Downe House

Safeguarding and Child Protection Policy

Approved by: Sofie McClymont

Designated Safeguarding Lead **Date: 14.9.2026**

Approved by: Mr Jeremy Farrell **Date: 17.9.26**

Nominated Safeguarding Governor

Approved by Governing Body

Chair of Governors: Sally McNair-Scott **Date: 22.9.26**

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1 Safeguarding Contact Details

Downe House School

Position	Name	Phone	e-mail
Designated Safeguarding Lead (DSL)	Mrs Sofie McClymont	01635 917795 07425 655383	mcclymonts@downehouse.net
Senior Deputy DSL	Mrs Ellie Llewellyn	01635917796 07425664050	llewellyne@downehouse.net
Deputy DSL	Mr Matt Godfrey	01635 204702 07425663497	godfreym@downehouse.net
Deputy DSL	Miss Georgie Taylor	01635 204632 07825 636754	taylorg@downehouse.net
Deputy DSL	Mrs Anna Dourountakis	01635 204686 07919 157 503	dourountakisa@downehouse.net
Deputy DSL	Ms Kate Eaves	01635 204685 07887 610307	eavesk@downehouse.net
Deputy DSL	Sister Gemma Palmer	01635 204657	Palmerg@downehouse.net
Deputy DSL	Mrs Genevieve Ford	01635 204791 07825 314582	fordg@downehouse.net
Headmistress	Mrs Emma McKendrick	01635 206402	headmistress@downehouse.net
Chair of Governors	Mrs Sally McNair-Scott	contact details for the Chair of Governors and Safeguarding Governor can be sought from the Clerk to the Governors- Edward Valletta – vallettae@downehouse.net	
Safeguarding Governor	Mr Jeremy Farrell		

Local Authority children's social services numbers

Name	Phone	Out of hours phone	e-mail
West Berkshire Contact, Advice & Assessment Service (CAAS)	Professionals only contact number: 01635 503190 Parents only contact number: 01635 503090	01344 786543	child@westberks.gov.uk
Service manager for Early Years, Vulnerable Learners and Families - Avril Allenby	01635 519044		Avril.Allenby@westberks.gov.uk
Principal Education Welfare and Safeguarding Officer, and PREVENT Link for Education -Melissa Perry	01635 519788		EWSS@westberks.gov.uk CME@westberks.gov.uk ehe@westberks.gov.uk
Community Coordinator – Prevention	01635 519982 or 07741832761		Jade.wilder@westberks.gov.uk
West Berkshire Education Safeguarding Officer	01635 503156		edsafeguarding@westberks.gov.uk
West Berkshire Senior Education Welfare Officer- Sally-Ann Looker	01635 519788		sal.looker@westberks.gov.uk

West Berkshire Exclusions and Reintegration Officer- Roslyn Arthur	01635 503409		Roslyn.Arthur@westberks.gov.uk
Director of Children Services - Annmarie Dodds			annmarie.dodds1@westberks.gov.uk
Director of Education - Neil Goddard			Neil.goddard1@westberks.gov.uk
Principal Adviser for School Improvement - Rose Carberry			Rose.Carberry1@westberks.gov.uk

Allegations against staff

Title	Name	Phone	e-mail
West Berkshire Local Authority's Designated Officer (LADO) Contact can be made via CAAS	Fiona Goussard	via CAAS on 01635 503190 LADO on 01635 503153	LADO.LADO@westberks.gov.uk

Extremism

Title	Name	Phone	e-mail
Prevent Officer- Thames Valley Police	Prevent Officer	07800702319 01189636349	Preventreferrals@thamesvalley.pnn.police.uk
Building Communities Together Team Manager and PREVENT Lead, West Berkshire Council	Susan Powell	01635 264703 07881 856801	susan.powell@westberks.gov.uk
Thames Valley Police	Non-emergency number	101	
	Emergency number	999	

Female genital mutilation (FGM)

Title	Name	Phone	e-mail
Thames Valley Police	Non-emergency number	101	
	Emergency number	999	

Other useful contact details

Name	Phone
Childline	0800 1111
NSPCC	0808 800 5000
Kidscape (Anti-bullying helpline for parents)	0845 120 5204
Report Abuse in Education	0800 136 663
National Domestic Abuse Helpline	0800 2000 247
Child exploitation Online Prevent (CEOP)	0870 000 3344
Whistleblowing	0800 028 0285- Email help@nspcc.org.uk

2 Introduction

2.1 Downe House is committed to safeguarding and promoting the welfare and wellbeing of young people and staff. We believe that everyone, without exception, has a right to be safe and to be treated with dignity and respect regardless of background and live a life free from discrimination. The School recognises that children and young people learn best when they are healthy, safe and secure.

2.2 Safeguarding and promoting the welfare of children is defined as providing help and support to meet the needs of children as soon as problems emerge; protecting children from maltreatment, whether that is within or outside the home, including online; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes. (Keeping Children Safe in Education, September 2026.)

2.3 This policy applies to all pupils in the School.

2.4 The purpose of this policy is to inform all staff (including supply staff), parents (including guardians and carers), contractors, third parties, 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, such as on educational visits or when delivering lessons online.

2.5 This policy is published on the School's website and is also available to parents of current and prospective pupils from the Designated Safeguarding Lead on request. Large print or other accessible formats can also be made available.

2.6 The policy is drafted in accordance with Berkshire West Safeguarding Children Partnership's agreed local interagency procedures.
[Note: Multi-agency arrangements for safeguarding children are now handled by the three safeguarding partner agencies: the local authority (Berkshire West); the Integrated Care Systems (previously known as the Clinical Commissioning Group) ; and the police.

2.7 This policy is also in accordance with current legislation and the following statutory guidance:

- Keeping Children Safe in Education September 2026 (KCSIE)
- Working Together to Safeguard Children March 2026 (WTSC)
- Prevent Duty Guidance for England and Wales December 2023
- Education (Independent School Standards) Regulations 2014
- Boarding Schools: National Minimum Standards (updated May 2026)
- Children Missing Education September 2025
- Information Sharing Advice for Safeguarding Practitioners (May 2024)
- Charity Commission guidance: safeguarding and protecting people for charities and trustees 2019
- The Equality Act (2010)
- The Human Rights Act (1998)
- Relationships Education, Relationships and Sex Education (RSE) and Health Education: Statutory Guidance (effective September 2026)
- DfE Filtering and Monitoring Standards for Schools and Colleges (updated September 2026)
- Berkshire West Safeguarding Partnership Child Protection and Safeguarding Policies and Procedures

2.8 We are advised by the local Safeguarding and Child Protection in Schools and Education Officer, whom the DSL regularly consults on safeguarding matters. Contact details can be found in section 1 of this policy.

2.9 Every complaint or suspicion of abuse from within or outside the School will be taken seriously and action will be taken in accordance with this policy.

3 Principles

3.1 Downe House expects all staff, governors and volunteers to share our commitment to safeguarding and promoting the welfare of all pupils in our care. To achieve this, the School seeks to create a safe School environment with a strong pastoral system, where pupils who have been subject to any form of abuse can report the matter confident that it will be taken seriously, they will not be made to feel ashamed of making a report and will be fully supported. 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.

3.2 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, Selection and Disclosure 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's 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 teaching staff 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;
- 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 the School premises are as secure as circumstances permit;
- teach pupils about safeguarding issues and about how to keep themselves safe (including online and when working from home online); and

- ensure that any deficiencies in our child protection and safeguarding procedures are remedied without delay.

4 Roles and responsibilities

4.1 Safeguarding and child protection is **everyone's** responsibility. All staff (including governors, supply staff, contractors and volunteers) are under a general legal duty to:

- contribute to providing a safe environment in which pupils can learn;
- consider at all times the best interests of the pupil and take action to enable all pupils to have the best outcomes;
- attend appropriate safeguarding and child protection training on an annual basis or additionally as directed by the DSL;
- be aware of the indicators of the different forms of abuse and neglect and of emergent mental health issues;
- assist children in need and to protect children from abuse, neglect, exploitation, radicalisation and extremism;
- be familiar with the School's policies pertaining to safeguarding and child protection procedures and follow them;
- 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.

4.2 The Designated Safeguarding Lead (DSL)

The School has appointed a Designated Safeguarding Lead (DSL) who is a senior member of staff and member of the School's Extended Leadership Team. The DSL takes lead responsibility for safeguarding (including on-line safety) and child protection and is the first point of contact for parents, pupils, staff and others if they have any concerns about safeguarding or child protection. The School also has Deputy DSLs, ensuring that there is always an appropriately trained and designated person in the School at all times.

The DSL will be given the time, funding, training, resources and support to ensure they are able to fulfil all the key aspects of their role as described in KCSIE (September 2026):

- **Managing Referrals:** the DSL will manage the referral of cases of suspected abuse, neglect, exploitation, radicalisation or any other relevant issue to the Local Authority Social Care Service, Channel programme, DBS and/or Police as appropriate.
- **Working with others:** the DSL will be the principal point of contact for all staff and when co-ordinating different departments and functions within and outside the School in the management of a case. They will promote supportive relationships with parents and carers to safeguard pupils' welfare, be able to identify the causes and consequences of issues that children are experiencing and to support staff to make appropriate adjustments in the provision of educational programmes.
- **Information sharing and managing the child protection file:** the DSL is responsible for keeping child-protection files up to date with accurate and complete records of any actions or decisions taken, the rationale for these decisions and ensuring these confidential records are securely stored and, where appropriate, transferred to a new school promptly.

- **Raising Awareness:** the DSL is responsible for reviewing and updating the School's safeguarding policy at least annually, for ensuring that all staff members have had appropriate training regarding its implementation, and that parents can access the policy and know that the School may make referrals where abuse, neglect or exploitation is suspected.
- **Training, knowledge and skills:** the DSL will receive the appropriate level of training, together with regular updates, to ensure they are able to understand the unique risks associated with online safety, to be confident that they have the relevant knowledge and up-to-date capability required to keep children safe whilst they are online at School and to diagnose and respond to the specific needs of vulnerable children and work effectively with agencies such as the LADO, the Police and the Channel agency.
- **Providing support to staff:** the DSL should receive sufficient support and training so that they can support staff and help them feel confident on welfare, safeguarding and child-protection matters, including referrals and taking into account safeguarding, welfare and SEN in the provision of academic and pastoral support.
- **Understanding the views of children:** the DSL should, through training, develop the knowledge and skills needed to encourage a culture of listening to children and taking account of their wishes and feelings among all staff. They should promote an understanding of the difficulties that children may have in approaching staff about their circumstances and help staff consider how to build trusted relationships which facilitate communication.

Note: A full description of the responsibilities of the DSL is set out in Appendix 4 of this policy.

4.3 Deputy Designated Safeguarding Leads (DDSL)

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. The DSL and all DDSLs have shared access to CPOMS, where confidential pastoral information is held. 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 safeguarding activities may be delegated to a DDSL but final lead responsibility for safeguarding and child protection remains with the DSL.

4.4 Headmistress

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

- the safeguarding and child protection policy and procedures adopted by the Governing Body are implemented and followed by all staff;
- sufficient time, training, funding, support and resources necessary to enable the DSL and DDSLs to carry out their roles effectively are allocated, 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 which operate with the best interests of the pupil at heart are in place for pupils to express their views and give feedback;
- 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 procedures;
- pupils are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online;

- safer recruitment procedures are being adhered to in line with Part 3 of KCSIE, September 2026;
- she acts as the 'case manager' in the event of an allegation of abuse made against another member of staff (including supply staff and volunteers) and liaises with the Local Authority Designated Officer (LADO); and
- she notifies the Disclosure and Barring Service and, where appropriate, the Teaching Regulatory Authority and/or the Police of anyone who has harmed or may pose a risk to a child.

