behaviour, ages and the stages of development of the children are critical factors to consider.
- Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' difference or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they are smaller in stature, have power over them, for example, if the older child is disabled or smaller in stature. Harmful sexual behaviour can, in some cases, progress on a continuum.
- Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.
- Children displaying harmful sexual behaviour have often experienced their own abuse and trauma. It is important that they are offered appropriate support.

See Brook's Sexual Behaviours Traffic Light Tool for parents and carers;
 Under 5's https://www.parentsprotect.co.uk/files/PP_Preschool_Traffic_Lights_Under_5_ENG.pdf
 Age 5-11 https://www.parentsprotect.co.uk/files/PP_Primary_Traffic_Lights_5_11_ENG.pdf

SERIOUS VIOLENCE

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include:

- increased absence from school
- a change in friendships or relationships with older individuals or groups
- a significant decline in performance
- signs of self-harm or a significant change in wellbeing
- or signs of assault or unexplained injuries
- Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

Risk factors which increase the likelihood of involvement in serious violence include:

- Being male
- Having been frequently absent or permanently excluded from school
- Having experienced child maltreatment
- Having been involved in offending, such as theft or robbery

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL. Advice for schools and colleges is provided in the Home Office's Preventing youth violence and gang involvement and its Criminal exploitation of children and vulnerable adults: county lines guidance.

CHILD SEXUAL EXPLOITATION (CSE) AND CHILD CRIMINAL EXPLOITATION (CCE):

Both CSE and CCE occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. The abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse. Sexual abuse 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 clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet

- Sexual exploitation of children and young people under 18 involves exploitative situations, contexts and relationships where the young person (or third person/s) receive 'something' (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of them performing, and/or others performing on them, sexual activities.
- Child sexual exploitation can occur through the use of technology without the child's immediate recognition; for example, being persuaded to post images on the internet/mobile phones without immediate payment or gain. Violence, coercion and intimidation are common. Involvement in exploitative relationships is characterised by the child's or young person's limited availability of choice, as a result of their social, economic or emotional vulnerability.
- A common feature of CSE is that the child or young person does not recognise the coercive nature of the relationship and does not see themselves as a victim of exploitation.
- If a member of staff is concerned that a pupil is the subject of CSE then this should be reported to the DSL or Deputy DSL. (See further information in Appendix 3)

Child Criminal Exploitation (CCE)

Criminal Exploitation of children is a geographically widespread form of harm that is a typical feature of **county lines** criminal activity, drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals.

Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism (NRM-Modern Slavery Statutory Guidance. Modern slavery: how to identify and support victims - GOV.UK (www.gov.uk)) should be considered. Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years;

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

Some of the following can be indicators of CCE:

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

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

- children who have older boyfriends or girlfriends; and
- children who suffer from sexually transmitted infections or become pregnant.
(See further information in Appendix 3)

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

RADICALISATION AND EXTREMISM

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

Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

Terrorism is an action that:

- Endangers or causes serious violence to a person/people;
- Causes serious damage to property; or
- Seriously interferes or disrupts an electronic system

The use or threat of terrorism 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.

Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place, and equip our pupils to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in pupils' behaviour.

The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a pupil, they will follow our procedures set out below.

Staff should **always** take action if they are worried.

Further information on the school's measures to prevent radicalisation are set out in other school policies and procedures, including PREVENT, All in One ICT Policy and On-line Safety, Anti-bullying and Equality, Staff Code of Conduct.

Response

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include [Channel](#), the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is **not for** use in emergency situations. In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related

FORCED MARRIAGE (FM)

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the 'one chance' rule, i.e. we may only have one chance to speak to the potential victim and only one chance to save them.

If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- Speak to the pupil about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fm@fco.gov.uk
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate.

Characteristics that may indicate forced marriage

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

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

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

HONOUR BASED VIOLENCE

'Honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

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

Commented [PS2]: Added hyphen

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

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

Commented [PS3]: Added hyphen

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

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

Commented [PS4]: Added hyphen

Commented [PS5]: Added hyphen

FEMALE GENITAL MUTILATION (FGM)

Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

Any teacher who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or

- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth

Must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children's social care as appropriate.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must speak to the DSL and follow our local safeguarding procedures.

The duty for teachers mentioned above does not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should **not** examine pupils.

Any member of staff who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out must speak to the DSL and follow our local safeguarding procedures.

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues
- A girl:
 - Having difficulty walking, sitting or standing, or looking uncomfortable
 - Finding it hard to sit still for long periods of time (where this was not a problem previously)
 - Spending longer than normal in the bathroom or toilet due to difficulties urinating
 - Having frequent urinary, menstrual or stomach problems
 - Avoiding physical exercise or missing PE
 - Being repeatedly absent from school, or absent for a prolonged period
 - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
 - Being reluctant to undergo any medical examinations
 - Asking for help, but not being explicit about the problem
 - Talking about pain or discomfort between her legs

Potential signs that a pupil may be at risk of FGM include:

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues

A girl:

- Having a mother, older sibling or cousin who has undergone FGM
- Having limited level of integration within UK society
- Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"

- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
- Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
- Being unexpectedly absent from school
- Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

The above indicators and risk factors are not intended to be exhaustive.

CHECKING THE IDENTITY AND SUITABILITY OF VISITORS

All visitors will be required to verify their identity to the satisfaction of staff. No visitors will be permitted to use their mobile phones on site and will be asked to turn them off.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before alerting a senior leader, usually the Executive head teacher to agree to allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign the visitors' book and wear a visitor's colour coded lanyard.

Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

SAFER RECRUITMENT

The recruitment steps outlined below are based on part 3 of Keeping Children Safe in Education.

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training. See Appendix 8 for our Safer Recruitment and Selection Process.

Management/Governance of Schools- Secretary of State Section 128 direction

A section 128 direction prohibits or restricts a person from taking part in the management of an independent school, including academies and free schools. A person who is prohibited is unable to participate in any management of an independent school such as:

- a management position in an independent school, academy or free school as an employee;

- a trustee of an academy or free school trust; a governor or member of a proprietor body for an independent school; or
- a governor on any governing body in an independent school, academy or free school that retains or has been delegated any management responsibilities.

A section 128 direction disqualifies a person from holding or continuing to hold office as a governor of a maintained school.

Our Governors are required to have an enhanced criminal records certificate from the DBS. It is the responsibility of the governing body to apply for the certificate for any of their governors who do not already have one.

Our schools carry out a section 128 check for school governors, because a person subject to one is disqualified from being a governor. Using the free Employer Secure Access sign-in portal via the Teaching Regulation Agency's (TRA) Teacher Services' web page, we can easily check if a person they propose to recruit as a governor is barred as a result of being subject to a section 128 direction.

VOLUNTEERS

We understand that some people otherwise unsuitable for working with children may use volunteering to gain access to children; for this reason, any volunteers in the school, in whatever capacity, are expected to follow the policies and procedures in the same way *as paid staff*.

