

**WOLVERHAMPTON GRAMMAR SCHOOL**  
**SAFEGUARDING POLICY**

**KEY EXTERNAL CONTACT DETAILS**

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#### **KEY SCHOOL CONTACT DETAILS**

<b>Governors</b>	<p><b>Chair of Governors</b> James Sage TEL: 01902 712004 EMAIL: <a href="mailto:kmh@wgs-sch.net">kmh@wgs-sch.net</a></p> <p><b>Nominated Safeguarding Governor</b> Dr Manisha Gowan-Gopal TEL: 01902 712004 EMAIL: <a href="mailto:kmh@wgs-sch.net">kmh@wgs-sch.net</a></p>
<b>Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Lead (DDSL)</b>	<p><b>Main DSL for the School</b> Claudine Jones TEL: 01902 421326 EMAIL: <a href="mailto:cj@wgs-sch.net">cj@wgs-sch.net</a></p> <p><b>Deputy DSL</b> Dan Peters TEL: 01902 421326 EMAIL: <a href="mailto:dlp@wgs-sch.net">dlp@wgs-sch.net</a></p> <p><b>EYFS DSL</b> Dan Peters TEL: 01902 421326 EMAIL: <a href="mailto:dlp@wgs-sch.net">dlp@wgs-sch.net</a></p> <p><b>Deputy EYFS DSL</b> James Griffiths TEL: 01902 421326 EMAIL: <a href="mailto:jxg@wgs-sch.net">jxg@wgs-sch.net</a></p>
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## **POLICY STATEMENT**

This policy applies to Wolverhampton Grammar School which includes the EYFS setting. This policy is reviewed and updated annually as a minimum and is available on the School website.

This policy has regard to the following guidance and advice:

- Keeping Children Safe In Education (September 2023) ('KCSIE')
  - KCSIE incorporates the additional statutory guidance, Disqualification under the Childcare Act 2006 (September 2018)
  - KCSIE also provides links to various toolkits and additional advice and support
- Working Together to Safeguard Children (2023) ('WT')
  - WT refers to the non-statutory advice: Information sharing (July 2018)
- Prevent Duty Guidance: for England and Wales (2023) ("Prevent"). Prevent is supplemented by non-statutory advice and a briefing note:
  - The Prevent duty guidance update: briefing for schools and early years providers (2023)
  - The use of social media for on-line radicalisation (July 2015)
- Relationships education, relationships, and sex education (RSE) and health education (September 2021)
- Behaviour in Schools (September 2022)
- Working together to improve school attendance (May 2022)
- Keeping children safe in out of school settings (April 2022)
- Digital and technology standards in schools and colleges (March 2023)
- The Charity Commission Guidance Safeguarding and protecting people for charities and trustees (June 2022)

This policy also takes into account the procedures and practice of Wolverhampton Local Authority as part of the inter-agency safeguarding procedures set up by Wolverhampton Safeguarding Together (WST).

## **EQUALITY ACT 2010**

The School understands and recognises their obligations under the Equality Act and that the school must not discriminate against pupils because of a protected characteristic including sex, race, disability, religion or belief, gender reassignment, pregnancy, maternity, or sexual orientation. In the context of safeguarding, the School will consider how to support pupils with regard to particular protected characteristics in order to meet their specific needs. The School will also consider their duty to make reasonable adjustments for disabled pupils.

## **CONCERNS ABOUT A CHILD**

The School has a duty to consider at all times the best interests of the pupil and take action to enable all pupils to achieve the best outcomes. **Safeguarding and promoting the welfare of children is everyone's responsibility. All staff are expected to act if they have a concern.** The School is wholly committed and adopts a 'whole school' approach to safeguarding. This means involving everyone in the school, and ensuring that, safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.

Parents are encouraged to raise any concerns directly with the School, if necessary using this safeguarding policy for concerns about the safety and/or welfare of children. Parents may contact the ISI directly if they wish.

The School has arrangements for listening to children and providing *early help*. The Head, DSL and Deputy DSL meet fortnightly to discuss safeguarding issues; they are assisted by a Safeguarding Team (including all Heads of House and Year) who have all received advanced safeguarding training (See Appendix 2). The DSL ensures Heads of House and Year are equipped to coordinate early help and supports them informally as well as through fortnightly meetings. All pupils meet with their Form Tutors or House Tutors daily and know they can speak to any member of staff if they have concerns. In the Junior School, all pupils have access to the Worry box through Firefly. In the senior school pupils are provided with access to an app called tootoot which they can use to access support or report any worries or concerns they have. The school employs a qualified Counsellor, who is made available to pupils via a straightforward referral process see Appendix 3. All pupils are also recommended a dedicated page on Firefly concerning pupil welfare. Here they can contact Claudine Jones (Senior School) or Dan Peters (Junior School) with any worry or concern they may have.

### **Definitions of safeguarding and types and signs of abuse**

Safeguarding and promoting the welfare of children is defined as:

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

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

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

Staff are referred to Appendix 1 of this policy for further detail of the types of abuse and possible signs of abuse as well as further information regarding specific safeguarding issues such as child criminal and/or sexual exploitation.

## **PROCEDURES FOR DEALING WITH A CONCERN ABOUT A PUPIL: Act immediately**

If staff suspect or hear an allegation or complaint of abuse or neglect from a pupil or any third party, they must act immediately and follow the relevant procedure below. Staff should not assume that somebody else will take action and share information that might be critical in keeping pupils safe.

The guidance, *Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers* supports staff who have to make decisions about sharing information. The governing body recognises the importance of information sharing between practitioners and local agencies, including ensuring arrangements for sharing information within the School and with local authority children's social care, the safeguarding partners and other organisations, agencies, and practitioners as required. Fears regarding sharing information under the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR) should not be allowed to stand in the way of the need to safeguard and promote the welfare, and protect the safety of pupils and neither the DPA 2018 or the UK GDPR prevent the sharing of information for the purposes of keeping children safe. If in doubt about what information can and should be shared, staff should speak to the Designated Safeguarding Lead (DSL).

The governing body will ensure that staff understand the relevant data protection principles which allow them to share (and withhold) personal information, including:

- being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information, which is sensitive and personal and should be treated as 'special category personal data'
- understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows the sharing of special category personal data, including without consent where there is good reason to do so. For example, information may be shared without consent where: it is not possible to gain consent; it cannot be reasonably expected to gain consent; and, gaining consent would place a child at risk
- not providing pupils' personal data where the serious harm test is met.

All staff should:

- listen carefully
- avoid asking leading questions
- reassure the individual that the allegation/complaint will be taken seriously and that they will be supported and kept safe
- ensure that the individual is not made to feel ashamed for making the report or given the impression that they are creating a problem by making the report
- not guarantee absolute confidentiality (as this may ultimately not be in the best interests of the pupil) and explain that the information needs to be passed to the appropriate person who will ensure that the correct action is taken.
- be aware that the individual 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. Staff should exercise professional curiosity and speak to the DSL if they have concerns
- determine how best to build trusted relationships with children and young people which facilitate communication

Every member of staff, including part-timers, temporary, visiting, contract and volunteer staff working in School should report any concerns (including those where a pupil may benefit from early help or where it includes alleged abuse by one or more pupils against another pupil) to a DSL either by submitting an accurate record of the disclosure or concern on CPOMS via Firefly or in person. This will help if/when responding to any complaint about the way a case has been handled. The record should 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, the decision reached and the outcome. It should include the date, time and place of the conversation and detail of what was said and done by whom. The information should be kept confidential and will be stored securely by the DSL who will ensure that the file is only accessible to those who need to see it, and is shared in accordance with the guidance set out in Parts One and Two of *KCSIE*.

Where the allegation relates to harmful sexual behaviours, if possible the disclosure should be managed with two members of staff present (preferably one of them being the DSL or member of the Safeguarding Team). If they speak to a DSL in person, they will be asked to note details on CPOMS thereafter. During the school holidays, or out of hours, concerns should be raised with the Head, by email. However, any staff member can make a direct referral to the MASH using the contact details above. The DSL will ensure that all concerns, discussions and decisions (together with reasons) made under these procedures will be recorded in writing.

The School will ensure the pupil's wishes and feelings are taken into account when determining what action to take and what services to provide. This is particularly important in the context of harmful behaviours, such as sexual harassment and sexual violence. The School manages this by encouraging them to speak with or email a DSL. Additionally, School can arrange for them to speak with the School Counsellor or any member of staff of their choice. This is promoted to the students regularly through assemblies, Tutor time and through Firefly. Students know their concerns will be treated seriously and that they can safely express their views and give feedback. The School operates its processes with the best interests of the pupils at heart.

### **Contextual Safeguarding**

Safeguarding incidents and/or behaviours can be associated with factors outside the School and can occur between pupils outside School. All staff, but especially the DSL and any deputies, should consider the context within which such incidents and/or behaviours occur. The School will as part of the wider assessment of pupils, consider whether environmental factors are present in a pupil's life that are a threat to their safety and/or welfare. The School will share as much information with the MASH team as possible as part of the referral process to enable consideration of all the available evidence and the full context of any abuse.

### **Early Help**

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

- Is disabled or has certain health conditions and has specific additional needs
- Has special educational needs (whether or not they have a statutory education, health and care plan)
- Has a mental health need
- Is a young carer

- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- Is frequently missing/goes missing from care or from home
- Is misusing drugs or alcohol themselves
- Is at risk of modern slavery, trafficking or sexual or criminal exploitation
- Is in a family circumstance presenting challenges for the pupil, such as substance abuse, adult mental health problems or domestic abuse
- Has returned home to their family from care
- Is showing early signs of abuse and/or neglect
- Is at risk of being radicalised or exploited
- Has a family member in prison, or is affected by parental offending
- Is experiencing, or is at risk of experiencing family ostracism
- Is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- Is a privately fostered child.
- Is absent from education, particularly on repeat occasions and/or prolonged periods including persistent absences for part of the school day.