4.5 Governing Body

The Governing Body 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 Body to provide scrutiny of the safeguarding policy and safeguarding 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 Governors will ensure that:

- They undertake annual training in relation to Safeguarding and Child Protection;
- they facilitate a whole-school approach to safeguarding which involves everyone in the School, ensuring safeguarding and child protection underpin all aspects of process and policy development;
- an effective, up-to-date safeguarding child protection policy is in place that is clear and easy understand for staff, pupils, parents and carers and is made available on the School's website;
- other policies, as prescribed in Part 2 of KCSIE, are in place and operational;
- the obligations imposed by the Human Rights Act (1998) and the Equality Act (2010) are met;
- pupils are being taught about how to keep themselves and others safe, including online, and that there is appropriate provision for the specific needs and vulnerabilities of individual children, including those who are victims of abuse and/or have SEN/D needs;
- required pre-employment checks are being carried out in a timely way and correctly recorded in the Single Central Register;
- an appropriate member of staff from the School's Extended Leadership Team is appointed to the role of DSL
- all staff receive safeguarding induction and ongoing training in accordance with this policy;
- the School's safeguarding arrangements take into account the procedures and practice of the Berkshire West Safeguarding Children Partnership;
- serious incidents which fall within the threshold of serious incident reporting are reported to the Charity Commission;
- the School contributes to inter-agency working, including providing a co-ordinated offer of early help when additional needs of pupils are identified;
- clear systems and processes are in place for identifying and managing pupils with mental health problems;
- child protection files are maintained and, where appropriate, such records are transferred to a pupil's new school or college in accordance with statutory guidance;
- appropriate filters and monitoring systems are in place to keep children safe online and that these are reviewed regularly;
- the School reports to their local authority (West Berkshire) any pupil who joins or leaves the School at non-standard transition times in line with statutory and local authority guidance; and

- written assurances are provided by individuals or organisations who hire School premises confirming appropriate safeguarding and child protection procedures are in place.

4.6 Safeguarding Governor

Mr Jeremy Farrell is the nominated Safeguarding Governor who monitors and co-ordinates the operation of safeguarding arrangements in the School. This is done in a number of ways, these being:

- conducting discussions about safeguarding matters with the DSL at least once a term and more regularly, if needed;
- Kept informed of communications with the local authority and/or partner agencies where appropriate; and
- conducting an audit in alternative years of the School's safeguarding procedures and submitting a written report to the Governing Body with recommendations for further improvements. The written report will typically consider: the effectiveness and implementation of relevant policies; staff safeguarding training; staff recruitment procedures; management of the SCR; 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.

4.7 The contact details for the Safeguarding Governor are set out in Section 1 of this policy.

5 The Safeguarding Team

5.1 The DSL at the School is Sofie McClymont (Director of Boarding) and member of the Extended Leadership Team. If the DSL is unavailable, the role will be carried out by one of the Deputy DSLs: Ellie Llewellyn (Director of Pupil Wellbeing) is Senior Deputy DSL, Genevieve Ford (Deputy Head Pastoral), Matt Godfrey (Deputy Head), Georgie Taylor (Assistant Head- Sixth Form), Anna Dourountakis (Assistant Head - Upper School), Kate Eaves (Assistant Head- Lower School) and Gemma Palmer (Director of the Health Centre). The DSL or Deputy DSLs are always available when the School is open to discuss safeguarding concerns with staff, either in person or via telephone, email or MS Teams. If the DSL and Deputy DSLs are unavailable, the role will be carried out by the Headmistress. Outside School hours and during out-of-term activities, a designated member of the LT will assume temporary responsibility.

5.2 The DSL, Sofie McClymont, is the designated member of staff who oversees the welfare of looked-after children.

5.3 Contact details for all the above are contained in section 1 of this policy.

6 Staff training

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

6.2 Induction training for all new members of staff, including temporary employees or volunteers, includes formal child-protection training which covers:

- This safeguarding policy and related policies on Prevention of 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 (including when they are online at home)*;
- the expectations, roles and responsibilities of staff in relation to filtering and monitoring online content;

- the pupil behaviour policy*;
- the School's safeguarding response to pupils who go missing from education;
- the Staff Code of Conduct, including low level concerns procedures*;
- the School's policy on Whistleblowing*; and
- an overview of the Local Safeguarding Children Partnership's procedures.

** 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.*

6.3 All staff, including the Headmistress and volunteers involved in regulated activity, will undertake appropriate child- protection training which, in line with LSCP guidance, is updated every two years. In addition, all staff will receive safeguarding updates delivered through a combination of INSET, e-bulletin 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.

6.4 A proportionate risk-based approach will be used to determine the extent of the information that is provided to temporary staff, volunteers and contractors.

6.5 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 4 and, where appropriate, Annex A of KCSIE are reissued to staff whenever this statutory guidance is updated by the DfE. Staff training provides an opportunity to check and consolidate their understanding of the policies. Staff can also access the policies and further reading in the staff section of Schoolbase.

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

6.7 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 obtained for those who have specific responsibility for looked-after children. They also refresh their knowledge and skills at regular intervals (and at least annually) by following developments in safeguarding to:

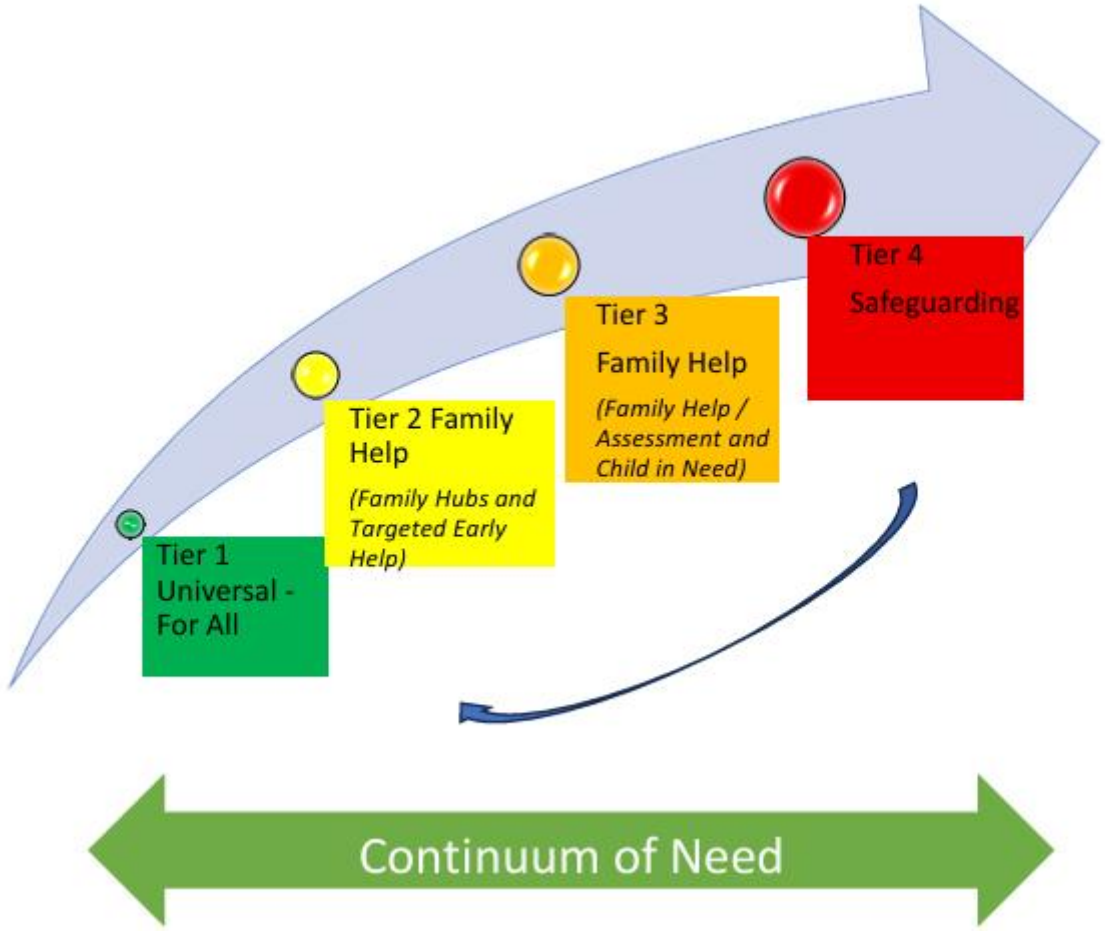
- keep abreast of best practice for promoting a culture of listening to children;
- remain up to date on the mechanics of inter-agency working as operated by the Berkshire West Local Authority;
- understand the assessment process for providing early help and intervention, for example through locally agreed common assessment processes such as early-help assessments;
- have an up-to-date working knowledge of how local authorities conduct 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 (recognising that this can impact on their attendance, attainment, behaviour and wellbeing);
- understand and support the School regarding 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.

6.8 New appointees to Governing Body receive appropriate safeguarding and child protection (including online) training at induction. This training is designed to ensure they understand their responsibilities as governors and equip them with the knowledge to provide strategic challenge to test and assure themselves that the School's safeguarding policies and procedures are effective and support the delivery of a robust whole school approach to safeguarding. All members of the Board of Governors receive update training at least on an annual basis.

6.9 **Hierarchy of intervention**

6.10 The Berkshire West Safeguarding Children Partnership publishes threshold guidance that all agencies, professionals and volunteers in the local authority catchment 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.

6.11 Within the continuum, there are four levels of intervention:



Tier 1: Help for everyone – Universal

All children and families using widely available universal services in the community to help them to learn, progress and develop to their full potential. The majority of children living in West Berkshire require support from universal services alone. Children at this level have no additional needs; all their health and developmental

needs will be met by universal services. These are children who consistently receive child focused caregiving from their parents or carers. Family hubs are also universal and are a safe space for families to access support.

Tier 2 Additional Help

Tier 2 has two parts: some children need additional help, while others need a multi agency response.

Addition Help:

Some children will have some additional needs. Their health and development may be affected and would benefit from extra help in order to make the best of their life chances. These children require additional support usually from a single agency to address the concern that has been identified. This may include children with disabilities accessing universal short breaks with support or targeted short breaks. This may be families who require support from professionals in their community or from family hubs such as parenting support or guidance, where advice may be required and for some an Early Help Plan to prevent escalation of need.

Focused help for multiple needs:

Some children will have some additional needs. Their health and development may be affected and would benefit from extra help in order to make the best of their life chances. These children require additional support usually from a single agency to address the concern that has been identified. This may include children with disabilities accessing universal short breaks with support or targeted short breaks. This may be families who require support from professionals in their community or from family hubs such as parenting support or guidance, where advice may be required and for some an Early Help Plan to prevent escalation of need.

This would have previously been known as Targeted Early Help and now known as Family Help.

Tier 3: Intensive help – Family Help:

This may have previously been considered Children in Need (as outlined in the Children Act 1989). These are children who are unlikely to achieve or maintain a satisfactory level of health or development, or their health or development will be significantly impaired without the provision of services; including children who are disabled. They may require longer term intervention from statutory, specialist or integrated targeted services. Assessment will be conducted to ensure a clear plan can be understood and achieved and could lead to a Family Help Support Plan lead by either a Social Worker or a Family Help Lead Pracitioner. This is the threshold for a statutory assessment led by children's social care under section 17, Children Act 1989.

Tier 4: Specialist help- Safeguarding:

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 managed 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 justice services. Children who need specialist educational support are most likely to be in a special school or setting, although some children will have their needs met well in mainstream schools and settings with specialised support. These children will have

an EHCP or will be in the process of EHC assessment. Children should also be supported at the level which best meets their needs and focused on prevention of higher tier services wherever possible.

7 Community-based Early Help assessment

7.1 If children do not require the support of statutory children's services, the DSL will generally lead the liaison with other agencies and setting up an inter-agency assessment as appropriate. Downe House recognises the importance of providing early help to pupils to provide support for a problem as soon as it arises, to prevent it from escalating. We recognise that young people may face many challenges that put them in need of support and ensure that staff are aware of them. These include: stress, peer pressure, body image concerns, mental health and relationship issues.

7.2 Pupils are encouraged to raise concerns as soon as they are identified, either through their House Staff, Academic Tutor or directly to the Designated Safeguarding Lead, so that effective early support can be provided. They should be taken seriously and never made to feel they are creating a problem by reporting concerns of abuse.

7.3 If staff believe that a pupil could benefit from early help, they should discuss the matter with the DSL who will, generally lead the liaison with other agencies and setting up an inter-agency assessment as appropriate (Community-based Early Help assessment).

7.4 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.

7.5 The School has various mechanisms to help identify emerging problems, including a thorough pupil recruitment process, the School's pastoral system, the Learning for Life (PSHE) programme and various policies, including Prevention of Bullying and Cyber-bullying, E-Safety, Mental Health and Prevent. Staff training also prepares staff to identify pupils who might benefit from early help.