Where a parent or other volunteer helps on a one-off basis, he/she will only work under the direct supervision of a member of staff, and at no time have one to one contact with children. However, if a parent or other volunteer is to be in school regularly or over a longer period then they will be checked to ensure their suitability to work with children and a DBS check completed every 3 years. Please refer to the school's Volunteer Policy.

SAFE STAFF

Checks will be undertaken corresponding to Safer Recruitment procedures on all adults working in the school to establish their suitability to work with children. Records of these checks are kept in accordance with Part 3 – Keeping Children Safe in Education 2024. Our recruitment procedures ask prospective staff to declare behaviour/convictions which may indicate they are not suitable to work with children, i.e. perpetrator of domestic violence where children were not involved.

All school staff will take care not to place themselves in a vulnerable position with a child. It is always advisable for interviews or work with individual children or parents to be conducted with or in view of other adults.

If an allegation is made against another member of staff, including supply staff or volunteers, the member of staff receiving the allegation will immediately inform the Head teacher or the most senior teacher if the Head teacher is not present. The Head teacher or most senior teacher will then consult with the Local Area Designated Officer.

Allegations against the Head teacher are reported to the Chair or Vice Chair of Governors, and referred to the NOLA (formerly LADO).

CONDUCT OF STAFF

The school has a duty to ensure that professional behaviour applies to relationships between staff and children, and that all members of staff are clear about what constitutes appropriate behaviour and professional boundaries. Please refer to the School's Staff Code of Conduct.

At all times, members of staff are required to work in a professional way with children. All staff should be aware of the expectations, inherent risks and possible consequences in:

- Working alone with a child;
- Physical interventions;
- Cultural and gender stereotyping;
- Dealing with sensitive information;
- Giving to, and receiving gifts from, children and parents;
- Contacting children through private telephones (including texting), e-mail, MSN, or social networking websites;
- Disclosing personal details inappropriately;
- Meeting pupils outside school hours or school duties;
- Making inappropriate sexual comments; excessive one to one attention beyond the normal requirements of the role; or inappropriate sharing of images.

If any member of staff has reasonable suspicion that a child is suffering harm, and fails to act in accordance with this policy and Berkshire West Safeguarding Partnership procedures, this will be viewed as misconduct, and appropriate action will be taken.

SUPPORTING STAFF

We recognise that staff working in the school who have become involved with a child who has suffered harm, or who appears likely to suffer harm, may find this situation stressful and upsetting.

We will support such staff by providing an opportunity to talk through anxieties with the Senior Designated Persons or Head teacher and to seek further support, if necessary.

The Senior and Deputy Designated Persons can seek personal support through ARC counselling services or other appropriate counselling services.

Staff will have access to <http://www.saferrecruitmentconsortium.org/GSWP%20Oct%202015.pdf>

This provides advice on the boundaries of appropriate behaviour and the circumstances that should be avoided in order to limit complaints against staff of the abuse of trust and/or allegations of abuse.

ONLINE SAFETY/SOCIAL MEDIA

The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm.

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

The 4 key categories of risk

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism
- **Contact** – being subjected to harmful online interaction with other users, such as 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** – personal online behaviour that increases the likelihood of, or causes, harm, such as 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

To meet our aims and address the risks above we will:

- Educate pupils about online safety as part of our curriculum. For example:
 - The safe use of social media, the internet and technology
 - Keeping personal information private
 - How to recognise unacceptable behaviour online
 - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year.
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety.
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
- Staff are allowed to bring their personal phones for their own use, into class or areas of the school where pupils are present, but will limit such use to non-contact time when pupils are not present
- Staff will not take pictures or recordings of pupils on their personal phones or cameras
- Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems and ensure all staff understand their roles and responsibilities in relation to filtering and monitoring
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community

This section summarises our approach to online safety and mobile phone use. For comprehensive details about our school's policy on online safety and the use of mobile phones, please refer to our online safety policy.

Some useful websites to support staff and parents are:

[Teaching online safety in school](#)

https://beinternetlegends.withgoogle.com/en_uk

<https://www.saferinternet.org.uk/>

<https://www.childnet.com/resources/supporting-young-people-online>

<https://www.thinkuknow.co.uk/Teachers/>

Filtering and Monitoring

In today's information-driven world, ensuring the safety of children has become more crucial than ever, considering the wide range of online content they can be exposed to. At Gorse Ride Schools, we prioritise the protection of our pupils by utilising Netsweeper, an advanced content filtering platform. This powerful tool enables us to monitor, block, and report harmful online content across multiple devices, creating a safe digital environment for our students.

Netsweeper employs a hybrid solution that encompasses URL, dynamic content, and crowdsourcing filters, effectively shielding our students from a variety of online threats. Through this comprehensive approach, any inappropriate searches are automatically filtered and blocked. Furthermore, a detailed report containing the search criteria or website URL is promptly emailed to a member of the Senior Leadership Team (SLT) for thorough investigation.

To enhance our monitoring efforts, a designated member of the SLT is granted access to a pupil test login. This allows periodic searches using inappropriate words, phrases, and text (such as self-harm, drugs, gambling) to ensure that all such content is effectively filtered and blocked. The results of these searches are reported to the SLT and Governors on a termly basis, providing transparency and accountability in our filtering practices.

In addition to this, a review will be conducted, at least annually, by members of the senior leadership team, the designated safeguarding lead (DSL), and the IT service provider and involve the responsible governor. The results of the online safety review will be recorded for reference and made available to those entitled to inspect that information.

Other instances that may also trigger a review include, but are not limited to, when:

- a safeguarding risk is identified
- there is a change in working practice, like remote access or BYOD
- new technology is introduced

To provide a safe search experience for our students, all pupil profiles are configured to use Kiddle as the default search engine. Kiddle is a visual search engine specifically designed for children, offering a secure platform for web, image, and video searches. This ensures that pupils are protected from potentially harmful content while conducting their online research.

While our filtering systems are robust, we understand that no system is entirely fool proof. In the rare event that something inappropriate manages to bypass the filters and blockage, we have established a clear process to address such situations promptly.

The process would be as follows:

1. Adult to turn off the screen (not computer) and remove the child(ren) from the computer
2. Check in with child and ensure that they are ok
3. Note child/ log in/ context around search/ website address and search made etc
4. A member of SLT (with safeguarding training) will view breach at the earliest possible opportunity & screenshot/ save as necessary
5. A member of SLT (with safeguarding training) will report to Inspired with information and decide upon course of action, e.g. amending search limitations/ websites accessible, adapting future lessons to avoid issue
6. Class teacher will inform parents of incident as well as actions as a result
7. Potential review as outlined above if deemed necessary
8. All steps and actions will be recorded on CPOMs

As an additional measure, we require teachers to adhere to strict filtering settings and lock their PCs when not in use. Our system is configured to automatically lock all PCs after a specified period of inactivity. This precautionary measure ensures that unauthorised access to teacher profiles and resources is prevented, further safeguarding our students.

