

Bradford Grammar School

## Safeguarding and Child Protection Policy and Guidance

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## **POLICY**

### **1. Responsibility for this policy**

- 1.1 The Board of Governors (“the Board”) of Bradford Grammar School (“the School”) has approved this policy (“the Policy”).
- 1.2 The safeguarding and protection of pupils shall be of central importance to the Board’s governance of the School in connection with both (a) the day to day operation of the School and (b) the Board’s strategic planning for development and future operations.

### **2. Specific Duties**

- 2.1 The Board shall appoint a named governor (who is currently Tonia Pugh) whose duties shall include
  - 2.1.1 a special responsibility for safeguarding and child protection;
  - 2.1.2 participation in the annual review of the Policy and also the Guidance (referred to in paragraph 2.3.3 below);
  - 2.1.3 meeting with the Designated Safeguarding Lead (DSL) regularly to provide support and carry out checks and reviews of safeguarding practice;
  - 2.1.4 liaison with the Local Authority Designated Officer(s) (LADO(s)) for Bradford MDC and partner agencies in the event of allegations of child abuse against the Headmaster of the Senior School or a member of the Board.
- 2.2 The duties of all members of the Board shall include
  - 2.2.1 the overriding duty to report any concern in connection with safeguarding and child protection as referred to in paragraph 6.1 below;
  - 2.2.2 fulfilling their statutory duties as set out in KCSIE Part 2;
  - 2.2.3 ensuring any serious incident is notified to the Charity Commission;
  - 2.2.4 undertaking all training as may be required of governors pursuant to this policy;
  - 2.2.5 complying with the provisions of the Human Rights Act 1998, the Equality Act 2010 and all other statutory obligations by which they are bound;
  - 2.2.6 taking all necessary steps to comply with the requirements of the Disclosure and Barring Service.
- 2.3 It is the duty of both the Headmaster and the DSL to ensure that
  - 2.3.1 the provisions of this policy are implemented throughout the School;

- 2.3.2 for the purposes of ensuring implementation, appropriate complementary guidance (“the Guidance”) is published within this document;
- 2.3.3 the Guidance is updated regularly and, in any event, as and when required in accordance with paragraphs 9.7 and 14.3 below.
- 2.4 The Headmaster, the Deputy Headmaster of the Senior School and the Headmaster of the Junior School shall be DSL trained.
- 2.5 The Headmaster shall appoint named persons with safeguarding responsibilities as follows:
  - 2.5.1 a DSL who from September 2024 is Jessica Watson;
  - 2.5.2 Senior School Deputy DSL (DDSL) (who from September 2024 is Kate Wilde);
  - 2.5.3 a Junior School DDSL (who from September 2024 is Felicity Robertshaw Hughes);

And for both the Senior and Junior Schools, additional employees as may be appropriate.

### **3. Application, scope and purpose**

- 3.1 This policy applies to the whole school, that is both the junior and senior schools, of Bradford Grammar School (“the School”), including the Early Years and Foundation Stage (EYFS).
- 3.2 This policy applies to governors, employees, volunteers, visitors and pupils at the School.
- 3.3 The overriding objective of this policy is to provide for the safeguarding, protection and the promotion of the safety, health and welfare of the children and young persons who are entrusted to its care whether or not registered at the School.
- 3.4 In furtherance of this objective the School
  - 3.4.1 is bound by all relevant statutory and other regulatory duties;
  - 3.4.2 shall have regard to the relevant Acts of Parliament, Regulations, statutory guidance, non-statutory guidance and other materials listed in Appendix 5;
  - 3.4.3 shall have regard to the Independent Schools (Standards) Regulations 2014;
  - 3.4.4 shall have regard to the Independent Schools Inspectorate (ISI) inspection framework which came into effect on 1 September 2023 (“Framework 23”);
  - 3.4.5 shall follow the code of practice set out in the West Yorkshire

- 3.4.6 shall work closely with the relevant Safeguarding Partnerships which provide training and other support.