7.6 The School recognises the increased vulnerability of young people who:

- are Disabled or have Special Educational Needs (whether or not they have a statutory Education, Health and Care plan);
- have a mental health need (including self-harm, suicidal ideation or risk of suicide);
- do not have English as a first language;
- are in a Private Fostering Arrangement(made privately without the involvement of a local authority, for the care of a child under the age of 16 years by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more).*
- are living away from home for the first time;
- are frequently missing from education, care or home or persistently absent from School or not receiving full-time education;
- have been repeatedly removed from the classroom, experienced multiple suspensions, are on a part-time timetable, are at risk of being permanently excluded from school;
- are faced with challenging family circumstances, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- are showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- are looked after children;

- are pregnant and/or are a parent themselves;
- have exhibited early signs of abusive, violent and/or harmful behaviours;
- are acting as a young carer;
- has a parent or carer in custody, or is affected by parental offending;
- are misusing drugs or alcohol themselves;
- are at risk of exploitation, modern slavery, trafficking, including criminal or sexual exploitation
- are at risk of being radicalised into terrorism;
- are gender questioning;
- are at risk of honour or faith-based abuse such as Female Genital Mutilation or Forced Marriage;
- have experienced multiple suspension, are at risk of being permanently excluded from school;
- are showing early signs of abuse, neglect or mental health problems; and
- may be subject to discrimination and maltreatment on the grounds of race, religion, ethnicity, sexual orientation or sexual identity or other protected characteristics.

Such children may be more likely to need early help. Also, recognising abuse, neglect or exploitation may be more difficult for these young people 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;
- SEN/D students are more prone to peer group isolation (including prejudice-based bullying) than other young people
- pupils with Special Educational Needs or Disabilities (SEN/D) can be disproportionately impacted by bullying/child-on-child abuse without outwardly showing any signs;
- communication barriers and difficulties overcoming these barriers; and
- cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in the real world.

*The School has a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Staff should notify the DSL when they become aware of private fostering arrangements, and the DSL will contact the family and notify the local authority.

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, neglect, exploitation and modern slavery (including sexual and criminal financial exploitation, human trafficking and slavery, servitude and forced or compulsory labour), so that they are able to identify pupils who may be in need of help or protection. They also must be mindful that children 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. To reduce barriers to a potential disclosure it is incumbent on staff to build trusted relationships with children which facilitate communication. Staff must also exercise professional curiosity and speak to the DSL, or any member of the Safeguarding Team, if they have concerns.

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. Harm can include ill treatment that is not physical as well as witnessing ill treatment of others, This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a

family or in an institutional or community setting by those known to them or, more rarely, by others. 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 (child-on-child abuse). Children may also cause harm to other family members, often referred to as child to parent or care giver abuse. 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.

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

- **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 verbal abuse, such as persistent criticism, belittling, or name-calling, as well as 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 involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, such as acts of penetration, whether that is with part of a person's body (for example rape or oral sex) or an object (e.g. Rape or assault by penetration), and 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. The sexual abuse of children by other children is a specific safeguarding issue (also known as child-on-child abuse) and is covered in greater detail later in this policy (section 20). There are specific offences for children under 13, who can never provide valid consent to sexual activity and there are specific offences which make clear that sexual activity with a child under 16 is an offence, regardless of whether they agreed to that activity.
- **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.

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

- Child criminal exploitation (CCE)
- Child sexual exploitation (CSE)
- Child-on-child

- Children absent or missing from education
- County lines
- Domestic abuse
- Honour-Based Abuse (HBA) and Female Genital Mutilation (FGM)
- Forced marriage
- Radicalisation
- Modern slavery
- Sexual violence and harassment (including upskirting)

Further information is provided in Appendices 2 and 3 of this policy and in Part 1 and Annex A of KCSIE.

9 Contextual safeguarding

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 this environment. This is known as contextual safeguarding. All staff should consider, and especially those within the safeguarding team, whether pupils 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, sexual abuse, and serious youth violence.

10 Signs of abuse

10.1 All staff need to be aware that pupils may be reticent about reporting abuse generally, and particularly so about child-on-child abuse, and need therefore need to be vigilant for potential indicators that abuse may be taking place and using CPOMs to inform the DSL team of any concerns they might have.

10.2 Possible signs of abuse include (but are not limited to) the following (and these do not necessarily mean that abuse is occurring):

- the pupil discloses that she has been abused, or asks a question which gives rise to that inference
- the pupil has an injury that cannot be reasonably or consistently explained, or is unusual in type or location
- the pupil shows signs of injury on a regular or patterned basis
- the pupil engages in extreme or challenging behaviour or there is a sudden change in the pupil's behaviour
- the pupil asks to drop subjects with a particular teacher and seems reluctant to discuss reasons
- the pupil appears neglected (eg dirty, hungry, inadequately clothed)
- the pupil appears reluctant to return home or has been openly rejected by parents or guardians
- the pupil's development is delayed in terms of emotional progress
- the pupil withdraws emotionally – showing a lack of trust in adults
- the pupil shies away from being touched or flinches at sudden movements
- the pupil loses or gains weight

10.3 Further guidance is provided in Appendix 2.

11 Listening to pupils and record keeping

11.1 The School provides a range of opportunities for pupils to be listened to. Pupils can speak with House staff, their Academic Tutor, teachers, the Health Team, a member of the DSL team or make use of the School counselling service. Concerns can also be brought to our attention via the House Council. Contact details for external

agencies such as Childline and Office of the Children's Commissioner are available on the 'Where do I go for help and advice' posters which are prominently on display throughout the School. Furthermore, pupils have the use of an anonymous reporting platform called Whisper. This facilitates them having a safe way to disclose their issues in confidence and this is managed by the DSL and Senior Deputy DSL.

11.2 The National Minimum Boarding standards require boarding schools to appoint an Independent Listener, as an additional point of contact for students who wish to discuss concerns or problems with someone who is divorced as much as possible from the hierarchy of the school. Communications with the Independent Listener are confidential except in cases where there is concern for the welfare or safety of the pupil (or others) in which case the relevant authorities would be informed. Downe House's s Independent Listener is: Dr Clare Ratnage. Her contact details are provided in the boarders' handbook and are clearly displayed on various notice boards in the boarding houses.

11.3 If a pupil discloses that 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 or be afraid of silences;
- keep in mind that some pupils may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity, and/or sexual orientation;
- limit the questioning to the minimum necessary for clarification using "what, when, how, where" but avoiding leading questions (such as, "has this happened to your siblings?") that 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, DDSL or Headmistress;
- only share information on a need-to-know basis; and
- **make a full written record of the conversation as set out below.**

11.4 Staff must record in writing all concerns, discussions and decisions made about a pupil as soon as possible on C-POMS. 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. The DSL or DDSL will organise for the evidence to be scanned and added to the CPOMS incident record.

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:

- *Sharing nudes and semi nudes: how to respond to an incident (March 2024)*.

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

12.1 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 (including supply staff) and volunteers* below should be followed. Staff should not assume that somebody else will act and share information that might be critical in keeping a pupil safe.

12.2 All concerns, discussions, decisions made and the reasons for those decisions should be recorded in writing. If in doubt about recording requirements, staff should discuss with the DSL.

12.3 If a teacher discovers that an act of female genital mutilation (FGM) appears to have been carried out on a girl under 18, the teacher **must** report this to the police. Unless the teacher 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 'FGM mandatory reporting duty for teachers ' information.)

12.4 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.

12.5 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 Housemistress, Academic Tutor or other member of staff, who will notify the DSL.

12.6 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.

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

13.1 When the DSL is notified of any concerns about a pupil's welfare, 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 and if a potential crime appears to have been committed by a pupil, the DSL will make a referral to the police prior to commencing an internal investigation.

13.2 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
- contextual factors
- the referral threshold set by the relevant Local Authority
- the pupil's wishes or feelings
- the inter-agency procedures of the relevant Local Safeguarding Children Partnership
- where relevant, local information sharing protocols relating to Channel referrals,
- whether a potential crime has been committed by a pupil, in which case the DSL will contact the police.

13.3 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 consider a later referral to children's social services if the pupil's situation does not appear to be improving.

13.4 Members of the DSL team are responsible for maintaining written safeguarding records once an issue has been logged on CPOMs. These records are confidential and the only personnel within the School who have access to them are the DSL/DDSLs and the Headmistress. Such records will include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved; and
- a note of any actions taken, decisions reached, rationale for these and the outcome.

14 Making a referral to children's social services

14.1 When a pupil is not considered at risk of harm, but still has an unmet need that could mean they are in a Child in Need, a referral should be made as soon as possible by the DSL Children's Social Care in the local authority in which the pupil lives. 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. Where a child and family would benefit from coordinated support from one or more agency (for example: education, health, housing, police) there should be a Community Based 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.

14.2 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**. Further guidance on when to call the police is provided by the NPCC - when to call the police. The School is not required to obtain parental consent prior to a referral being made.

14.3 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.

14.4 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.

14.5 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, to ensure both that their concerns are addressed and that the pupil's situation improves.

14.6 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 (see the School's Prevent Policy).

14.7 Where a potential crime has been committed by a pupil, the School will contact the police prior to commencing any internal investigation.

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

14.9 Where there is a difference of opinion between the School and West Berkshire Local Authority, the School will follow the Berkshire Escalation Process for Professionals with Safeguarding Concerns (see Appendix 7). All contact will be recorded in writing (for example, via CPOMS).

15 Informing parents

15.1 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 Headmistress before discussing details with parents.

15.2 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.

15.3 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.

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

16 Allegations about members of staff, supply staff, contractors and volunteers

16.1 Guidance to staff

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, which is issued to all staff. Particular care should be taken where staff have one-to-one meetings with a pupil.

16.2 The following procedures will be used where it is alleged that a member of staff, a supply teacher, contractor or volunteer 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;
- behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children; or
- behaved or may have behaved in a way (in or outside of School) that indicates they might not be suitable to work with children. The incident may not necessarily involve children but may raise concerns that such behaviour might be replicated against a child (eg domestic violence at home).

These criteria are often referred to as the allegation or harms threshold. The procedures outlined below 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 the latest version of KCSIE).

16.3 Reporting an allegation about staff

If an allegation is made about staff that appears to meet the criteria in paragraph 17.2:

- Where an allegation is made about a member of staff, supply staff, the DSL, contractor or volunteer, the matter should be reported immediately to the Headmistress, or in the Headmistress's absence, to the Safeguarding Governor, Veryan Exelby. The adult to whom the allegation relates should not be informed without the explicit consent of 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. In the event of a situation where there is a potential conflict of interest in reporting the matter to the Headmistress, the allegation should be reported directly to the LADO.

- Allegations about the Headmistress should be reported to the Chair of Governors (contact details for the Chair of Governors can be sought from the Clerk to the Governors) without first notifying the Headmistress.
- Allegations about a Governor should be reported to the Chair of Governors. If the allegation is against the Chair of Governors, the matter should be reported to the Safeguarding Governor.
- The Headmistress or Chair of Governors who receives any such allegation is referred to in these procedures as the 'case manager'.

16.4 Action to be taken by the case manager

- Before contacting the LADO, the case manager will conduct basic enquiries in line with Berkshire West's procedures to establish the facts to help determine whether there is any foundation to the allegation. Nothing must be done at this initial stage that could jeopardise a future police investigation.
- If the case manager is unsure whether the allegation meets the criteria in para 17.2 above, the LADO will be consulted for advice.
- Any allegations meeting the criteria in para 17.2 will be dealt with in accordance with the local authority's arrangements for managing allegations. All such allegations must be dealt with as a priority to avoid any delay.
- The case manager will immediately (and in any event within one working day) discuss the matter with the LADO before further action is taken. The case manager may also consult with the DSL, but no attempt will be made to formally 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.
- Where an adult makes an allegation to the School that they were abused as child, the individual will be advised to report the allegation to the police. Non-recent allegations made by a pupil will be reported to the LADO in line with Berkshire West Safeguarding Children Partnership's procedures for dealing with such allegations. The LADO will then coordinate with local authority children's social care and the police.

16.5 Disclosure of information

- The case manager will inform the accused person of the allegation as soon as possible after the LADO has been consulted and, if appropriate, local authority children's social care and the police.
- 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, only in relation to their child: no information can be shared regarding the member of staff.
- 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.

