

CROSFIELDS SCHOOL

SAFEGUARDING & CHILD PROTECTION POLICY

Person Responsible:	DSL – Mr. Adam Mallins
Review Date:	1 September 2022
Signed by Safeguarding Governor:	Mr. Mark Turner
Signed by Chair of Governors:	Mr. Chas Bradfield
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This Policy is reviewed annually and is subject to immediate review in line with statutory changes as and when they take place.

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1 Introduction

The School's Commitment to Safeguarding

- 1.1 Crosfields School is committed to safeguarding and promoting the welfare and wellbeing of pupils and staff. We believe that everyone, without exception, has a right to be safe and treated with dignity and respect, regardless of background and live a life free from discrimination. The School recognises that children learn best when they are healthy, safe and secure.
- 1.2 The terms **“child”, “children” and “pupils” “Students”** includes anyone under the age of 18. Crosfields School is also a provider of Early Years Foundation Stage (EYFS).
- 1.3 ‘Staff’ as written in this policy includes anyone with contact with a child including teaching, non-teaching, governors, contractors and volunteers and extends to all supply/agencies being used by the School for duties in School.
- 1.4 The School recognises that nothing is more important than children’s welfare. Children who need help and protection deserve high-quality and effective support as soon as a need is identified (Working Together to Safeguard Children 2018)
- 1.5 Safeguarding and promoting the welfare of children is defined as protecting children from maltreatment; preventing impairment of children’s mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes. (Keeping Children Safe in Education, September 2022.)
- 1.6 The School will adopt a child-centered and co-ordinated approach to safeguarding that is based on a system that responds to the needs and interest of children and families and not the other way around. Anyone working with children and their families will be clear about what is required of them individually and how they need to work together in partnership with others. (Working Together to Safeguard Children 2018)
- 1.7 This policy applies to all pupils in the School, including EYFS.
- 1.8 The purpose of this policy is to inform staff, parents, contractors, volunteers and governors about the School’s responsibilities for safeguarding children and to enable all parties to have a clear understanding of how these responsibilities should be carried out. It applies wherever staff members are working with pupils – even where this is away from the School site, such as on educational visits.

1.9 This policy is published on the School website and is available to parents of current and prospective pupils from the School on request.

1.10 The policy has due regard to all relevant legislation, statutory guidance and other School policies including but not limited to the list below and a longer list can be found in Appendix 10.

- Keeping Children Safe in Education September 2022 (KCSIE)
- Children Act 1989 and 2004
- Working Together to Safeguard Children 2018 (amended Dec 2020) (WTSC)
- Prevent Duty Guidance for England and Wales July 2015
- Disqualification Under the Childcare Act August 2018
- Education (Independent School Standards) Regulations 2014
- Berkshire West agreed inter-agency procedures
- (see www.berkshirerwestsafeguardingchildrenpartnership.org.uk)
- What to do if you are worried a child is being abused – advice for practitioners March 2015
- Safeguarding children and young people October 2018
- Children Missing Education September 2016
- Strategy for dealing with safeguarding issues in charities December 2017
- Safer Working Practices, Safer Recruitment Consortium, May 2019 (Addendum April 2020)
- Apprenticeships, Children and Learning Act 2009

1.11 We follow the procedures of the Berkshire West Safeguarding Children Partnership (BWSCP). Contact details are contained in Appendix 2 and their multi-agency safeguarding arrangements can be found via their website here [BWSCP Home](#). We will operate in accordance with any multi-agency safeguarding arrangements put in place with these safeguarding partners.

1.12 Every complaint or suspicion of abuse, neglect or exploitation from within or outside the School will be taken seriously and action will be taken in accordance with this policy. In particular we will take appropriate steps to address and deal with child-on-child abuse as set out below.

1.13 The School will continue to follow DfE advice [COVID 19 Actions for Schools during the coronavirus outbreak](#) for as long as it applies and will take steps to ensure that any COVID 19 measures include effective DSL cover and support given the potential for remote learning.

2 Principles of Child Protection

2.1 Crosfields School is committed to safeguarding and promoting the welfare of all pupils in our care, and expects all staff, governors and volunteers to share this commitment. To achieve this, the School seeks to create a safe School environment and a strong pastoral system. Staff are trained

to listen to pupils' concerns, identify issues early and respond appropriately following agreed procedures. The School will consider, at all times, what is in the best interest of the child.

2.2 The School will take all reasonable measures to:

- ensure that we practise safer recruitment in checking the suitability of staff, governors and volunteers (including staff employed by other organisations) to work with children and young people. Staff recruitment procedures are outlined in detail in the School's Recruitment Policy;
- ensure that, where staff from other organisations are working with our pupils on another site, we have received confirmation that appropriate child protection checks and procedures apply to those members of staff and that any such checks do not raise any issues of concern in relation to the suitability of those staff members working with children;
- follow the local inter-agency procedures of the Berkshire West Safeguarding Children Partnership and contribute to inter-agency working;
- support pupils in need through early intervention and, where appropriate, support them in co-operation with multi-agencies who are working to the Common Assessment Framework (CAF) and as part of the Team around the Child (TAC) approach;
- be alert to signs of abuse, both in the School and from outside and to protect each pupil from any form of abuse, whether from an adult or another pupil;
- deal appropriately with every suspicion or complaint of abuse and support pupils who have been abused in accordance with their agreed child protection plan;
- design and operate procedures which promote this policy, but which, so far as possible, ensure that teachers and other staff who are innocent are not prejudiced by false allegations;
- be alert to the needs of pupils with physical and mental health conditions. All staff should be aware that:
 - They 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 from developing one;
 - 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
 - Operate robust and sensible health and safety procedures;

- Operate clear and supportive policies on drugs, alcohol and substance misuse;
- Assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology, based on an understanding of the potential risk in the local area;
- Identify children who may be vulnerable to radicalisation, and know what to do when they are identified;
- Take all practicable steps to ensure that School premises are as secure as circumstances permit;
- Teach pupils about safeguarding issues and about how to keep themselves safe (including on-line and when working online at home); and
- Ensure that any deficiencies in our child protection and safeguarding procedures are remedied without delay.

3 Roles and Responsibilities

The Governing Body of Crosfields designates appropriate senior member(s) of staff to take lead responsibility for child protection. This team has the status and authority within the School to carry out the duties of the post, including committing resources and, where appropriate, supporting and directing other staff. The School ensures that the DSLs have sufficient time, funding, supervision and support to fulfil child welfare and safeguarding responsibilities effectively.

3.1 All staff (including governors, volunteers and supply staff)

All staff are under a general legal duty to:

- consider at all times what is in the best interest of the pupil
- contribute to providing a safe environment in which children can learn;
- attend appropriate safeguarding and child protection training (3 yearly, level 1 refresher), annually as directed by the DSL and as and when additional updates are required, including training on how to reassure victims;
- be aware of indicators of the different forms of abuse and neglect and of emergent mental health problems and know what to do when a child reports abuse, exploitation or

neglect;

- Be aware that a pupil may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or may not recognise their experiences as harmful.
- assist children in need and to protect children from abuse, neglect, radicalisation and extremism;
- be familiar with the School's policies pertaining to safeguarding and child protection procedures (see sections 8-17) and follow them;
- be aware of the role and identity of the DSL and Deputy DSLs;
- be aware of the process for making referrals to children's social care;
- know how to access and implement the procedures, independently if necessary;
- keep a sufficient record of any significant complaint, conversation or event;
- report any matters of concern to the DSL or, where appropriate, to one of the key contacts in accordance with this policy; and
- support social services and any other agencies following any referral.

3.2 The Designated Safeguarding Lead (DSL)

The Designated Safeguarding Lead (DSL) is a member of the Senior Leadership Team and has ultimate lead responsibility for child protection matters in the School, including online safety and is the first point of contact for parents, pupils, staff and external agencies if they have any concerns about safeguarding or child protection. The DSL also co-ordinates the School's CP representation at conferences and meetings.

A full description of the responsibilities of the DSL is set out in Annexe C of KCSIE (September 2022) and Appendix 9 of this policy, however these can be categorised as follows:

- Manage referrals
- Work with others
- Undergo and organise training
- Raise Awareness
- Manage child protection files
- Be available

- Ensure appropriate online safety measures are in place

3.3 The Deputy Designated Safeguarding Leads (DDSLs)

The DSL is supported by a number of Deputy Designated Safeguarding Leads (DDSLs). DDSLs are trained to the same standard as the DSL and in the absence of the DSL carry out those functions necessary to ensure the ongoing safety and protection of pupils. In the event of a long-term absence of the DSL a deputy will assume responsibility for all the activities described above. On a day-to-day basis, whilst the activities of the DSL can be delegated to appropriately trained deputies, the ultimate lead responsibility will not be delegated. Regular DSL meetings (at least every half term) are carried out.

3.4 The Head

The Head is responsible for ensuring that the procedures outlined in this policy are followed on a day-to-day basis. To this end the Head will ensure that:

- the safeguarding and child protection policy and procedures adopted by the governing body are implemented and followed by all staff;
- the allocation of sufficient time, training, funding, support and resources necessary to enable the DSL and DDSLs to carry out their roles effectively is given, including the assessment of pupils and attendance at strategy discussions and other necessary meetings;
- matters which affect pupil welfare are adequately risk assessed by appropriately trained individuals and for ensuring that the relevant findings are implemented, monitored and evaluated;
- systems are in place for children to express their views and give feedback which operate with the best interests of the child at heart;
- all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the School's Whistleblowing Policy and Low Level Concerns Policy;
- pupils are provided with opportunities throughout the curriculum and wider co-curricular programme to learn about safeguarding, including keeping themselves safe online;
- ensure safer recruitment procedures in line with Part 3 of KCSIE, September 2022 are being adhered to;

- they liaise with the Local Authority Designated Officer (LADO) before taking any action and on an ongoing basis, where an allegation has been made against a member of staff or volunteer; and
- they notify the Disclosure and Barring Service and, where appropriate, the Teaching Regulatory Authority of anyone who has harmed or may pose a risk to a child.

3.5 The Governing Board

The Governing Board has overall responsibility to ensure compliance with child protection statutory requirements and actively promote the wellbeing of pupils. It is the role of the Governing Board to provide scrutiny of Safeguarding Policy and practice. The governing body takes seriously its responsibility to fulfil its duty of care in promoting the welfare of children, ensuring their security and protecting them from harm. To this end the School's Governors will ensure that:

- all governors receive appropriate safeguarding and child protection training upon their induction and that this training is updated regularly.
- an effective, up-to-date child protection policy is in place and made available on the School's website;
- other policies, as prescribed in Part 2 of KCSIE, are in place and operational;
- required pre-employment checks are being carried out in a timely way and correctly recorded in the Single Central Register;
- all staff receive safeguarding training in accordance with this Policy;
- pupils are taught about safeguarding, including online safety;
- the School's safeguarding arrangements take into account the procedures and practice of the Berkshire West Safeguarding Children Partnership
- the School contributes to inter-agency working, including providing a co-ordinated offer of early help when additional needs of children are identified;
- appropriate filters and monitoring systems are in place to keep children safe online (including when they are online at home); and
- the School reports to their local authority any child who joins or leaves the School at non-

standard transition times in line with statutory and local authority guidance.

- Be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), Data Protection Act 2018, the UK GDPR and the local multi-agency safeguarding arrangements

3.6 The Safeguarding Governor

The School governors have appointed a nominated governor for safeguarding to take a lead in relation to responsibility for safeguarding arrangements. The nominated Governor:

- discusses safeguarding matters with the DSL once per term and more regularly if needed;
- liaises directly with the local authority and/or partner agencies where appropriate; and
- undertakes an annual audit of the School's safeguarding procedures and working with the DSL, submits a written report to the Governing Body with recommendations for further improvements. The annual written report will typically consider: the effectiveness and implementation of relevant policies; staff safeguarding training; staff recruitment procedures; the handling of safeguarding issues; referral management; the contribution the School is making to inter-agency working; and the provision for teaching pupils how to keep themselves safe. This audit will form part of the annual review undertaken by the Governing Body as a whole to ensure that all policies, procedures and training provided by the School are effective and comply with the law.

The nominated Governor for safeguarding is Mark Turner. Contact details are set out in Appendix 1.

4 The School's Child Protection Team

Designated Safeguarding Lead and Prevent Lead (Senior School)

Mr Adam Mallins, Deputy Head (Pastoral)

0118 987 1810 adammallins@crofields.com

Designated Safeguarding Lead and Prevent Lead (Prep School)

Mr Tom Goodhew, Deputy Head (Pastoral)

0118 987 1810 tomgoodhew@crofields.com

Designated Safeguarding Lead and Prevent Lead (EYFS and Pre-Prep)

Mrs Janey McDowell, Head of Pre-Prep
0118 987 1810 janeymcdowell@crofields.com

Safeguarding and Prevent Governor

Mr Mark Turner
020 894 01878 gov-MT@crofields.com

Deputy Designated Safeguarding Leads

Mrs Charlotte Reid, Head of Corylus with responsibility for Corylus House
charlottereid@crofields.com

Mr Ian Anderson, Head of Ilex with responsibility for Ilex House
iananderson@crofields.com

Mrs Sarah Harris, Head of Quercus, with responsibility for Quercus House
sarahharris@crofields.com

Mr Alex Murray-Smith, Head of Salix with responsibility for Salix House
alexmurraysmith@crofields.com

Miss Edwina Westacott, Head of Marlborough House, with responsibility for Marlborough House
edwinawestacott@crofields.com

Mr Matt Rowe, Head of School House, with responsibility for School House
matthewrowe@crofields.com

Mr Ben Keepax, Head of Lake House, with responsibility for Lake House
benkeepax@crofields.com

Mr Simon Dinsdale, Second Master
simondinsdale@crofields.com

Mrs Sue Nicholas, Nurse Manager
suenicholas@crofields.com

Miss Beth Hazel, Junior Nurse
bethhazel@crofields.com

Mr John Ireland, Deputy Head Academic (Junior School)

johnireland@crofields.com

Mrs Alice Westley-Smith, Deputy Head of Pre-Prep
alicewestley@crofields.com

The DSL or DDSLs are always available during School hours to discuss safeguarding concerns with staff, either in person or via telephone or email.