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

In the first instance, staff who consider that a pupil may benefit from early help should discuss this with the School's DSL. The DSL will consider the appropriate action to take in accordance with the Thresholds of Need and Support in Wolverhampton document. The DSL may make a referral to the MASH team and will liaise with external agencies and professionals in an inter-agency assessment, as appropriate. If early help is appropriate, the matter will be kept under review and consideration and the DSL will liaise with the MASH team if the pupil's situation does not appear to be improving.

#### **What staff should do if they have concerns about a pupil**

If staff, (including governors, agency staff and volunteers) have any concerns about a pupil (as opposed to a pupil being in immediate danger), they should either, speak with the School's DSL to agree a course of action, or submit an accurate record of the concern on CPOMS via Firefly. Staff can also make a direct referral to the MASH team. Staff should not assume that somebody else will take action and share information that might be critical in keeping pupils safe; they should maintain an attitude of 'It could happen here'. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. If a pupil's situation does not appear to be improving, the DSL should press the MASH team for reconsideration. Staff should challenge any inaction and follow this up with the DSL and the MASH team as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing on CPOMS.

#### **What staff should do if a pupil is in danger or at risk of harm**

If staff, (including governors, agency staff and volunteers) believe that a pupil is in immediate danger or at risk of harm, they should make an immediate referral to the MASH team and/or the Police. Anyone can make a referral. Any such referral must be made immediately and in any event within 24 hours (one working day) of staff being aware of the risk. Parental consent is not needed for referrals to statutory agencies such as the police and the MASH team. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. The local authority social worker should acknowledge receipt to the referrer within 24 hours and make a decision about the next steps and type of response required. Staff should challenge any inaction and

follow this up with the DSL and the MASH team as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing on CPOMS.

The School's Local Safeguarding Children Executive is Wolverhampton Safeguarding Together (WST). A full copy of their local procedures can be found: <http://westmidlands.procedures.org.uk/>

### **Specific arrangements for 1-1 teaching**

Where 1-1 teaching may take place, for example peripatetic instrumental/singing lessons, SEN/ additional support teaching, counselling, the following arrangements are in place:

- Class / practise room doors have windows;
- Where doors do not have glass insert they are left open;
- Staff are regularly reminded through training and INSET of the importance in ensuring the safety of both themselves and the children in their care.

### **What staff should do if a pupil is seen as at risk of radicalisation**

Staff should follow the School's normal referral processes when there are concerns about pupils who may be susceptible to extremist ideology and radicalisation. This may include a Prevent referral or referral to children's social care depending on the level of risk. If staff have concerns that there is an immediate/significant risk of a pupil being drawn into terrorism they must call 999 or call the MASH team who will provide advice and support as required.

The School, in recognition that pupils may be susceptible to being drawn into terrorism or other forms of extremism, carries out appropriate risk assessments termly following consultation with the Police of the potential risk in the local area. Such risk assessments are discussed with the Head, DSL and DDSL and the governor responsible for safeguarding to ensure the School's safeguarding arrangements are sufficiently robust to help prevent and protect pupils from being drawn into terrorism and are regularly revised.

### **What staff should do if they discover an act of Female Genital Mutilation ('FGM')**

Staff must report to the Police cases where they discover that an act of FGM appears to have been carried out. Unless the member of staff has a good reason not to, they should still consider and discuss any such case with DSL and involve the MASH team as appropriate. Staff are referred to Appendix 1 of this policy for the procedure to be followed where they suspect that a pupil may be at risk of FGM.

### **What staff should do if they have concerns that pupils are at risk from or involved with serious violent crime**

All staff should be aware of indicators which may signal that pupils are at risk from, or are involved with serious violent crime. These may include increased absence from School, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, signs of assault or unexplained injuries.

If staff have any concerns about a pupil (as opposed to a pupil being in immediate danger), they should, where possible, speak with the School's DSL to agree a course of action, although staff can make a direct referral to the MASH team.

Additional guidance on local procedures for identifying Child Criminal Exploitation can be found on the WST website: <https://www.wolverhamptonsafeguarding.org.uk/safeguarding-children-and-young-people/i-work-with-children-young-people-families/exploitation>



## **How should staff respond to an incident of nudes and semi-nudes being shared by pupils**

All members of staff in an education setting have a duty to recognise and refer any incidents involving nudes and semi-nudes and will be equipped with the necessary safeguarding training and support to enable them to recognise concerns.

For this purpose, 'sharing nudes/semi-nudes' means the sending or posting of nude or semi-nude images, videos, or live streams by children under the age of 18 online. This could be via social media (including Snapchat), gaming platforms, chat apps (including WhatsApp and iMessage) or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. The sharing of nudes and semi-nudes may happen publicly online, in 1:1 messaging or via group chats and/or via closed social media accounts. The images, videos or live streams may include more than one child.

Any direct disclosure by a pupil will be taken seriously and staff will ensure the pupil is feeling comfortable and will only ask appropriate and sensitive questions, in order to minimise further distress or trauma to them.

If staff are notified or become aware of an incident of nudes or semi-nudes being shared by a pupil or of a pupil, they should refer the incident to the DSL as soon as possible, either in person or via CPOMS

The DSL will follow the DDMSC / UKIS guidance "*Sharing nudes and semi-nudes: advice for education settings working with children and young people*" (December 2020) when responding to a report of sharing nudes and/or semi-nudes. This will include:

- Holding an initial review meeting with appropriate staff. This may include the staff member(s) who heard the disclosure and the safeguarding or leadership team who deal with safeguarding concerns.
- Carrying out interviews with the pupil involved (if appropriate).
- Informing parents and carers at an early stage and keep them involved in the process in order to best support the pupil unless there is good reason to believe that involving them would put the child at risk of harm. Any decision not to inform them should be made in conjunction with other services such as children's social care and/or the police, who would take the lead in deciding when they should be informed.
- Carrying out a risk assessment to determine whether there is a concern that a pupil has been harmed or is at risk of immediate harm at any point in the process
- If not, the incident can be handled in school in accordance with the "sharing nudes" guidance and the School's Child Protection and Behaviour policies.
- If it is determined that there is a risk of harm, the DSL will make a referral to children's social care and/or the police immediately.

All incidents relating to nudes and semi-nudes being shared will be recorded, whether they have been referred externally or not. The School will record the reason for not reporting incidents externally on CPOMS. Records will be kept in line with statutory requirements set out in *KCSIE* and local safeguarding procedures. No copies of imagery will be taken or retained.

This guidance does not apply to the sharing of images of children under 18 by an adult over 18 as this constitutes child sexual abuse. In the event that staff become aware of such an incident, they should notify the DSL immediately, who should always inform the police as a matter of urgency.

## **What staff should do if a pupil goes missing from education**

Pupils who are absent from education, particularly on repeat occasions and/or for prolonged periods, and children missing education, can be a vital warning sign to a range of safeguarding issues, including

neglect and child sexual and/or criminal exploitation, particularly county lines. It is important that the School's response to persistently absent pupils and children missing education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future.

The School's procedures for unauthorised absence and for dealing with pupils who are absent repeatedly and/or for prolonged periods, and children missing from education can be found on the School website and staff network and will be used for searching for, and if necessary, reporting, any pupil missing from education. Further detail can also be found at Appendix 1 of this policy.

Where reasonably possible, the School will hold more than one emergency contact number for each pupil to provide the School with additional options to make contact with a responsible adult particularly when a pupil is repeatedly absent and/or absent for prolonged periods is also identified as a welfare and/or safeguarding concern.

The School will report to Wolverhampton Education Services (Attendance Support) a pupil who fails to attend school regularly or has been absent from school without the School's permission for a continuous period of 10 school days or more.

When working with Wolverhampton Education Services (Attendance Support) where school absence indicates safeguarding concerns the School will have regard to the non-statutory DfE guidance 'Working together to improve school attendance'.

#### **What staff should do if a child needs a social worker (Children in Need and Child Protection Plans)**

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.

Local authorities should share the fact a child has a social worker, and the DSL should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This should be considered as a matter of routine.

Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

#### **What staff should do if a child requires mental health support**

The School has an important role to play in supporting the mental health and wellbeing of its pupils. Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. The School aims to prevent health problems by promoting resilience as part of a whole school approach to social and emotional wellbeing of our pupils, which is delivered through the Wellbeing Curriculum.

Staff can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies. The School Counsellor has produced a range of resources available on Firefly. More information can be found in *the DfE Mental Health and Behaviour in Schools* guidance. Public Health England has produced a range of resources to support school teachers to promote positive health, wellbeing and resilience among young people.

### **What staff should do if they have concerns about the behaviour of another staff member**

If staff have concerns (including Low Level Concerns and Self-Referrals – See WGS Low Level concern Policy) about another staff member (including supply staff, agency staff, volunteers and contractors), then this should be referred to the Head. Where there are concerns about the Head, this should be referred to the Chair of Governors. In the event of allegations of abuse being made against the Head, staff are referred to the procedures below regarding managing allegations of abuse against staff (including volunteers) and refer the matter directly to the LADO.

### **What staff should do if they have concerns about safeguarding practices in the School**

The School aims to ensure there is a culture of safety and raising concerns and an attitude of 'it could happen here'. Where staff have concerns about poor or unsafe practices and potential failures in the School's safeguarding systems, these should be raised with the Head or the DSL. If they continue to have concerns (or their concerns are in regard to the Head or the DSL) they should raise them in accordance with the School's Whistleblowing Policy which can be found in the Staff Employment Manual. No disciplinary action will be taken against a member of staff for making such a report provided that it is done in good faith.

If staff and volunteers feel unable to raise an issue with the School or feel that their genuine concerns are not being addressed, they may use other whistleblowing channels, such as the NSPCC whistleblowing advice line. Contact details for the NSPCC helpline can be found on the Key Contacts page at the start of this policy.

## **ARRANGEMENTS FOR DEALING WITH CHILD ON CHILD ALLEGATIONS (INCLUDING CHILD ON CHILD SEXUAL VIOLENCE AND HARASSMENT)**

Child on child abuse is abuse by one or more pupils against another pupil. It can be standalone or as part of wider abuse and can happen both inside and outside of school, and online. It can manifest itself in many ways and can include: abuse within intimate partner relationships, bullying (including cyber bullying, prejudice-based and discriminatory bullying), abuse within intimate partner relationships between peers, physical abuse (such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm), initiation/hazing type violence and rituals, upskirting, sexting, consensual and non-consensual sharing of nudes and/or semi-nudes, sexual assault, gender based issues, sexual behaviours including child on child sexual violence and sexual harassment, 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. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

These arrangements apply to all reports and concerns of peer-on-peer abuse, whether they have happened in school or outside of it, and/or online. Abuse that occurs online or outside of school should not be downplayed and should be treated equally seriously.