16.6 Investigation

- Investigations will usually be undertaken by a senior member of School staff, under the guidance of the LADO. However, depending on the nature and complexity of an allegation, the investigation may instead be conducted by external agencies, such as social services or the police. 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 case manager will monitor the progress of the case to ensure that it is being dealt with as quickly as possible in a thorough and fair way. Wherever possible, the first review should take place within four weeks of the initial assessment. Subsequent reviews will take place at fortnightly (and no longer than monthly) interval whilst the investigation is ongoing.
- It is recognised that the School may have to consider an allegation against an individual not directly employed by the School: for example, supply staff provided by an employment agency or business. Downe House will ensure allegations are dealt with properly. Prior to ceasing using a supply member of staff due to safeguarding concerns, the facts will be found out and the LADO liaised with to determine a suitable outcome. The School may discuss with the agency whether it is appropriate to suspend the person they have supplied, or redeploy them, whilst the investigation is carried out. Downe House may take the lead in the investigation, to ensure that the allegation is dealt with properly and to recognise the fact that the agency would not have direct access to pupils or other school staff. They would therefore not be able to collect the facts or liaise with the LADO, police and/or local authority children's social services. Supply staff will be advised to contact their trade union for representation. If there is an allegation meeting, it will address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the School.
- If the School receives an allegation relating to an incident that happened when an individual or organisation was using its premises for the purposes of running activities for children, the School will follow the procedures set out in this policy, including informing the LADO.
- The School will not cease its investigations if the person involved leaves, resigns, ceases to provide their services, or refuses to cooperate. Records will be kept of the nature of the allegation and any supporting evidence used to determine whether or not, on the basis of information available, the allegation is substantiated. The person involved will be notified in writing of the outcome of the investigation process.
- 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 or cause harm to the person subject to the investigation.
    - 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

16.7 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.
- The School will also provide access to counselling or medical advice, where appropriate.
- The School will not prevent social contact with work colleagues and friends, when staff are suspended, unless there is reason to believe this may be prejudicial to the gathering and presentation of evidence.
- Support will also be offered to the pupil(s) affected and their parents or guardian. 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 suitable and effective way.

16.8 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 that a pupil, or other pupils at the School, is/are at risk of significant harm, or where 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 the allegation is against a member of the residential boarding staff and the member of staff is suspended as a result of a safeguarding allegation, the School will provide alternative accommodation away from children pending the outcome of the child protection investigation.
- 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.

16.9 Confidentiality and information sharing

- 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, in order to ensure a fair investigation with minimum impact on 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.
- The case manager will take advice from the LADO, police and children's services, as appropriate, to agree:
    - Who needs to know about the allegation and what information can be shared
    - How to manage speculation, leaks and gossip, including how to make the parents or guardian of the pupil involved aware of their obligations with respect to confidentiality
    - What, if any, information can be reasonably given to the wider community to reduce speculation
    - How to manage press interest if, or when, it arises

- Where the police are involved, wherever possible the School will ask the police to obtain consent from the individuals involved to share their statements and evidence for use in any subsequent disciplinary process initiated by Downe House.

16.10 Unsubstantiated, unfounded, false or malicious allegations

- If an allegation by a pupil is determined to be unsubstantiated, unfounded, false or malicious, the case manager should consider the following actions:
    - If the pupil who made the allegation is in need of help or may have been abused by someone else and, under such circumstances, whether a referral to pupil's social services is appropriate
    - Whether to take disciplinary action against the pupil in accordance with the School's Behaviour Policy.
- If a parent has made a deliberately invented or malicious allegation, the Headmistress will consider whether to require that parent to withdraw their child or children from the School, on the basis that they have treated the School 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.

16.11 Substantiated allegations

- If an allegation is substantiated and the member of staff, contractor or volunteer is dismissed because they are unsuitable to work with children 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.
- Settlement agreements, including a form of words for a reference, will not be used in cases where a member of staff, volunteer or contractor resigns or ceases to provide his or her services, where there are allegations that indicate the person is a risk or poses a risk of harm to children. Resignation or ceasing to provide services will not prevent a referral being made to the Disclosure and Barring Service where appropriate.
- 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.
- At the conclusion of a case in which an allegation is substantiated, the LADO will review the circumstances of the case with the case manager to determine whether any improvements could be made to the School's procedures to prevent the occurrence of similar events in the future. Consideration will also be given to how the investigation process was managed, including, where appropriate, the use of suspension of the accused. The case manager will produce a written report that will be presented to the governors without delay.

16.12 Charity Commission

- Downe House as a registered charity has a duty to protect people who come into contact with its work as a charity from abuse or mistreatment of any sort. As part of this duty the School is required to notify the Charity Commission of serious incident involving pupils or other beneficiaries of the charity. Examples of where such a report would be required include (but are not limited to):
    - incidents (alleged or actual) where pupils have been abused or mistreated whilst under the School's care or by individual(s) connected to the School
    - failures to follow policies and procedures which have put pupils at significant risk of harm

- It is the responsibility of the Governing Body to ensure such reports are made promptly. The report will give details of circumstances of the incident, actions taken by the School and details of lessons to be learnt from the subsequent review. The Governors will also ensure that an action plan is put in place to ensure any deficiencies or weaknesses in the School's safeguarding arrangements are remedied without delay.

16.13 Record keeping and references

- Details of allegations that are found to be malicious or false will be removed from personnel records, unless the individual gives their written consent for the retention of the information. 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 and decisions and the outcome (*substantiated*, *unfounded* or *unsubstantiated*) will be kept on the employee's file. A copy will be provided to the individual concerned, where agreed by local authority children's care or the police, and a declaration on whether the information will be referred to in any future reference. 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, Downe House will not refer to any allegation or history of allegations where the allegation(s) have been proven to be false, unfounded, unsubstantiated, false or malicious. Factual information (not opinions) will be included in references, where an allegation has been substantiated.

16.14 Learning lessons

- Throughout the investigation process into a safeguarding allegation about a member of staff and at the conclusion of a case, irrespective of whether the allegation is substantiated, the School will review the circumstance of the case to see if there are any improvements that can be made in its practice or policy which may prevent similar cases in the future. Such reviews will be conducted by the case manager in consultation with the LADO and will also consider how future investigations of a similar nature could be carried out more effectively, including any issues arising from any decision to suspend a member of staff, the duration of the suspension and whether or not the suspension was justified. The case manager will submit a report the Governing Body summarising the outcome of the review.

17 Low-level concerns

17.1 As part of a whole School approach to safeguarding, Downe House seeks to promote a culture in which all concerns about all adults working in or on behalf of the School are dealt with promptly and appropriately. The purpose of the School's low-level concerns procedures is to create and embed a culture of openness, trust and transparency in which our values and expectations of staff behaviour as set out in the Code of Conduct are constantly lived, monitored and reinforced by all staff.

17.2 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 has acted in a way that:

- Is inconsistent with the School's Code of Conduct, including inappropriate conduct outside of work; and
- Does not meet the allegation threshold (see 17.2) or is otherwise not serious enough to consider a referral to the LADO. If the School is any doubt as to whether the information shared about a member of staff meets the harms threshold, advice from the LADO will be sought.

NB: The term 'low-level' does not mean that the concern is insignificant; it simply means the behaviour does not meet the allegation threshold as defined in KCSIE.

17.3 Inappropriate behaviour can exist on a wide spectrum, from that which is inadvertent or thoughtless through to that which is ultimately intended to enable abuse. Examples of such behaviour could include but are not limited to: being overly friendly with pupils; showing favouritism; taking photographs of pupils on a personal device; or humiliating pupils.

17.4 Low level concerns may arise in several ways and from a number of sources: for example, suspicion; complaint; or disclosure made by a pupil, parent or another adult within or outside the organisation; or as a result of vetting checks undertaken.

17.5 Staff are required to report any concerns about any adult (including a person employed by a supply agency or a contractor) to the Headmistress (or nominated deputy). Where the concern relates to the Headmistress, it should be reported to the Chair of Governors. Such reports should be made without undue delay. Staff do not need to be able to determine whether their concern is a low-level concern or whether it meets the threshold of an allegation. This determination will be made by the Headmistress/Chair of Governors when the matter has been investigated.

17.6 The Headmistress or DSL will gather as much evidence as possible by speaking directly to the member of staff making the report (unless the concern has been raised anonymously), to the individual who are the subject of the concern and to any witnesses. If the Headmistress is the subject of the concern, the Chair of Governors will act in a similar fashion. Full details of how low-level concerns will be investigated are set out in an annex to the Staff Code of Conduct.

17.7 A member of staff may find themselves in a situation which could be misinterpreted or might appear compromising to others. Equally, a member of staff, for whatever reason, may have behaved in a manner which, on reflection, falls short of the standard set out in the Staff Code of Conduct. Under such circumstances, the member of staff should make a self-referral to the Headmistress as soon as possible. Doing so demonstrates transparency, facilitates effective management of the issue and can reduce the risks of misunderstandings and false allegations.

17.8 All low-level concerns, including those determined to be unfounded, will be recorded in writing by the Headmistress. The record will include details of the concern, the context in which the concern arose, and any actions taken, decisions reached and the eventual outcome. The name of the individual sharing their concerns will be noted. If the individual wishes to remain anonymous, then this will be respected as far as reasonably possible. Records of low-level concerns are confidential and securely stored by the DSL in accordance with the Data Protection Act 2018, the Data (Use and Access) Act 2025 and the UK General Data Protection regulation until the individual ceases to be employed by the School.

17.9 Low-level concerns which relate exclusively to safeguarding (and not to misconduct or poor performance) will not be referred to in employment references provided by the School. 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 will be referred to.

17.10 Records of low-level concerns will be reviewed at least termly by the DSL, Headmistress and Chair of Governors to ensure that all such concerns are being dealt with promptly and appropriately, and that any potential patterns of concerning, problematic or inappropriate behaviour are identified. Where a pattern of behaviour is identified consideration will be given to whether the matter should be escalated to the LADO and, more broadly, whether existing policies need to be revised and/or additional training is required to address wider cultural issues and minimise the risk of recurrence in the future.

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

18.1 Most instances of pupils causing harm to each other will be dealt with under the School's Prevention of 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). This type of abuse can happen both inside and outside of School and online.

18.2 Child on child abuse is a safeguarding issue for both the victim and alleged perpetrator. All staff should know that child-on-child abuse is preventable and it may involve serious physical harm or threats involving weapons.

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- discriminatory behaviour, including racism, faith-targeted abuse, and other prejudice-based incidents,
- abuse in intimate personal relationships between children (also known as teenage relationship abuse),
- physical abuse such as hitting, kicking, shaking, biting, hair-pulling or otherwise causing physical harm this may include an online element which facilitates, threatens and/or encourages physical abuse);
- physical assault and harm, or the threat of harm with a weapon,
- harmful sexual behaviour, sexual violence and sexual harassment – which may include misogyny/misandry.
- consensual and non-consensual making or sharing of nudes and semi nudes, including those generated using AI. The School will take a safeguarding approach in response to all such incidents, with a proportionate approach that considers the age, development and circumstances of the children involved, as well as any elements of coercion, exploitation or vulnerability.
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- upskirting, which typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or to cause humiliation, distress, or alarm, and initiation/hazing type violence and rituals. Upskirting is a criminal offence and anyone of any gender can be a victim.

18.4 It is more likely that girls will be victims and boys perpetrators of child-on-child abuse. Child-on-child abuse also 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.

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

18.6 A child or young person who is (or is perceived to be) lesbian, gay, bisexual or transsexual (LGBT+) may mean that they can be targeted by other children and subjected to harm because of this. This risk can be compounded where such pupils lack a trusted adult with whom they can be open. With this in mind, the School provides a number of 'safe spaces' for these children to speak out and share their concerns, including the Health Centre and The GSA (Gay Straight Alliance).

18.7 A child or young person might be at an increased risk of being neglected, abused or exploited by peers and/or persons inside or outside of their family unit because of their medical condition. Pupils with known medical conditions and allergies are supported accordingly.

18.8 Children can be particularly vulnerable in residential settings such as boarding accommodation. All staff and especially those who are based in the boarding houses need to be alert to welfare issues children living away from home may experience as well as the potential for child-on-child abuse. Particular risks associated with young people sharing accommodation overnight include: bullying or intimidation by peers; initiation or hazing rituals; sexual relationships; use of mobile devices in the boarding house; concerns regarding educational guardianship arrangements; and access to staff accommodation. These risks have been assessed and a variety of policies and procedures are in place to mitigate them.

18.9 Whilst sexual violence and sexual harassment are forms of child-on-child abuse to which the comments and measures below concerning awareness, education and reporting apply, their particular nature requires extra commentary, which is provided in section 20.

18.10 Downe House has an important role in developing pupils' understanding of what constitutes child-on-child abuse and instilling behavioural norms that minimise the risk of it taking place. With this in mind, staff should 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 not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing any form of child-on-child abuse as 'banter', 'just having a laugh' or 'boys being boys'; and
- implementing the School's prevention of bullying strategy.