Moreover, our teachers and teaching support staff are responsible for supervising pupils whenever they access the web. Pupils are not permitted to have unsupervised access to the IT suite or any classroom or school computer. This active supervision ensures that students engage in safe and appropriate online activities while maintaining a secure online environment.

At Gorse Ride Schools, we remain committed to the safety and well-being of our students. By employing advanced filtering tools, coupled with strong oversight and proactive measures, we strive to create a secure digital space that fosters responsible and informed internet usage among our pupils.

Education at home

Parents and pupils are given guidance as to how to be safe online and are directed to appropriate websites. Updated User Agreements were created and signed by pupils, parents and staff. The department has provided advice to support schools and colleges: safeguarding-in-schools-colleges and-other-providers and safeguarding-and-remote-education.

Cyberbullying

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/374850/Cyberbullying_Advice_for_Headteachers_and_School_Staff_121114.pdf

Central to the School's anti-bullying policy is the principle that '*bullying is always unacceptable*' and that '*all pupils have a right not to be bullied*'.

The school recognises that it must take note of bullying perpetrated outside school which spills over into the school and so we will respond to any cyber-bullying we become aware of carried out by pupils when they are away from the site.

Cyber-bullying is defined as "an aggressive, intentional act carried out by a group or individual using electronic forms of contact repeatedly over time against a victim who cannot easily defend himself/herself."

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

- Bullying by texts or messages or calls on mobile phones
- The use of mobile phone cameras to cause distress, fear or humiliation

- Posting threatening, abusive, defamatory or humiliating material on websites, to include blogs, personal websites, social networking sites
- Using e-mail to message others
- Hijacking/cloning e-mail accounts
- Making threatening, abusive, defamatory or humiliating remarks in on-line forums

Cyber-bullying may be at a level where it is criminal in character.

It is unlawful to disseminate defamatory information in any media including internet sites.

Section 127 of the Communications Act 2003 makes it an offence to send, by public means of a public electronic communications network, a message or other matter that is grossly offensive or one of an indecent, obscene or menacing character.

The Protection from Harassment Act 1997 makes it an offence to knowingly pursue any course of conduct amounting to harassment.

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

Sexting

<https://www.thinkuknow.co.uk/Teachers/Resources/>

<https://www.ceop.police.uk/Media-Centre/Press-releases/2009/What-does-sexting-mean/>

<https://www.childnet.com/parents-and-carers/hot-topics/sexting>

'Sexting' often refers to the sharing of naked or 'nude' pictures or video through mobile phones and the internet. It also includes underwear shots, sexual poses and explicit text messaging.

While sexting often takes place in a consensual relationship between two young people, the use of Sexted images in revenge following a relationship breakdown is becoming more commonplace.

Sexting can also be used as a form of sexual exploitation and take place between strangers.

As the average age of first smartphone or camera enabled tablet is 6 years old, sexting is an issue that requires awareness raising across all ages.

The school will use age appropriate educational material to raise awareness, to promote safety and deal with pressure. Parents should be aware that they can come to the school for advice.

Gaming

<http://www.childnet.com/search-results/?keywords=gaming>

<https://www.childnet.com/parents-and-carers/hot-topics/gaming>

Online gaming is an activity that the majority of children and many adults get involved in. The school will raise awareness:

- By talking to parents and carers about the games their children play and help them identify whether they are appropriate.
- By talking to parents about setting boundaries and time limits when games are played.
- By highlighting relevant resources.

Online reputation

<http://www.childnet.com/resources/online-reputation-checklist>

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

Grooming

<http://www.childnet.com/search-results/?keywords=grooming>

<http://www.internetmatters.org/issues/online-grooming/>

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

The school will build awareness amongst children and parents about ensuring that the child:

- Only has friends online that they know in real life
- Is aware that if they communicate with somebody that they have met online, that relationship should stay online

That parents should:

- Recognise the signs of grooming
- Have regular conversations with their children about online activity and how to stay safe online

The school will raise awareness by:

- Running sessions for parents
- Include awareness around grooming as part of their curriculum
- Identifying with both parents and children how they can be safeguarded against grooming

Images of Children and Young People

The use of digital images in schools is a complex area and it is recommended that schools have a detailed policy and guidelines that set out what is acceptable in their setting. The text below is a brief summary of the key points extracted from the Wokingham Borough Council Children's Services 'All in One Online safety Guidelines', available at this link: http://wsh.wokingham.gov.uk/learning-and-teaching/ict-computing-and-onlinonline_safety/online_safety/onlinonline_safety-school-guidance-for-senior-leaders/

- **School Policy** – The school has a clear and sufficiently detailed policy (the eSafety policy) which covers the taking and use of digital images and video of pupils and takes steps to ensure that it is understood and enforced. Particular care will be taken when images of pupils may pass beyond the direct control of the school and into the public domain, e.g. on the school website and on social networking. Guidance includes reference to the storage and deletion of images of pupils, including the policy on the use of devices with a facility to store or transfer data to other locations (e.g. 'cloud' storage) to ensure the school is line with ICO (Information Commissioner's Office) guidance.
- **Acceptable Use Agreements** – Staff and pupils sign ICT Acceptable Use Agreements. This includes a section on the use of digital images and clarifies that personal mobile devices e.g. phones /cameras must not be used for taking pictures of children at school. Volunteers are expected to also sign an acceptable use agreement and abide by its conditions.
- **Parental Permission** – The eSafety policy sets out that that written permission must be obtained by parents before any photographs or videos are taken. Where parental permission has not been obtained, or it is known that a pupil should not be photographed or filmed, every reasonable effort should be made to ensure that a pupil's image is not recorded.
- **Parents taking photographs or video** – We understand that parents like to take photos of or video record their children in the school production, or at sports day, or school presentations. This is a normal part of family life, and we will not discourage parents from celebrating their child's successes. These photos and videos are only for personal use and can only be shared with immediate family and friends. Images must not be shared on social networking sites or other websites that are accessible by the general public. Parents are informed before performances and other activities that this is the school policy and told to make sure that images are not shared. Written notice is also given in programmes and ticketing information.
- **Events/Activities involving multiple schools** – The school make reasonable efforts to safeguard the digital images of pupils in events that take place outside the school. We ask that the organisers of such events include a statement asking for people not to share digital images or videos in their programmes. Both the Wokingham Area School Music Association and the District Primary Athletics Association do this. However neither organisation can guarantee that digital images are not taken and shared.

To ensure that parents are aware of this limitation, the letter inviting children to such events includes a clause notifying parents that we cannot control the distribution of images and if they would like to discuss this they should talk to the Head teacher.

Although the school will make reasonable efforts to safeguard the digital images of pupils, parents are made aware that at some types of event it is not always realistic to strictly enforce image guidelines. The school cannot therefore be held accountable for the use of images taken by parents or members of the public at events.

BEFORE AND AFTER SCHOOL ACTIVITIES AND CONTRACTED SERVICES

Where the Governing Body transfers control or otherwise allows the use of school premises to external bodies (such as sports clubs) or service providers during or out of school hours, we will ensure that these bodies or providers have appropriate safeguarding policies and procedures, and that there are arrangements in place to co-ordinate with the school on such matters. Such considerations will be made explicit in any contract or service level agreement with the bodies or providers. If an allegation were made against an outside organisation/individual, we will follow our Safeguarding procedures and inform the LADO.