#### **4. Publication and availability**

- 4.1 The Policy and the Guidance shall be
- 4.1.1 published on the School website;
  - 4.1.2 available in hard copy on request.

#### **5. Definitions**

##### **5.1 Safeguarding**

Working Together to Safeguard Children 2023 defines safeguarding and promoting the welfare of children as:

- providing help and support to meet the needs of children as soon as problems emerge;
- protecting children from maltreatment, whether the risk of harm comes from within the child's family and / or outside (from the wider community), including online;
- preventing impairment of children's mental and physical health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes, In line with the new national professional practice standards.

The term 'children' includes every child who is on roll at the School.

##### **5.2 Child Protection**

Child Protection is the practice of taking all reasonable and necessary measures

- to prevent and/or to protect children from being the subject of abuse of any kind; and
- to support as far as is possible those who have been abused.

##### **5.3 Child Abuse**

The term child abuse is used to describe a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear, or experience its effects. Children may be abused in a family or in an institutional or extra-familial contexts by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or another child or children.

#### 5.4 Parents

The word “parents” wherever used in this document means one or both parents of a child or a young person (or any other person who has parental responsibility for or care of the child or young person) currently registered at the School.

### 6. **Overriding Duty**

- 6.1 All governors, employees, volunteers and contractors have an overriding duty to report any concern in connection with safeguarding, child protection or abuse of children to an appropriate person at the School, for example, any of the DSL / DDSLs, the Headmaster, the Headmaster of the Junior School.
- 6.2 All pupils at and visitors to the School shall be encouraged (as if they had a duty) to report any concern in connection with child protection or safeguarding of children with an appropriate person at the School, for example, the DSL, any of the DDSL, the Headmaster, the Headmaster of the Junior School.

### 7. **Confidentiality**

- 7.1 There shall be specified within the Guidance such duties and practices which shall be followed for maintaining all requirements with regard to confidentiality as are necessary and appropriate.

### 8. **Online Safety**

- 8.1 The School has appropriate filters and monitoring systems in place to safeguard children from potentially harmful and inappropriate material online when using the School's IT system. The School uses Cisco technology to filter pupils' internet access and Senso technology to detect and report on signs that a pupil may be at risk. The DSL and DDSLs are alerted by the system to potential safeguarding concerns so that these can be managed swiftly.

Such systems aim to reduce the risk of children being exposed to illegal, inappropriate or harmful materials online (content risk); reduce the risk of children 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 child's likelihood of, or causes, harm for example making, sending and receiving explicit images.

The School recognises however that children have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G) which means that children 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. Parents are responsible for ensuring that appropriate adult content filtering is enabled for pupils' 3G, 4G and 5G mobile connections.

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 Online Safety guidance and Mobile Devices guidance on the School website, which also include detail on the use of mobile and smart technology in School including the School's management of the associated risks, and the School's monitoring arrangements to ensure that children 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 at least annually.

The School will liaise with parents about the importance of children being safe online and about the systems the School uses to filter and monitor online use.

- 8.2 Duties and practices regarding online safety are specified in paragraph 23 below.

## **9. Designated and Deputy Designated Safeguarding Leads**

- 9.1 The current DSL and DDSLs are specified in paragraph 2.5 above.
- 9.2 The DSL has specific responsibilities including those set out in the sub-paragraphs which follow:
- (a) fostering within the School a culture which places the safety, protection and wellbeing of pupils at the centre of everything that it does;
  - (b) implementing all necessary procedures in connection with training as set out in paragraph 10 below;
  - (c) encouraging a climate within the School where governors, employees, volunteers, contractors or any other persons feel secure to report to an appropriate person any concern or suspicion in connection with child protection or safeguarding with an appropriate person, for example, any of the DSL, the DDSLs, the Headmaster, the Headmaster of the Junior School;
  - (d) promoting, in support of the responsibility set out in (c) above, awareness of the School's Whistleblowing Guidance and the NSPCC whistleblowing helpline number 0800 028 0285;
  - (e) receiving from whatever source all reports and all information relating to concerns or suspicions about possible (a) failures in connection with safeguarding and child protection and (b) child abuse of any kind including online abuse;