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

- providing developmentally appropriate Learning for Life (PSHE) 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 pupils to raise concerns with staff, knowing that they will be listened to, believed and valued
- delivering targeted work on assertiveness and keeping safe for those pupils identified as being potentially vulnerable

18.11 If a pupil discloses that they or another pupil has been the victim of child-on-child abuse, the guidance for gathering and recording the information provided in Section 11 of this policy should be followed.

18.12 If an allegation of child-on-child abuse has been made the DSL must be informed as soon as possible. Where the DSL considers that the behaviour meets the local authority threshold criteria (ie where there is reasonable cause to suspect a pupil is suffering or is likely to suffer significant harm), 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 the latest version of KCSIE.

18.13 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. Where it appears that a potential crime has been committed by a pupil, the DSL will contact the police before proceeding with an internal investigation.

18.14 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.

18.15 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 procedures, will 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.

19 Child-on-child sexual violence and sexual harassment

19.1 Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Behaviour outside the normal range is called harmful sexual behaviour (HSB) because it is harmful to others or the student themselves. HSB can occur online and/or face-to-face. (For a table that presents key features of the continuum, please see Appendix 6.)

Central to determining whether sexual behaviour between children can be considered harmful is the age and development of those involved. For example, sexual behaviour can be considered harmful if one of the children is much older, particularly if there is more than two years' difference, or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child if they have power over them, for example, if the older child is disabled or smaller in stature. For some there may be a link between viewing online pornography and subsequent HSB.

HSB can escalate over time. Early intervention when inappropriate behaviour is identified can help prevent problematic, abusive and/or violent behaviour in the future. It should be noted that the majority of young people displaying HSB do not become sexual offenders as adults.

19.2 Sexual harassment refers to 'unwanted conduct of a sexual nature' and can occur online and offline and both inside and outside of school. Sexual harassment can take a wide variety of forms:

- Sexual comments, such as: telling sexual stories, making lewd comments or sexualised remarks about a person's clothes or appearance, using sexualised names, sexual jokes or taunting etc
- Physical behaviour, such as deliberately brushing against someone, interfering with clothing (flicking bra straps, lifting up skirts etc), pulling down trousers, upskirting, displaying pictures, drawings or photos of a sexual nature
- Online sexual harassment, such as non-consensual sharing of images and videos (nudes and semi-nudes), sharing unwanted explicit content, sexualised online bullying, unwanted sexualised comments and messages, sexual exploitation and coercing others into sharing images of themselves or performing acts they are not comfortable with online

19.3 Sexual violence includes acts such as sexual assault, assault by penetration, rape and causing someone to engage in sexual activity without consent (this could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party). 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. Consent to sexual activity may be given to one sort of sexual activity but not another and can be withdrawn at any time during sexual activity.

19.4 Sexual harassment and sexual violence can occur between pupils of any age and sex. However, staff should be aware that some groups are at greater risks than others. Girls, pupils with SEND, and LGBTQ+ pupils are more likely to be victims of these types of abuse. Evidence shows that boys are more likely to be perpetrators and girls to be victims. Young people who are victims of sexual harassment and sexual violence will find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment.

19.5 Pupils may not find it easy to tell staff about their abuse verbally. They can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report, or a member of staff may overhear a conversation that suggests a child has been harmed, or a child's own behaviour might indicate that something is wrong.

19.6 All staff will be trained to manage a report of child-on-child sexual violence and sexual harassment. It is essential that **all** victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the School should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting sexual harassment or sexual violence. Nor should a victim ever be made to feel ashamed for making a report, or their experience minimised. It is also important to emphasise that the law is in place to protect children and young people rather than criminalise them.

19.7 Section 12 of this policy provides general guidance for listening to pupils and record-keeping. Effective safeguarding practice in the context of claims of sexual harassment or sexual violence further requires the following:

- If possible, reports should be managed with two members of staff present, (preferably one of them being the Designated Safeguarding Lead or a Deputy).
- Where the report includes an online element, staff should know and following the searching, screening and confiscation advice (for schools) and UKCIS advice on sharing nudes and semi-nudes. **The key consideration is for staff not to view or forward illegal images of a child.** The UKCIS advice provides more details on what to do when viewing an image is unavoidable. In some cases, it may be more appropriate to confiscate any devices to preserve any evidence and hand them to the police for inspection.
- The recognition that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory and so pupils may not be able to recall all details or timeline of abuse.

19.8 The School will respond appropriately to all reports and concerns about sexual harassment and/or sexual violence both online and offline, including those that have happened outside of the School. The DSL/DDSLs are likely to have a complete safeguarding picture and be the most appropriate people to inform the School's initial response. Important considerations will include:

- the wishes of the victim in terms of how they want to proceed*;
- the nature of the alleged incident(s), including whether a crime may have been committed and/or whether harmful sexual behaviour has been displayed;
- the ages and developmental stages of the children involved;
- any power imbalance between the children (eg whether the alleged perpetrator(s) is/are significantly older, more mature and confident);
- whether the victim has a disability or learning difficulty;
- whether the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature);
- if the sexual harassment or sexual violence took place within an intimate relationship between those involved;
- the risk of intra familial harms and the need for siblings to be supported following an incident;
- whether there are ongoing risks to the victim, other children, adult pupils or school or School staff;
- and other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

*Note: The victim of sexual harassment or violence may ask the School not to tell anyone but the DSL has to balance the victim's wishes against their duty to protect the victim and other pupils in the School. The general rule of thumb is that if a pupil is either at risk of harm, or is in immediate danger or has been harmed, a referral to local authority social care should be made. Rape, assault by penetration and sexual assaults are crimes and must therefore be reported to the police.

19.9 The DSL will reach a judgement about which of the following four ways is the most appropriate for handling the case:

- Internal management: handled entirely within the School.
- Early help: where the pupils concerned do not require referral to statutory services but may benefit from assistance from an external agency.
- Local authority children's social care: where a child has been harmed, is at risk of harm, or is in immediate danger.
- Report to the police: in addition to the above, where the seriousness of the concern merits it. Where it appears that a potential crime has been committed by a pupil, the DSL will contact the police before proceeding with an internal investigation.

In all but the first circumstance, how the case is managed will be determined in conjunction with the local authority MASH (Multi Agency Safeguarding Hub) team and/or the police. The School will follow the guidance as set out in detail in the latest version of KCSIE.

19.10 The School will do all that it reasonably can to protect the anonymity of pupils involved in any report of sexual harassment or sexual violence. Amongst other things, this will mean carefully considering which staff should know about the report and any support that will be put in place for those involved.

19.11 Risk and needs assessments are integral to the management of most cases of sexual harassment and all cases involving sexual violence. These assessments must be formulated on a case-by-case basis and should be conducted **immediately** once an incident comes to light rather than waiting for the outcome (or even the start) of a local authority children's social care and/or police investigation. Where sexual violence is alleged to have occurred the risk and needs assessment should consider:

- The victim, especially their protection and support
- Whether there may have been other victims
- The alleged perpetrator(s)
- All other children at the School, especially any actions that are appropriate to protect them from the alleged perpetrators
- The time and location of the incident, and any action required to make the location safer

Risk assessments will be recorded in writing and kept under regular review by the DSL to ensure the risk mitigation measures that have been put in place are effective and reflect changing circumstances. It is highly likely that these risk assessments will be informed by assessments made by social workers and/or sexual violence specialists.

19.12 Where a report has been made to the police, the School will seek their advice and agree what information can be disclosed to staff and others, in particular the alleged perpetrators and their parents or carers. Central to this discussion will be how the victim can best be protected. Thereafter the DSL will continue to work closely with the police (and any other agencies as required) and keep up to date with how any investigation is progressing. The fact that another body is investigating or has investigated an incident does not necessarily prevent the School from coming to its own conclusion, on the balance of probabilities, and imposing a sanction accordingly. However, the School will consider if, by taking any action, an external investigation and/or any subsequent

prosecution could be compromised. There may also be circumstances in which it would be unreasonable or irrational to reach its own view about what has occurred while an independent investigation is ongoing. The School will be guided by the police and/or local authority children's social care when making this decision.

19.13 Where allegations of sexual harassment or sexual violence are contested there can be lengthy delays before the criminal process is complete. In such circumstances, a determination made will need to be made on a risk assessment basis as to whether it is viable for both the victim and alleged perpetrator to continue their education at the School. Consideration will be given to: stress and trauma to the victim; the potential for the suspected person to intimidate the victim or witnesses; and the need to protect the rights of the alleged perpetrator to education, privacy and family life. The decisions taken must be proportionate to the alleged offence and balance the rights of the victim and perpetrator(s) and will be guided by advice provided by children's social services and the police.

19.14 Not all cases reported to the police are progressed and those that are may result in a not guilty verdict. The fact that an allegation was withdrawn or could not be substantiated does not necessarily mean that it was unfounded. Under these circumstances, the School will discuss with the victim how the situation is to be managed and ongoing support will be provided to them and the alleged perpetrator(s).

19.15 Where a criminal investigation into sexual harassment or sexual violence leads to a conviction of caution, the School will, if it has not already done so, consider what sanctions it wishes to impose in line with its behaviour policy. The sanction imposed will be proportionate to the offence and the circumstances in which it took place. Proven cases of rape and assault will constitute a serious breach of discipline and are highly likely to result in the permanent exclusion of the perpetrator(s). Where an offence justifies a lesser sanction, consideration will also be given to how best to keep the victim and perpetrator(s) a reasonable distance apart on School premises (including during before and after school-based activities) and on transport to and from school. Any arrangements will take account of the wishes of the victim and will be discussed with their parents or carers and those of the perpetrator(s). Support arrangements will be put in place for both the victim and the perpetrator(s).

19.16 Sexual assault can result in a range of health needs, including physical, mental, and sexual health problems and unwanted pregnancy. Where pupils have a health need arising from sexual assault or abuse, the School will assist them in gaining access to suitable specialist support services.

19.17 If a report of sexual violence or sexual harassment is determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider if disciplinary action should be taken against the pupil who made the allegation and/or whether a referral to local authority children's social care is appropriate.

20 Other safeguarding arrangements

20.1 **Mental health**

All staff should also be aware that mental health problems can, in some cases, develop into safeguarding concerns. This could include self-harm, signs of an eating disorder, suicidal ideation or risk of suicide. This could also 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 pupils 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.

If a child is struggling with their mental health, self-harming, has an eating disorder or is experiencing suicidal ideation and making plans to end their life, there are likely to be potential warning signs which education staff are well placed to recognise. These could include:

- significant changes in behaviour,

- ongoing difficulty sleeping,
- withdrawing from social situations,
- not wanting to do things they usually like, and
- physical signs of self-harm or neglecting themselves.

Not every child who exhibits these behaviours is suicidal or has a mental health concern. However, by identifying these and other potential warning signs, education staff can identify children who may be struggling with their mental health and contemplating suicide and offer support and vital early intervention. Schools and colleges should ensure that any interventions they offer are evidenced as safe and effective and appropriate for the need and phase of education.

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 or with the Senior Deputy DSL, Ellen Llewellyn, who is the Mental Health Lead at Downe House, who may in turn contact an appropriate external agency (such as Child and Adolescent Mental Health Services CAMHS).

Where support is needed, the DSL should consider whether to inform parents or carers to support the pupil's wellbeing, where doing so would not place the pupil at additional risk.

A referral to CAMHS for a pupil considered to require mental health support may need to be considered even where parents or the pupil do not wish this to happen or where it is felt that private support is not sufficient. Therefore, consideration will be given to this and set against the wider safeguarding responsibility of the School. Where the referral has been made by the Health Centre, the Safeguarding team will also follow up on any such referral where CAMHS, parents or pupil have opted out of support.

20.2 **Teaching pupils to keep themselves safe**

The School has an important role to play in preventative education to prepare students for life in modern Britain and to create a culture of zero tolerance towards behaviours such as sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment. This culture is underpinned by the School's behaviour policy and pastoral support systems. Records of any such behaviours will be kept separately within CPOMS.