The School takes a zero-tolerance approach and abusive comments and interactions should never be passed off or dismissed as "banter" or "part of growing up". Nor will harmful sexual behaviours including sexual comments, remarks or jokes and online sexual harassment, be dismissed as the same or "just having a laugh" or "boys being boys". Staff will also challenge physical behaviours (that are potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

The School acknowledges that even if there have been no reported cases of peer on peer abuse in relation to pupils within the School, such abuse may still be taking place and is simply not being reported. The School will ensure that pupils are aware of how they can report abuse, and that they are aware of the procedures that the School will follow once a report has been made. These procedures will be well promoted and in a format that is easily accessible and easily understood by pupils.

The School recognises that a pupil is likely to disclose an allegation to someone they trust: this could be **any** member of staff. By making such a disclosure the pupil is likely to feel that the member of staff is in a position of trust. The School also recognises that pupils may not find it easy to tell staff about their abuse verbally and that instead they may show signs or act in ways they hope adults will notice and react to. It is also recognised that an incident may come to a member of staff's attention through a report of a friend, or by overhearing conversations. It is therefore important that all staff are clear on the School's policy and procedures with regards to child on child abuse and can recognise the indicators and signs of child on child abuse and know how to identify it and how to respond to reports.

The School recognises that a first disclosure to a trusted adult may only be the first incident reported. It is not necessarily representative of a singular incident. Staff will take all reports of abuse seriously regardless of how long it has taken for the pupil to come forward. Staff will act immediately and will support the victim when they raise a concern.

The School recognises that pupils with special educational needs and disabilities (SEND) or certain health conditions are three times more likely to be abused by their peers, can face additional safeguarding challenges and may be more prone to peer on peer group isolation or bullying (including prejudice-based bullying) than other pupils. The School will consider extra pastoral support for those pupils. The School also recognises that certain pupils may face additional barriers to reporting an incident of abuse because of their vulnerability, disability, sex, ethnicity and/or sexual orientation. Staff will support such pupils in expressing any concerns they may have and will be particularly vigilant to any signs or indicators of abuse, discussing this with a DSL or recording concerns on CPOMS, as appropriate.

The School's Anti-Bullying Policy and Behaviour Management Policy detail measures taken to minimise the risk of child on child abuse.

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

A pupil against whom an allegation of abuse has been made may be suspended from the School during the investigation. The School will take advice from the WST on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the alleged victim and perpetrator(s). If it is 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 the WST, parents are informed as soon as possible and that the pupils involved are supported during the interview by an appropriate adult and until the investigation is completed. Confidentiality will be an important consideration for the School and advice will be sought as necessary from the WST and/or the police as appropriate. The School will have regard to the procedures set out in *KCSIE* at all times.

The victim may ask the School not to tell anyone about the sexual violence or sexual harassment. Advice should be sought from the DSL or DDSL who should consider: parents or carers should normally be informed unless doing so would put the victim at greater risk; the basic safeguarding principle that

if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care; and whether a crime has been committed. Ultimately, the DSL or DDSL will balance the victim's wishes against their duty to protect the victim and other children.

Police may be informed of any harmful sexual behaviours which are potentially criminal in nature, such as grabbing bottoms, breasts and genitalia. Rape, assault by penetration and sexual assaults will be passed to the police. Where a report has been made to the police, the School will consult the police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator(s) and their parents or carers. If the DSL decides to make a referral to the MASH team and/or a report to the police against a victim's wishes, the reasons should be explained to the pupil and appropriate specialist support offered. The DSL may also decide that the pupils involved may benefit from early help, and may make the necessary referral in accordance with the WST referral process.

The School's approach to sexting is detailed in the ICT Acceptable Use for Pupils Policy and the Anti-Bullying Policy. The School will follow the DDMSC / UKIS guidance "Sharing nudes and semi-nudes: advice for education settings working with children and young people" (December 2020) when responding to an allegation that nudes and/or semi-nudes have been shared.

In the event of disclosures about child on child abuse, all pupils involved (both victim(s) and perpetrator(s)) will be treated as being at risk, and safeguarding procedures in accordance with this policy will be followed. Victims will be supported by the Safeguarding team and where appropriate, the School Counsellor and support from external agencies will be sought, as appropriate.

When there has been a report of sexual violence, the DSL will make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider:

- the victim;
- whether there may have been other victims;
- the alleged perpetrator(s); and
- all the other pupils (and, if appropriate, staff) at the School especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms.

Risk assessments will be recorded on CPOMS and kept under review. In relation to a report of sexual violence or sexual harassment, the DSL and all staff involved will reassure any victim that they are being taken seriously and that they will be supported and kept safe. The victim will never be made to feel ashamed for making the report nor will they be given the impression that they are creating a problem by reporting sexual violence or sexual harassment; nor would a victim ever be made to feel ashamed for making a report or have their experience minimised. The School will explain to the child in a way that avoids alarming or distressing them that the law is in place to protect children rather than to criminalise them. The School will consider the age and the developmental stage of the victim, the nature of the allegations and the potential risk of further abuse. The School acknowledges that, by the very nature of sexual violence and sexual harassment, a power imbalance is likely to have been created between the victim and alleged perpetrator(s). The DSL will consider the risks posed to pupils and put adequate measures in place to protect them and keep them safe and to ensure their educational attainment is not adversely affected as far as is possible. This may include consideration of the proximity of the victim and alleged perpetrator and considerations regarding shared classes, sharing School premises (including during any before or after school-based activities) and School transport. The School will also consider the risks posed to the victim from other health needs, including

physical, mental and sexual health problems, as well as unwanted pregnancy which may arise as a result of the incident, and will consider recommending additional support.

The School will consider intra familial harms and whether any support for siblings is necessary following an incident.

The School will keep a written record of all concerns, discussions and decisions made.

The School will reflect on reported concerns, including the decisions made and actions taken, in order to identify any patterns of concerning, problematic or inappropriate behaviour which may indicate an unacceptable culture, or any weaknesses in the School's safeguarding system which may require additional training or amendments to relevant policies. Where a pattern is identified the School will decide on an appropriate course of action.

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

#### **PROCEDURES FOR DEALING WITH SAFEGUARDING CONCERNS OR ALLEGATIONS OF ABUSE REGARDING TEACHERS INCLUDING SUPPLY STAFF AND OTHER STAFF (INCLUDING THE HEAD, GOVERNORS, VOLUNTEERS AND CONTRACTORS)**

The School's procedures for managing allegations against staff (including supply staff, volunteers and contractors) who are currently working in the School whether in a paid or unpaid capacity follows Department for Education statutory guidance and WST arrangements and applies when staff (including supply staff and volunteers) have (or are alleged to have):

- Behaved in a way that has harmed a pupil, or may have harmed a pupil: and/or
- Possibly committed a criminal offence against or related to a pupil; and/or
- Behaved towards a pupil or pupils in a way that indicated that they may pose a risk of harm if they were to work regularly or closely with children; and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children, including behaviour that may have happened outside of school

Allegations that do not meet the above harms test should be dealt with using the School's procedure for handling low level concerns set out below.

Allegations against a teacher who is no longer teaching should be referred to the police. Historical (non-recent) allegations of abuse should be referred to the police and also the LADO. Non-recent allegations made by a child will be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations. The LADO will coordinate with children social care and the police.

If an allegation is made against anyone working with children in the School, before contacting the LADO, the School will conduct a basic enquiry in line with local procedures to establish the facts in order to determine whether there appears to be any foundation to the allegation. The School should

not undertake their own investigation of allegations without prior consultation with the LADO or, in the most serious cases, the police, so as not to jeopardise statutory investigations.

When dealing with allegations about a staff member the School will apply common sense and judgment, deal with allegations quickly, fairly, and consistently and will support the person subject to the allegation.

1. Allegations which appear to meet the above reporting criteria are to be reported straight away to the 'case manager' who is the Head. Where the Head is absent or is the subject of the allegation, reports should be made to the Chair of Directors. Where the Head is the subject of the allegation, the Head must not be informed of the allegation prior to contact with the Chair of Directors and LADO. However, staff may consider discussing any concerns/allegations with the DSL and may make any referral via them.
2. The Head should immediately discuss the allegation with the LADO and consider the nature, content and context of the allegation and agree a course of action including any involvement of the police. Where the Head deems there to be an immediate risk to pupils or there is evidence of a possible criminal offence, they may involve the police immediately. All discussions should be recorded in writing, and any communication with both the individual and the parents of the pupil(s) agreed. The LADO should be informed within one working day of all allegations that come to the School's attention and appear to meet the criteria or that are made directly to the Police and/or the MASH team. The DSL is responsible for ensuring the pupil is not at risk.
3. Where the Head is concerned about the welfare of other pupils in the community, or the member of staff's family, they will discuss these concerns with the LADO and make a risk assessment of the situation. It may be necessary for the LADO to make a referral to children's social care.
4. When to inform the individual, who is the subject of the allegation will be considered on a case by case basis and with guidance from the LADO, and if appropriate, the police and/or children's social care. Subject to any objection, the Head will ensure that the individual who is subject of the allegation is informed as soon as possible and given an explanation of the likely course or action. The Head will appoint a named representative to keep the individual informed of the progress of the case and will consider what other support is appropriate for the individual.
5. The Head should give careful consideration as to whether the circumstances of the case warrant suspension from contact with children at the School or whether alternative arrangements should be put in place until the allegation is resolved. The following alternative arrangements should be considered by the Head before suspending a member of staff:
  - redeployment within the School so that the individual does not have direct contact with the child or children concerned;
  - providing an assistant to be present when the individual has contact with children;
  - redeploying to alternative work in the School so the individual does not have unsupervised access to children;
  - moving the child or children to classes where they will not come into contact with the member of staff, but this decision should only be made if it is in the best interest of the child or children concerned and takes accounts of their views. It should be made making it clear that this is not a punishment and parents have been consulted; or,
  - temporarily redeploying the member of staff to another role in a different location, for example to an alternative school where available.