Outside of School hours and during out of term activities the DSL is available via the School office. Should the DSL be unavailable a designated member of the DSL team will assume responsibility.

Parents are welcome to approach any of the above if they have concerns about the welfare of any child in the School, whether these concerns relate to their own child or any other.

A printable copy of key safeguarding contacts including the School's child protection team can be found in Appendix 1 and 2.

5 Staff Training

5.1 Staff training encourages all members of staff to maintain an attitude of 'it could happen here' where abuse and neglect are concerned.

5.2 All training will be carried out in accordance with the BWSCP procedures.

5.3 Induction training for all new members of staff (including temporary staff and volunteers) includes formal child protection training which covers:

- This safeguarding policy and related policies on Anti-Bullying and Cyber-bullying, E-Safety, Mental Health and Prevent*;
- Part 1 and Annex A of KCSIE*;
- the role, identity and contact details of the DSL and Deputy DSLs;
- policies on acceptable use of IT and online safety for both pupils and staff (including when they are online at home)*;
- the pupil behaviour policy*;
- the School's children who go missing from education policy;
- the staff Code of Conduct*;
- the School policy on Whistleblowing*;
- the Berkshire West Safeguarding Children Partnership procedures and contact details.
- Individual roles, vulnerabilities and protecting themselves
- Wellbeing Manager entry (if applicable)

** Copies of these documents will be provided either in paper form or electronically as part of the induction process and new staff will be required to sign a declaration confirming they have read and understood them. A proportional,*

risk-based approach will be taken to determine the level of information provided to temporary staff and volunteers.

5.4 All staff, including the Head and volunteers involved in regulated activity, will undertake appropriate child protection training which, in line with BWSCP guidance, is updated every three years. In addition, all staff will receive safeguarding updates delivered through a combination of INSET, safeguarding newsletter updates, appropriate email updates and the completion of relevant e-courses on a regular basis and at least annually. Safeguarding training is coordinated by the DSL and includes online safety and Prevent training where appropriate.

5.5 All staff receive updated copies of the School policies referred to above and are required to confirm that they have read and understood them. In addition, Part 1 and, where appropriate, Annex A of KCSIE are reissued to staff at the start of every academic year and whenever this statutory guidance is updated by the DfE; staff are required to read this information and sign to say that they have understood them. Staff training provides an opportunity to check and consolidate their understanding of the policies. Staff can also access the policies and further on the Shared Staff folder.

5.6 The DSL team will regularly assess the appropriate focus for staff training so that it can respond to specific safeguarding concerns such as mental health, online safety, radicalisation, child sexual exploitation, child criminal exploitation, sexual violence and harassment, and female genital mutilation.

5.7 The DSL and Deputy DSLs undertake training that is in accordance with locally-agreed procedures to provide them with the knowledge and skills necessary to carry out their role. This training includes Prevent awareness training and will be updated every two years. Additional specialist training will be provided to those who have specific responsibility for safeguarding and Looked After Children. They also refresh their knowledge and skills at regular intervals (and at least annually) by following developments in safeguarding to:

- keep abreast of best practice for promoting a culture of listening to children;
- remain up to date on the mechanics of inter-agency working as operated by the BWSCP;
- understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments;
- have an up-to-date working knowledge of how local authorities conduct a child protection case conferences so they can contribute to these effectively when required to do so;
- be alert to the specific needs of children in need, those with special educational needs and young carers;
- understand and support the School with regard to the requirements of the Prevent duty and provide advice and support to staff on protecting children from the risk of radicalisation; and

- be able to keep proper written records of concerns and referrals.

5.8 All members of the Board of Governors receive training at least on a three-yearly basis to ensure they have the knowledge necessary to discharge their collective responsibility to exercise appropriate oversight over the School's safeguarding policies and procedures.

6 Hierarchy of Intervention

6.1 Every child and family is unique; their needs must be carefully considered with them so that the help they receive is right for them. Every practitioner is responsible for ensuring that the appropriate steps are taken to understand the level of need in order to get the right help, at the right time, from the right people. (BWSCP Threshold Guidance Autumn 2020)

6.2 The BWSCP publishes threshold guidance (see here [Threshold Guidance BWSCP Wokingham](#)) that all agencies, professionals and volunteers in the area can use to consider how best to meet the needs of individual children and young people. This guidance provides a summary of thresholds for intervention in relation to a continuum of need, ranging from children who need no additional intervention to those who require intensive help and specialist support. Children's needs are not static and they may experience different needs – at different points on the continuum – throughout their childhood years.

6.3 Within the continuum provided by the BWSCP there are four levels of intervention:

Level 1: Help for Everyone

Children, young people and their families who receive universal services have no additional needs; all their health and developmental needs will be met by universal services. These are children who consistently receive child focused care-giving from their parents or carers.

Level 2: Additional Help

Children with additional needs (including disabilities), who may be vulnerable and showing early signs of abuse and/or neglect; their needs are not clear, not known or not being met. These children and their families need some additional help so that their children can develop, learn and achieve their full potential. They may be living in a situation where the worries, concerns or conflicts are becoming more frequent or over an extended period. In order to resolve the issues, these children may require additional support, advice, direction and sometime planned intervention or additional resources.

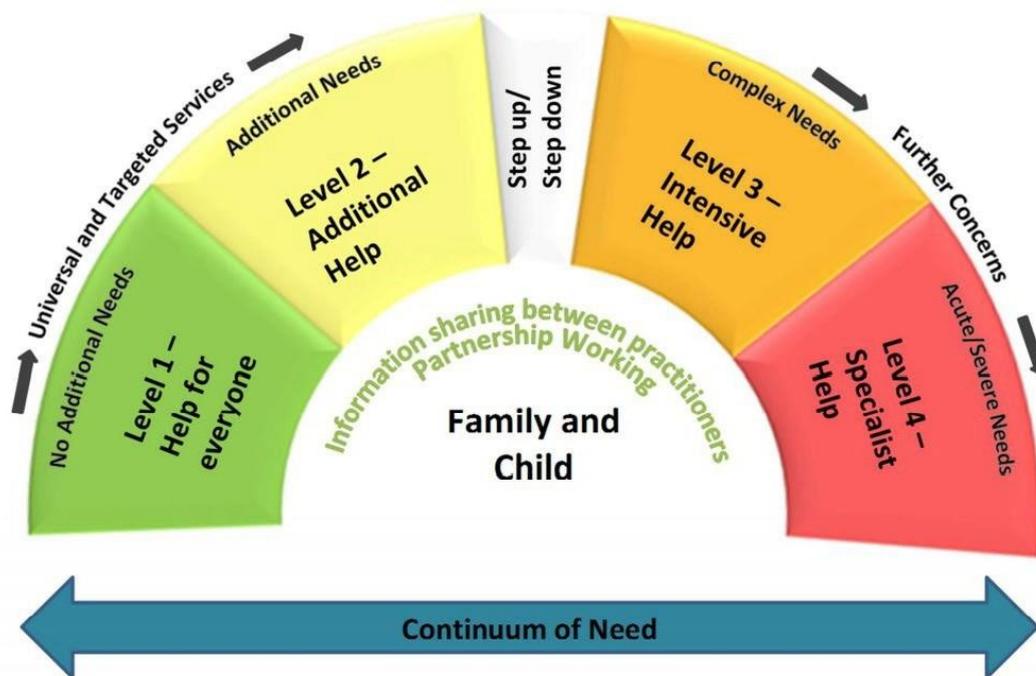
Level 3: Intensive Help

Children and families who require significant or complex personalised support, often from several

agencies working together, to help them to reach their potential. The child may be dealing with multiple longer-term issues such as a significant disability, anti-social or challenging behaviour, neglect or poor family relationships, long-term problems with education or health and they need support from services to ensure that the impact of these significant issues are minimised as much as possible. This is the threshold for a statutory assessment led by children’s social care under section 17, Children Act 1989.

Level 4: Specialist Help

Children who are living in circumstances where they are suffering or are likely to suffer significant harm, where the young person themselves may pose a risk of serious harm to others or where there are complex needs in relation to disability and may require a more specialist intervention. Children and young people will be referred to children’s social care and dealt with under section 47, 20 or 31 of the Children Act 1989. This will also include children who have been remanded into custody and statutory youth offending services.



7 Early Help Assessment

7.1 Early Help refers both to help in the critical early years of a child’s life and to help throughout a child, young person and family’s life too. Early help intervention should happen as soon as possible when difficulties emerge in order to prevent problems from worsening or becoming entrenched. Working Together 2018 states that ‘Providing early help is more effective in

promoting the welfare of children than reacting later. Early help means providing support as soon as a problem emerges, at any point in a child's life, from the foundation years through to the teenage years.'

7.2 The School recognises the important role that everyone in the School community, including pupils, play in recognising the need for early help.

7.3 Pupils are encouraged to raise concerns as soon as they are identified to any member of staff they feel comfortable with. There is also pupil worry boxes around the School and the worry button available to all pupils online which are regularly monitored by pastoral staff.

7.4 If staff believe that a pupil could benefit from early help, they should discuss the matter with the DSL who will, taking into account BWSCP's threshold criteria, consider what action should be taken. If early help is provided, the situation will be monitored carefully and a referral to children's social services made if the pupil's situation does not appear to be improving.

7.4 The School has various mechanisms to help identify emerging problems, including a thorough pupil recruitment process, the School's pastoral system, the Wellbeing and PSHEs programmes and various policies, including Anti-Bullying and Cyber-bullying, E-Safety, Child on Child Abuse, Sexual Harassment and Prevent. Staff training also prepares staff to identify children who might benefit from early help.

7.5 The School recognises the increased vulnerability of young people to whom any or all of the following apply:

- They are disabled, have certain health conditions or have specific additional needs .
- Have SEND, regardless of whether they have a statutory EHC plan.
- Have mental health needs.
- They do not have English as a first language.
- They are looked after children.
- They are acting as a young carer.
- They are showing early signs of abuse or neglect.
- Show signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
- They may be subject to discrimination and maltreatment on the grounds of race, religion, ethnicity, sexual orientation or sexual identity.
- Are in a family circumstance presenting challenges for them such as drug and alcohol misuse, adult mental health problems, or domestic abuse.
- Misuse of drugs or alcohol
- Are at risk of HBA, such as FGM or forced marriage.
- Are privately fostered

- Have family members in prison or are affected by parental offending.
- Are at risk of modern slavery, trafficking, or sexual or criminal exploitation.
- Are at risk of being radicalised or exploited.
- Are frequently missing or going missing from care or from home.

Such children may be more likely to need early help. Also, recognising abuse or neglect may be more difficult for these children for many reasons, including:

- assumptions that indicators of possible abuse such as behaviour, mood or injury relate to a pupil's disability without further exploration;
- that pupils with special educational needs or disabilities can be disproportionately impacted by bullying without outwardly showing any signs;
- communication barriers and difficulties overcoming these barriers; and
- a disabled child's understanding of abuse.

8 What to look out for and when to be concerned

8.1 All staff should be aware of the types and signs of abuse and neglect so that they are able to identify pupils who may be in need of help or protection. If staff are unsure, they should always speak to the DSL (or a Deputy DSL if the DSL is unavailable)

8.2 Child abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

8.3 Staff should be aware of the four main categories of child abuse which are commonly identified as outlined in KCSIE:

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

- **Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or

developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

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

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

8.4 Other forms of abuse which staff should be aware of are:

- Children missing from education
- Child sexual exploitation (CSE)
- Child criminal exploitation (CCE) County Lines
- Domestic abuse
- Honour-Based Abuse (HBA): Female Genital Mutilation (FGM), Forced marriage and Breast Ironing
- Radicalisation
- Children and the court system
- Children with family members in prison

- Homelessness
- Sexual violence and sexual harassment
- Child abduction and community safety incidents
- Cybercrime
- Modern Slavery and the National Referral Mechanism

These are defined more fully in Appendix 3 and 4 and further information is contained in Part 1 and Annex A of KCSIE.

8.5 All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the School and/or can occur between young people outside these environments. This is known as contextual safeguarding. All staff should consider, and especially those within the safeguarding team, whether students are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of forms and young people may be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence. Further information can be found here: [Contextual Safeguarding Network](#). All staff will be aware of the appropriate action to take following a pupil being identified as at potential risk of abuse and, in all cases, will speak to the DSL if they are unsure.

The school is aware that the Police, Crime, Sentencing and Courts Act will introduce a new duty in early 2023 on a range of specified authorities, such as the police, to share data and information, and put plans in place to prevent and reduce serious violence within their local communities. The School will be under a separate duty to cooperate with core duty holders when asked and will ensure arrangements are in place to do so.

All staff will be aware that technology is a significant component in many safeguarding and wellbeing issues, including online abuse, cyberbullying, and the sharing of indecent images.

8.6 . Pupils potentially at greater risk of harm

The school recognises that some groups of pupils can face additional safeguarding challenges, and understands that further barriers may exist when determining abuse and neglect in these groups of pupils. Additional considerations for managing safeguarding concerns and incidents amongst these groups are outline below.

Pupils who need social workers

Pupils may need social workers due to safeguarding or welfare needs. These needs can leave pupils vulnerable to further harm and educational disadvantage.

As a matter of routine, the DSL will hold and use information from the LA about whether a pupil has a social worker in order to make decisions in the best interests of the pupil's safety, welfare, and

educational outcomes.

Where a pupil needs a social worker, this will inform decisions about safeguarding, e.g. responding to unauthorised absence, and promoting welfare, e.g. considering the provision pastoral or academic support.