The School is committed to raising awareness of personal safety whenever the opportunity arises. This includes highlighting general health and safety matters in and around the School as well as in the wider world and educating pupils about specific safeguarding issues, such as staying safe online (including when they are accessing remote learning), radicalisation, grooming, child sexual exploitation, child criminal exploitation, healthy relationships, mental health, substance misuse, bullying and sexting. These issues are explored in a variety of contexts, including academic and Learning for Life (PSHE) lessons, the Assembly Programme, in House and in individual meetings with Academic Tutors and House Staff. Staff are also aware of the ongoing need to promote fundamental British values as a means of building resilience to the risks of radicalisation. A range of written and online resources are also provided to pupils when they join the School (House Handbooks, House A-Zs, Prevention of Bullying Policy and Acceptable use of IT Policy); these are also available on the Pupil Hub on Schoolbase. Pupils are specifically taught how to identify risks and how to modify behaviour to mitigate these risks.

20.3 **Gender questioning pupils**

When supporting a gender questioning pupil, the School will take a cautious approach as there remain many unknowns about the impact of social transition and children may well have wider vulnerabilities, including having complex and psychosocial needs. The School will not initiate any action in this area, but will usually work in partnership with parents, except in rare circumstances where to do so would constitute a significant risk of harm to the pupil. Team meetings will be called with the relevant staff to consider how best to support a gender questioning pupil, including whether parents should be informed, how to do this and what risks are identified. All records of such meetings will be recorded in writing (such as via CPOMS).

This will be in accordance with our **Gender Identity Protocol.**

20.4 **Online safety**

The widespread use of digital communications technologies, such as personal mobile devices and the internet, presents young people with a host of opportunities for learning, participation, creativity and self-expression. At the same time, it has become a significant component of many safeguarding issues, including child exploitation, radicalisation and sexual predation. Issues of online safety can be broadly categorised into four areas of risk:

1. **Content**: Being exposed to illegal, inappropriate or harmful content such as pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories,
2. **Contact**: being subjected to harmful online interaction with other users or generative AI applications that simulate this; for example: peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes,
3. **Conduct**: online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, including those generated using AI and online bullying, and
4. **Commerce:** Risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils or staff are at risk, please report it to the Anti-Phishing Working Group (https://apwg.org/).

Guidance to support schools and colleges to understand safety considerations and legal responsibilities if they choose to use Generative AI (either teacher-facing or pupil-facing) can be found at Generative artificial intelligence in education.

The School also has a range of filtering systems in place to keep pupils safe when accessing the internet whilst at the School, and usage is also monitored (see the School's E-safety Policy for further details). Filtering refers to the technology preventing access to harmful and inappropriate content, whilst monitoring refers to the practical steps staff take to ensure harmful or inappropriate access is not made. Monitoring can include:

- Physical monitoring
- Live software monitoring
- Monitoring user logs
- Monitoring individual devices.

We make sure that any School devices used away from the School site are also subject to filtering and monitoring procedures. During non-term time, the School do not pro-actively monitor School devices and this responsibility is passed to parents. Each year we review our filtering and monitoring procedures to ensure that they effectively prevent access to harmful or inappropriate content. All our staff take part in annual cyber security training.

The School recognises, however, that pupils may use their 3G/4G/5G connection and bypass its filters. This access means some pupils, could whilst at School, potentially use these devices to bully, control or sexually harass, share indecent images, view and share pornography and other harmful content. Downe House employs a range of strategies to promote an understanding of online risks and to discourage misuse:

- clear policies on e-safety and acceptable use of ICT
- exploring e-safety in detail via the curriculum and pastoral events;
- ensuring systems are in place to facilitate early disclosure of potentially harmful online incidents;
- providing information to parents about how Downe House uses filters and monitors online use and, more generally, to promote understanding of the varied and evolving nature of online risks; and
- informing pupils (and their parents) of the online activity that will be expected of them as members of the School: the websites they will be expected to access; and how and with whom they will interact online (eg email or Teams meetings with their Housestaff/Academic Tutor; and
- deterrence through the use of robust sanctions against those found to have abused others online.

Regular reviews of the filtering and monitoring systems are scheduled to ensure effectiveness. Reviews will be carried out by the SLT member responsible for filtering and monitoring, with the support of the DSL.

Mobile phones and cameras

The School provides mobile phones for staff for trips and cameras for taking photographs when necessary. Mobile phones should not be used when supervising or teaching pupils except in cases of emergency or for the completion of electronic class registers. Images of a pupil or pupils must not be taken or stored on any personal mobile phone. If a phone is to be used for School social media purposes whilst on educational visits, permission must be obtained from a member of the Leadership Team and reference to their use and subsequent safety of data must be referred to in the trip risk assessment. The images should be deleted from the phone within 24 hours of a return to School. This will be checked by the EVC following residential trips and in Department meetings as a standing agenda item.

Photographs and videos are taken of pupils by staff for a variety of purposes, including displays of work/activities, personal records of achievement and for the School website and newsletter. Written permission is obtained when a pupil joins the School and this also indicates the level of consent, including where images may be used (personal records only or personal records and on the School website and in School publications). The DSL will ensure that all staff are aware of the names of pupils who may not be photographed or where there is limited consent. Images of pupils on the website will not be named. Images may only be captured on School cameras and the images may only be stored on those cameras and on the School's password-protected computers. Once images have been transferred from a camera onto a computer the images should be deleted from the camera immediately. Additional copies may be stored on flash drives, but these must be stored securely in a locked cupboard. Images must not under any circumstances be transmitted by staff to other individuals over the internet.

When taking photographs or recording video footage, staff should have regard to the following guidance:

- all pupils must be appropriately dressed
- images that only show a single pupil with no surrounding context should be avoided: photographs of three or four pupils are more likely to include the learning context
- use photographs that represent the diversity of pupils participating
- do not use images that are likely to cause distress, upset or embarrassment

- do not use images of a pupil who is considered vulnerable, unless parents or a guardian have given specific written permission

The Foundation Office will review (at least annually), stored images and delete unwanted and out-of-date material.

Parents should be made aware of the need for sensitivity and respect when filming/photographing events featuring their own child or children. Staff should monitor the use of cameras at these events and ask anyone behaving inappropriately to cease filming/taking photos.

20.5 **The use of Reasonable Force**

There are limited circumstances when it is appropriate for staff in School to use 'reasonable force' to safeguard children. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a pupil to safety by the arm, to more extreme circumstances such as breaking up a fight or where a pupil needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is necessary for the least amount of time', the application of which will depend on the circumstances. Staff should recognise that children with SEND, mental health problems or those with medical conditions, have an additional vulnerability. In the event that a member of staff is required to use "reasonable force", this should be reported to the DSL or Deputy, at the earliest convenience following this. Where there is a concern around a pupil that reasonable force may be required, an individual support plan should be prepared accordingly.

20.6 **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 Co-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's Risk Assessment Policy.

20.7 **Staff recruitment**

The School is committed to safer recruitment processes. Members of teaching and non-teaching staff at the School, including part-time staff, temporary and supply staff, and visiting staff such as musicians and sports coaches are subject to the background checks required under the Education (Independent School Standards) Regulations 2014 and in accordance with the latest version of KCSIE. For most appointments, an enhanced DBS check with 'barred list' information will be required. At least one member of any staff recruitment panel will have had Safer Recruitment training. The School's separate Recruitment, Selection and Disclosure Policy contains further details about how the process of staff recruitment is conducted.

20.8 **Children absent or missing from education procedures**

All staff are aware that children being absent, as well as missing, from education for prolonged periods and/or on repeat occasions, 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/or persistent absences from education and, where necessary, reporting to the Local Authority any pupil who is 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.

Children missing from education are children of compulsory school age who are not registered at a school and are not receiving suitable education otherwise than at a school. 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; ie, where a compulsory school-aged pupil 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 pupil 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 the pupil normally lives with and which parents hold parental responsibility); address of new or additional places of residence; at least one contact telephone number at which the parent can be contacted in an emergency*; date of birth; name and address of last School attended (if any); and details of whether they are a boarder or a day pupil.

**Note: In line with KCSIE 2026, it is the School's policy to hold a minimum of two emergency contact numbers for each pupil.*

20.9 **Elective home education**

Where a parent expresses their intention to remove a pupil from Downe House in order for them to be home educated, the School will work with the relevant local authority and other key professionals to coordinate a meeting with parents where possible, ideally before a final decision is made, which will include the sharing of any relevant safeguarding files. This is to ensure that parents have considered what is in the best interests of their child.

20.10 **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 Downe House'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 West Berkshire Safeguarding Children Partnership 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 the School's Acceptable Use Policy) and set out the filtering and monitoring mechanisms in place.

Downe House's Prevent Policy contains further details about how the School fulfils the statutory requirements imposed by the Prevent Duty. The DSL and any deputies are familiar with the revised Prevent Duty guidance for England and Wales, particularly paragraphs 141–210, which are relevant to education and childcare settings. The DSL and deputies are aware of and follow local procedures for making a Prevent referral where there are concerns that a student may be at risk of radicalisation or being drawn into terrorism.

20.11 **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 Deputy Head (Pastoral) in order that they may carry out a vetting procedure. The event organiser or, if the organiser is a pupil, a member of the Leadership Team, 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. 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.

20.12 **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, in accordance with the relevant statutory duties. 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 as soon as possible and within five days for an in-year transfer or within the first five days of the start of a new term to allow the new school to have support in place when the pupil arrives. 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 pupil leaving: for example, information that would allow the new school to continue supporting victims of abuse and have support in place for when the pupil 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 in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including in relation to their education outcomes. The Data Protection Act 2028, the Data (Use and Access) Act 2025 and UK 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 safeguard and 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 May 2024. See Appendix 4.

20.13 **Whistleblowing**

All staff are required to report to the Headmistress 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 Headmistress (or a member of the Leadership Team) 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 section 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.

20.14 **School premises, security and visitors**

- The School will take all practicable steps to ensure that all School buildings are as secure as circumstances permit. The School buildings have CCTV cameras at their main entrances and other locations. Staff and pupils need to use their staff or pupil cards as swipe cards to gain access to School buildings.
- All staff are identified by photo ID cards worn at all times during School-related activities and duties. An electronic Visitors' Book 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' on a red lanyard, which must be clearly displayed and worn at all times whilst on the School's premises.

20.15 **Use of School premises by third parties**

Downe House hires and rents out facilities to organisations, both during term time and the holidays. Where activities and courses are provided by the School (such as for Summer Language courses), this policy and all other arrangements for child protection will apply. Where services or activities are supplied to children by another organisation, the School will seek reassurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed), regardless of whether the pupils who make use of these services or activities are on the School roll. This requirement forms part of any lease or hire agreement made with third parties and failure to comply with this will lead to the termination of the contract or agreement.

20.16 **Alternative provision**

If the School places a pupil with an alternative provider for example as part of the Downe House Global Schools Exchange Programme, it continues to be responsible for the safeguarding of that pupil and will take all reasonable steps to ensure that the placement meets the pupil's needs.

20.17 **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 content and operation of this policy and present an annual report to the Downe House Board of Governors.
- The DSL will monitor the operation of this policy and procedures on a day-to-day basis and will provide regular updates at Leadership Team meetings. In addition, the DSL will present a termly report to the Governors.
- The Downe House Board of 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.

20.18 **Other relevant policies**

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

- Prevention of Bullying Policy
- Boarders' Handbook
- Health and Safety Policy
- Attendance Policy
- Educational Visits Policy

- Recruitment, Selection and Disclosure Policy
- Code of Conduct for Staff
- Policy for Promoting Good Behaviour
- Cyber-bullying Policy
- E-Safety Policy
- IT acceptable Use Policy
- Whistleblowing Policy
- Supervision Policy
- Missing Pupil Policy
- Mental Health and Wellbeing Policy
- Prevent Duty Policy
- Mobile Phone Use Policy
- Relationships and Sex Education Policy
- Educational Guardianship Policy
- Gender Identity Protocol

Appendix 1: Other types of abuse

- **Child abduction and community safety incidents:** child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers. The most common form of abduction is by a parent or family member and often occurs in the wake of an acrimonious separation or divorce where there is a dispute over custody arrangements. Abduction by strangers is much rarer. There are a variety of reasons why strangers abduct children, including:

  - Sexual interest in the child by the offender
  - Offender's desire to control, dominate, and cause harm to the child and /or a child's family
  - Emotional/mental health issues
  - Financial motives where the abductor intends to profit from the abduction by demanding a ransom or by trafficking the child (see sections on child sex exploitation, child criminal exploitation and modern slaver below)

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

- **Children absent and/or 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 can act as a vital warning sign of a range of safeguarding possibilities. These include abuse and neglect, which may include sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation (FGM), 'honour'-based abuse or risk of forced marriage.