These alternatives allow time for an informed decision regarding the suspension, this will, however, depend upon the nature of the allegation.

Suspension should not be an automatic response when an allegation is reported. It should be considered only in cases where there is cause to suspect a child or other children at the School is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. The case manager will give due weight to the views of the LADO, WT and KCSIE when making a decision about suspension (including with respect to considering alternatives). Where the individual is suspended, the Head will confirm the decision within one working day, and will ensure they know who their point of contact is in the School and shall provide them with their contact details. The Head will also record the rationale and justification for the suspension, including what alternatives were considered and why they were rejected.

6. Where further enquiries are required to enable a decision about how to proceed, the LADO and the Head should discuss how and by whom the investigation will be undertaken. The LADO will provide advice and guidance to the School to ensure that an appropriate investigation is carried out. In straightforward cases, the investigation should usually be undertaken by a senior member of staff at the School. Where there is lack of resource, or the nature or complexity of the allegation requires it, an independent investigator may be appointed to undertake the investigation.
7. The Head will ensure that parents are informed as soon as possible and kept informed about progress of the case, subject to any advice from the MASH team or the police. Parents and others will be made aware that there are restrictions on publishing information which may lead to the identification of the teacher subject to the allegation.
8. The Head will monitor the progress of cases to ensure they are dealt with as quickly as possible in a thorough and fair process. The outcome of the investigation of an allegation will record whether it is substantiated (sufficient evidence to prove it), unsubstantiated (insufficient evidence either to prove or disprove it), false (sufficient evidence to disprove it), malicious (sufficient evidence to disprove it and that there has been a deliberate act to deceive or cause harm to the person subject of the allegation) or unfounded (to reflect cases where there is no evidence or proper basis which supports the allegation being made).
9. Reviews are conducted at fortnightly or monthly intervals, depending on the complexity of the case. The first review will take place no later than four weeks after the initial assessment and subsequent review dates will be set at the review meeting.
10. The Head will discuss with the LADO whether a referral to the Disclosure and Barring Service or Teaching Regulation Agency should be made where an allegation is substantiated and the person is dismissed or the School ceases to use their services, or the person resigns or otherwise ceases to provide their services. The School has a legal obligation to report promptly to the Disclosure and Barring Service any person (whether employed, contracted, a volunteer or a student) who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. Further, or in the alternative, if an investigation leads to the dismissal or resignation prior to dismissal of a member of teaching staff specifically, the School must consider making a referral to the Teaching Regulation Agency and a prohibition order may be appropriate (because that teacher has displayed unacceptable professional conduct,



conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence).

11. On conclusion of the case, the Head should review the circumstances of the case with the LADO to determine whether there are any improvements to be made to the School's safeguarding procedures or practices to help prevent similar events in the future. Learning lessons where the allegation is concluded to be either, unfounded, false, malicious or unsubstantiated, the Head (and if they have been involved, the LADO) should consider the facts and determine whether any lessons can be learned and if improvements can be made.

Where an individual is removed from regulated activity, or would have been removed had the individual not left, including when they are suspended, redeployed to work that is not regulated activity, are dismissed, or have resigned, and the individual has engaged in relevant conduct in relation to children and/or adults, and/or satisfied the harm test in relation to children and/or vulnerable adults, and/or been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence, the School will make a referral to the DBS.

The School has a duty of care to its staff, and whilst the welfare of a pupil is paramount, the School must offer appropriate welfare support to the adult subject to the investigation and potentially their family. The School will make every reasonable effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered. Information will also not ordinarily be shared with other staff or with pupils or parents who are not directly involved in the investigation.

Where initial discussions lead to no further action, the case manager and the LADO should record the decision and justification for it and agree on what information should be put in writing to the individual concerned, and by whom.

Allegations found to be malicious or false will be removed from the individual's personnel records unless the individual gives consent for retention of the information. In all other circumstances a written record will be made of the decision and retained on the individual's personnel file in accordance with *KCSIE* and a copy will only be provided to the individual concerned. The information to be kept on file includes a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, a note of any action taken, decisions reached and the outcomes, and a declaration on whether the information will be referred to in any future reference. All records should be retained until the accused has reached pension age, or for a period of 10 years from the date of the allegation, whichever is longer. Records should be reviewed at the end of the retention period in case it is necessary to keep it for longer.

Allegations proven to be false, unsubstantiated, unfounded or malicious will not be included in employer references. If an allegation is shown to be deliberately invented or malicious, the DSL should consider whether the pupil and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the Head will consider whether any disciplinary action is appropriate against a pupil who made it in accordance with the School's behaviour policy; or whether the Police should be asked to consider if action might be appropriate against the person responsible even if they are not a pupil.

In all cases where there are concerns or allegations of abuse, the School will make a serious incident report to the Charity Commission whenever the Commission's guidelines deem it appropriate to do so.

## **ARRANGEMENTS FOR DEALING WITH SAFEGUARDING CONCERNS OR ALLEGATIONS OF ABUSE ABOUT SUPPLY TEACHERS AND CONTRACTED STAFF**

The School's procedures for managing allegations against staff above also apply to staff not directly employed by the School, for example, supply teachers provided by an employment agency or business ('the agency'). The School will usually take the lead but agencies should be fully involved (because they have their own policies and procedures) and co-operate in any enquiries from the LADO, police and/or children's social care.

In no circumstances will the School decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. The School will discuss with the agency (or agencies where the supply teacher is working across a number of schools) whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation.

The School will advise supply teachers being investigated to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting which is often arranged by the LADO should 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 during the investigation.

When using an agency, the School should inform the agency of its process for managing allegations but also take account of the agency's policies and their duty to refer to the DBS as personnel suppliers. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

Where the agency dismisses or ceases to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left the School first, the School must consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency).

## **ARRANGEMENTS FOR DEALING WITH SAFEGUARDING CONCERNS AND ALLEGATIONS ABOUT ORGANISATIONS OR INDIVIDUALS USING SCHOOL PREMISES**

The School may receive an allegation or concern relating to an incident that happened when an individual or organisation was using the school premises for the purposes of running activities for children and/or vulnerable adults (for example community groups, sports associations, or service providers that run extra-curricular activities). As with any safeguarding allegation, the School will follow their safeguarding policy and procedures, including informing the LADO.

When services or activities at the School are provided under the direct supervision or management of school staff, this Policy will apply in relation to any safeguarding concerns or allegations. Where services or activities are not under the direct supervision or management of the School, the School will seek assurance that any individual or organisation has appropriate safeguarding and child protection policies and procedures in place (and the School will inspect these as needed); and ensure that there are arrangements in place for the provider to liaise with the School on these matters where appropriate.

The School has arrangements in place for the use of school premises for non-school activities including the availability of the DSL or DDSL and how they can be contacted.

### **ARRANGEMENTS FOR DEALING WITH LOW LEVEL CONCERNS OR ALLEGATIONS (THAT DO NOT MEET THE HARMS THRESHOLD)**

A low-level concern is any concern that an adult working in or on behalf of the School may have acted in a way that:

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

A 'low-level' concern does not mean that it is insignificant. A concern may be a low-level concern, no matter how small, even if it does no more than give a sense of unease or a 'nagging doubt'. Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse (for example, grooming-type behaviours).

The School takes all concerns about safeguarding seriously and recognises that addressing even low-level concerns is important to create and embed a culture of openness, trust, and transparency in which the School's values and expected behaviour of its staff are constantly lived, monitored, and reinforced by all staff.

The School has a separate Low-Level Concerns Policy which enables all staff to share concerns – no matter how small – about their own or another member of staff's behaviour which can be found on the staff network

### **SAFER RECRUITMENT**

The School is committed to safer recruitment processes to create a culture that safeguards and promotes the welfare of pupils in the School whilst deterring and preventing people who are unsuitable to work with children from applying or securing employment, or volunteering opportunities, within the School.

Members of the 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 necessary statutory child protection checks before starting work, for example, right to work checks, additional overseas checks (if necessary), verifying identity, taking up references, checking work history and confirming medical fitness for the role. For most appointments, an enhanced DBS check with 'barred list' information will be appropriate. A DBS certificate will be obtained from the candidate before or as soon as practicable after appointment. Alternatively, if the applicant has subscribed to it and gives permission, the School may undertake an online update check through the DBS Update Service.

Full details of the School's safer recruitment procedures for checking the suitability of staff, Governors and volunteers to work with children and young people is set out in the School's Recruitment Selection and Disclosure Policy.

The School's protocols for ensuring that any visiting speakers, whether invited by staff or pupils themselves, are suitable and appropriately supervised is set out in the School's Recruitment Selection and Disclosure Policy.

The School's procedures for managing contractors attending the School site can be found in the Management of Contractors Policy.

## **MANAGEMENT OF SAFEGUARDING**

The School's DSL is Claudine Jones who is a member of the Senior Management Team. She has overview of all safeguarding in the School and leads safeguarding in the Senior School. Dan Peters is the Deputy DSL and DSL for EYFS (EYSL) in the Junior School. Along with his role as Deputy DSL (DDSL) for the whole site, he has specific responsibility for the safeguarding of all children in the Junior School. In the absence of either Claudine Jones or Dan Peters, safeguarding concerns must be raised with the Head, who is a fully qualified DSL. This ensures there is the required cover for the role at all times. Key Contacts for these leads are at the start of this policy. Additional members of staff trained to DSL level (The Safeguarding Team) can be found in Appendix 2 and are available during school hours to discuss any safeguarding concerns.

The DSL's role is to take lead responsibility for safeguarding and child protection matters in the School (including online safety). The DSL's responsibility is to maintain an overview of safeguarding within the School, to open channels of communication with local statutory agencies, refer incidents to third parties (including the local authority children's services, the DBS, Channel and the police) where appropriate, to support staff in carrying out their safeguarding duties and to monitor the effectiveness of the School's policies and procedures in practice. The DSL will also take lead responsibility for online safety and understanding the filtering and monitoring systems and processes the School have in place. The DSL works with the governors to review and update the School's Safeguarding Policy annually, or more often as required.