Pupils with SEND

When managing safeguarding in relation to pupils with SEND, staff will be aware of the following:

- Certain indicators of abuse, such as behaviour, mood and injury, may relate to the pupil's disability without further exploration; however, it should never be assumed that a pupil's indicators relate only to their disability
- Pupils with SEND can be disproportionately impacted by issues such as bullying, without outwardly showing any signs
- Communication barriers may exist, as well as difficulties in overcoming these barriers

When reporting concerns or making referrals for pupils with SEND, the above factors will always be taken into consideration. When managing a safeguarding issue relating to a pupil with SEND, the DSL will liaise with the school's SENCO, as well as the pupil's parents where appropriate, to ensure that the pupil's needs are met effectively.

LGBTQ+ pupils

The fact that a pupil may be LGBTQ+ is not in itself an inherent risk factor for harm; however, staff will be aware that LGBTQ+ pupils can be targeted by other individuals. Staff will also be aware that, in some cases, a pupil who is perceived by others to be LGBTQ+ (whether they are or not) can be just as vulnerable as pupils who identify as LGBTQ+.

Staff will also be aware that the risks to these pupils can be compounded when they do not have a trusted adult with whom they can speak openly with. Staff will endeavour to reduce the additional barriers faced by these pupils and provide a safe space for them to speak out and share any concerns they have.

Pupils requiring mental health support

All staff will be made aware that mental health problems can, in some cases, be an indicator that a pupil has suffered, or is at risk of suffering, abuse, neglect or exploitation.

9 Signs of Abuse

9.1 Possible signs of abuse as outlined in 'What to do if you are worried about a child (DfE, March 2015) include the following (but are not limited to and do not necessarily mean that abuse is occurring):

- Children whose behaviour changes – they may become aggressive, challenging, disruptive, withdrawn or clingy, or they might have difficulty sleeping or start wetting the bed;
- Children with clothes which are ill-fitting and/or dirty;
- Children with consistently poor hygiene;
- Children who make strong efforts to avoid specific family members or friends, without an obvious reason;
- Children who don't want to change clothes in front of others or participate in physical activities;
- Children who are having problems at School, for example, a sudden lack of concentration and learning or they appear to be tired and hungry;
- Children who talk about being left home alone, with inappropriate carers or with strangers;
- Children who reach developmental milestones, such as learning to speak or walk, late, with no medical reason;
- Children who are regularly missing from School or education;
- Children who are reluctant to go home after School;
- Children with poor School attendance and punctuality, or who are consistently late being picked up;
- Parents who are dismissive and non-responsive to practitioners' concerns;
- Parents who collect their children from School when drunk, or under the influence of drugs; • Children who drink alcohol regularly from an early age;
- Children who are concerned for younger siblings without explaining why;
- Children who talk about running away; and
- Children who shy away from being touched or flinch at sudden movements

9.2 Further guidance is provided in Appendix 4. Other sources of information on the signs of abuse include: [BWSCP, What do do if you are concerned about a child DfE 2015](#); and [Spotting the signs of abuse NSPCC](#)

10 Listening to Pupils and Record Keeping

10.1 The School provides a range of opportunities for pupils to be listened to. These include: daily interactions with their tutor; Year group meetings; house councils / forums; School counsellors and medical team; annual wellbeing surveys.

10.2 Contact details for Childline, the NSPCC and Kooth (seniors only) are available on posters around the School as are details about the School's counselling service and medical centre.

10.3 If a pupil discloses that he or she has been abused or neglected in some way, the member of staff should:

- immediately stop any other activity to listen;
- listen carefully to the pupil and keep an open mind - do not interrupt the child or be afraid of silences;
- limit the questioning to the minimum necessary for clarification using "what, when, how, where" but avoid using leading questions such as, "has this happened to your siblings?" which may prejudice an investigation;
- not make any attempt to investigate the incident themselves or make a decision as to whether or not the pupil has been abused;
- reassure the pupil, but never promise not to tell anyone. Instead, explain who has to be told to ensure that proper action is taken in accordance with this policy;
- discuss the conversation with the DSL as soon as possible and take no further action unless instructed to do so by the DSL.
- only share information on a need-to-know basis; and
- make a full written record of the conversation as set out below.

10.4 Staff must record in writing all concerns, discussions and decisions made about a child as soon as possible on Wellbeing Manager. Details of how to do this can be seen in Appendix 7. The recording must be a clear, precise and factual account of the conversation or observations. Where a child has made a disclosure, the record must include details of:

- its date, time and place
- what was said and done by whom and in whose presence
- any noticeable non-verbal behaviour or words used by the child.

Any other evidence (for example, scribbled notes, mobile phones containing text messages, clothing, computers) must be kept securely and passed on to the DSL as soon as possible. No copies should be retained by the member of staff or volunteer. Notes may be scanned and uploaded onto Wellbeing Manager Where a report includes an online element, staff should,

where possible, avoid viewing illegal images of a child and under no circumstances should such images be forwarded electronically.

Further guidance is available on what to do if viewing an image is unavoidable on:

- <https://www.gov.uk/government/publications/searching-screening-and-confiscation>
- <https://www.gov.uk/government/groups/uk-council-for-child-internet-safety-ukcci>

10.5 Documents relating to Child Protection are held securely by the Head, DSL and digitally using the safeguarding software, Wellbeing Manager. These documents are passed securely to the DSL at the receiving School when a child leaves Crosfields. Documents are kept for 25 years from the child's date of birth.

10.6 If a pupil is withdrawn from Crosfields School, having not reached the normal date of transfer, due to a family move or any other reason, all efforts will be made to identify any new address and the School to which they are being admitted, to ensure that their educational records are sent without delay to that School. If the parent/carer fails to provide this information, an urgent referral will be made by the Head to the BWSCP.

10.7 If Crosfields School receives educational records concerning a child who is not registered here, the records will be returned to the sending School with a note advising them to contact their local Children's Services.

10.8 The content of Child Protection conferences or Review reports prepared by the School, will follow the headings recommended by the BWSCP and will, wherever possible, be shared with the parents/carer in advance of meetings.

10.9 Archived records will be kept in accordance with DfE guidelines and data protection principles.

11 Procedure to be followed by staff if they have concerns about a pupil's welfare

11.1 Concerns about a child may arise from:

- Observation of the child's behaviour or appearance.
- Things the child has said.
- A third party (another pupil, parent or guardian) who expresses concern.
- Receipt of an anonymous allegation.

11.2 If a member of staff has concerns about a pupil's welfare (including any mental health concerns), they must inform the DSL as soon as possible, unless the concerns involve an allegation against a member of staff, in which case the procedures set out in the section Allegations against members of staff and volunteers below should be followed. Staff should be aware that the GDPR and Data Protection Act 2018 do not prevent, or limit, the sharing of information for the purpose of keeping children and young people safe.

11.3 All concerns, discussions, decisions made and the reasons for those decisions should be recorded in writing on Wellbeing Manager (see section 10 of this policy and Appendix 7). If in doubt about recording requirements, staff should discuss with the DSL.

11.4 When a child is not considered at risk of harm, but still has an unmet need that could mean they are a Child in Need, a referral should be made by the DSL to Children's Social Care. Parental consent for referrals of this type is not required in these circumstances. However, it is best practice for such concerns to be discussed first with parents and any subsequent referral to be made transparently with their knowledge.

11.5 If a pupil is in **immediate danger** or is at **risk of harm**, a referral should be made to children's social services and/or the police **immediately**. Anyone can make a referral, although if a referral is made by someone other than the DSL, the DSL should be informed as soon as possible. Further guidance is available from the National Police Chief's Council: [When to call the Police](#)

11.6 If a teacher or member the medical team discovers that an act of female genital mutilation (FGM) appears to have been carried out on a girl under 18, the individual must report this to the police. Unless the individual has a good reason not to, they should also still inform the DSL. This statutory duty does not apply to suspected cases of FGM or those at risk of FGM, which should both be addressed in accordance with the safeguarding procedures described in this policy. (For further details, see Annex A of KCSIE and 'Guidance for Schools' information)

11.7 The normal safeguarding procedures outlined in this Policy must be used when there are concerns about children who may be at risk of being drawn into terrorism.

11.8 Parents can report to the DSL on the welfare of any pupil in the School, whether their own child or not. If preferred, parents may discuss concerns in private with the pupil's teacher or other member of staff, who will notify the DSL.

11.9 Any member of staff may refer a matter to children's social services directly. This could happen in exceptional circumstances such as in an emergency or if there is a genuine concern that appropriate action has not been taken.

12 Duties of the DSL on being notified of a concern about a pupil's welfare

12.1 When the DSL is notified of any concerns about a pupil's welfare, he or she will decide on the appropriate course of action. In particular, the DSL will decide whether a referral should be made to children's social services.

12.2 Factors that the DSL should bear in mind when making their decision include:

- the best interests of the child
- the nature and seriousness of the complaint
- the referral threshold set by the Local Safeguarding Board
- the child's wishes or feelings
- the inter-agency procedures of the BWSCP
- where relevant, local information sharing protocols relating to Channel referrals.

12.3 If the DSL decides not to make a referral, but to support the pupil with early help, the DSL will keep the situation under review and a later referral to children's social services will be made if the pupil's situation does not appear to be improving.

13 Making a Referral to Children's Social Services

13.1 If a pupil is NOT in immediate danger or at risk of suffering harm but is in need of additional support from one or more agencies, the DSL will make a referral to children's social services in the Local Authority in which the child lives. Due to the wide catchment of Crosfields School there are a number of local authorities that might be contacted. Contacts can be found in Appendix 2.

13.2 If the initial referral is made by telephone, the DSL should confirm the referral in writing. Confirmation of the referral and details of the decision on what action will be taken should be received from the Local Authority within one working day. If this is not received, the DSL should

contact children's social services again.

13.3 If the DSL is not sure whether a referral should be made, he/she will consult with children's social services on a no-names basis. However, if at any stage sufficient concern exists that a pupil may be at risk of harm or in immediate danger, a referral to children's social services and/or the police will be made immediately.

13.4 If the referral is made by a member of staff other than the DSL, the DSL should be informed as soon as possible that a referral has been made.

13.5 The School is not required to obtain parental consent prior to a referral being made to statutory agencies.

13.6 Information must be shared with the minimum of people and the child concerned given clear avenues of support and communication.

13.7 If, after a referral, the pupil's situation does not appear to be improving, the DSL should contact children's social services again to follow the matter up and ensure that their concerns are addressed and the pupil's situation improves.

13.8 Where relevant, the School will co-operate with the Channel panel and the police in providing any relevant information so that each can effectively carry out its functions to determine whether an individual is vulnerable to being drawn into terrorism. The School will respond to requests for information from the police promptly and in any event within five to ten working days.

13.9 Where a child and family would benefit from coordinated support from one or more agencies (for example: education, health, housing, police) there should an inter-agency early help assessment and procedures will be put in place by children's services to arrange this. The School will coordinate with the local agencies involved.

13.10 An outline of the safeguarding reporting and referral process can be found in Appendix 6.

14 Informing Parents

14.1 Parents will usually be informed of any action to be taken under these procedures. However, there may be circumstances when the DSL will need to consult with the Local Authority Designated Officer (LADO), children's social services, the police and/or the Head before discussing details with parents.

14.2 For Channel referrals, the DSL will consider seeking the consent of the pupil (or their parent/guardian) when determining what information can be shared. Whether or not consent is sought will be dependent on the circumstances of the case but may relate to issues such as the health of the individual, law enforcement or protection of the public.

14.3 When the School decides to refer a particular complaint of abuse to social services or the police, the parents/guardian and pupil will be informed in writing of their right to make their own complaint or referral to social services or the police, where appropriate, and will be provided with contact names, addresses and telephone numbers.

14.4 For the avoidance of doubt, referrals do not require parental consent. Staff must act in the best interests of the child, even if this means making a referral against the parents' wishes.

15 Concerns or Allegations relating to staff including supply teachers, volunteers and contractors

15.1 Guidance to staff

In this section reference to allegations also covers concerns.

Guidance is given to staff to be circumspect about placing themselves in situations which may:

- put themselves or their pupils at risk of harm; or
- give rise to allegations of abuse.

To reduce the risk of allegations, staff should be aware of safer working practices and should be familiar with the detailed guidance on acceptable behaviour and actions contained in the Staff Code of Conduct. Specific information about protecting themselves, such as Changing Room Guidance, is given in individual staff inductions and in the safeguarding training.

Particular care should be taken where staff have one-to-one meetings with pupils, or where they work in changing rooms/swimming areas.

15. 2 As part of the whole school approach to safeguarding, Crosfields school promotes an open and transparent culture in which all concerns about all adults working in or on behalf of the school (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately. All concerns about adults (including allegations that do not meet the harms threshold, see sections below) are shared responsibly and with the right person, recorded and dealt with appropriately. All

allegations relating to staff are taken seriously, whether made about events in their private or professional life.

This culture aims to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the school are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of Crosfields.

There are two levels of allegations/concern:

- Allegations that may meet the harms threshold
- Allegations/concerns that do not meet the harms threshold – referred to for the purpose of this guidance as “low level concerns”.

15.3 Allegations that may meet the harms threshold

The following procedures will be used where it is alleged that a member of staff, volunteer or supply teacher has:

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

(this may include an incident outside of School which did not involve children but could have an impact on their suitability to work with children, for example an incident of domestic abuse).

These procedures aim to strike a balance between the need to protect children from abuse and the need to protect staff and volunteers from false, malicious or unfounded allegations. The procedures follow Part four of KCSIE. Reporting an allegation about staff if an allegation is made about staff that appears to meet the criteria in paragraph 15.3:

- Where an allegation is made about a member of staff, supply staff, the DSL or volunteer, the matter should be reported immediately to the Head or in the Head's absence, the DSL, the Nominated Governor for Safeguarding or Chair of Governors. The adult to whom the allegation relates should not be informed without the explicit consent of the LADO. The contact details for the LADO can be found in Appendix 2.

- Allegations about the Head should be reported to the Chair of Governors, or in his absence the Nominated Safeguarding Governor without first notifying the Head.
- Allegations about a governor should be reported to the Chair or the Nominated Safeguarding Governor. If the allegation is against either the Chair or the Nominated Safeguarding Governor, the matter should be reported to the other.
- The Head, Chair or Nominated Safeguarding Governor who receives any such allegation is referred to in these procedures as the 'case manager'.