LINKS TO OTHER SCHOOL POLICIES

This Policy will be read in conjunction with other policies regarding the safety and welfare of children. These together make up the suite of policies to safeguard and promote the welfare of children in this school.

Policies to refer to include:

- Prevent Radicalisation
- Positive Behaviour
- Anti-bullying
- Code of Conduct
- Disability Equality
- ICT Acceptable use
- Online safety
- Equal Opportunities
- Whistleblowing
- Volunteers in school
- Safer Recruitment
- Complaints
- Family Care
- Health and Safety
- Data Protection
- Induction

Listed below are links to some Model Policies.

Prevent

<http://wsh.wokingham.gov.uk/leadership/prevent/>

WBC Model Code of Conduct Policy:

<http://wsh.wokingham.gov.uk/leadership/policies/code-of-conduct-policy/>

Preventing Bullying policy:

<http://wsh.wokingham.gov.uk/leadership/policies/preventing-bullying/>

WBC Model Children Missing in Education policy:

<http://wsh.wokingham.gov.uk/leadership/policies/children-missing-in-educ/>

WBC Model Equal Opportunities Policy:

<http://wsh.wokingham.gov.uk/leadership/policies/equal-opportunities/>

Model ICT Acceptable Use Policy:

<http://wsh.wokingham.gov.uk/leadership/policies/ict-aup/>

WBC Model Whistleblowing Policy:

<http://wsh.wokingham.gov.uk/leadership/policies/whistleblowing/>

Berkshire Child Protection Procedures

<http://www.proceduresonline.com/berks/wokingham/index.html>

APPENDIX 1 - SAFEGUARDING CHILDREN – KEY POINTS

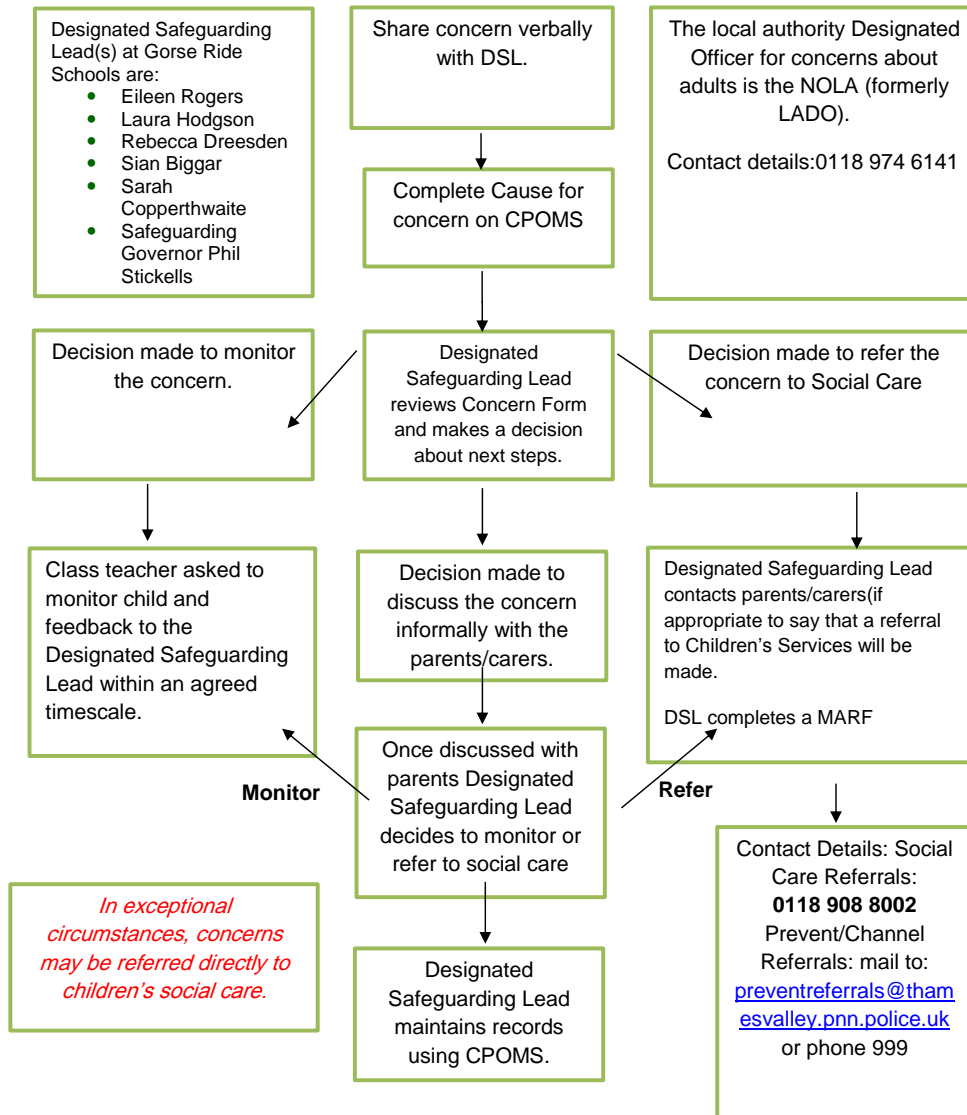
Staff and volunteers in charge of children or young people should know what to do if they suspect that someone is being physically, emotionally or sexually abused, or if someone tells them that this is happening. Ensure that you are familiar with the Safeguarding policy; copies of which are located in the staffroom and on the school's web-site. On request you will be provided with a printed copy.

In addition, the following key points give you a guide on what to do and not to do.