  Attendance registers are carefully monitored to identify any trends and action will be taken in accordance with the School's attendance policy if any absence of a pupil gives rise to concern. The School will report to the Local Authority instances of unexplainable and/or persistent 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 Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE):** Both CCE and CSE are forms of abuse that occur when 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. This may be done (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 and/or (c) through violence or threat of violence. An imbalance of power is commonly associated with age difference, but it can also be due to a range of other factors including gender, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic and other resources.

  Perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation. Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation. More detailed definitions of CCE and CSE are given below:

- **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, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or the threat of violence. The victim (male or female) 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. 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 (eg through others copying videos or images they have created and posted on social media).
- **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 taking part in any criminal or sexual activity. 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 being forced or manipulated into threatening/committing serious violence to others.

- **County lines:** "County lines" is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line". This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children's homes and care homes. Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. If a pupil is suspected to be at risk or involved in county lines, a safeguarding referral should be considered (via the National Referral Mechanism) alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

- **Children and the court system:** Children are sometimes required to give evidence either as witnesses in the criminal courts or as part of family court procedure. This can be stressful and may reflect existing conflict and difficulties in the family. Staff members should be aware that any pupil who is involved in the court process may be at risk of a particular safeguarding issue. The Ministry of Justice has produced age appropriate guides for children who may have to give evidence in the criminal courts.

- **Children with family members in prison:** Children with a parent in prison are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. National Information Centre on Children of Offenders provides information designed to support professionals working with offenders and their children to help mitigate the negative consequences for those children.

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

- unauthorised access to computers (illegal 'hacking');
- Denial of Service (DoS) or Distributed Denial of Service (DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence.

Children with skill and an interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a pupil in this area, the Designated Safeguarding Lead (or a Deputy), should consider referring them to the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low-level cyber-dependent offences and divert them to a more positive use of their skills and interests.

- **Domestic abuse:** Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents involving: physical or sexual abuse; violent or threatening behaviour; controlling or coercive behaviour, economic abuse; psychological, emotional or other abuse and includes where they see, hear or experience its effects. For the definition to apply, both parties must be aged 16 or over and personally connected. Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socio-economic status sexuality or background. Domestic violence can take place inside or outside the home.

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

When young people experience domestic abuse within their own intimate relationships, this is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators offered support.

- Operation Encompass operates in all police forces across England. Their aim is to ensure all children experiencing domestic abuse receive timely support in their school. It helps police and schools work together to provide emotional and practical help to children. See https://www.operationencompass.org/.

- **Serious violence:**

Serious violence is a continuing safeguarding concern. It may involve physical assault, carrying, threatening with, or using weapons, often in the context of peer conflict or bullying, and it can also be associated with criminal exploitation. Staff should report any concerns about a pupil carrying or using a weapon (or expressing intent to do so) to the DSL (or a deputy). The DSL should assess the risk to both the individual pupil and others in the school, considering wider information or concerns, and take appropriate action. Depending on the risk, they should put in place a safety and support plan, and where relevant, consider action to de-escalate peer conflict.

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from School, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

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

- **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.

- **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 ways to coerce a person into marriage. Since February 2023 it is also a crime to carry out any whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used.

- **Modern slavery:** Modern slavery encompasses human trafficking and slavery, servitude, forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal or organs. The modern slavery statutory guidance provides more information on how to identify and support victims.

- **Radicalisation and extremism: "**Radicalisation" refers to the process of a person legitimising support for, or use of, terrorist violence. "Terrorism" is defined as an action that endangers or causes serious violence to a person/people; causes serious damage to property, or seriously interferes with 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. "Extremism" is defined in the Prevent strategy as vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces. Extremist views may result in terrorist activity. The use or 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 a sense of identity, a 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.

There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology. As with managing other safeguarding risks, staff should be alert to changes in behaviour which could indicate that they may be in need of help or protection. Young people at risk of radicalisation may display different signs or seek to hide their views. 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 will apply the "notice, check share" procedure as outlined in the Prevent duty and may then continue to make a referral to the police if appropriate. Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It is run in every local authority and addresses all kinds of extremism, including those related to Islamism or the extreme-right. 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.

- **Nudes and semi-nudes, including where generated by AI**. The term 'making or sharing nudes and semi nudes' refers to the creation, sending or posting of nude or semi-nude images by young people under the age of 18. The term 'images' includes all visual content, such as photographs, videos and livestreams. Images may be taken by the child themselves (sometimes referred to as 'self-generated imagery') or taken or created by another person. They may also be digitally altered or wholly generated using artificial intelligence, including what are sometimes described as 'deepfakes' or 'deep nudes'. 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. Also, consensual and non-consensual sharing of nude or semi-nude images and/or videos can be an indicator that children are at risk. Consequently, a

member of the DSL team 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 peer 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.

Management of an incident. Any direct disclosure by a pupil should be taken seriously. Pupils who make such disclosures are likely to be embarrassed and worried about the consequences. Typically, they will have tried to handle the problem themselves and they will consider notifying a member of staff as a last resort. Given the potential seriousness of the situation, the DSL must be informed as soon as possible. The DSL will conduct an initial review, which will include meeting relevant staff and the pupils, to consider:

- whether there is an immediate risk to any child or young person;
- if a referral should be made to the police and/or local authority children's social care;
- if it is necessary to view the image(s) in order to safeguard the pupil **– in most cases, images or videos should not be viewed**;
- what further information is required to decide on the best response;
- whether the image(s) has been shared widely and via what services and/or platforms;
- whether immediate action should be taken to delete or remove images or videos from devices or online services or to confiscate the device used (if possible);
- any relevant facts about the pupil involved which would influence the DSL's risk assessment; and
- whether to inform the parents or whether involving them would put young person at risk of harm.

Viewing the Imagery. 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. If a device is confiscated, it should be turned off and locked away securely until it is passed on to the DSL or an external agency such as the police. Staff must not intentionally view any nudes and semi-nudes unless there is good and clear reason to do so. The decision to view any imagery should be based on the professional judgement of the DSL. Imagery should never be viewed if the act of viewing will cause significant distress or harm to those involved. The DSL must further be satisfied that it is the only way to make a decision about whether to involve other agencies, i.e. that it is necessary (i) to contact a reporting agency (such as the IWF) to have it taken down; or (ii) to support the pupil or parent in making a report; or (iii) or that is unavoidable because the pupil has shown it directly to a staff member or because the imagery has been found on School equipment. Along with our own Safeguarding and Child Protection procedures, the School will follow the advice given in *Sharing nudes and semi nudes: advice for education settings working with children and young people (March 2024)*.

Referral. Once the DSL has sufficient information, a decision will be taken over whether the matter should be dealt with internally or referred to local authority children's social care and/or the police. The DSL will be informed by the need to ensure the welfare and protection of the pupil. Records will be kept of the information available and the rationale for any decisions taken.

A referral will always be made to local authority children's social care and/or the police immediately if the incident involves:

- the incident involves an adult.
- there is reason to believe that a young person has been coerced, blackmailed or groomed, or there are concerns about their capacity to consent

- what you know about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- you have reason to believe a child or young person is at immediate risk of harm owing to the sharing of nudes and semi-nudes, for example, they are presenting as suicidal or self-harming

Support. It is vital that continuing support be given to the pupil so that they know they are not alone. Pupils must be advised on how to report sexual images or videos, how to get them taken down and how to delete it from their accounts. Pupils must also be made aware of the importance of not sharing the image further. Most online service providers offer a reporting function for account holders and some offer a public reporting function to enable a third party to make a report on behalf of the child or young person. Pupils can use the IWF and Childline's Report Remove tool to report images and videos they are worried have been, or might be, shared publicly.

Deletion of imagery. If the School decides that other agencies do not need to be involved, then consideration should be given to deleting nudes and semi-nudes from devices and online services to limit any further sharing. In most cases, pupils should be asked to delete the imagery and to confirm that they have deleted them. Any decision to search a pupil's device and delete imagery should be based on the professional judgement of the DSL.

Recording incidents. All incidents relating to nudes and semi-nudes being shared need to be recorded. This includes incidents that have been referred to the police or local authority children's social care and those that have not been reported. Copies of imagery should not be taken.

Appendix 2: Further information on signs of abuse

Physical abuse

Physical signs	Behavioural signs
• Unexplained bruises and welts on the face, throat, arms, buttocks, thighs or lower back in unusual patterns or shapes which suggests the use of an instrument • Unexplained burns, especially burns found on palms, soles of feet, abdomen or buttocks • Scald marks: immersion burns produce 'stocking' or 'glove' marks on feet and hands or upward splash marks, which may suggest hot water has been thrown over a child • Human bite marks • Broken bones	• Behavioural extremes (withdrawal, aggression or depression) • Unbelievable or inconsistent explanations of injuries • Fear of parents being contacted • Flinching when approached or touched • Truancy or running away from home

Emotional abuse

Physical signs	Behavioural signs
• Eating disorders, including obesity or anorexia • Speech disorders (stammering) • Nervous disorders (rashes, hives, facial tics, stomach aches)	• Fear of parent being approached • Fear of making mistakes • Developmental delay in terms of emotional progress • Cruel behaviour towards children, adults or animals • Self-harm • Behavioural extremes, such as overly compliant/demanding, withdrawn/aggressive, listless/excitable

Sexual abuse

Physical signs	Behavioural signs
• Torn, stained or bloody underclothes • Pain or itching in genital area • Bruises or bleeding near genital area or anus • Sexually transmitted infections • Pregnancy • Discomfort when walking or sitting down	• Self-harm • Sexual knowledge or behaviour (promiscuity) that is beyond their age/developmental level • Sudden or unexplained changes in behaviour • Avoidance of undressing or wearing extra layers of clothing • Truancy • Regressive behaviours (bed-wetting or fear of dark)

Neglect

Physical signs	Behavioural signs
• Height and weight significantly below age level • Poor hygiene (lice, body odour etc)	• Erratic attendance at School • Chronic hunger or tiredness

• Inappropriate clothing for weather conditions • Indicators of prolonged exposure to the elements (sunburn, chapped extremities, insect bites) • Constant hunger, sometimes stealing food from others	• Having few friends • Assuming adult responsibilities

Child sexual exploitation

Physical signs	Behavioural signs
• Tiredness or mood swings • Bruising • Sexually transmitted diseases • Pregnancy	• Sudden decline in School performance, punctuality, attendance • In possession of expensive goods • Going to place they cannot afford • Age-inappropriate clothing • Inappropriate sexualised behaviour • Secretive • Deterioration in mental well-being • Mixing with older people • Misuse of drugs and alcohol

Child criminal exploitation and county lines

Physical signs	Behavioural signs
• *See sections on physical and sexual abuse* • Carrying weapons • Have been the victim or perpetrator of serious violence (eg knife crime) • Exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection • Found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity; owe a 'debt bond' to their exploiters • Have their bank accounts used to facilitate drug dealing	• Self-harming • Persistently absent from School or home and/or being found out of area • Deterioration in mental well-being • Unexplained acquisition of money, clothes or mobile phones • Excessive receipt of texts/phone calls and/or having multiple handsets • Relationships with controlling older individuals or groups • Significant decline in School performance • Gang association or isolation from peers or social networks • Involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs

Female genital mutilation

Physical signs	Behavioural signs
• Difficulty walking, sitting or standing • Bladder or menstrual problems	• Abroad for a prolonged period • Unusual behaviour after a period of absence

• Severe pain and bleeding • Infections such as tetanus, HIV and hepatitis B and C	• May talk of a 'special procedure' or 'special occasion to become a woman' • Spending longer periods in the bathroom • Reluctance to undergo normal medical examinations

Forced marriage

Physical signs	Behavioural signs
• Cut or shaved hair as a form of punishment for being disobedient	• Absence from School • Failure to return from visit to country of origin • Self-harm or attempted suicide • Running away from home • Early marriage of siblings • Sudden announcement of engagement to a stranger

Grooming

Physical signs	Behavioural signs
See section on sexual abuse	• Spending increasingly prolonged time online • Having older boyfriends or girlfriends • Secretiveness about who they are talking to online and what sites they visit • Possession of electronic devices such as mobile phones or webcams that parents have not provided • Engaging less with their usual friends • Using sexual language that you would not expect them to know • Going to unusual places to meet people • Using drugs and/or alcohol • Going missing from home or School