15.4 Action to be taken by the case manager

If the case manager is unsure whether the allegation meets the criteria in para 15.2 above, the LADO will be consulted for advice. Any allegations meeting the criteria in para 15.2 will be dealt with in accordance with the BWSCP procedures. All such allegations must be dealt with as a priority so as to avoid any delay.

The case manager will immediately (and in any event within one working day) discuss the matter with the Local Authority Designated Officer (LADO) – the person designated by the local authority to be involved in the management of allegations against people who work with children before further action is taken. The case manager may also consult with the DSL, but no attempt will be made to investigate the allegation until the LADO is consulted. The purpose of the initial discussion between the case manager and the LADO is to consider the nature, content and context of the allegation and agree a course of action. All discussions with the LADO should be recorded in writing.

The initial sharing of information and evaluation may lead to a decision that no further action is to be taken in regard to the individual facing the allegation or concern, in which case this decision and a justification for it will be recorded by both the case manager and the LADO, and agreement reached on what information should be put in writing to the individual concerned and by whom.

In situations where a person is deemed an immediate risk to children or where there is evidence of a possible criminal offence, the case manager may, in consultation with the LADO, request police involvement from the outset.

Allegations against a teacher who is no longer teaching and historical allegations will be referred to the police.

15.5 Disclosure of information

- The case manager will inform the accused person of the allegation as soon as possible after the LADO has been consulted.

- The parents of the pupil involved will be informed of the allegation as soon as possible if they do not already know of it, although where external agencies are involved, the case manager will not inform the accused or the parents until it has been agreed what information can be disclosed. Parents will be kept informed of the progress of the case, including the outcome of any disciplinary process.

The timing and extent of disclosures, and the terms on which they are made, will be dependent upon and subject to the laws on confidence and data protection and the advice of external agencies.

15.6 Investigation

Allegations about safeguarding are usually conducted by external agencies such as social services or the police rather than by the School. In some cases, the LADO may ask for further enquiries to be made before a formal decision is reached about how to proceed. When this occurs, the LADO will provide specific guidance as how and by whom the investigation should be conducted.

Where an external agency is conducting the investigation rather than the School, the School will cooperate fully with external investigators. No internal investigation into possible breaches of the School's disciplinary code will commence until any external investigation or criminal proceedings are complete.

The School will take the lead in any investigation involving a supply teacher to ensure that the allegation is dealt with properly and to recognise the fact that the agency would not have direct access to children or other School staff. They would therefore not be able to collect the facts or liaise with the LADO. The School will ensure that agency is fully involved in the management of any allegations.

In accordance with DfE statutory guidance, the following definitions will be used when determining the outcome 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

False: there is sufficient evidence to disprove the allegation

Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence

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

allegation being made

15.7 Support

The School has a duty of care towards its employees and will ensure that effective support is provided for anyone facing such an allegation. A representative will be appointed to keep him or her informed of the progress of the case and to consider what other support is available.

Support will also be offered to the pupil(s) affected and their parents/guardians. The School will consult with the children's social services, or the police as appropriate, as to how this can be done in the most appropriate and effective way

15.8 Suspension

Suspension will not be an automatic response to an allegation and will only be considered in a case where there is cause to suspect a pupil or other pupils at the School is or are at risk of significant harm or the allegation is so serious that it might be grounds for dismissal. The School will consider whether the result that would be achieved by suspension could be obtained by alternative arrangements, such as redeployment. A member of staff will only be suspended if there is no reasonable alternative. The School will balance the need to ensure the safety and welfare of the pupil with the need for a full and fair investigation. The LADO will be consulted as to the appropriate action to take.

If suspension is deemed appropriate, the reasons and justification will be recorded by the School and the individual notified of the reasons for the suspension. The School will ensure that the suspended person is given the contact details for the representative who has been appointed to keep him or her informed about the progress of the case.

If it is decided that the person who has been suspended should return to work, the School will consider how to facilitate this; for example, whether a phased return would be appropriate. The School may provide a mentor and will also consider how to manage contact with the pupil who made the allegation. If the member of staff is residential on the School site, alternative accommodation may be provided.

15.9 Confidentiality

The School will make every effort to guard the privacy of all parties during and after an investigation into an allegation. It is in everyone's best interest to maintain this confidentiality to ensure a fair investigation with minimum impact for all parties.

A breach of confidentiality will be taken seriously and may warrant its own investigation. It is a criminal offence to publish information that could lead to the identification of a member of staff who is the subject of an allegation before they are charged with an offence. Publication includes any speech, writing, relevant programme or other communication in whatever form, which is addressed to the public at large or any section of the public.

15.10. Malicious or unsubstantiated allegations

If an allegation by a pupil is shown to have been deliberately invented or malicious, the Head will consider whether to take disciplinary action against the pupil in accordance with the School's Behaviour and Discipline Policy.

If a parent has made a deliberately invented or malicious allegation the Head will consider whether to require that parent to withdraw their child or children from the School, on the basis that they have treated the Head or a member of staff unreasonably.

Whether or not the person making the allegation is a pupil or a parent (or other member of the public), the School reserves the right to contact the police to determine whether any action might be appropriate.

15.11. Record keeping and references

Details of allegations that are found to be malicious will be removed from personnel records. For all other allegations, a comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken will be kept on the employee's file. A copy of this summary will be provided to the individual concerned. Such records will be retained at least until the employee reaches the normal pension age (or for a period of ten years from the date of the allegation, if this is longer).

When providing employer references, Crosfields will not refer to any allegation that has been proven to be false, unsubstantiated or malicious, or any history of allegations where all such allegations have been proven to be false, unsubstantiated or malicious.

15.12 Dismissals and resignations

If an allegation is substantiated and the member of staff, contractor or volunteer is dismissed because they are unsuitable to work with children, or would have been had the person not resigned, a settlement agreement (sometimes referred to as a compromise agreement) will not be used and a report to the Disclosure and Barring Service will be made promptly and in any event within one month of the person leaving the School.

Any such incidents will be followed by a review of the safeguarding procedures within the School with a report being presented to the governors without delay.

If a member of staff, contractor or volunteer tenders his or her resignation, or ceases to provide his or her services, any child protection allegations will still be followed up by the School in accordance with this policy and a referral will be made to the Disclosure and Barring Service as soon as possible (within one month) if the criteria for referral are met.

If a teacher has been dismissed, or would have been dismissed had they not resigned, in cases involving unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction for a relevant offence, the School will give separate consideration to whether a referral should be made to the Teaching Regulatory Authority. The School will follow the advice set out in the TRA documents: [Teacher misconduct: information for teachers](#) and [Teacher misconduct: the prohibition of teachers](#) (as updated from time to time) to decide whether a referral should be made.

15.13. Allegations that may not meet the harms threshold (Low level concerns)

What is a low level concern?

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold set out at 15.3. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that:

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

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

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

It is crucial that all low-level concerns are shared responsibly with the right person, and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools and colleges from becoming the subject of potential false low-level concerns or misunderstandings.

Sharing low-level concerns

Low-level concerns about a member of staff, supply staff, volunteer or contractor should be reported to the Head either face to face or by email. A low-level concern can be reported anonymously via a link on the staff home page. Reports about supply staff and contractors should be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

Recording low-level concerns

All low-level concerns should be recorded in writing. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

Any records will be kept with the Head and but they will be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR)

Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, Crosfields will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it will be referred to the LADO.

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

Responding to low-level concerns

The school or college policy should set out the procedure for responding to reports of low-level

concerns.

If the concern has been raised via a third party, the Head should collect as much evidence as possible by speaking:

- directly to the person who raised the concern, unless it has been raised anonymously;
- to the individual involved and any witnesses.

The information collected will help them to categorise the type of behaviour and determine what further action may need to be taken. All of this needs to be recorded along with the rationale for their decisions and action taken.

16 Arrangements for dealing with child-on-child abuse and allegations

16.1 The school adopts a zero-tolerance stance on child-on-child abuse of any kind. Staff should be aware that whilst there may be no reported cases of child-on-child abuse, such abuse could still be taking place, and they should therefore remain alert to this.

Most instances of pupils causing harm to each other will be dealt with under the School's Anti-bullying and Behaviour Policies. However, all staff should be aware that safeguarding concerns can arise as a result of conduct by a pupil towards another (sometimes referred to as child-on-child abuse). For the purposes of this policy, "child-on-child" abuse is defined as abuse between children.

Examples of pupils' conduct towards each other that could raise safeguarding concerns are:

- Bullying, including cyberbullying and prejudice-based or discriminatory bullying
- Abuse in intimate personal relationships between children -- sometimes known as 'teenage relationship abuse'
- physical abuse such as hitting, kicking, biting etc – this may include an online element which facilitates, threatens and/or encourages physical abuse.
- sexual violence – this may include an online element which facilitates, threatens and/or encourages sexual violence
 - sexual harassment including online sexual harassment which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent
- The consensual and non-consensual sharing of nude and semi-nude images and/or videos
- initiation/hazing types violence and rituals – this may include an online element
- Upskirting

16.2 Evidence shows that boys are more likely to be perpetrators and girls to be victims of child-on-child abuse. Child-on-child abuse often manifests itself differently for boys than it does for girls. For

example, girls seem to be at greater risk of sexual assault and/or exploitation whereas boys seem to be at greater risk of physical gang-related violence and serious youth violence. Crosfields School has a zero tolerance approach to abuse and at no stage should such behaviour be labelled as “banter” or “boys being boys” as this could lead to a culture of unacceptable behaviours and an unsafe environment for children.

Students with Special Educational Needs or Disabilities are particularly vulnerable to child-on-child abuse.

16.3 Sexual violence and sexual harassment can occur between students of any age and sex. However, staff should be aware that some groups are at greater risks than others. Girls, students with SEND, and LGBTQ+ students are more likely to be victims of these types of abuse. Sexual violence includes acts such as sexual assault, assault by penetration, and rape. A key feature of such acts is that the sexual activity takes place without the consent of the victim. Consent can only be given if an individual has the freedom and capacity to choose to participate in a sexual act.

Sexual harassment refers to ‘unwanted conduct of a sexual nature’ and can occur online and offline. Sexual harassment can take a wide variety of forms:

- Sexual comments e.g. making lewd comments or sexualized remarks about a person’s clothes or appearance, using sexualised names etc
- Physical behaviour e.g. deliberately brushing against someone, interfering with clothing (flicking bra straps, lifting up skirts etc), displaying pictures, drawings or photos of a sexual nature
- Online harassment e.g. non-consensual sharing of images & videos, unwanted sexualised comments and messages

16.4. Crosfields School has an important role in developing students’ understanding of what constitutes child-on child abuse and instilling behavioural norms that minimise the risk of it taking place. All staff should be familiar with the School’s ‘Child-on-child abuse’ policy and the ‘Sexual harassment policy’. Staff should also be aware of the importance of:

- enforcing the School’s rules which are explicit about the high standards of behaviour and courtesy the School expects
- implementing in a consistent way its Behaviour Policy
- being clear that sexual violence or sexual harassment is abusive behaviour and be dismissed as

'banter', 'just having a laugh' or 'boys being boys'

- implementing the School's anti-bullying strategy and promoting the School values.

Other strategies in place to prevent the occurrence of child-on-child abuse include:

- providing developmentally appropriate well-being lessons which develop pupils' understanding of acceptable behaviour. Themes covered in these lessons that are particularly relevant to child-on-child abuse include: consent, gender roles, stereotyping and equality, healthy relationships, and power imbalances in relationships
- having systems in place to for any students to raise concerns with staff, knowing that they will be taken seriously, be supported and kept safe.
- delivering targeted work on assertiveness and keeping safe for those students identified as being potentially vulnerable
- All staff will be trained to manage a report of child-on-child sexual violence and sexual harassment.

16.5. If an allegation of child-on-child abuse, including the sharing of consensual or non-consensual nude or semi-nude imagers and/or videos, has been made the DSL must be informed as soon as possible. Children will be able to report such abuse confidentially to a teacher or the DSL in the comfort that such allegations will be treated seriously. Where the DSL considers that the behaviour meets the local authority threshold criteria, the case will be referred to the local authority using the procedures set out in this policy. The School will take advice from children's social services on when and how to inform the pupil about the allegations and how the investigation of allegations should be conducted. It will also take all appropriate action to ensure the safety and welfare of all pupils involved including those accused of abuse. Further details on how cases of child-on-child abuse will be managed is contained in Part 5 of KCSIE and in the School Child-on-child abuse policy.

A pupil against whom an allegation of abuse has been made may be suspended during the subsequent investigation and the School's policies on behaviour and discipline will apply.

If it proves necessary for a pupil to be interviewed by the police in relation to allegations of abuse, the School will ensure that, subject to the advice of children's social services, parents are informed as soon as possible and that an appropriate adult supports the pupil during the interview. If a pupil's parents are abroad, the pupil's education guardian will be asked to support the pupil and to accommodate him or her if they have been suspended.

16.6. Both the victim and the perpetrator will be treated as being at risk and safeguarding procedures in accordance with this policy will be followed. The DSL as part of these procedure swill produce a welfare risk assessment which will consider the needs of all those involved (victim, perpetrator and other pupils at the School) and the measures that need to be taken to protect and keep them safe. When compiling the risk assessment appropriate weight will be given to: the wishes of the victim; the nature of the alleged incident; the ages of those involved; whether the incident was an isolated one or part of a pattern; any power imbalance between the victim and perpetrator; any ongoing risks to the victim and other pupils; and any relevant contextual factors. Children’s social services will independently risk assess the situation and any report produced by them will be used to inform and update the School’s own risk assessment which, in any event, will be reviewed on a regular basis.

17 Other Safeguarding Arrangements

17.1 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 students 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 young people 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 by raising the issue with the DSL, who may in turn contact an appropriate external agency. Further details are provided in the School’s Mental Health policy.