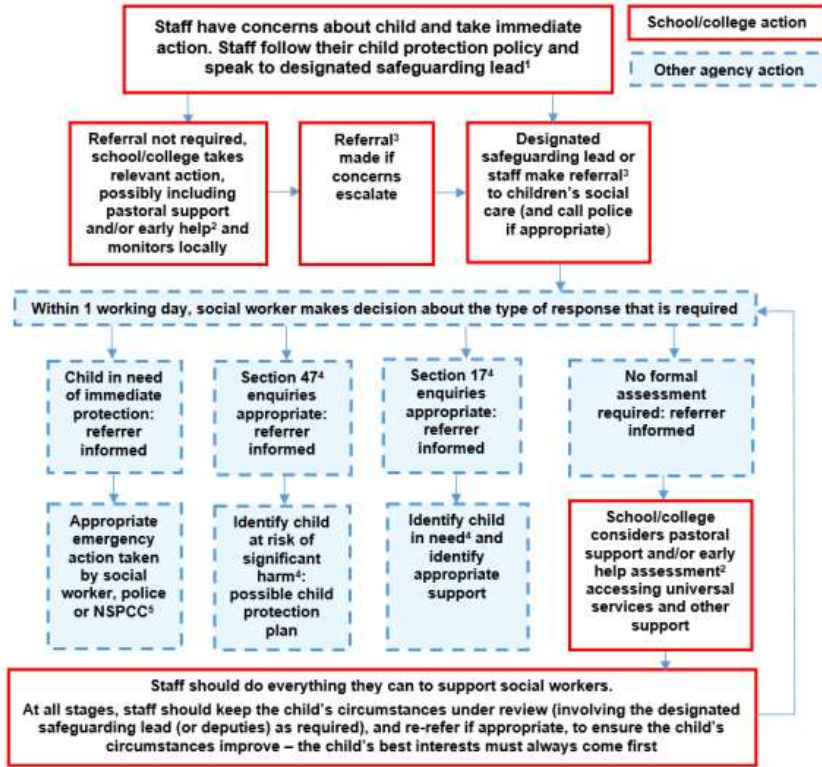
1. Always stop and listen straight away to someone who wants to tell you about incidents or suspicions of abuse.
2. If you can, write brief notes of what they are telling you while they are speaking. These may help later if you have to remember exactly what was said. Keep your original notes, however rough and even if you wrote on the back of something else. It's what you wrote at the time that may be important later, not a tidier and improved version you wrote up afterwards! If you don't have the means to write at the time, make notes of what was said or observed as soon as possible afterwards.
3. Never make a promise that you will keep what is said confidential or secret. If you are told about abuse you have a responsibility to tell the right people to get something done about it. If asked, explain that if you are going to be told something very important that needs to be sorted out, you will need to tell the people who can sort it out, but that you will only tell the people who absolutely have to know.
4. Do not ask leading questions that might give your own ideas of what might have happened, e.g. "did he do X to you?" Just ask, "what do you want to tell me?" or "Is there anything else you want to say?"
5. Immediately tell the senior designated person for safeguarding, currently this is the Head teacher, unless they are the subject of the accusation. Don't tell other adults or young people what you have been told. If someone has made an accusation to you about the Head teacher, you should report your concerns to the Chair of Governors.
6. Never attempt to carry out an investigation of suspected or alleged abuse by interviewing people etc. The Local Authority Designated Officer NOLA (formerly LADO) or the Referral and Assessment team, WBC Social Care and police officers are the people trained to do this. You could cause more damage and endanger possible criminal proceedings. It is your duty to refer concerns on, not investigate.
7. As soon as possible (and certainly the same day) the senior designated person for safeguarding or the Chair of Governors where the allegation is against the Head teacher, should refer the matter to the NOLA (formerly LADO) or the Referral and Assessment Team WBC Social Care (helped by your notes). Follow their instructions about what to do next. They will set up any necessary investigations. That is their statutory job.
8. Never think abuse is impossible in your organisation or that an accusation against someone you know well and trust is bound to be wrong.
9. Children and young people often tell other young people, rather than staff or other adults about abuse. Therefore, you may hear an allegation from another child

APPENDIX 2 - FLOW CHART FOR RAISING SAFEGUARDING CONCERNS ABOUT A CHILD

(A concern could be about physical/ emotional/ sexual abuse or neglect- see Appendix 3 for more information)



ACTIONS WHERE THERE ARE CONCERNS ABOUT A CHILD



APPENDIX 3 - RECOGNISING SIGNS OF CHILD ABUSE

Categories of Abuse:

- Physical Abuse
- Emotional Abuse (including Domestic Abuse)
- Sexual Abuse
- Neglect

Signs of Abuse in Children:

The following non-specific signs may indicate something is wrong:

- Significant change in behaviour
- Extreme anger or sadness
- Aggressive and attention-seeking behaviour
- Suspicious bruises with unsatisfactory explanations
- Lack of self-esteem
- Self-injury
- Depression
- Age inappropriate sexual behaviour
- Child Sexual Exploitation

Risk Indicators

The factors described in this section are frequently found in cases of child abuse. Their presence is not proof that abuse has occurred, but:

- Must be regarded as indicators of the possibility of significant harm
- Justifies the need for careful assessment and discussion with designated / named / lead person, manager, (or in the absence of all those individuals, an experienced colleague)
- May require consultation with and / or referral to Children's Services

The absence of such indicators does not mean that abuse or neglect has not occurred.

In an abusive relationship the child may:

- Appear frightened of the parent/s
- Act in a way that is inappropriate to her/his age and development (though full account needs to be taken of different patterns of development and different ethnic groups)

The parent or carer may:

- Persistently avoid child health promotion services and treatment of the child's episodic illnesses
- Have unrealistic expectations of the child
- Frequently complain about/to the child and may fail to provide attention or praise (high criticism/low warmth environment)
- Be absent or misusing substances
- Persistently refuse to allow access on home visits
- Be involved in domestic abuse

Staff should be aware of the potential risk to children when individuals, previously known or suspected to have abused children, move into the household.

Factors Staff should consider for the potential need for Early Help

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care plan)
- has a mental health need
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from 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 at risk of being radicalised or exploited
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child.

Recognising Physical Abuse

The following are often regarded as indicators of concern:

- An explanation which is inconsistent with an injury
- Several different explanations provided for an injury
- Unexplained delay in seeking treatment
- The parents/carers are uninterested or undisturbed by an accident or injury
- Parents are absent without good reason when their child is presented for treatment
- Repeated presentation of minor injuries (which may represent a "cry for help" and if ignored could lead to a more serious injury)
- Family use of different doctors and A&E departments
- Reluctance to give information or mention previous injuries

Bruising

Children can have accidental bruising, but the following must be considered as non-accidental unless there is evidence or an adequate explanation provided:

- Any bruising to a pre-crawling or pre-walking baby
- Bruising in or around the mouth, particularly in small babies which may indicate force feeding
- Two simultaneous bruised eyes, without bruising to the forehead, (rarely accidental, though a single bruised eye can be accidental or abusive)
- Repeated or multiple bruising on the head or on sites unlikely to be injured accidentally
- Variation in colour possibly indicating injuries caused at different times
- The outline of an object used e.g. belt marks, hand prints or a hair brush
- Bruising or tears around, or behind, the earlobe/s indicating injury by pulling or twisting
- Bruising around the face
- Grasp marks on small children
- Bruising on the arms, buttocks and thighs may be an indicator of sexual abuse

Bite Marks

Bite marks can leave clear impressions of the teeth. Human bite marks are oval or crescent shaped. Those over 3 cm in diameter are more likely to have been caused by an adult or older child. A medical opinion should be sought where there is any doubt over the origin of the bite.

Burns and Scalds

It can be difficult to distinguish between accidental and non-accidental burns and scalds, and will always require experienced medical opinion. Any burn with a clear outline may be suspicious e.g.:

- Circular burns from cigarettes (but may be friction burns if along the bony protuberance of the spine)
- Linear burns from hot metal rods or electrical fire elements
- Burns of uniform depth over a large area
- Scalds that have a line indicating immersion or poured liquid (a child getting into hot water is his/her own accord will struggle to get out and cause splash marks)
- Old scars indicating previous burns/scalds which did not have appropriate treatment or adequate explanation

Scalds to the buttocks of a small child, particularly in the absence of burns to the feet, are indicative of dipping into a hot liquid or bath.