- (f) informing the Headmaster or the Headmaster of the Junior School and/or any other person as may be appropriate of any child protection or safeguarding issue which has arisen;
- (g) acting upon such reports and information promptly and, as and when circumstances demand, urgently and in accordance with the best interests of the pupil or pupils concerned;
- (h) co-ordinating early help arrangements as set out in paragraph 23.3 below as and when appropriate;
- (i) co-ordinating cooperation and working together with relevant outside agencies as and when appropriate;
- (j) liaising with the Bursar and Human Resources Department to ensure that appropriate child protection and safeguarding checks and procedures are applied in respect of
  - all employees of the School;
  - contractors engaged on the site of the School;
  - contractors engaged on other sites where pupils may be located, for example, on educational visits;
- (k) communicating to all persons who should know that a pupil has or has had a social worker assigned in order to promote the pupil's best possible educational outcomes;
- (l) keeping and updating proper records of each and every child protection and safeguarding issue in which they become involved;
- (m) ensuring that within 5 days of a pupil leaving the School (a) any relevant safeguarding information is provided to the succeeding school or college so as to enable proper continuity of support and (b) the relevant child protection file is transferred;
- (n) ensuring that any relevant safeguarding information is requested from the previous schools of new pupils;
- (o) making referrals to child protection agencies as and when appropriate. These agencies include:
  - Local Safeguarding Partnership;
  - Disclosure and Barring Service;
  - Local Authority Designated Officer (LADO);
- (p) keeping all procedures and arrangements for safeguarding and child protection under constant review in order to prevent or remedy deficiencies or weaknesses in the same;
- (q) having lead responsibility for online safety;
- (r) discharging all other responsibilities as set out in the latest version of KCSIE Annex C.

### 9.3 In the event of the School being invited to any child protection conference

- 9.3.1 the DSL or DDSL shall attend any such conference;
- 9.3.2 the DSL or DDSL in attendance shall assist the conference by providing all available information relevant to the case which is the subject of the conference.
- 9.4 The DSL shall have a duty to act on concerns and implement child protection and safeguarding training as follows:
  - 9.4.1 updating their own training at least every two years and keeping relevant records of the same;
  - 9.4.2 conducting supervision amongst themselves on a regular basis and, in any event, at least once per term;
  - 9.4.2 ensuring that appropriate training for governors is updated regularly and, in any event, at least annually;
  - 9.4.3 ensuring that appropriate training for employees is updated regularly and, in any event, at least annually;
  - 9.4.4 promoting knowledge of significant developments in the field of child protection and safeguarding by periodic dissemination of appropriate material to governors, employees, and other relevant persons, for example by means of written updates, meetings and supervision.
- 9.5 The DSL shall have a duty to comply with the requirements for training set out in paragraph 10 below insofar as these concern them.
- 9.6 The DSL shall have an ongoing duty to keep the terms and scope of their duties and responsibilities under review in order to ensure so far as is reasonably practicable that any deficiencies or weaknesses in safeguarding and child protection arrangements are remedied promptly.
- 9.7 The DSL shall review and update the Guidance as set out in paragraph 14.3 below.

## **10. Training**

- 10.1 The devising and implementation of all training required in connection with this policy shall be the duty of the DSL.
- 10.2 All employees shall receive appropriate child protection and safeguarding training.