17.2 Teaching pupils to keep themselves safe (Preventative Education)

The School is committed to educating pupils about safeguarding issues, which are explored in a variety of contexts, including collect, wellbeing and PSHE lessons, tutorials, house assemblies, additional pastoral talks and opportunities within the curriculum. Issues covered include online safety, radicalisation, grooming, child sexual exploitation, child criminal exploitation, healthy relationships,

mental health, substance misuse and bullying.

Pupils are also taught how to identify risks and how to modify their behaviour to mitigate these risks. Staff are aware of the ongoing need to promote fundamental British values as a means of building resilience to the risks of radicalisation.

The safe use of technology is a focus in all areas of the curriculum and key ICT safety measures are routinely reinforced in lessons, assemblies and at pastoral events, The School has an Acceptable Use of IT policy. It manages access to the internet via 3G, 4G and 5G through the use of filters and monitoring systems to ensure IT is being used in a safe and appropriate manner.

Staff will be aware of the filtering systems in place and will know how to escalate concerns where they are identified.

Further information regarding the school's approach to online safety can be found in the Online Safety Policy.

Communicating with parents

As part of the usual communication with parents, the school will reinforce the importance of pupils being safe online and inform parents that they will find it helpful to understand what systems the school uses to filter and monitor online use.

The school will also make it clear to parents what their children are being asked to do online for school.

17.3 Education of parents

The School also educates parents on safeguarding and pastoral matters through items in the newsletter, Parental talks and the Wellbeing blog.

17.4 Mobile phones and cameras

The use of personal electronic devices, including mobile phones and cameras, by staff and pupils is closely monitored by the school, in accordance with the appropriate use policy. For the purpose of this guidance, the term 'mobile phone' relates to any portable personal device that can be used to take photos or for communication.

Staff working with EYFS children:

- Any member of staff working **in** EYFS or **with** EYFS children must keep their mobiles stored safely away and should not be carried on their person. These members of staff may only use their mobile phones in staff areas away from the children.

Staff working with children outside of EYFS:

- Outside of EYFS Crosfields staff are permitted to carry and use their mobile phones within the guidelines provided.

Staff should also:

- ensure that their phones are protected with PIN/access codes in case of loss or theft. Access to school accounts through mobile devices must be protected by two-factor authentication.
- avoid making use of personal mobile phones on the school premises during times when they are teaching or supervising children, or, in the case of non-teaching staff, when undertaking their daily working routine, unless there is a business need to do so. Business need includes but is not limited to using 3CX to make business calls, registering pupils on ISAMS, finding out details on SOCS, plugging mobile into a speaker to play music.
- never use a mobile phone in any changing room, toilet or in the swimming pool.
- never take an image or video of pupils on a personal device. A school device should be used.
- ensure that a school device is used for 'posting' to school social media accounts if images or videos are involved.
- never contact pupils or those connected with the family of the pupil **unless making a call to parents through 3CX.**
- never give their home telephone number or mobile phone number to pupils. The same applies to parents/carers, unless permission is given by the Head.
- never store parents' or pupils' telephone or contact details on their mobile phone. For teachers who are also parents at the school, they should take care to differentiate between their professional roles and their personal selves such that their interactions cannot be misconstrued in any way. Staff should consult with a member of the Senior Leadership Team for further guidance or if they have a concern.
- never send, or accept from anyone, texts or images that could be viewed as inappropriate. If a member of staff suspects a message, text or similar may contain inappropriate content it should not be opened and a DSL should be contacted.

Staff should ensure that any mobile phones and/or cameras are used in accordance with the School's acceptable use policies (for both staff and children).

17.5 Risk assessment

The School recognises that the evaluation of risks and putting in place measures to mitigate those risks contributes to promoting the welfare and protection of pupils. Risk assessments may pertain to the whole School, to specific curricular or extra-curricular activities that have hazards associated with them, or to individual pupils or staff. The procedures for conducting, recording and monitoring risk assessments are set out in full in the School Risk Assessment Policy.

17.6 Safer recruitment

The school's full policy and procedures for safer recruitment are outlined in the Recruitment Policy.

An enhanced DBS check with barred list information will be undertaken for all staff members engaged in regulated activity. A person will be considered to be in 'regulated activity' if, as a result of their work, they:

- Are responsible on a daily basis for the care or supervision of children.
- Regularly work in the school at times when children are on the premises.
- Regularly come into contact with children under 18 years of age.

The DfE's [DBS Workforce Guides](#) will be consulted when determining whether a position fits the child workforce criteria.

The appropriate DBS and suitability checks will be carried out for all governors, volunteers, and contractors.

Staff suitability

All centres providing care for pupils under the age of eight must ensure that staff and volunteers working in these settings are not disqualified from doing so under the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018. A person may be disqualified if they:

- Have certain orders or other restrictions placed upon them.
- Have committed certain offences.

All staff members are required to sign the [declaration form](#) provided in the appendices of this policy confirming that they are not disqualified from working in a schooling environment. A disqualified person will not be permitted to continue working at the school, unless they apply for and are granted a waiver from Ofsted. The school will provide support with this process.

Ongoing suitability

Following appointment, consideration will be given to staff and volunteers' ongoing suitability – to prevent the opportunity for harm to children or placing children at risk.

Referral to the DBS

The school will refer to the DBS anyone who has harmed a child or poses a risk of harm to a child, or if there is reason to believe the member of staff has committed an offence and has been removed from working in regulated activity. The duty will also apply in circumstances where an individual is deployed to another area of work that is not in regulated activity or they are suspended.

17.7 Single Central Register

The school keeps an SCR which records all staff, including agency and third-party supply staff, and teacher trainees on salaried routes, who work at the school. All members of the proprietor body are also recorded on the SCR.

The following information is recorded on the SCR:

- An identity check
- A barred list check
- An enhanced DBS check
- A prohibition from teaching check
- A check of professional qualifications, where required
- A check to determine the individual's right to work in the UK
- Additional checks for those who have lived or worked outside of the UK
- A section 128 check for those in management positions

For agency and third-party supply staff, the school will also record whether written confirmation from the employment business supplying the member of staff has been received which indicates that all the necessary checks have been conducted (i.e. all the same checks the school would perform on any individual working in the school or who will be providing education on the school's behalf, including through online delivery) and the date that confirmation was received.

If any checks have been conducted for volunteers, this will also be recorded on the SCR. If risk assessments are conducted to assess whether a volunteer should be subject to an enhanced DBS check, the risk assessment will be recorded.

Written confirmation that supply agencies have completed all relevant checks will also be included. The school is free to record any other information it deems relevant. The details of an individual will be removed from the SCR once they no longer work at the school.

17.8 Children missing education procedures

All staff are aware that children going missing, particularly repeatedly, is a potential indicator of a range of safeguarding issues such as: neglect, sexual abuse or exploitation, child criminal exploitation, mental health problems, substance abuse, travelling to conflict zones, female genital mutilation or forced marriage. The School has clear procedures in place for following up on unexplained absences and, where necessary, reporting to the local authority pupils who are missing from School for more than 10 School days (continuous). The procedure includes the requirement to record any incident, the action taken and the reasons given by the pupil for being missing. See the School's Missing Pupil policy.

The School has a legal duty to inform the Local Authority if a pupil is to be removed from the roll at a non-standard transition point; i.e. where a compulsory School-aged child leaves the School before completing the School's final year. When this notification is made the following information has to be provided by the School: full name of the pupil; name, address and telephone number of the parent the pupil lives with; details of any new address for the child and parent; the name of the pupil's destination School and expected start date; and the reason why the pupil is leaving the School.

The School is also legally required to notify the Local Authority within five days of adding a pupil's name to the admissions register at a non-standard transition point. The notification includes all the details contained in the admissions register for the new pupil; specifically, their full name; sex; name and address known to be a parent of the pupil (and an indication of which parent he pupil normally lives with and which parents hold parental responsibility); address of new or additional places of residence; at least one contact telephone numbers at which the parent can be contacted in an emergency*; date of birth; name and address of last School attended (if any); information must be forwarded to the Education Welfare Service. This information is also logged and a record is kept by the DSL. In line with KCSIE 2021, it is the School's policy to hold a minimum of two emergency contact numbers for each pupil.

17.9 The Prevent Duty

All Schools are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 to have "due regard" to the need to prevent people from being drawn into terrorism. This duty is known as the Prevent duty. There are four specific elements to Crosfield's approach to meeting the statutory requirements imposed by the Prevent duty. In summary these are:

- Risk assessment – working with the Local Authority, who provide contextual information about the area, the School assesses the risk of pupils being drawn into terrorism, including extremist ideologies
- Working in partnership – liaising closely with the Bracknell Forest LSB to ensure pupils requiring support are referred at a suitably early stage

- Staff training – enabling staff to identify pupils at risk of being drawn into terrorism and to challenge extremist ideas
- IT policies – to provide guidance to pupils as to how to stay safe online (see Acceptable Use Policy) and set out the filtering and monitoring mechanisms in place.

In addition:

- The School has a robust Crisis Management and Response plan
- Prevent is included in School recruitment arrangements

17.10 Visiting speakers

Any pupil or member of staff who wishes to invite a speaker to address pupils must provide details of the individual to the DSL (in accordance with the 'Visiting Speaker policy), so that a comprehensive vetting procedure can be undertaken. The event organiser will undertake a search via the internet to research the background of the individual and consider taking up references from other Schools at which they have spoken at in the past. If the event organiser is a pupil, the member of staff in charge of that activity / society will undertake the search. The event organiser should also consider carefully whether the views being expressed, or likely to be expressed, constitute extremist views that risk drawing people into terrorism or are shared by terrorist groups. In these circumstances the event will not be allowed to proceed.

It is not necessary to undertake a DBS check on every speaker. In cases where specific vetting checks are not prescribed by KCSIE, the visiting speaker will be accompanied at all times by a member of staff to ensure there is no unsupervised access to pupils. However, if a DBS check is deemed necessary, the appropriate details will be recorded on the School's SCR. An evaluation form will be completed by the event organiser and submitted to the DSL following the visit.

17.11 Confidentiality and information sharing

The School will keep all child protection records confidential, allowing disclosure only to those who need the information in order to safeguard and promote the welfare of children. The School will co-operate with police and children's social services to ensure that all relevant information is shared for the purposes of child protection investigations. Where a pupil who is subject to a child protection plan is moving to another School, the DSL will ensure their child protection file is securely transferred to the new School as soon as possible. This file will be transferred separately from the main pupil file to the DSL at the new School and confirmation of safe receipt will be obtained. The DSL should

also consider if it would be appropriate to share any information with a new School in advance of a child leaving. For example, information that would allow the new School to continue supporting victims of abuse and have support in place for when the child arrives.

Where allegations have been made against staff, the School will consult with the LADO and, where appropriate, with the police and social services to agree the information that should be disclosed and to whom.

Information sharing is essential for effective safeguarding and promoting the welfare of children and young people. The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. 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. Information that is relevant to safeguarding is regarded as 'special category personal data' and as such can be shared securely on a need-to-know basis. Further non-statutory guidance [Information Sharing](#) was published by the Government in July 2018. See Appendix 6.

17.12 Whistleblowing

All staff are required to report to the Head with any concerns about:

- poor or unsafe safeguarding practices at the School;
- potential failures by the School or its staff to properly safeguard the welfare of pupils; or
- other wrongdoing in the workplace that does not involve the safeguarding and welfare of pupils.

If the member of staff feels unable to raise their concern with the Head (or a relevant member of SLT) or if they believe any concern has not been dealt with, they should contact the Chair of Governors. The NSPCC whistleblowing advice line is available for staff who do not feel able to raise safeguarding concerns internally (see Appendix 1 for contact details). Any member of staff can whistleblow without fear of detriment (retribution or disciplinary action) provided the report was made in good faith. Malicious allegations may be considered as a disciplinary offence

17.13. School premises, security and visitors:

- The School will take all practicable steps to ensure that premises are as secure as circumstances permit. This includes:
- Regular patrols around the campus by members of SLT and support staff

- Visitor access control procedures.
- CCTV at various points around the campus
- Perimeter fencing

All staff are identified by photo ID cards worn at all times during School related activities and duties. A Visitors' Log is kept at Reception. All visitors must sign in on arrival and sign out on departure and are escorted whilst on School premises by a member of staff. All visitors will be given a name badge with the title 'Visitor', which must be clearly displayed and worn at all times whilst on the premises.

17.14 **Use of the school premises for non-school activities**

Where the governing board hires or rents out school facilities or the school premises to organisations or individuals, e.g. for providers to run community or extracurricular activities, it will ensure that appropriate arrangements are in place to keep pupils safe.

Where the governing board provides the activities under the direct supervision or management of school staff, child protection arrangements will apply. Where activities are provided separately by another body, this may not be the case; therefore, the governing board will seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place, including inspecting these as needed. The governing board will also ensure that there are arrangements in place to liaise with the school on these matters where appropriate. The governing board will ensure safeguarding requirements are included in any transfer of control agreement, i.e. a lease or hire agreement, as a condition of use and occupation of the premises, and specify that failure to comply with this would lead to termination of the agreement.

Extracurricular activities and clubs

Extra-curricular activities and clubs hosted by external bodies, e.g. charities or companies, will work in collaboration with the school to effectively safeguard pupils and adhere to local safeguarding arrangements.

Staff and volunteers running extracurricular activities and clubs are aware of their safeguarding responsibilities and promote the welfare of pupils. Paid and volunteer staff understand how they should respond to child protection concerns and how to make a referral to CSCS or the police, if necessary.

Any safeguarding concerns raised regarding individuals providing these services, supply staff or other contractors will be notified to their employers. All national governing bodies of sport that receive funding from either Sport England or UK Sport must aim to meet the Standards for Safeguarding and Protecting Children in Sport.

17.15 **Monitoring this Policy**

Any child protection incidents at the School will be followed by a review of the safeguarding procedures in the School and a report to the governors. Where an incident involves a member of staff, the LADO will be asked to assist in this review to determine whether any improvements can be made to the School's procedures.