Fractures

Fractures may cause pain, swelling and discolouration over a bone or joint. Non-mobile children rarely sustain fractures.

There are grounds for concern if:

- The history provided is vague, non-existent or inconsistent with the fracture type
- There are associated old fractures
- Medical attention is sought after a period of delay when the fracture has caused symptoms such as swelling, pain or loss of movement
- There is an unexplained fracture in the first year of life

A large number of scars or scars of different sizes or ages, or on different parts of the body, may suggest abuse.

Recognising Emotional Abuse

Emotional abuse may be difficult to recognise, as the signs are usually behavioural rather than physical. The manifestations of emotional abuse might also indicate the presence of other kinds of abuse.

The indicators of emotional abuse are often also associated with other forms of abuse.

The following may be indicators of emotional abuse:

- Developmental delay
- Abnormal attachment between a child and parent/carer e.g. anxious, indiscriminate or not attachment
- Indiscriminate attachment or failure to attach
- Aggressive behaviour towards others
- Scape-goated within the family
- Frozen watchfulness, particularly in pre-school children

- Low self-esteem and lack of confidence
- Withdrawn or seen as a “loner” – difficulty relating to others

Recognising Signs of Sexual Abuse

Boys and girls of all ages may be sexually abused and are frequently scared to say anything due to guilt and/or fear. This is particularly difficult for a child to talk about and full account should be taken of the cultural sensitivities of any individual child/family.

Recognition can be difficult, unless the child discloses and is believed. There may be no physical signs and indications are likely to be emotional/behavioural.

Some behavioural indicators associated with this form of abuse are:

- Inappropriate sexualised conduct
- Sexually explicit behaviour, play or conversation, inappropriate to the child’s age
- Continual and inappropriate or excessive masturbation
- Self-harm (including eating disorder), self-mutilation and suicide attempts
- Involvement in prostitution or indiscriminate choice of sexual partners
- An anxious unwillingness to remove clothes e.g. for sports events (but this may be related to cultural norms or physical difficulties)

Some physical indicators associated with this form of abuse are:

- Pain or itching of genital area
- Blood on underclothes
- Pregnancy in a younger girl where the identity of the father is not disclosed
- Physical symptoms such as injuries to the genital or anal area, bruising to buttocks, abdomen and thighs, sexually transmitted disease, presence of semen on vagina, anus, external genitalia or clothing

Sexual Abuse by Young People

The boundary between what is abusive and what is part of normal childhood or youthful experimentation can be blurred. The determination of whether behaviour is developmental, inappropriate or abusive will hinge around the related concepts of true consent, power imbalance and exploitation. This may include children and young people who exhibit a range of sexually problematic behaviour such as indecent exposure, obscene telephone calls, fetishism, bestiality and sexual abuse against adults, peers or children.

Developmental Sexual Activity

Encompasses those actions that are to be expected from children and young people as they move from infancy through to an adult understanding of their physical, emotional and behavioural relationships with each other. Such sexual activity is essentially information gathering and experience testing. It is characterised by mutuality and of the seeking of consent.

Inappropriate Sexual Behaviour

Can be inappropriate socially, inappropriate to development, or both. In considering whether behaviour fits into this category, it is important to consider what negative effects it has on any of the parties involved and what concerns it raises about a child or young person. It should be recognised that some actions may be motivated by information seeking, but still cause significant upset, confusion, worry, physical damage, etc. it may also be that the behaviour is “acting out” which may derive from other sexual situations to which the child or young person has been exposed.

If an act appears to have been inappropriate, there may still be a need for some form of behaviour management or intervention. For some children, educative inputs may be enough to address the behaviour.

Abusive sexual activity included any behaviour involving coercion, threats, aggression together with secrecy, or where one participant relies on an unequal power base.

Assessment

In order to more fully determine the nature of the incident the following factors should be given consideration. The presence of exploitation in terms of:

Equality – consider differentials of physical, cognitive and emotional development, power and control and authority, passive and assertive tendencies

Consent – agreement including all the following:

- Understanding that is proposed based on age, maturity, development level, functioning and experience;
- Knowledge of society's standards for what is being proposed;
- Awareness of potential consequences and alternatives;
- Assumption that agreements or disagreements will be respected equally;
- Voluntary decision;
- Mental competence.

Coercion

The young perpetrator who abuses may use techniques like bribing, manipulation and emotional threats of secondary gains and losses that is loss of love, friendship, etc. Some may use physical force, brutality or the threat of these regardless of victim resistance.

In evaluating sexual behaviour of children and young people, the above information should be used only as a guide. Further advice is available from the Referral and Assessment Team.

Recognising Neglect

Evidence of neglect is built up over a period of time and can cover different aspects of parenting. Indicators include:

- Failure by parents or carers to meet the basic essential needs e.g. adequate food, clothes, warmth, hygiene and medical care
- A child seen to be listless, apathetic and irresponsible with no apparent medical cause. Failure of child to grow within normal expected pattern, with accompanying weight loss
- Child thrives away from home environment
- Child frequently absent from school
- Child left with adults who are intoxicated or violent
- Child abandoned or left alone for excessive periods

Child Sexual Exploitation (CSE)

The following list of indicators is not exhaustive or definitive but it does highlight common signs which can assist professionals in identifying children or young people who may be victims of sexual exploitation.

Signs include:

- underage sexual activity;
- inappropriate sexual or sexualised behaviour;
- sexually risky behaviour, 'swapping' sex;
- repeat sexually transmitted infections;
- in girls, repeat pregnancy, abortions, miscarriage;
- receiving unexplained gifts or gifts from unknown sources;
- having multiple mobile phones and worrying about losing contact via mobile;
- having unaffordable new things (clothes, mobile) or expensive habits (alcohol, drugs);
- changes in the way they dress;
- going to hotels or other unusual locations to meet friends;
- seen at known places of concern;
- moving around the country, appearing in new towns or cities, not knowing where they are;
- getting in/out of different cars driven by unknown adults;
- having older boyfriends or girlfriends;
- contact with known perpetrators;
- involved in abusive relationships, intimidated and fearful of certain people or situations;
- hanging out with groups of older people, or anti-social groups, or with other vulnerable peers;
- associating with other young people involved in sexual exploitation;
- recruiting other young people to exploitative situations;
- truancy, exclusion, disengagement with school, opting out of education altogether;
- unexplained changes in behaviour or personality (chaotic, aggressive, sexual);
- mood swings, volatile behaviour, emotional distress;
- self-harming, suicidal thoughts, suicide attempts, overdosing, eating disorders;
- drug or alcohol misuse;
- getting involved in crime;
- police involvement, police records;
- involved in gangs, gang fights, gang membership;
- injuries from physical assault, physical restraint, sexual assault.

Female Genital Mutilation (FGM)

It is essential that staff are aware of FGM practices and the need to look for signs, symptoms and other indicators of FGM.