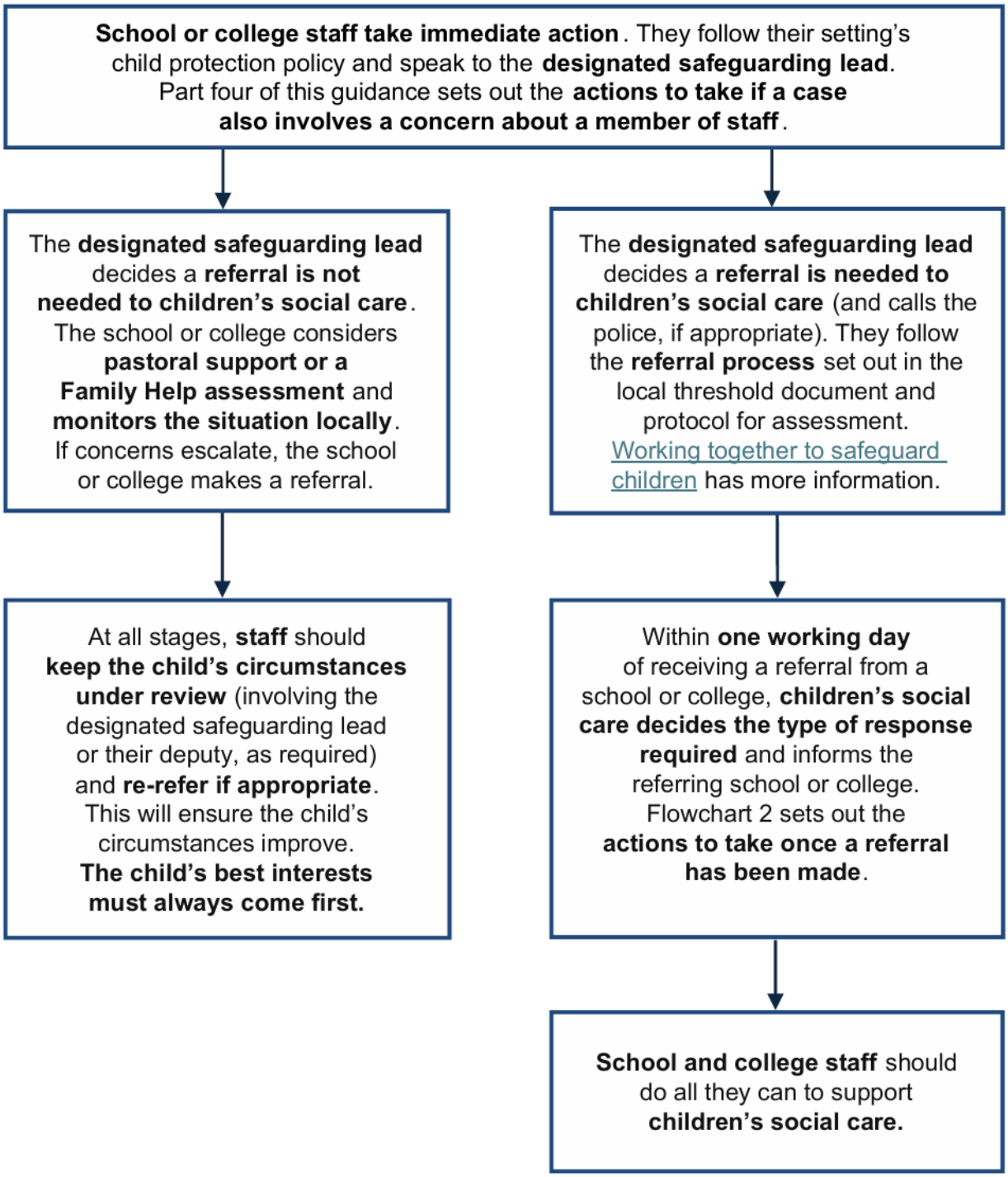
Radicalisation

Physical signs	Behavioural signs
• out of character changes in dress, behaviour, and peer relationships	• Beginning to isolate themselves from family and friends • Showing sympathy for extremist causes • Glorifying violence • Legitimising the use of violence to defend ideology or a cause • Evidence of possessing illegal or extremist literature • A sudden disrespectful attitude towards others • Unwilling to engage with or being abusive to pupils who are different

	• Increased secretiveness, especially in relation to internet use eg changing online identity or having more than one online identity • Unwillingness or inability to discuss their views • Feeling persecuted • Embracing conspiracy theories • Increasingly judgemental or argumentative • Advocating messages similar to illegal organisations such as 'Muslims Against Crusades' or other non-proscribed extremist groups such as the English Defence League

Additional advice and support can be found on pages 174 -182 KCSIE 2026

Appendix 3: Actions where there are concerns about a child (KCSIE, September 2026)



2. Early help involves providing support as soon as problem emerges. Where coordinated early help is required, an early help

Appendix 4: DSL Job Description

Job description for the Designated Safeguarding Lead (DSL and DDSLs)	
The School is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment	
Summary of the role	• To take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems in place) occurring at the School and to support all other staff in dealing with any child welfare and child protection concerns that arise. • To provide advice and support to other staff on matters of child welfare, safeguarding and child protection. • To take part in strategy discussions and inter-agency meetings and to support other staff to do so, and to contribute to the assessment of pupils. • To promote and safeguard the welfare of pupils in the School. • Whilst the activities of DSL can be delegated to appropriately trained deputies (DDSLs), the ultimate lead responsibility for child protection remains with the DSL. This lead responsibility cannot be delegated.
Main duties and responsibilities	**Further specifics:**
Availability	You are expected to: • ensure during term time that you or a Deputy will always be contactable to discuss any safeguarding concerns (on the numbers detailed in section 1); and • arrange adequate and appropriate cover arrangements for weekends/non term-time as detailed in the termly Emergency Contact rota.
Managing referrals	You are expected to refer cases: • of suspected abuse and neglect of any pupil at the School to the local authority children's social care and support staff who make referrals to local authority children's social care; • to the Channel programme where there is a radicalisation concern 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 Disclosure and Barring Service (**DBS**); and • where a crime has been committed to the Police.
Working with others	You are expected to: • act as a source of support, advice and expertise for all staff; • act as a point of contact with the three safeguarding partners: the local authority (Berkshire West); the Integrated Care Systems; and the police; • liaise with the Headmistress to inform her of issues; especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;

	• ensure that an 'appropriate adult' is present if a pupil is being questioned or detained by the police;
	• as required, liaise with the "case manager" (as per Part 4 of KCSIE) and the designated officer (LADO) at the local authority for child-protection concerns in cases which concern a staff member;
	• liaise with staff (especially teaching staff, pastoral support staff, IT staff, First Aiders, counsellors and the named persons with oversight for SEND) on matters of safety, 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;
	• promote supportive engagement with parents in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances; and
	• work with the Headmistress 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 the School. This includes:
	  ○ ensuring that the School knows who its cohort of children are who have or have had a social worker, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort; and,
	  ○ supporting 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 files	You are expected to:
	• ensure that child protection files are kept up to date.
	• ensure that information is kept confidential and stored securely.
	• ensure that records include:
	  ○ a clear and comprehensive summary of the concern;
	  ○ details of how the concern was followed up and resolved; and
	  ○ a note of any action taken, decisions reached and the outcome.
	• ensure that files are only accessed by those who need to see them and that where the file or content within it is shared, this happens in line with information-sharing advice, as set out in Part 1 and Part 2 of KSCIE.
	• ensure, when a pupil leaves the School, that:
	  ○ their child protection file is transferred to the new school or School as soon as possible (within 5 days for an in-year transfer or within the first 5 days of the start of a new term); and
	  ○ their child protection file is transferred separately from the pupil's main file in a secure manner and confirmation of receipt is received from the destination school or School; and
	• consider whether it is appropriate to share any information with the new school or School in advance of the pupil leaving.

Raising awareness	You are expected to: • ensure each member of staff has access to, and understands, the School's safeguarding policy and procedures, especially new and part-time staff; • ensure the School's safeguarding policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the Board regarding this, • ensure the safeguarding policy is available publicly and parents know that referrals about suspected abuse or neglect may be made and the role of the School 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 leadership staff.
Training, knowledge and skills	You are expected to ensure your child protection training and that of the DDSLs is sufficient and appropriate to provide the knowledge and skills required to carry out this role. This training must be updated every two years. All members of the DSL team should also undertake Prevent awareness training. In addition to the formal training, the knowledge and skills of members of the DSL team should be supplemented and refreshed at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role so that they: • understand the assessment process for providing early help and statutory intervention, including local criteria for action and local-authority 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 response 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 with the three safeguarding partners, other agencies, organisations and practitioners; • understand and support the School with regards to the requirements of the Prevent duty and be 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; • can recognise the additional risks that children with SEN and disabilities (SEND) face online (for example, from online bullying, grooming and radicalisation) and are confident they have the capability to support SEND children to stay safe online; • obtain access to resources and attend any relevant or refresher training courses; and • encourage a culture among all staff of listening to pupils and taking account of their wishes and feelings , in any measures the School may put in place to protect them.
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 (and deputies) 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 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 1, 2 and 5 of KCSIE, and therefore members of the DSL team should: • understand the importance of information sharing, both within the School, and with other schools and Schools 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, the Data (Use and Access) Act 2025 and the General Data Protection Regulation; and • be able to keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent programme.

Appendix 5: Hackett's Continuum of Sexual Behaviours

Hackett (2010) has proposed a continuum model to demonstrate the range of sexual behaviours presented by children and young people, from those that are normal, to those that are highly deviant.

Normal	**Inappropriate**	**Problematic**	**Abusive**	**Violent**
Developmentally expected	Single instances of inappropriate sexual behaviour	Problematic and concerning behaviours	Victimising intent or outcome	Physically violent sexual abuse
Socially acceptable	Socially acceptable behaviour within peer group	Developmentally unusual and socially unexpected	Includes misuse of power	Highly intrusive
Consensual, mutual, reciprocal	Context for behaviour may be inappropriate	No overt elements of victimisation	Coercion and force to ensure victim compliance	Instrumental violence which is physiologically and/ or sexually arousing to the perpetrator
Shared decision making	Generally consensual and reciprocal	Consent issues may be unclear	Intrusive	Sadism
		May lack reciprocity or equal power	Informed consent lacking, or not able to be freely given by victim	
		May include levels of compulsivity	May include elements of expressive violence	

Reference: Hackett, S (2010). Children, young people and sexual violence. In Barter, C and Berridge, D (eds) *Children behaving badly? Exploring peer violence between children and young people*. London: Blackwell Wiley.

Appendix 6: Berkshire Escalation Process for Professionals with Safeguarding Concerns

Berkshire West Safeguarding Children Partnership

Briefing On the Escalation Process

At no time must professional disagreement detract from ensuring that the child is safeguarded. The child's welfare and safety must remain paramount throughout. Occasionally situations arise when workers within one organisation may believe or consider that the actions, inactions (drift and delay) or decisions of another do not adequately safeguard a child. Where there is professional disagreement the following Pan Berkshire process should be followed:

Stage 1 - Most disagreements can be resolved through discussion and negotiation. The professionals involved should attempt to resolve differences through discussion within one working day, but if they are unable to do so, their disagreement must be reported by them to their line manager / team manager. Most issues or concerns can be resolved, through discussion by the relevant line managers / team manager. This contact should take place within twenty-four hours.

Stage 2 - Where it is not possible to resolve the matter at frontline/ team manager level, the matter should be referred without delay to the next management level or appropriate safeguarding lead. The issue will then be considered at that management level, with direct communication taking place with the designated professional or named professional for safeguarding within the individual agency that raised the dispute.

Stage 3 - If the disagreement remains, the matter should be referred to a senior manager with responsibility for safeguarding who will consider the matter with their equivalent level of management within the agency concerned. The purpose of escalating the dispute to this level is to reach a position where differing professional opinions have been taken into account and efforts made to explore whether the dispute has arisen through lack of clarity or understanding in the professional dialogue. Agencies must agree a way forward with the interests of the child taking precedence over a professional stalemate.

Stage 4 - In the event that the professional disagreement remains unresolved, the matter must be referred to the departmental head with responsibility for safeguarding, who will report the matter to the statutory Berkshire West Safeguarding Children Partners. The Statutory Partners will review the issues and provide a final opportunity for the involved agencies to ensure that there is a full understanding of the issues before a decision is finalised. In all cases where it has not been possible to resolve differences and/or where there may be lessons to be learned for future practice, consideration should be given to holding a multi-agency case review.

For further information please visit: https://proceduresonline.com/berks/reading/p_conflict_res.html