The DSL will monitor the operation of this policy and procedures on a day-to-day basis and will provide regular updates at Senior Leadership Team meetings. In addition, the DSL will present a termly report to the governors.

The governors will undertake an annual review of the policy and implementation of its procedures including good co-operation with local agencies and of the efficiency with which the related duties have been discharged. The governors will draw on the expertise of staff, including the DSL, when considering amendments to policies and/or arrangements related to safeguarding. Any deficiencies or weaknesses in child protection and safeguarding arrangements identified at any time will be remedied without delay.

The School will continually monitor and evaluate safeguarding and child protection. This will be achieved by:

- Listening to feedback from parents, pupils and staff
- Recording and analysing reports on Wellbeing Manager to track trends and patterns
- Recording the level of need for pupils on Wellbeing Manager and keeping termly and annual reports
- Recording the number of pupils on welfare plans or safety risk assessments
- Monitoring the number of referrals to BWSCP
- Recording and analysing the number of low level concerns and self-reports made to the DSL
- Analysing feedback from training courses

17.16 **Other relevant policies**

The following policies should be read in conjunction with this policy:

- Anti-Bullying Policy (cyber- bullying is contained within this Policy)
- Health and Safety Policy
- Risk Assessment Policy
- Educational Visits Policy
- Recruitment and Selection Policy
- Code of Conduct for Staff
- Rewards and Sanctions Policy

- E-Safety Policy
- ICT acceptable Use Policy
- Whistleblowing Policy
- Missing Pupil Policy
- Supervision of Pupils Policy
- Prevent Duty Policy
- Mobile Phone Use
- RSE policy

APPENDIX 1 Crosfields Safeguarding Contacts

At Crosfields School, the following individuals have responsibility for Child Protection and Safeguarding matters.

Designated Safeguarding Lead and Prevent Lead

Mr Adam Mallins, Deputy Head SS (Pastoral)
0118 987 1810 adammallins@crosfields.com

Designated Safeguarding Lead

Mr. Tom Goodhew, Deputy Head JS (Pastoral)
Tomgoodhew@crosfields.com

Designated Safeguarding Lead

Mrs. Janey McDowell, Deputy Head PP
Janeymcdowell@crosfields.com

Safeguarding and Prevent Governor

Mr Mark Turner
020 894 01878 gov-MT@crosfields.com

Deputy Designated Safeguarding Leads

Mr Simon Dinsdale - simondinsdale@crosfields.com
Mr John Ireland - johnireland@crosfields.com
Mrs Sue Nicholas- suenicholas@crosfields.com
Miss Beth Hazel – bethhazel@crosfields.com
Mrs Charlotte Reid - charlottereid@crosfields.com
Mr Ian Anderson- iananderson@crosfields.com
Ms Sarah Harris - sarahharris@crosfields.com
Mr Alex Murray-Smith - alexmurraysmith@crosfields.com
Miss Edwina Westacott - edwinawestacott@crosfields.com
Matt Rowe - matthewrowe@crosfields.com
Mr Ben Keepax - benkeepax@crosfields.com
Mrs Alice Westley-Smith - alicewestley@crosfields.com

APPENDIX 2 External Safeguarding Contacts

Berkshire West Safeguarding Children Partnership (BWSCP)

Crosfields School falls under the provenance of the BWSCP. The local contacts are shown below.

- **Wokingham Children's Safeguarding and Social Care Team:** 0118 908 8002
triage@wokingham.gov.uk
- **Wokingham Local Authority Dedicated Officer (LADO):** Nicola Vines 0118 974 6141 or 07783 828150

Via email : LADO@wokingham.gov.uk

Outside these hours – between 5.00 p.m. and 9.00 a.m. and on weekends and Bank Holidays – the Emergency Duty Team (which covers the whole of Berkshire) can be contacted on 01344 7865430

Other contacts

Call 999 in an emergency or if you believe a child is in immediate danger

Call the Police on 101 for non-emergency situations that do not require an immediate response.

Child Line (advice for children): 0800 1111

NSPCC (advice for concerned adults): 0808 800 5000

NSPCC whistleblowing helpline: 0800 028 0285
email: help@nspcc.org.uk

Report Abuse in Education helpline: 0800 136 663
(Monday to Friday 8am - 10pm, or 9am - 6pm at weekends)
email: help@nspcc.org.uk

Forced Marriage unit: 020 7008 0151
email: fm@fcdo.gov.uk

FGM Unit: The Rose Centre (Oxford Road Community Centre)
0118 951 0279

Foreign Office Response Centre

(24/7): 020 7008 1500

Counter Extremism helpline (DFE) for *Prevent* non-emergency advice for staff and governors (Mon – Fri 9am-5pm) 020 7340 7264

e-mail: counter-extremism@education.gsi.gov.uk

National Counter Terrorism Unit: 0800 789 321

DBS: For barring issues and information 01325 953795

For disclosure issues 0870 9090811

PO Box 181, Darlington, DL1 9FA

Other Children’s Social Care Duty Teams:

Are available 9.00am to 5.00pm weekdays (excluding bank holidays) on the telephone numbers below:

- **Bracknell:** 01344 351582
- **Slough:** 01753 875362
- **South Oxfordshire:** 0345 050 7666 (Out of hours 0800 833 408)
- **West Berkshire:** 01635 503090 (Out of hours 01344 786543)
- **Windsor and Maidenhead:** 01628 683150 (Out of hours 01344 786543)
- **Reading:** 0118 937 3641 (Out of hours 01344 786543)

Appendix 3 Other Types of Abuse

Children missing from education: all children of compulsory School age, regardless of their circumstances, are entitled to a full-time education which is suitable to their age, ability, aptitude and any special needs they may have. A child going missing from education is a potential indicator of abuse or neglect, including possible sexual abuse, sexual exploitation or radicalisation. The School will report to the Local Authority instances of prolonged unauthorised absence or a pupil being removed from the School roll under the circumstances outlined in KCSIE. In cases where a pupil has a prolonged period of authorised absence for a reason such as long-term illness, the School will be proactive in terms of providing support to both the parents and the pupil.

• **Child sexual exploitation (CSE):** CSE occurs where an individual or group takes advantage of an imbalance of power* to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants (for example, food, drugs, alcohol money or affection) and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years, including 16- and 17-year-olds who can legally consent to have sex. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media).

*An imbalance of power is commonly associated with age difference, it can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic and other resources.

• **Child Criminal Exploitation (CCE):** is where is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology. CCE can include being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten young people.

Specific forms of CCE can include:

- Being forced or manipulated into transporting drugs or money through county lines.
- Working in cannabis factories.

- Shoplifting or pickpocketing.
- Committing vehicle crime.
- Committing, or threatening to commit, serious violence to others.
- Cyber-crime -For the purposes of this policy, **“cyber-crime”** is defined as criminal activity committed using computers and/or the internet. This includes ‘cyber-enabled’ crimes, i.e. crimes that can happen offline but are enabled at scale and at speed online, and ‘cyber- dependent’ crimes, i.e. crimes that can be committed only by using a computer. Crimes include:
 - Unauthorised access to computers, known as ‘hacking’.
 - Denial of Service attacks, known as ‘booting’.
 - Making, supplying or obtaining malicious software, or ‘malware’, e.g. viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence.

All staff will be aware of the signs of cyber-crime and follow the appropriate safeguarding procedures where concerns arise and should familiarise themselves with the School’s acceptable use policies. This may include the DSL referring pupils to the National Crime Agency’s Cyber Choices programme.

County lines: ‘County lines’ is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas (within the UK), using dedicated mobile phone lines or other form of ‘deal line’. Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move (and store) drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including Schools, further and higher educational institutions, pupil referral units, special educational needs Schools, children’s homes and care homes.

Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. One of the ways of identifying potential involvement in county lines are missing episodes (both from home and School), where the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. If a child is suspected to be at risk or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

Domestic abuse: The cross-government definition of domestic abuse is: any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or

over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to: psychological; physical; sexual; financial and emotional.

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

Operation Encompass: This operates within Thames Valley. It helps police and Schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead) in School before the child or children arrive at School the following day. This ensures that the School has up to date relevant information about the child's circumstances and can enable support to be given to the child according to their needs. Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked.

Forced marriage: Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent is where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage.

Honour-Based Abuse (HBA): So-called 'honour-based' abuse (HBA) encompasses crimes which have been committed supposedly to protect or defend the honour of the family and/or community, including FGM (see below) and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. All forms of HBV are abuse, are illegal in the UK (regardless of the motivation) and should be handled and escalated as such.

Female Genital Mutilation (FGM): FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Victims of FGM are likely to

come from a community that is known to practise FGM. Staff should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. All staff must be aware of the law requiring teachers to report cases to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl aged under 18. The duty to report resides with the teacher who becomes aware of the case not the DSL, although the DSL should be informed unless the teacher has a good reason for not doing so. The report should be made orally by calling 101 within 24 hours of the issue coming to light. Failure to report a case of FGM can result in disciplinary sanctions.

Virginity testing and hymenoplasty

Under the Health and Care Act 2022, it is illegal to carry out, offer or aid and abet virginity testing or hymenoplasty in any part of the UK. It is also illegal for UK nationals and residents to do these things outside the UK.

Virginity testing - Also known as hymen, '2-finger' or vaginal examination, this is defined as any examination (with or without contact) of the female genitalia intended to establish if vaginal intercourse has taken place. This is irrespective of whether consent has been given. Vaginal examination has no established scientific merit or clinical indication.

Hymenoplasty - A procedure which can involve a number of different techniques, but typically involving stitching or surgery, undertaken to reconstruct a hymen with the intent that the person bleeds the next time they have vaginal intercourse. Hymenoplasty is different to procedures that may be performed for clinical reasons, e.g. surgery to address discomfort or menstrual complications.

Pupils aged 13 and older are considered to be most at risk, but it can affect those as young as 8, and anyone with female genitalia can be a victim regardless of age, gender identity, ethnicity, sexuality, religion, disability or socioeconomic status. All staff will be aware of the following indicators that a pupil is at risk of or has been subjected to a virginity test and/or hymenoplasty:

- A pupil is known to have requested either procedure or asks for help
- Family members disclose that the pupil has already undergone the practices
- Pain and discomfort after the procedures, e.g. difficulty in walking or sitting for a long period of time which was not a problem previously
- Concern from family members that the pupil is in a relationship, or plans for them to be married
- A close relative has been threatened with either procedure or has already been subjected to one
- A pupil has already experienced or is at risk of other forms of HBA
- A pupil is already known to social services in relation to other safeguarding issues

- A pupil discloses other concerns that could be an indication of abuse, e.g they may state that they do not feel safe at home, that family members will not let them out the house and/or that family members are controlling
- A pupil displays signs of trauma and an increase in emotional and psychological needs, e.g. withdrawal, anxiety, depression, or significant change in behaviour
- A pupil appears fearful of their family or a particular family member
- Unexplained absence from school, potentially to go abroad
- Changes in behaviour, e.g. a deterioration in schoolwork, attendance, or attainment

The above list is not exhaustive, but if any of these indicators are identified, staff members will immediately raise concerns with the DSL. An assessment of the risk they face will be undertaken. If there is believed to be immediate danger, the police will be contacted without delay.

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 defined in the Prevent 34 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. This also includes calling for the death of members of the armed forces. Extremist views may result in terrorist activity which is where is an action or actions endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts electronic systems. The use of threat of terrorist activity must be designed to influence the government or intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

There are various reasons why a young person might become interested in extremism:

- a search for answers to questions about identity, faith and belonging
- a desire for ‘adventure’ and excitement
- a desire to enhance self-esteem of the individual and promote ‘street cred’
- the discovery of and identification with a charismatic individual and, through them, attraction to a group which can offer identity, social network and support
- a sense of grievance that can be triggered by personal experiences of racism or discrimination

The School has a legal duty to have due regard to the need to prevent people from being drawn into terrorism and this is an aspect of safeguarding. Being drawn into terrorism includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit. Schools should be safe spaces in which children and young people can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, and learn how to challenge these ideas.

School staff should use their professional judgement in identifying young people who might be at risk of radicalisation and discuss their concerns with the DSL. On the basis of this information the DSL may

conclude that a referral to the Channel Programme is appropriate. The Channel programme is run in every local authority and addresses all kinds of extremism including the extreme-right and Islamist-related. The support provided could include assistance with education or employment, and ideological mentoring to provide vulnerable individuals with skills to protect themselves from being drawn into extremism. An individual's engagement with the programme is entirely voluntary at all stages.

Although not a cause for concern on their own, possible indicators when taken into consideration alongside other factors or context may be a sign of being radicalised. Further information and a list of such indicators can be found at Radicalisation and Extremism - Examples and Behavioural Traits (educateagainsthate.com)

- **Modern slavery**

For the purposes of this policy, "**modern slavery**" encompasses human trafficking and slavery, servitude, and forced or compulsory labour. This can include CCE, CSE, and other forms of exploitation.

All staff will be aware of and alert to the signs that a pupil may be the victim of modern slavery. Staff will also be aware of the support available to victims of modern slavery and how to refer them to the National Referral Mechanism.

- **Child abduction and community safety incidents**

For the purposes of this policy, "**child abduction**" is define as the unauthorised removal or retention of a child from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents and other relatives, other people known to the victim, and strangers.

All staff will be alert to community safety incidents taking place in the vicinity of the school that may raise concerns regarding child abduction, e.g. people loitering nearby or unknown adults conversing with pupils.

Pupils will be provided with practical advice and lessons to ensure they can keep themselves safe outdoors.

- **Youth produced sexual imagery:** While sharing photos and videos online and via smartphones is part of daily life for many people, enabling them to share their experiences, connect with friends and record their lives, there are risks associated with the production and distribution of sexual and explicit images. both in terms of the law (Protection of Children Act 1978, as amended by the Sexual Offences Act 2003) and in relation to the possible impact on a child's well-being if images are shared more widely than they originally intended.