Where a pupil leaves the School, including for in-year transfers, the DSL will also ensure their child protection information held on CPOMS is downloaded and transferred to the new school (where known) separately from the main pupil file, within 5 days for an in-year transfer or within 5 days of the start of a new term. The DSL will ensure secure transit and obtain confirmation of receipt. In addition to the child protection file, the DSL should also consider if it would be appropriate to share any additional information with the new school in advance of a pupil leaving to help them put in place the right support to safeguard this child and to help the pupil thrive in the school.

The DSL regularly reviews the School's and their own practices and concerns about welfare and safeguarding matters. This includes the personal and professional duty of all staff to report welfare and safeguarding concerns to the DSL, or in the absence of action, directly to the MASH team.

During term time, the DSL, the Deputy DSL or the Head will always be available during school hours to discuss safeguarding concerns. If a DSL, Deputy DSL or the Head is not available in person, they can be contacted via telephone by contacting School Reception, or staff can log any concern on CPOMS. For out of hours/out of term activities, staff should log a concern on CPOMS or email the Head directly.

The DSL or Deputy DSL should liaise with the three safeguarding partners and work with other agencies in line with Working Together to Safeguard Children. "NPCC - When to call the police" can assist the DSL or Deputy DSL understand when they should consider calling the police and what to expect when they do. If the School has questions about any police investigation, it will ask the police. The DSL or

Deputy DSL will also be responsible for liaising with the School Counsellor and, where possible, the Wolverhampton Child and Adolescent Mental Health Service (CAMHS) where safeguarding concerns are linked to mental health. The DSL and Deputy DSL are aware as to what local specialist support is available to support all children involved in sexual violence and sexual harassment and are confident as to how to access this support when required.

Whilst the Head should ensure that the policies and procedures adopted, particularly those concerning referrals of cases of suspected abuse and neglect, are understood and followed by all staff, and the Directors are ultimately responsible for ensuring staff are competent, supported and regularly reviewed in relation to safeguarding, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility should not be delegated.

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

## **TRAINING**

Induction and training are in line with advice from WST.

### **All Staff**

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

- the Safeguarding Policy (including the policy and procedures to deal with child on child abuse);
- the role and identity of the DSL and Deputy DSLs
- the Behaviour Management Policy
- the Staff Code of Conduct including the School's Whistleblowing Policy and the IT Acceptable Use Policy (Staff and Pupil) & the Social Media Policy
- the safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods or children missing education
- a copy of Part One of *KCSIE*
- School leaders and staff who work directly with children will also be required to read Annex B of *KCSIE 2023*
- Emergency Evacuation procedures (EYFS)
- Health & Safety Issues (EYFS)

**Copies of the above documents are provided to all staff during induction.**

Temporary staff and volunteers are provided with a summary leaflet containing the appropriate safeguarding information.

### **All staff are also required to:**

- Read Part One of *KCSIE* [and Annex B where relevant] and confirm that they have done so. Each time Part one of *KCSIE* is updated by the Department for Education, staff will be updated on the changes via INSET or other update training.
- Understand key information contained in Part One of *KCSIE*. The School will ensure staff understanding through the use of the VWV Plus E-learning platform.
- Receive training in safeguarding and child protection regularly, in line with advice from the WST. Training will include online safety (including the expectations, applicable roles and responsibilities in relation to filtering and monitoring) and harmful sexual behaviours including child on child sexual violence and harassment. It will also include Prevent awareness training to equip staff to raise concerns appropriately by ensuring all staff have the knowledge

and confidence to identify children at risk of being drawn into terrorism; are able to challenge extremist ideas; and know how to refer children and young people for further help.

- Undertake regular informal updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively, including online. The School provides these via, INSET, e-bulletins and staff meetings.

The governing body will ensure that all governors receive appropriate safeguarding and child protection (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in the School are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated.

The governing body are aware of their obligations under the Human Rights Act 1998 (HRA), the Equality Act 2010, the Data Protection Act 2018, the UK GDPR, and their local multi-agency safeguarding arrangements. Under the Human Rights Act 1998, it is unlawful for the School to act in a way that is incompatible with the European Convention on Human Rights (ECHR) Convention. Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach conventions set out in the European Convention on Human Rights (ECHR) Convention. The Data Protection Act 2018 and the UK GDPR place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.

### **DSLs**

The DSLs receives updated child protection training at least every two years to provide them with the knowledge and skills required to carry out the role. This includes local inter-agency working protocols, participation in child protection case conferences, supporting children in need, identifying children at risk of radicalisation, record keeping and promoting a culture of listening to children, training in the WST approach to *Prevent* duties and harmful sexual behaviours. Further details of the required training content for the DSL are set out in Annex C of *KCSIE*.

In addition to their formal training, the DSL's knowledge and skills are updated at least annually to keep up with any developments relevant to their role. In particular, the School will support the DSL in developing their knowledge and skills to understand the views of children including to encourage a culture of listening to children and taking account of their wishes, as well as having an awareness of the difficulties children may face in approaching staff with a disclosure.

The Head and Deputy DSL are trained to the same level as the DSL, as are other members of The Safeguarding Team as listed in Appendix 2.

### **OVERSIGHT OF SAFEGUARDING, INCLUDING ARRANGEMENTS FOR REVIEWING POLICIES AND PROCEDURES**

Dr Manisha Gowan-Gopal is the Director with responsibility for the safeguarding arrangements in the School.

The School considers its obligation to review safeguarding practices a matter of its everyday concerns. A review of the School's safeguarding policies takes place at least annually, including an update and review of the effectiveness of procedures and their implementation including lessons learnt. which is audited by the Director Lead. Safeguarding is a standard item on the Board Meeting Agenda and the DSL attends the Board Meetings to present a termly update to Directors including any changes to

Safeguarding legislation. All Board members undertake Safeguarding training using the tesDevelop platform. The Safeguarding Policy, which is reviewed at least annually, is formally approved at the Autumn Board Meeting. The Director lead:

- undertakes annual checks of the SCR
- presents an annual report to the Board
- attends Safeguarding Team meetings at least termly
- discusses all referrals with the DSL

The School draws on the expertise of staff, including the DSL(s), in shaping the School's safeguarding arrangements and policies.

The School's safeguarding policies and procedures should be transparent, clear, and easy to understand for staff, pupils, students, parents, and carers.

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

## **THE SCHOOL'S ARRANGEMENTS TO FULFIL OTHER SAFEGUARDING RESPONSIBILITIES**

### **Teaching pupils how to keep safe online**

The Board of Directors ensures that all pupils are taught about safeguarding, including online, through the curriculum and PSHE to help pupils to adjust their behaviours, both inside and outside of school, in order to reduce risks and build resilience, including to radicalisation. This includes teaching pupils about the safe use of electronic equipment and the internet and the risks posed by adults or young people, who use the internet and social media to bully, groom, abuse or radicalise other people, especially children, young people and vulnerable adults. The School recognises that a "one size fits all" approach may not be appropriate for all children, and a more personalised or contextualised approach for more vulnerable children, victims of abuse and some SEND children might be needed.

Internet safety (including when children are online at home) is an integral part of the School's ICT curriculum and also embedded in the Wellbeing Curriculum.

### **Filtering and Monitoring**

The School has appropriate filters and monitoring systems in place to safeguard pupils from potentially harmful and inappropriate material online when using the School's IT system. The School's systems are:

- Smoothwall S15 primary hardware appliance and S9 for failover redundancy.
- Smoothwall UTM subscription service providing Web Content Filter, Proxy, IPS (Intrusion Prevention System), IDS (Intrusion Detection System) and DPI (Deep Packet Inspection). Daily safeguarding reports and alerts are automatically generated as part of the Smoothwall reporting services and delivered to the DSL.
- Ruckus & Smoothwall via Active Directory provide Radius Accounting for Proxy Authentication.
- Microsoft Azure P2 premium identity management.
- Microsoft 365 forefront protection.
- Microsoft 365 Exchange online protection.
- Sophos Managed detection and response with XDR.
- AUP policies.

Such systems aim to reduce the risk of pupils being exposed to illegal, inappropriate and harmful materials online (content risk); reduce the risk of pupils being subjected to harmful online interaction with others including commercial advertising and grooming (contact risk); restrict access to online risks such as online gambling, phishing or financial scams (commerce risk); and help manage online behaviour that can increase a pupil's likelihood of, or causes, harm for example making, sending and receiving explicit images.

The School recognises however that pupils have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G) which means that pupils may consensually and/or non-consensually share indecent images, sexually harass their peers via mobile and smart technology, and view and share pornography and other harmful content whilst at school undetected.

The School ensures compliance with the DfE's 'filtering and monitoring standards for schools' by;

- Identifying and assigning roles and responsibilities to manage filtering and monitoring systems.
- Reviewing the filtering and monitoring provision at least annually.
- Blocking harmful and inappropriate content without unreasonably impacting teaching and learning.
- Having effective monitoring strategies in place that meet our safeguarding needs.

Further detail of the School's policy and procedures in relation to online safety can be found in the School's Anti-Bullying Policy and the IT Acceptable Use Policy for Pupils. This also includes detail on the use of mobile and smart technology in School, including the School's management of the associated risks, and the School's filtering and monitoring arrangements to ensure that pupils are safe from harmful and inappropriate content, including terrorist and extremist material when accessing the internet through the School's systems. These systems will be reviewed periodically.

School staff should remain aware that many pupils have unlimited and unrestricted access to the internet via 3G, 4G and 5G and when pupils are using their devices as part of a classroom activity, pupils are expected to use the School Network. Outside of the classroom, staff should remain vigilant and question any suspicious/concerning behaviour involving a mobile device. Staff should note any concerns on CPOMS or discuss them with the DSL.

The School will liaise with parents to reinforce the importance of children being safe online and the systems the School uses to filter and monitor online use. Parents and carers will be made aware of what their children are being asked to do online when undertaking remote learning, including the sites they will be asked to access and who from the School their child is going to be interacting with online.