What is FGM?

It involves procedures that intentionally alter/injure the female genital organs for non-medical reasons.

4 types of procedure:

Type 1 Clitoridectomy – partial/total removal of clitoris

Type 2 Excision – partial/total removal of clitoris and labia minora

Type 3 Infibulation - entrance to vagina is narrowed by repositioning the inner/outer labia

Type 4 all other procedures that may include: pricking, piercing, incising, cauterising and scraping the genital area.

Why is it carried out?

Belief that:

- FGM brings status/respect to the girl – social acceptance for marriage;
- Preserves a girl's virginity;
- Part of being a woman / rite of passage;

- Upholds family honour;
- Cleanses and purifies the girl;
- Gives a sense of belonging to the community;
- Fulfils a religious requirement;
- Perpetuates a custom/tradition;
- Helps girls be clean / hygienic;
- Is cosmetically desirable;
- Mistakenly believed to make childbirth easier.

Is FGM legal?

FGM is internationally recognised as a violation of human rights of girls and women. It is **illegal** in most countries including the UK.

Circumstances and occurrences that may point to FGM happening are:

- Child talking about getting ready for a special ceremony;
- Family taking a long trip abroad;
- Child's family being from one of the 'at risk' communities for FGM (Kenya, Somalia, Sudan, Sierra Leon, Egypt, Nigeria, Eritrea as well as non-African communities including Yemeni, Afghani, Kurdistan, Indonesia and Pakistan);
- Knowledge that the child's sibling has undergone FGM;
- Child talks about going abroad to be 'cut' or to prepare for marriage.

Signs that may indicate a child has undergone FGM:

- Prolonged absence from school and other activities;
- Behaviour change on return from a holiday abroad, such as being withdrawn and appearing subdued;
- Bladder or menstrual problems;
- Finding it difficult to sit still and looking uncomfortable;
- Complaining about pain between the legs;
- Mentioning something somebody did to them that they are not allowed to talk about;
- Secretive behaviour, including isolating themselves from the group;
- Reluctance to take part in physical activity;
- Repeated urinal tract infection;
- Disclosure.

Domestic Abuse

How does it affect children?

Children can be traumatised by seeing and hearing violence and abuse. They may also be directly targeted by the abuser or take on a protective role and get caught in the middle. In the long term this can lead to mental health issues such as depression, self-harm and anxiety.

What are the signs to look out for?

Children affected by domestic abuse reflect their distress in a variety of ways. They may change their usual behaviour and become withdrawn, tired, start to wet the bed and have behavioural difficulties. They may not want to leave their house or may become reluctant to return. Others will excel, using their time in your care as a way to escape from their home life. None of these signs are exclusive to domestic abuse so when you are considering changes in behaviours and concerns about a child, think about whether domestic abuse may be a factor.

Safeguarding is everyone's responsibility and if there are concerns regarding a child then contact:

- The Senior Designated Person for Safeguarding or one of the Deputy Designated Persons;
- **999 if you believe a child is in immediate danger;**
- Early Help Hub (Children's Safeguarding and Social Care Team) Telephone 0118 908 8002 or email: triage@wokingham.gov.uk;
- Emergency Duty Team - out of office hours: telephone: 01344 786 543;
- Thames Valley Police: telephone: 101 non emergencies;
- NSPCC (National Society for the Prevention of Cruelty to Children) 24 Hour Helpline: 0808 800 5000.
- Additional advice:
 - NSPCC- UK domestic-abuse Signs Symptoms Effects
<https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/domestic-abuse/signs-symptoms-effects/>
 - Refuge what is domestic violence/effects of domestic violence on children
<http://www.refuge.org.uk/get-help-now/what-is-domestic-violence/effects-of-domestic-violence-on-children/>
 - Safelives: young people and domestic abuse. <http://www.safelives.org.uk/knowledge-hub/spotlights/spotlight-3-young-people-and-domestic-abuse>
 - Domestic abuse: specialist sources of support - GOV.UK (www.gov.uk)
<https://www.gov.uk/government/publications/domestic-abuse-get-help-for-specific-needs-or-situations/domestic-abuse-specialist-sources-of-support> (includes information for adult victims, young people facing abuse in their own relationships and parents experiencing child to parent violence/abuse)

APPENDIX 4 - INDICATORS OF VULNERABILITY TO RADICALISATION

1. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.

2. Extremism is defined by the Government in the Prevent Strategy as:

Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.

3. Extremism is defined by the Crown Prosecution Service as the demonstration of unacceptable behaviour by using any means or medium to express views which:

- Encourage, justify or glorify terrorist violence in furtherance of particular beliefs;
- Seek to provoke others to terrorist acts;
- Encourage other serious criminal activity or seek to provoke others to serious criminal acts; or
- Foster hatred which might lead to inter-community violence in the UK.

4. There is no such thing as a “typical extremist”: those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.

5. Pupils may become susceptible to radicalisation through a range of social, personal and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that school staff are able to recognise those vulnerabilities.

6. Indicators of vulnerability include:

- Identity Crisis – the student / pupil is distanced from their cultural / religious heritage and experiences discomfort about their place in society;
- Personal Crisis – the student / pupil may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging;
- Personal Circumstances – migration; local community tensions; and events affecting the student / pupil’s country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy;
- Unmet Aspirations – the student / pupil may have perceptions of injustice; a feeling of failure; rejection of civic life;
- Experiences of Criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement / reintegration;
- Special Educational Need – students / pupils may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

7. However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.

8. More critical risk factors could include:

- Being in contact with extremist recruiters;
- Accessing violent extremist websites, especially those with a social networking element;
- Possessing or accessing violent extremist literature;
- Using extremist narratives and a global ideology to explain personal disadvantage;

- Justifying the use of violence to solve societal issues;
- Joining or seeking to join extremist organisations; and
- Significant changes to appearance and / or behaviour;
- Experiencing a high level of social isolation resulting in issues of identity crisis and / or personal crisis.

The Department of Education Guidance The Prevent Duty can be accessed via this link. <https://www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty>

APPENDIX 5 - ALLEGATIONS OF ABUSE MADE AGAINST STAFF

This section is based on 'Section 1: Allegations that may meet the harms threshold' in part 4 of Keeping Children Safe in Education.

This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer, or contractor, has:

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school

We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

A 'case manager' will lead any investigation. This will be the Executive head teacher, or the chair of Governors where the executive head teacher is the subject of the allegation. The case manager will be identified at the earliest opportunity.

Our procedures for dealing with allegations will be applied with common sense and judgement.

Suspension of the accused until the case is resolved

Suspension of the accused will not be the default position and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the local authority

If in doubt, the case manager will seek views from the school's personnel adviser and the designated officer at the local authority, as well as the police and children's social care where they have been involved.