Creating and sharing sexual photos and videos of under-18s is illegal. The DSL should be notified as soon as possible if an incident comes to light in which a pupil under the age of 18:

- has created and shared sexual imagery of themselves with a child under the age of 18;
- has shared sexual imagery created by another person under the age of 18 with another person; or
- is in possession of sexual imagery created by another person under the age of 18.

Staff **must not** ask to see the imagery but should confiscate the device on which it is held and pass it on to the DSL. You should not view youth-produced sexual imagery unless there is good and clear reason to do so.

A decision to respond to the incident without involving the police or children's social care would be made in cases when the DSL is confident that they have enough information to assess the risks to pupils involved and the risks can be managed within the School's pastoral support and disciplinary framework and, if appropriate, local network of support.

Appendix 4 Further information on signs of abuse (NSPCC)

1. Spotting the signs of physical abuse

All children have trips, falls and accidents which may cause cuts, bumps and bruises. These injuries tend to affect bony areas of their body such as elbows, knees and shins and are not usually a cause for concern. Injuries that are more likely to indicate physical abuse include:

Bruising

- bruises on babies who are not yet crawling or walking
- bruises on the cheeks, ears, palms, arms and feet
- bruises on the back, buttocks, tummy, hips and backs of legs
- multiple bruises in clusters, usually on the upper arms or outer thighs
- bruising which looks like it has been caused by fingers, a hand or an object, like a belt or shoe
- large oval-shaped bite marks.

Burns or scalds

- any burns which have a clear shape of an object, for example cigarette burns
- burns to the backs of hands, feet, legs, genitals or buttocks.

Other signs of physical abuse include multiple injuries (such as bruising, fractures) inflicted at different times. If a child is frequently injured, and if the bruises or injuries are unexplained or the explanation doesn't match the injury, this should be investigated. It's also concerning if there is a delay in seeking medical help for a child who has been injured.

2. Spotting the signs of sexual abuse

There may be physical signs that a child has suffered sexual abuse. These include:

- anal or vaginal soreness or itching
- bruising or bleeding near the genital area
- discomfort when walking or sitting down
- an unusual discharge
- sexually transmitted infections (STI)
- pregnancy.

Changes in the child's mood or behaviour may also cause concern. They may want to avoid spending time with specific people. In particular, the child may show sexual behaviour that is inappropriate for their age. For example:

- they could use sexual language or know things about sex that you wouldn't expect them to
- they might become sexually active or pregnant at a young age.

3. Spotting the signs of neglect

Neglect can be difficult to identify. Isolated signs may not mean that a child is suffering neglect, but multiple and persistent signs over time could indicate a serious problem. Some of these signs include:

- children who appear hungry - they may not have lunch money or even try to steal food
- children who appear dirty or smelly
- children whose clothes are inadequate for the weather conditions
- children who are left alone or unsupervised for long periods or at a young age
- children who have untreated injuries, health or dental problems
- children with poor language, communication or social skills for their stage of development
- children who live in an unsuitable home environment.

4. Spotting the signs of child sexual exploitation

Sexual exploitation can be very difficult to identify. Young people who are being sexually exploited may:

- go missing from home, care or education
- be involved in abusive relationships
- hang out with groups of older people
- be involved in gangs or anti-social groups
- have older boyfriends or girlfriends
- spend time at places of concern, such as hotels or known brothels
- be involved in petty crime such as shoplifting • have access to drugs and alcohol
- have new things such as clothes and mobile phones, which they aren't able to easily explain
- have unexplained physical injuries

5. Spotting the signs of harmful sexual behaviour

It's normal for children to show signs of sexual behaviour at each stage in their development. Children also develop at different rates and some may be slightly more or less advanced than other children in their age group. Behaviours which might be concerning depend on the child's age and the situation. Signs might be:

- using sexually explicit words and phrases

- inappropriate touching
- using sexual violence or threats
- sexual activity with other children or adults.

6. Spotting the signs of emotional abuse

There aren't usually any obvious physical signs of emotional abuse, but you may spot changes in a child's actions or emotions. Some children are naturally quiet and self-contained whilst others are more open and affectionate. Mood swings and challenging behaviour are also a normal part of growing up for teenagers and children going through puberty. Be alert to behaviours which appear to be out of character for the individual child or are particularly unusual for their stage of development.

Babies and pre-school children who are being emotionally abused may:

- be overly affectionate towards strangers or people they have not known for very long
- not appear to have a close relationship with their parent, for example when being taken to or collected from nursery
- lack confidence or become wary or anxious
- be unable to play
- be aggressive or nasty towards other children and animals.

Older children may:

- use language, act in a way or know about things that you wouldn't expect for their age
- struggle to control strong emotions or have extreme outbursts
- seem isolated from their parents
- lack social skills or have few, if any, friends
- fear making mistakes
- fear their parent being approached regarding their behaviour
- self-harm.

7. Spotting the signs of domestic abuse

It can be difficult to tell if domestic abuse is happening, because abusers can act very differently when other people are around. Children who witness domestic abuse may:

- become aggressive
- display anti-social behaviour
- suffer from depression or anxiety

- not do as well at school - due to difficulties at home or disruption of moving to and from refuges.

8. Spotting the signs of bullying and cyberbullying

It can be hard to know whether or not a child is being bullied. They might not tell anyone because they're scared the bullying will get worse. They might also think that the bullying is their fault. No one sign indicates for certain that a child's being bullied, but you should look out for:

- belongings getting 'lost' or damaged
- physical injuries such as unexplained bruises
- being afraid to go to school, being mysteriously 'ill' each morning, or skipping school
- not doing as well at school
- asking for, or stealing, money (to give to a bully)
- being nervous, losing confidence or becoming distressed and withdrawn
- problems with eating or sleeping
- bullying others.

9. Spotting the signs of child trafficking

Signs that a child has been trafficked may not be obvious but you might notice unusual behaviour or events. Children who have been trafficked may:

- have to do excessive housework chores
- rarely leave the house and have limited freedom of movement
- not have any documents (or have falsified documents)
- give a prepared story which is very similar to stories given by other children
- be unable or reluctant to give details of accommodation or personal details
- not be registered with a school or a GP practice
- have a history with missing links and unexplained moves
- be cared for by adults who are not their parents or carers
- not have a good quality relationship with their adult carers
- be one among a number of unrelated children found at one address
- receive unexplained or unidentified phone calls whilst in a care placement or temporary accommodation.

There are also signs that an adult is involved in child trafficking, such as:

- making multiple visa applications for different children
- acting as a guarantor for multiple visa applications for children
- having previously acted as the guarantor on visa applications for visitors who have not left the UK when the visa expired.

10. Spotting the signs of female genital mutilation

A child at risk of FGM may not know what's going to happen. But they might talk about or you may become aware of:

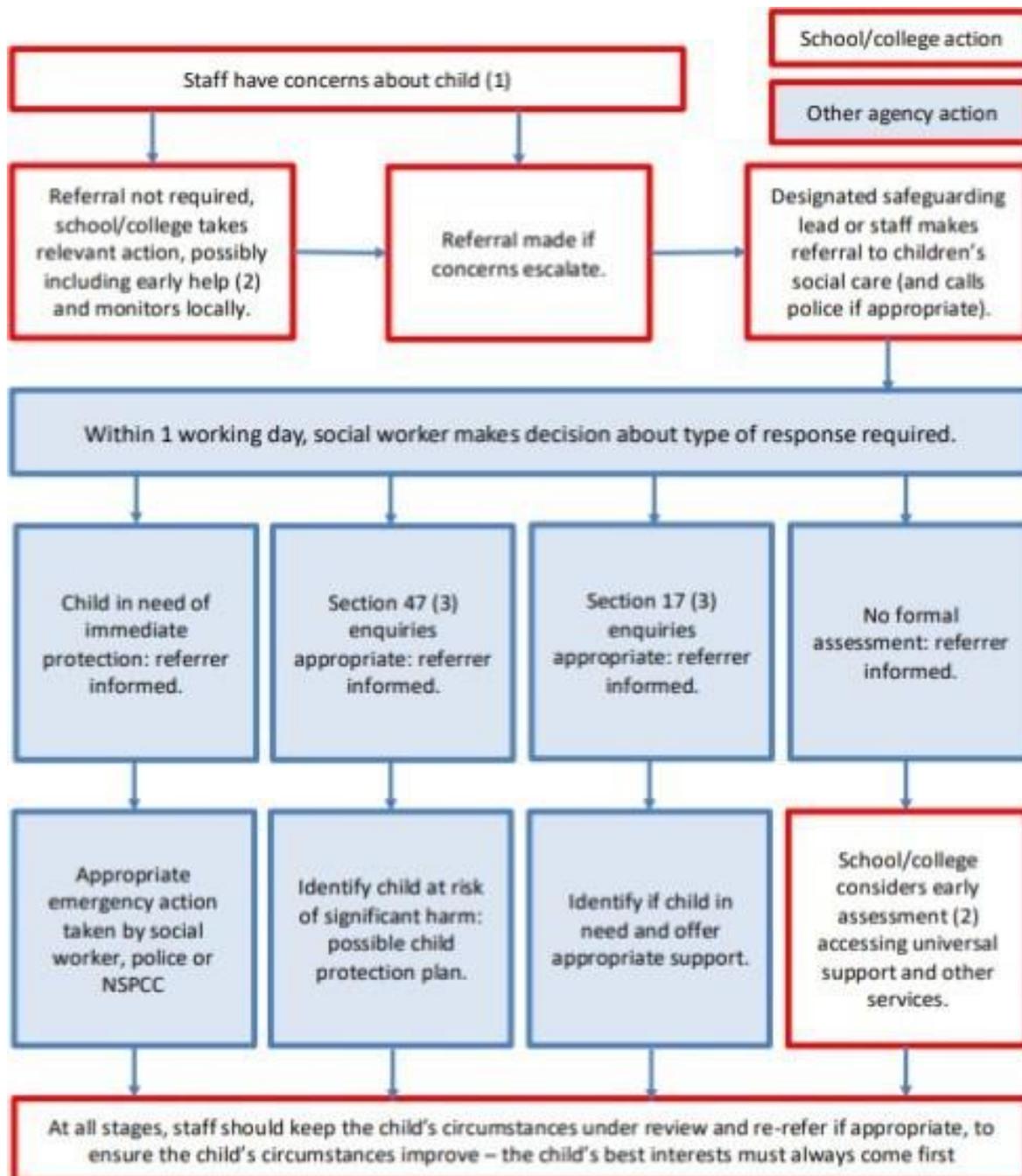
- a long holiday abroad or going 'home' to visit family
- relative or cutter visiting from abroad
- a special occasion or ceremony to 'become a woman' or get ready for marriage
- a female relative being cut – a sister, cousin or an older female relative such as a mother or aunt
- missing school repeatedly or running away from home.

A child who has had FGM may:

- have difficulty walking, standing, or sitting
- spend longer in the bathroom or toilet
- appear withdrawn, anxious, or depressed
- have unusual behaviour after an absence from school or college
- be particularly reluctant to undergo normal medical examinations
- ask for help but may not be explicit about the problem due to embarrassment or fear.

Reporting requirements Regulated health and social care professionals and teachers in England and Wales must report 'known' cases of FGM in under-18s to the police (Home Office, 2016).

Appendix 5 Actions where there are concerns about a child (KCSIE, 2022)

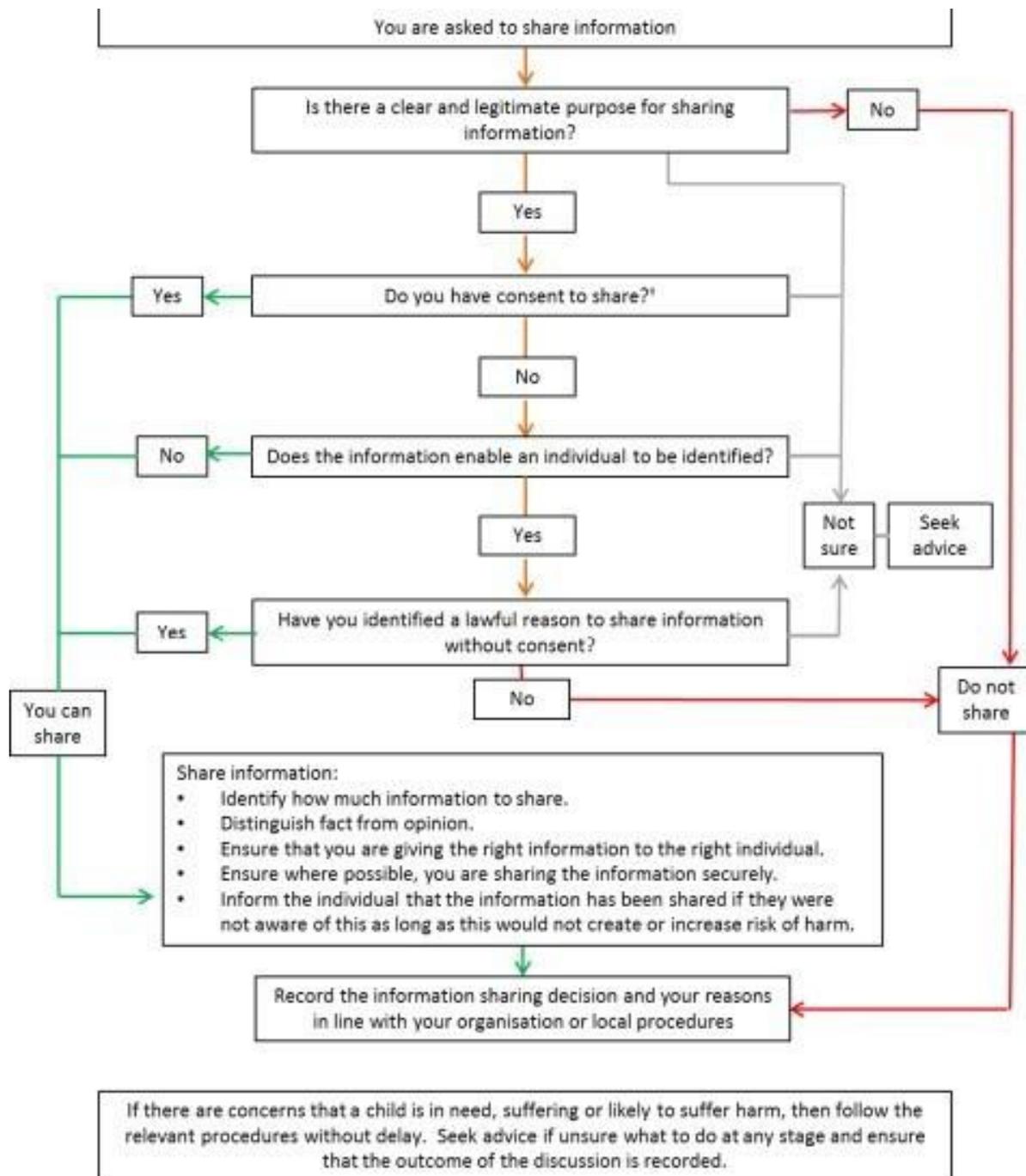


1. Cases where there is a concern or allegation made against a staff member refer to the Principal or LADO (see Section 15)

2. Early help involves providing support as soon as problem emerges. Where coordinated early help is required, an early help inter-agency assessment will be arranged.