### **Relationships and Sex Education ("RSE")**

RSE is compulsory and the School understands that preventative education is most effective in the context of a whole-school approach that prepares children for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic, and sexual violence/harassment.

The School will have regard to the DfE's statutory guidance Relationships Education, Relationships and Sex Education (RSE) and Health Education when making arrangements for and teaching RSE.

RSE is part of the School's Wellbeing curriculum.



### **Looked after children**

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

Claudine Jones is the designated member of staff who has responsibility for their welfare and progress. The School ensures that the designated member of staff receives appropriate training in order to carry out their role.

### **Arrangements for visiting speakers**

The School has clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable. The School's responsibility to pupils is to ensure that they can critically assess the information they receive as to its value to themselves, and that the information is aligned to the ethos and values of the School and British values.

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

Visiting speakers will be expected to understand that, where appropriate, their session should actively promote the British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs and at no point undermine these. In some cases, the School may request a copy of the Visiting Speaker's presentation and/or footage in advance of the session being provided.

Visiting Speakers, whilst on the School site, will be supervised by a School employee. On attending the School, Visiting Speakers will be required to show original current identification documents including a photograph such as a passport or photo card driving licence. The School shall also keep a formal register of visiting speakers retained in line with its Data Protection Policy.

### **Arrangements for use of school premises for non-school activities**

When services or activities at the School are provided under the direct supervision or management of school staff, this Policy will apply in relation to any safeguarding concerns or allegations.

Where services or activities are not under the direct supervision or management of the School, the School will seek assurance that any individual or organisation has appropriate safeguarding and child protection policies and procedures in place (and the School will inspect these as needed); and ensure that there are arrangements in place for the provider to liaise with the School on these matters where appropriate. This applies regardless of whether or not the children who attend any of these services or activities are children on the school roll.

The School will ensure that the DSL or DDSL can be contacted and/or is available at all times the school premises is in use, whether that activity is a school or non-school activity and regardless as to whether the children attending are on the school roll. During school hours, the DSL or DDSL can be contacted via School Reception, in person, or by telephoning 01902 421326, or during out of school hours via email: [dsl@wgs-sch.net](mailto:dsl@wgs-sch.net)

The School will ensure that safeguarding requirements are included in any agreement for use of the school premises (via the lease or hire agreement) as a condition of use and occupation of the premises and that failure to do so by the provider to comply with this will lead to termination of the agreement.

When considering the safeguarding arrangements any providers have in place the School will have regard to the DfE's non statutory guidance 'Keeping children safe in out-of-school settings' (April 2022) which the School issues to all providers.

## **EARLY YEARS PROVISION SAFEGUARDING ARRANGEMENTS**

### **Disqualification from working in childcare**

Where staff work in, or are involved in the management of, the School's early years or provision of care of pupils under the age of eight, the School will take steps to check whether those staff are disqualified under the Childcare Act 2006. These checks will be undertaken pre-appointment, and from time to time during employment. This forms part of the School's safer recruitment practices, further details of which can be found in the School's Recruitment Selection and Disclosure Policy.

The School records all checks of staff employed to work in or manage relevant childcare on the Single Central Register. This includes the date disqualification checks were completed.

Where a member of staff is found to be disqualified or if there is doubt over that issue then, pending resolution, the School will remove them from the work from which they are or may be disqualified.<sup>148</sup> Suspension or dismissal will not be an automatic response; the School will consider if there is scope in principle to redeploy them with other age groups or in other work from which they are not disqualified, subject to assessing the risks and taking advice from the LADO when appropriate.

### **Use of mobile phones, cameras and other electronic devices**

The welfare and protection of our children is paramount, and consideration should always be given to whether the use of photography will place our children at risk. Consent to photograph is always sought from all new admissions, and the general scenarios for photography is explained to all parents, i.e.

- Photography for specific ELG evidence to regularly update parents
- Photography for the newsletter (Firefly – parent login required)
- Photography for special events e.g. Sports Day and Performing Arts events
- Photography for marketing purposes

The School's policy on the use of mobile technology and photography in the setting can be found in the School's IT Acceptable Use Policy. Personal mobile phones must not be used in the EYFS. Personal mobile devices, cameras and other electronic devices with imaging and sharing capabilities must not be used to photograph or video children – staff must use their school iPads for all photography. Staff who wear smart watches must ensure that the associated device is stored out of reach and out of sight of children, in a designated space. Mobile phone calls may only be taken at staff breaks or in staff members' own time. If staff have a personal emergency, they may use the phone in the Head's, or (old) Deputy Head's Office *at any time*. Staff who act in breach of this may be subject to disciplinary action. Parents are not permitted to use their mobile phones or camera in or around the EYFS setting without prior approval from the Head.

### **DSL for the EYFS**

The practitioner designated to take lead responsibility for safeguarding children in the early years settings is Dan Peters (EYFS DSL). The Deputy Early Years DSL is James Griffiths.

### **Duty to notify Ofsted**

The School will inform Ofsted of any significant event which is likely to affect the suitability of any person who is in regular contact with children on the premises where childcare is provided. For example, where the School is satisfied that a person working in a relevant setting falls within one of the disqualification criteria. Any significant event must be notified to Ofsted as soon as reasonably practicable, but at the latest within 14 days of the date the School became aware (or ought reasonably to have become aware) of it.

The School will notify Ofsted within 14 days of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere).

### **Please also refer to the following policies:**

Code of conduct for staff - website, staff employment manual	Anti Bullying Policy - website
Whistleblowing Policy - staff employment manual	Supervision Policies (Junior & Senior) - website
Behaviour Management Policies (Junior & Senior) - website	Equal Opportunity Policy (Pupil) - website, staff network
Complaints Policy - website	IT Acceptable Use Policy (Staff) - staff employment manual
KCSIE - website	Social Media Policy (Staff) - staff employment manual
Risk Management Policy- staff network (available on request)	Recruitment Selection and Disclosure Policy - website
Health & Safety Policy – website	IT Acceptable Use Policy (Pupils) - website
Risk Assessment Policy – staff network	Privacy Policy (Pupils and Parents) - website
Taking, Using and Storing Images of Children Policy – website	Missing Child Procedure and Arrangements when a Child is Not Collected - website
Management of Contractors Policy – staff network	Low Level Concerns Policy - staff network
Attendance Policy - website	

### **Monitoring and Evaluation of this policy**

The school monitors and evaluates its Safeguarding Policy and procedures through the following activities:

- Annual Directors' audit and termly review of child protection & safeguarding policy and practice
- SMT discussion
- Frequent scrutiny of attendance data
- Regular analysis of a range of risk assessments
- Regular review of appropriate provision for the fulfilment of other safeguarding responsibilities relevant to the school. e.g. minibus travel, after hours care, weekend sport provision
- Frequent scrutiny of governing body meeting minutes
- Annual pupil bullying survey
- Regular scrutiny of recruitment procedures
- Logs of bullying/racist behaviour/complaints are reviewed annually by SMT and Directors

### **Appendices**

1. Signs and Types of Abuse
2. The Safeguarding Team of Staff Training to DSL Level
3. Counsellor Referral Procedure 2023-2024
4. What happens if staff have concerns about a child – from KCSIE 2023

NJCA/CJ  
January 2024

Next Review:  
September 2024

## APPENDIX 1 - SIGNS AND TYPES OF ABUSE

All School staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another therefore staff should always be vigilant and always raise any concerns with the DSL (or deputy).

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. All staff, but especially the DSL and deputies, should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation.

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues and should recognise that children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently online and in daily life. Staff should be aware that children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

**In all cases, if staff are unsure, they should always speak to the DSL (or deputy).**

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

**Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

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

Sexual abuse also includes sexual violence and sexual harassment (see below) which can occur between two children of any sex (also known as child on child abuse). This can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Acts of sexual violence are sexual offences under the Sexual Offences Act 2003, such as rape, sexual assault and assault by penetration. Schools should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.

**Sexual harassment:** is 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school. Sexual harassment is likely to violate a child's dignity, and/or make them feel intimidated, degraded, or humiliated and/or create a hostile, offensive or sexualised environment. Sexual harassment can include sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names; sexual "jokes" or taunting; physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes, or upskirting, and sharing of unwanted explicit content (for example displaying pictures, photos or drawings of a sexual nature); and online sexual harassment, which might include consensual or non-consensual sharing of sexual images and videos (often referred to as the sharing of nudes/semi-nudes, or sexting – see below); inappropriate sexual comments on social media; exploitation; coercion and threats. Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

**Sexual violence:** refers to sexual offences under the Sexual Offences Act 2003, including rape, assault by penetration, sexual assault, and/or causing someone to engage in sexual activity without consent. Consent to sexual activity may be given to one sort of sexual activity, but not another, or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. A child under the age of 13 can never consent to any sexual activity. The age of consent is 16, and sexual intercourse without consent is rape.

**Child-on-child sexual violence and/or harassment:** Sexual violence and sexual harassment (as defined above) can occur between two children of any age and sex, from primary through to secondary stage and into colleges. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. It is more likely that girls will be the victims of sexual violence and harassment, and it is more likely that it will be perpetrated by boys. It can however occur between children of any sex. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. Children who are victims of sexual violence and/or sexual harassment wherever it happens, will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college.

**Harmful sexual behaviour:** problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is "harmful sexual behaviour". Harmful sexual behaviour can occur online and/or face-to-face and can also occur simultaneously between the two. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' age difference, or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature.

**Sharing of nudes and/or semi-nudes:** the sending or posting of nude or semi-nude images, videos, or live streams online by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. The sharing of nudes and semi-nudes can happen publicly online, in 1:1

messaging or via group chats and closed social media accounts and may include images or footage of more than one child or young person.

Alternative terms used by children and young people may include 'dick pics' or 'pics' or may be referred to by adults or professionals as 'youth produced/involved sexual imagery', 'indecent imagery', 'image based sexual abuse' or 'sexting'.