Definitions for outcomes of allegation investigations

Substantiated: there is sufficient evidence to prove the allegation

Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation

False: there is sufficient evidence to disprove the allegation

Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)

Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care

If immediate suspension is considered necessary, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details

If it is decided that no further action is to be taken in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation

If it is decided that further action is needed, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate

- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. Employees will be encouraged to seek support from trade union representatives, or a colleague, for example for welfare counselling or medical advice

- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child
- We will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.
- If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.
- Where the police are involved, wherever possible the school will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

Additional considerations for supply teachers and all contracted staff

If there are concerns or an allegation is made against someone not directly employed by the school, such as a supply teacher or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures.

We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our NOLA to determine a suitable outcome

The governing board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation

We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the NOLA as required

We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

Timescales

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week

- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days
- However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

Specific actions

Action following a criminal investigation or prosecution

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

Unsubstantiated, unfounded, false or malicious reports

If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

- Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate

- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Confidentiality and information sharing

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

The case manager will take advice from the NOLA, police and children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference
-

In these cases, the school will provide a copy to the individual, in agreement with children's social care or the police as appropriate.

Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

References

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious

- Include substantiated allegations, provided that the information is factual and does not include opinions

Learning lessons

After any cases where the allegations are *substantiated*, the case manager will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

Non-recent allegations

Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a child to the NOLA in line with our local authority's procedures for dealing with non-recent allegations.

Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

Section 2: Concerns that do not meet the harm threshold

The section is based on 'Section 2: Concerns that do not meet the harm threshold' in part 4 of Keeping Children Safe in Education.

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers, and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Disclosure made by a child, parent, or other adult within or outside the school
- Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Definition of low-level concerns

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the school may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**
- Does not meet the harm threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

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

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

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

Sharing low-level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

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

Responding to low-level concerns

If the concern is raised via a third party, the head teacher will collect evidence where necessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously
- To the individual involved and any witnesses

The head teacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's Code of Conduct.

Keeping Children Safe in Education also links to this report for more information [Developing and implementing a low-level concerns policy: A guide for organisations which work with children](#)

Record keeping

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken. Advice may be sought from Wokingham Borough Council Human Resources

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority.
- Retained at least until the individual leaves employment at the school
- Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

References

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

The seven golden rules to sharing information

1. Remember that the General Data Protection Regulation (GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.
2. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
3. Seek advice from other practitioners, or your information governance lead, if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
4. Where possible, share information with consent, and where possible, respect the wishes of those who do not consent to having their information shared. Under the GDPR and Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful basis to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be clear of the basis upon which you are doing so. Where you do not have consent, be mindful that an individual might not expect information to be shared.
5. Consider safety and well-being: base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
6. Necessary, proportionate, relevant, adequate, accurate, timely and secure: ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely (see principles).
7. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

APPENDIX 7 - RECRUITMENT AND SELECTION PROCESS

The recruitment steps outlined below are based on part 3 of Keeping Children Safe in Education.

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training.

We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

Advertising

When advertising roles, we will make clear:

- Our school's commitment to safeguarding and promoting the welfare of children
- That safeguarding checks will be undertaken
- The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children
- Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account

Application forms

Our application forms will:

- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
- Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders

Shortlisting

Our shortlisting process will involve at least 2 people who will be on the interview panel and will:

- Consider any inconsistencies and look for gaps in employment and reasons given for them
- Explore all potential concerns

Once we have shortlisted candidates, we will ask shortlisted candidates to:

- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
 - If they have a criminal history
 - Whether they are included on the barred list
 - Whether they are prohibited from teaching
 - Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
 - Any relevant overseas information
- Sign a declaration confirming the information they have provided is true
- Inform candidates that we may conduct online searches as part of due diligence checks.

Seeking references and checking employment history

We will try to obtain references before interview. Any concerns raised will be explored further with referees and taken up with the candidate at interview.

When seeking references, we will:

- **Not accept open references**
- Liaise directly with referees and verify any information contained within references with the referees
- Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the head teacher/principal as accurate in respect to disciplinary investigations
- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
- Resolve any concerns before any appointment is confirmed

Interview and selection

When interviewing candidates, we will:

- Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this
- Explore any potential areas of concern to determine the candidate's suitability to work with children
- Record all information considered and decisions made

Pre-appointment vetting checks

We will record all information on the checks carried out in the school's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

New staff

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new staff, we will:

- Verify their identity, it is important to be sure that the person is who they claim to be, this includes being aware of the potential for individuals changing their name. Best practice is checking the name on their birth certificate.
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken

- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. Where available, these will include:
 - For all staff, including teaching positions: [criminal records checks for overseas applicants](#)
 - For teaching positions: obtaining a letter of professional standing from the professional regulating authority in the country where the applicant has worked
- We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Regulated activity means a person who will be:

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or
- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

Existing staff

In certain circumstances we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:

- There are concerns about an existing member of staff's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more
- We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:
- We believe the individual has engaged in [relevant conduct](#); or
- We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or
- We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and

- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Agency and third-party staff

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children
- We will obtain the DBS check for self-employed contractors.
- We will not keep copies of such checks for longer than 6 months.
- Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.
- We will check the identity of all contractors and their staff on arrival at the school.
- For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Trainee/student teachers

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

In both cases, this includes checks to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

Volunteers

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity

- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment
- Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought

Governors

All governors will have an enhanced DBS check without barred list information.

They will have an enhanced DBS check with barred list information if working in regulated activity.

All governors will also have a section 128 check (as a section 128 direction disqualifies an individual from being a maintained school governor).

All proprietors, trustees, local governors and members will also have the following checks:

- A section 128 check (to check prohibition on participation in management under [section 128 of the Education and Skills Act 2008](#)).
- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

All governors will also have the following checks:

- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

Staff working in alternative provision settings

Where we place a pupil with an alternative provision provider, we remain responsible for the safeguarding of that pupil. We conduct safeguarding checks prior to the pupil using the provision and we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform. Half termly visits are conducted to ensure the pupils safety.

Adults who supervise pupils on work experience

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

Pupils staying with host families

Where the school makes arrangements for pupils to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people.

Where the school is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner schools abroad to ensure that similar assurances are undertaken prior to the visit.

APPENDIX 8 – CHILDREN WHO ARE LESBIAN, GAY, BISEXUAL, OR GENDER QUESTIONING

This section remains under review, pending the outcome of the gender questioning children guidance consultation, and final gender questioning guidance documents being published.

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

However, the Cass review identified that caution is necessary for children questioning their gender as there remain many unknowns about the impact of social transition and children may well have wider vulnerabilities, including having complex mental health and psychosocial needs, and in some cases additional diagnoses of autism spectrum disorder and/or attention deficit hyperactivity disorder.

It recommended that when families/carers are making decisions about support for gender questioning children, they should be encouraged to seek clinical help and advice. When parents are supporting pre-pubertal children, clinical services should ensure that they can be seen as early as possible by a clinical professional with relevant experience.

As such, when supporting a gender questioning child, as advised by KCSIE 2024 we will take a cautious approach and consider the broad range of the child's individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying.

We will refer to DFE Guidance for Schools and Colleges in relation to Gender Questioning Children, when deciding how to proceed.

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