3. Referrals will follow the processes set out in XXXX's threshold guidance

Appendix 6 Flowchart of when and how to share information



Appendix 7 Safeguarding Manager entry guidance

What should NOT go on Safeguarding Manager?

- Any low level pastoral incident / concern – this should be recorded as a concern as part of Rewards and Conduct Manager. You should also speak to Head of House / tutor if needed.
- Any safeguarding concerns about a member of staff – speak / communicate with the Head , Chair of Governors (or DSL if others unavailable)

What should you report on Safeguarding Manager?

Any issue which concerns you about a pupil or an incident you have witnessed. This might include:

- Concerns about a pupil being anxious, depressed, showing different behaviour – a subtle change over time or a rapid change
- A significant pastoral concern such as a friendship difficulty, inability to form good relationships with peers
- Any safeguarding concern – mental health issues, self-harm, suicidal ideation, eating disorder, abuse, drugs, inappropriate behaviour, bullying and child on child abuse of any sort, alcohol use, inappropriate use of online technology including accessing pornography, gambling, criminal activity of any sort etc
- Home issues – parental divorce, significant illness, parental mental health concerns, lack of supervision, family member in prison
- A safeguarding “event” – finding pupils in a compromising situation, a member of the public trespassing or accessing area of the School that they are not allowed, a significant accident. An event does not have to have a pupil assigned to it (especially if you are uncertain who the pupil might have been – it is more important to report what you saw)

How to report a concern

- Logon to Isams and go to the wizard bar on the right hand side of your dashboard
- Click on “Create a Concern” (under the Safeguarding Manager title)
- Fill in the details on the “Create a Concern” page, remembering these important points:
- The ‘Nature’ should be brief – a couple of words only. Eg. “Injury to right leg”; “Bullying”; “Possible drugs use”
- The ‘details’ box should contain ALL details, specifically names, times, places –as much detail as you have about the pupil / event /situation. You can copy and paste the contents of an email into here should that be how you are aware of the concern. You should also add in here any action already taken.
- Any related documents should be sent to your section’s DSL (AJM, TG or JMcD) who will be able to attach them to the concern.
- The concern will automatically sent to the DSL team who will then distribute as necessary

How to update a concern / record an action if you are asked

- You will only be able to update a concern if you have been assigned an action or visibility to that concern by the DSL.

Completing an action that has been tasked to you:

- If you have been tasked with an action you will receive an email to alert you.
- If this is the case you can log on to ISAMS and go to the Safeguarding Manager Module (right hand side of your dashboard if you have saved it as a favourite; if not go the 'Waffle' icon and click on the 'star' icon to make it a favourite.
- Ensure you have the 'Overview' tab clicked
- You will see your actions listed under 'My Actions'.
- Click on an action and work through the boxes. If further action is required be sure to select this option from the drop-down menu.

Updating an action:

- Log on to ISAMS and go to the Safeguarding Manager Module (right hand side of your dashboard if you have saved it as a favourite; if not go the 'Waffle' icon and click on the 'star' icon to make it a favourite. Type in the pupil name you wish to see and click on the right name when it appears in the list
- You will see a timeline of concerns. Click on the relevant concern.
- Click on the 'Actions' button
- From here you can add to /update an existing action listed or create a new action.

Appendix 8 Useful glossary of terms

Child protection refers to the processes undertaken to meet statutory obligations laid out in the Children Act 1989 and associated guidance (see Working Together to Safeguard Children), in respect of those children who have been identified as suffering, or being at risk of suffering harm.

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as: protecting children from maltreatment; preventing impairment of children's health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care and taking action to enable all children to have the best outcomes. (Keeping Children Safe in Education).

Keeping Children Safe in Education states that "safeguarding and promoting the welfare of children is everyone's responsibility". Everyone who comes into contact with children and their families and carers has a role to play in safeguarding children.' This means that the School should consider, at all times, 'what is in the best interests of the child.'

All staff should be aware that behaviours linked to the likes of domestic abuse, drug taking, alcohol abuse, truancy and sexting put children in danger. Safeguarding issues can manifest themselves via child on child abuse. This is most likely to include, but is not limited to:

- Bullying (including cyberbullying),
- Physical abuse such as hitting, shaking, biting, hair pulling, or otherwise causing physical harm
- Sexual violence and sexual harassment
- Upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender can be a victim.
- Sexting (also known as youth produced sexual imagery) Initiation/hazing type violence and rituals

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

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

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

Child refers to all young people who have not yet reached their 18th birthday.

Parent refers to birth parents and other adults who are in a parenting role, for example step-parents, foster carers and adoptive parents.

Extremism refers to the Government's 'Prevent Strategy' which defines extremism 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".

Prevent is part of the UK's Counter Terrorism Strategy, preventing people from becoming involved in terrorism or supporting terrorism. 'Prevent duty guidance for England and Wales: guidance for specified authorities in England and Wales on the duty of Schools and other providers in the Counter Terrorism and Security Act 2015 to have due regard to the need to prevent people from being drawn into terrorism', HM Government, 2015.

Radicalisation is the process where someone has their vulnerabilities or susceptibilities exploited towards crime or terrorism – most often by a third party, who have their own agenda, who have attempted to radicalise vulnerable children and young people to hold extreme views including views justifying political, religious, sexist or racist violence or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation.

Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institution or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children. All staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.

Early Help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years. In the first instance staff should discuss early help requirements with the DSL. Staff may be required to support other agencies and professionals in an early help assessment. If early help is appropriate the DSL should support the staff member in liaising with other agencies and setting up an inter-agency assessment as appropriate. If early help and or other support is appropriate the case should be kept under constant review and consideration given to a referral to children's social care if the child's situation does not appear to be improving. While the School understands that the acronym 'LADO' has been removed from

KCSIE in favour of 'designated officer', it continues to use it for the sake of brevity, as allowed by the Independent Schools Inspectorate Handbook- 'The Regulatory Requirements'.

Contextual safeguarding: Safeguarding incidents and/or behaviours can be associated with factors outside the School or School and/or can occur between children outside the School or School. All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence. Upskirting: The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on the 12th April 2019.

'Upskirting' is where someone takes a picture under a persons clothing (not necessarily a skirt) without their permission or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender can be a victim.

Appendix 9 DSL Job Description

KCSIE - Annex C: Role of the designated safeguarding lead

Governing bodies and proprietors should ensure an appropriate senior member of staff, from the school or college leadership team, is appointed to the role of designated safeguarding lead. The designated safeguarding lead should take lead responsibility for safeguarding and child protection (including online safety). This should be explicit in the role holder's job description.

This person should have the appropriate status and authority within the school or college to carry out the duties of the post. The role of the designated safeguarding lead carries a significant level of responsibility, and they should be given the additional time, funding, training, resources and support they need to carry out the role effectively. Their additional responsibilities include providing advice and support to other staff on child welfare, safeguarding and child protection matters, taking part in strategy discussions and interagency meetings, and/or supporting other staff to do so, and to contributing to the assessment of children.

Deputy designated safeguarding leads

It is a matter for individual schools and colleges as to whether they choose to have one or more deputy designated safeguarding leads. Any deputies should be trained to the same standard as the designated safeguarding lead and the role should be explicit in their job description. Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the designated safeguarding lead, this lead responsibility should not be delegated.

Availability

During term time the designated safeguarding lead (or a deputy) should always be available (during school or college hours) for staff in the school or college to discuss any safeguarding concerns. Whilst generally speaking the designated safeguarding lead (or deputy) would be expected to be available in person, it is a matter for individual schools and colleges, working with the designated safeguarding lead, to define what "available" means and whether in exceptional circumstances availability via phone and or Skype or other such media is acceptable. It is a matter for individual schools and colleges and the designated safeguarding lead to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.

Manage referrals

The designated safeguarding lead is expected to refer cases:

- of suspected abuse and neglect to the local authority children's social care as required and

support staff who make referrals to local authority children's social care;

- to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme;
- where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- where a crime may have been committed to the Police as required. NPCC - When to call the police should help understand when to consider calling the police and what to expect when working with the police.

Working with others

The designated safeguarding lead is expected to:

- act as a source of support, advice and expertise for all staff;
- act as a point of contact with the safeguarding partners;
- liaise with the Head or principal to inform him or her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- as required, liaise with the "case manager" (as per Part four) and the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member;
- liaise with staff (especially teachers, pastoral support staff, school nurses, IT Technicians, senior mental health leads and special educational needs coordinators (SENCOs), or the named person with oversight for SEN in a college and Senior Mental Health Leads) on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically;
- liaise with the senior mental health lead and, where available, the Mental Health Support Team,
- where safeguarding concerns are linked to mental health;
- promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances;
- work with the Head and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at school or college. This includes:
 - ensure that the school or college knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort; and,

- support teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.

Information sharing and managing the child protection file

The designated safeguarding lead is responsible for ensuring that child protection files are kept up to date.

Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child. Records should 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.

They should ensure the file is only accessed by those who need to see it and where the file or content within it is shared, this happens in line with information sharing advice as set out in Part one and Part two of this guidance.

Where children leave the school or college (including in year transfers) the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools and colleges should ensure key staff such as designated safeguarding leads and SENCOs or the named person with oversight for SEN in colleges, are aware as required.

Lack of information about their circumstances can impact on the child's safety, welfare and educational outcomes. In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any additional information with the new school or college in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school or college. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse and have that support in place for when the child arrives.

Raising Awareness

The designated safeguarding lead should:

- ensure each member of staff has access to, and understands, the school's or college's child

- protection policy and procedures, especially new and part-time staff;
- ensure the school's or college's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this;
- ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school or college in this;
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements; and
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and school and college leadership staff.

Training, knowledge and skills

The designated safeguarding lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The designated safeguarding lead should undertake Prevent awareness training. Training should provide designated safeguarding leads with a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of children, as well as specific harms that can put children at risk, and the processes, procedures and responsibilities of other agencies, particularly children's social care, so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements;
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- understand the importance of the role the designated safeguarding lead has in providing information and support to children social care in order to safeguard and promote the welfare of children;
- understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes;
- are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers;
- understand the importance of information sharing, both within the school and college, and with the safeguarding partners, other agencies, organisations and practitioners;
- understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of

radicalisation;

- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college;
- can recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support children with SEND to stay safe online;
- obtain access to resources and attend any relevant or refresher training courses; and,
- encourage a culture of listening to children and taking account of their wishes and feelings,
- among all staff, in any measures the school or college may put in place to protect them.

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

Providing support to staff

Training should support the designated safeguarding lead in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters. This includes specifically to:

- ensure that staff are supported during the referrals processes; and
- support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

Understanding the views of children

It is important that children feel heard and understood. Therefore, designated safeguarding leads should be supported in developing knowledge and skills to:

- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school or college may put in place to protect them; and,
- understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

Holding and sharing information

The critical importance of recording, holding, using and sharing information effectively is set out in Parts one, two and five of this document, and therefore the designated safeguarding lead should be equipped to:

- understand the importance of information sharing, both within the school and college, and with other schools and colleges on transfer including in-year and between primary and secondary

education, and with the safeguarding partners, other agencies, organisations and practitioners;

- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR); and,
- be able to keep detailed, accurate, secure written records of concerns and referrals and understand the purpose of this record-keeping.

Appendix 10 Legal Framework

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

Legislation

- Children Act 1989
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- The Education (School Teachers' Appraisal) (England) Regulations 2012 (as amended)
- Sexual Offences Act 2003
- Female Genital Mutilation Act 2003 (as inserted by the Serious Crime Act 2015)
- Equality Act 2010
- Counter-Terrorism and Security Act 2015
- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018
- Voyeurism (Offences) Act 2019
- Domestic Abuse Act 2021
- The charity Commission guidance June 2022
- Relationships education, relationships, and sex education (RSE) and health education (September 2021)

Statutory guidance

- HM Government (2020) 'Multi-agency statutory guidance on female genital mutilation'
- HM Government (2022) 'Multi-agency practice guidelines: Handling cases of Forced Marriage'
- HM Government (2021) 'Channel Duty Guidance: Protecting people vulnerable to being drawn into terrorism'
- DfE (2022) 'Keeping children safe in education KCSIE'
- DfE (2018) 'Working Together to Safeguard Children'
- DfE (2015) 'The Prevent duty'
- DfE (2018) 'Disqualification under the Childcare Act 2006'

Non-statutory guidance

- DfE (2015) 'What to do if you're worried a child is being abused'
- DfE (2018) 'Information sharing'
- DfE (2017) 'Child sexual exploitation'
- DfE (2021) 'Teachers' Standards'
- Department of Health and Social Care (2022) 'Virginity testing and hymenoplasty: multi-

agency guidance'

- DfE (2022) 'Recruit teachers from overseas'
- DfE (2020) 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'