The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may also occur where:

- children and young people find nudes and semi-nudes online and share them claiming to be from a peer
- children and young people digitally manipulate an image of a young person into an existing nude online
- images created or shared are used to abuse peers e.g. by selling images online or obtaining images to share more widely without consent to publicly shame

For this reason, incidents can either be classified as 'aggravated' or 'experimental'. The DDCMS / UKIS guidance "*Sharing nudes and semi-nudes: advice for education settings working with children and young people*" sets out the classification of incidents, and how each should be handled.

**Upskirting:** is now a criminal offence and typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission and/or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Anyone of any gender can be a victim.

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

**Serious violence:** indicators which may signal that children are at risk from, or are involved with serious violent crime include increased absence from School, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation. All staff should be aware of the associated risks which increase the likelihood of involvement in serious violence (for example, being male, frequent absence from school or permanently excluded from school, experienced child maltreatment or having been involved in offending) and understand the measures in place to manage these.

**Specific safeguarding issues:** behaviours linked to drug taking, alcohol abuse, truanting and sexting put children in danger. Safeguarding issues can also manifest themselves via child on child abuse, such as abuse within intimate partner relationships, bullying (including cyberbullying), gender-based

violence/sexual assaults, sexting and upskirting. Safeguarding issues can also be linked to, for example, children being absent, repeatedly and/or for prolonged periods, children missing from education; child sexual exploitation; domestic violence; fabricated or induced illness; faith abuse (including ostracism of families); female genital mutilation; forced marriage; gangs and youth violence; gender-based violence /violence against women and girls; hate; mental health; preventing radicalisation; relationship abuse; sexting; consensual and non-consensual sharing of nudes and semi-nudes; and trafficking.

**Child sexual exploitation (CSE):** CSE is a form of child sexual abuse (see above) which occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years (including 16 and 17 year olds who can legally consent to have sex) who has been coerced into engaging in sexual activities. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media). Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

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 threats of violence.

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

- children who have older boyfriends or girlfriends, and
- children who suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

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

CSE may occur alone, or may overlap with CCE, and/or county lines, as well as other forms of abuse.

**Child criminal exploitation (CCE):** CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or (b) for the financial or other advantage (such as increased status) of the perpetrator or facilitator and/or (c) through violence or the threat of violence. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines, see below), forced to shoplift or pickpocket. They can also



be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. 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 – where this is the case, their vulnerability as victims is not always recognised by adults and professionals (especially when they are older children). It is important in these circumstances that the child perpetrator is also recognised as a victim.

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts, money, or new possessions
- children who associate with other children involved in exploitation
- children who suffer from changes in emotional well-being
- children who misuse drugs and alcohol
- children who go missing for periods of time or regularly come home late, and
- children who regularly miss school or education or do not take part in education.<sup>172</sup>

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

CCE may occur alone, or may overlap with CSE, and/or county lines, as well as other forms of abuse.

Children who have been exploited will need additional support to help maintain them in education.

**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 exploited to sell drugs and move and store drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children’s homes, and care homes. Children are 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.

A number of the ways of identifying indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- who go missing and are subsequently found in areas away from their home;
- that have been the victim or perpetrator of serious violence (e.g. knife crime);
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection;
- are 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.

Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office.

**Modern Slavery:** Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the National Referral Mechanism is available in the statutory guidance "*Modern slavery: how to identify and support victims (June 2021)*"

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

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

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

If there are concerns about a child in this area, the DSL (or a deputy), should consider referring into 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. Cyber Choices does not

currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Additional advice can be found at: Cyber Choices, 'NPCC- When to call the Police' and National Cyber Security Centre - NCSC.gov.uk

**Mental health:** all staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

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

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following this policy and speaking to the DSL or a deputy.

The DfE has published advice and guidance on *Preventing and Tackling Bullying, and Mental Health and Behaviour in Schools*. In addition, Public Health England has produced a range of resources to support secondary and senior school teachers to promote positive health, wellbeing and resilience among young people including its guidance *Promoting Children and Young People's Emotional Health and Wellbeing*. Its resources include social media, forming positive relationships, smoking and alcohol.

**So called 'honour based' abuse:** 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. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take.

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can also be found on pages 38-41 of the Multi-agency statutory guidance on FGM. To give an example of indications that a girl has already been subjected to FGM:

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

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

There is a statutory duty on teachers to personally report to the Police where they **discover** (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve children’s social care as appropriate. If the teacher is unsure whether this reporting duty applies, they should discuss their concerns with the DSL in accordance with this policy. Where a teacher suspects that a pupil is at risk (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or it involves a pupil over 18, teachers should follow the School’s local safeguarding procedures.

Further information can be found in the *Multi-agency statutory guidance on female genital mutilation and the FGM resource pack*, particularly section 13.

**Forced marriage:** Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their 18th birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial ‘marriages’ as well as legal marriages.

Schools and colleges can play an important role in safeguarding children from forced marriage. There are a range of potential indicators that a child may be at risk of forced marriage, details of which can be found on pages 13-14 of the Multi-agency guidelines: Handling cases of forced marriage. Further information on forced marriage is available in guidance published by the Forced Marriage Unit. School staff can also contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email [fm@fco.gov.uk](mailto:fm@fco.gov.uk).

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

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology, there are possible indicators that should be taken into consideration alongside other factors and contexts. Background factors combined with specific influences such as family and friends may contribute to a child’s susceptibility. Similarly, radicalisation can occur through many different

methods (such as social media or the internet) and settings (such as within the home). As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be susceptible and act proportionately, which may include making a Prevent referral. Designated safeguarding leads and other senior leaders in colleges should familiar themselves with the Prevent duty guidance: for further education institutions in England and Wales. Staff should contact the DSL or the Deputy DSL, who should be aware of the local procedures in place, before making a Prevent referral.

**Special educational needs and/or disabilities (SEND), or pupils with certain health conditions:** Pupils with SEND or certain health conditions can face additional safeguarding challenges. These children may not outwardly show signs of abuse and/or may have difficulties in communication about abuse or neglect, or bullying.

These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
- the potential for children with SEND or certain health conditions being disproportionately impacted by behaviours such as peer group isolation or bullying (including prejudice-based bullying), without outwardly showing any signs; and
- communication barriers and difficulties in managing or reporting these challenges.
- being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in School or the consequences of doing so.

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

**Lesbian, gay, bi or trans (LGBT):** The fact that a child may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by their peers. In some cases, a pupil who is perceived by their peers to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT. Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. The School endeavours to provide a safe space for LGBT children to speak out or share their concerns with trusted members of staff.

**Domestic abuse:** The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear, or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including but not limited to, psychological, sexual, physical, emotional, and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

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. Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of peer on peer abuse 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 should be offered support. The Act's provisions, including the new definition, will be commenced over the coming months.

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

School staff can contact Operation Encompass on 0204 513 9990 (8am to 1pm, Monday to Friday) for advice in respect of children who have experienced domestic abuse.

**Homelessness:** Being homeless, or at risk of homelessness presents a real risk to a child's welfare. The School should be aware of potential indicators of homelessness including: household debt, rent arrears, domestic abuse and anti-social behaviour, as well as a family being asked to leave a property. If staff are made aware, or suspect that a pupil may be at risk of homelessness they should talk to the DSL in the first instance. Whilst referrals to the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not and should not replace a referral to the LADO where a child has been harmed or is at risk of harm, in accordance with this policy.

**Children who are absent from school:** A child being absent from School, particularly repeatedly and/or for prolonged periods, and children missing education is a potential indicator of a range of safeguarding issues including abuse, neglect, sexual abuse, CSE and CCE. It can also be a sign of child criminal exploitation including county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM, so-called 'honour'-based abuse or risk of forced marriage. Staff must follow the School's procedures for dealing with children who are absent particularly persistently or for prolonged periods. The School's procedure for dealing with children who are absent and/or missing can be found in the School's Missing Child Procedure. All unexplained absences will be followed up in accordance with this.

The School shall inform the local authority of any pupil who is going to be added to or deleted from the School's admission register at non-standard transition points in accordance with the requirements of the Education (Pupil Registration) (England) Regulations 2006 (as amended). This will assist the local authority to:

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

- b) follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect or radicalisation.

School attendance registers are carefully monitored to identify any trends. The School will inform the local authority (and the local authority where the child is normally resident) of any pupil who fails to attend school regularly, or has been absent without the School's permission for a continuous period of 10 school days or more. at such intervals as are agreed between the School and the local authority.

Action should be taken in accordance with this policy if any absence of a pupil from the School gives rise to a concern about their welfare. The School's policy supports identification of abuse and provides preventative measures against the risk of the child going missing in the future. This applies when issues are first emerging as well as where children are already known to the local authority children's social care and need a social worker.

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

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

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff.

It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: [www.actionagainstabduction.org](http://www.actionagainstabduction.org) and [www.clevernevergoes.org](http://www.clevernevergoes.org).

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

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

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. The School may refer some parents and carers to this service where appropriate.

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

## **APPENDIX 2 – THE SAFEGUARDING TEAM OF STAFF TRAINED TO DSL LEVEL:**

Nic Anderson - Head

Claudine Jones – DSL [Assistant Head Senior School]

Dan Peters – Deputy DSL & EYSL [Head Junior School]

James Griffiths – Deputy EYSL [Deputy Head Junior School]

Nigel Crust – Head of House & Deputy DSL

Josh Birch – Head of Year 7

Rhiannon Clancy – Head of Sixth Form

Steve Clancy – Head of House

Truan Cothey – Assistant Head Junior School

Kathy Dyer – Assistant Head of House

Hattie Grew – Assistant Head of Sixth Form

Sara Hare – Assistant Head Junior School

Shona Hemmings – Finance Director

Toby Hughes – Deputy Head Senior School

Huw Humphreys – Assistant Head of House

Steve Jackson-Turnbull – Head of House

Tom Jeavons – Assistant Head of House

Stephanie Jones – Senior Administrator

Claire Ray – Head of House

Zoe Rowley – Senior Librarian

Emma Stanton – Assistant Head Junior School

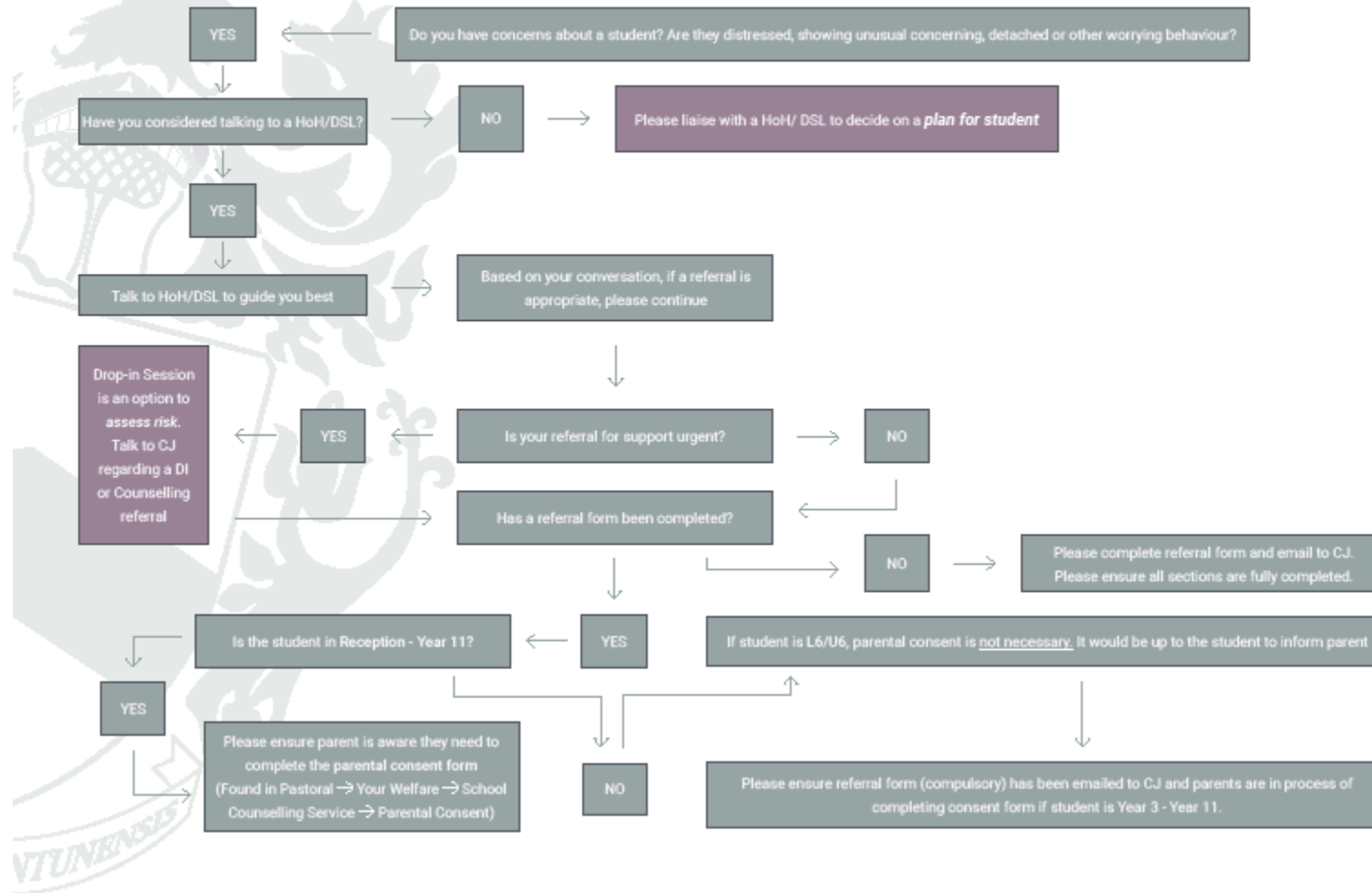
JP Villafrati – Sixth Form Assistant



APPENDIX 3 – COUNSELLOR REFERRAL PROCEDURE

## Wolverhampton Grammar School Information for Staff

### School Counselling Referral Process: 2023/2024



## What happens next?

CJ WILL RECEIVE REFERRAL FORM FROM STAFF AND A COMPLETED PARENTAL CONSENT FORM

SCHOOL COUNSELLOR (BA) WILL RECEIVE BOTH FORMS

- BA TO ALLOCATE COUNSELLING APPOINTMENT TO STUDENT



STUDENT IS SEEN FOR FIRST APPOINTMENT. CONFIDENTIALITY ETC. ALL EXPLAINED

- BA SENDS OUT A FIREFLY APPOINTMENT TASK WITH DETAILS OF ROOM LOCATION ETC.



STUDENT & BA, BASED ON 1ST SESSION, WILL DECIDE IF STUDENT WILL CONTINUE AND IF SO, HOW MANY SESSIONS TO CONTRACT FOR & APPOINTMENT SENT OUT VIA FIREFLY

- STUDENT, REFERRER, CJ & PARENT (IF OK TO), WILL BE COPIED INTO THIS APPOINTMENT TASK



IF CONTINUING, NEXT SESSION TIME/DATE BOOKED WITH STUDENT.

IF NOT CONTINUING/NOT APPROPRIATE FOR COUNSELLING, ALTERNATIVE SUGGESTIONS OF SUPPORT MAY BE DISCUSSED. THIS WILL BE RELAYED BACK TO STUDENT & REFERRER – WITH STUDENT'S PERMISSION.

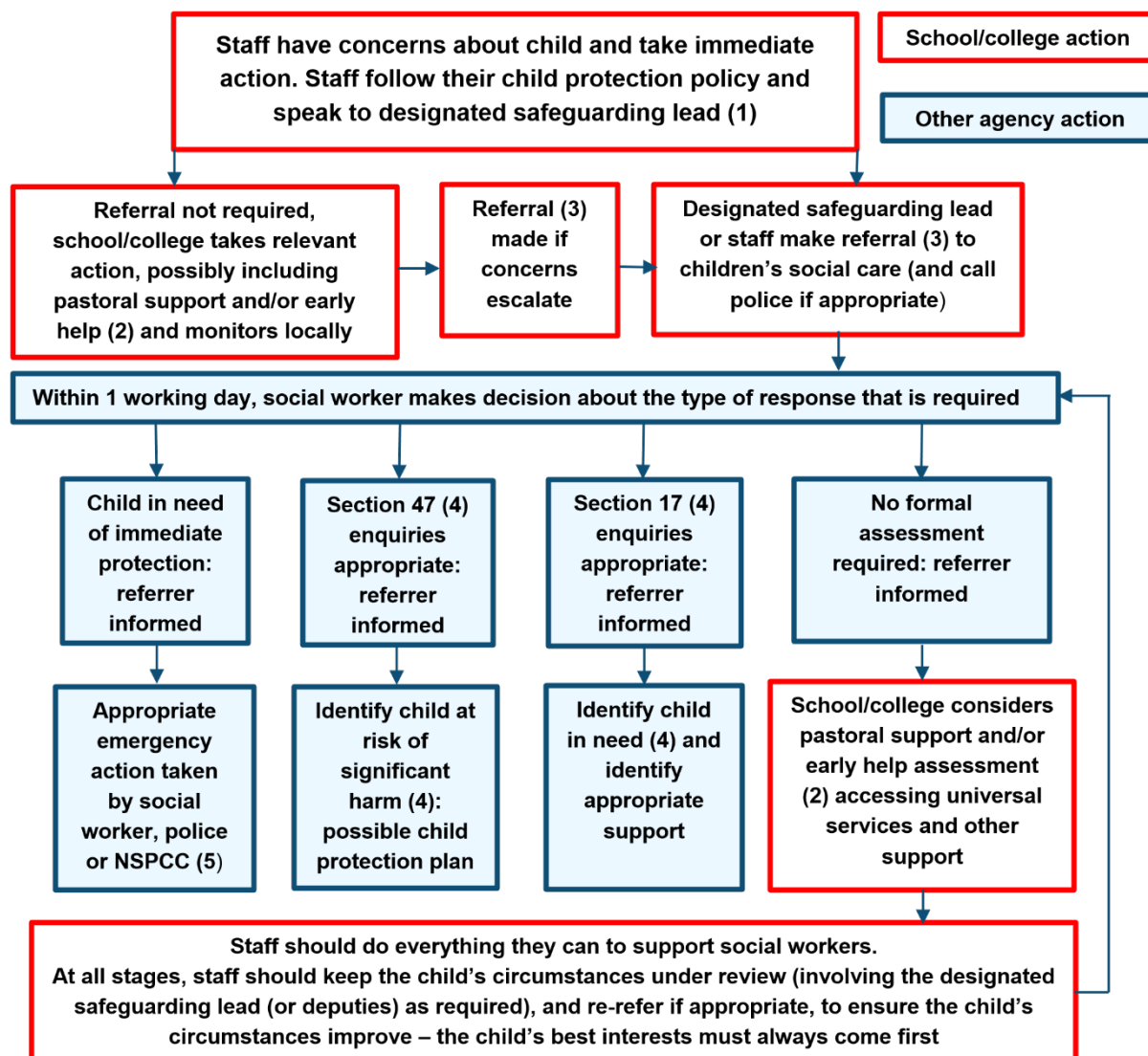
### Counselling Related Information:

Staff are politely requested to not ask the counsellor how the sessions are going. Counsellor can only give limited information (e.g. attendance related, with student's knowledge). It is helpful to remember that 'no news is good news'. The Counsellor will forward any self-harm or risk-related concerns directly to CJ and/or to a DSL staff member. The referrer will then be informed.

### Drop-In Session Related Information:

- Drop in sessions are offered as a one-off session, which do not require parental consent.
- Drop in sessions are scheduled, shorter sessions on allocated days, lasting 20 minutes.
- They can help if a student is not sure about being referred for counselling, or if a staff member has some concerns about a student.

APPENDIX 4 – WHAT HAPPENS IF STAFF HAVE CONCERNS ABOUT A CHILD – from KCSIE 2023



<sup>1</sup> In cases which also involve a concern or an allegation of abuse against a staff member, see Part four of this guidance.

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

<sup>3</sup> Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of [Working Together to Safeguard Children](#).

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

<sup>5</sup> This could include applying for an Emergency Protection Order (EPO).