- 10.2.1. All new employees as part of their induction shall receive specific training in connection with the overriding duty set out in paragraph 6.1. The duty to report set out there is sometimes referred to as “whistleblowing”.
- 10.2.2 All new employees shall receive training as part of their induction in connection with (a) Safeguarding and Child Protection and (b) Online Safety.
- 10.2.3 All employees shall be required to read and confirm that they have read and understood the
  - 1) Safeguarding and Child Protection Policy;
  - 2) Staff Code of Conduct;
  - 3) Pupil Behaviour Policy;
  - 4) Online Safety Policy;
  - 5) Online Safety Guidance;
  - 6) ICT Acceptable Use Agreement; and
  - 7) KCSIE as applies to their role (see Appendix 6).
- 10.3 All employees shall be made aware of the systems within the School which support safeguarding, including the Safeguarding and Child Protection Policy, Staff Code of Conduct, the role and identity of the DSL and the DDSLs.
- 10.4 All employees shall receive, at least annually, safeguarding and child protection updates (for example, via staff briefings, email or staff meetings) which is in line with advice from the relevant local safeguarding partners.
- 10.5 The DSL and the DDSLs shall update their own safeguarding and child protection training in accordance with paragraph 9.4.1 above.
- 10.6 All governors shall receive regular child protection and safeguarding training and, in particular, such training shall be directed to assist the Board in meeting the objectives of governance as set out in paragraph 1.2 above.
  - 10.6.1 All governors shall be required to read and confirm that they have read and understood (a) Part 2 and Annex C of the latest version of KCSIE and (b) the Policy and Guidance.
  - 10.6.2 All governors shall be required to undergo such further training as from time to time may be directed by the DSL.
- 10.7 The Junior School Personal, Social and Health Education (PSHE) programme and the Senior School Personal Development (PD) programme will include sessions to promote awareness of matters related to safeguarding and child protection and, to this extent, are complementary to the specific requirements of training as set out above.

## **11. Disclosure and Barring Service**

- 11.1 The School shall comply with all relevant requirements, checks and guidance as specified from time to time by the Disclosure and Barring Service.

## **12. Recruitment**

- 12.1 The School's Safer Recruitment Policy governs all matters relating to recruitment.

**13. Visitors**

- 13.1 The required procedures which must be followed in connection with persons visiting the School are set out in the School's Safer Recruitment Policy and Visiting Speakers Guidance.

## **14. Guidance**

This Guidance concerns the implementation of procedures for the protection and safety of pupils and is devised in accordance with the duties of the Headmaster and the DSL set out in paragraph 2.3 above.

This Guidance is complementary to the provisions of the Policy set out above but is of no less relevance or importance for the protection and safety of pupils than the provisions of the Policy itself.

This Guidance shall be kept under review and updated as provided in paragraph 2.3.3 above.

## **15. Purpose and Objectives**

The purpose of this Guidance is to further the overriding objective of the Policy set out in paragraph 3.3 above.

This  
Guidance  
seeks to

- promote the achievement of the highest standards in connection with the safeguarding and protection of pupils;
- to enhance understanding of the various issues which relate to the safeguarding and protection of pupils;
- provide practical help to employees and others in this regard and, in particular, in connection with procedures which are appropriate to follow both generally and in particular circumstances.

## **16. Ethos, Communication and Confidentiality**

Safeguarding and child protection are enhanced when pupils have high self-esteem, confidence, supportive friends and clear lines of communication with a trusted adult.

At all times all matters concerning safeguarding and child protection are to be handled sensitively, professionally and in ways that support the needs of the pupil.

Safeguarding and child protection are fostered when pupils feel secure and know that their concerns in this connection will be taken seriously. It is important, therefore (a) that there are adults within the School whom pupils can approach if they have any concern, difficulty or worry; (b) that all pupils at the School know who those adults are and how they may be approached and (c) that those adults will take all necessary steps in order to assist in dealing with any matters which are reported to them.

Appropriate and timely communication is central to the effective safeguarding and protection of pupils and, as the particular circumstances demand, must include governors, employees, volunteers, parents and pupils.

Whilst professionals can only work together to safeguard and protect pupils if there is an exchange of relevant information between them, confidentiality is essential when dealing with safeguarding and child protection issues. The starting point is that personal information should be disclosed to third parties with the knowledge of the subject of that information or their parent. When sharing information in order to safeguard or promote the welfare of a pupil, consent is not a necessary processing condition. If it is in a pupil's best interest to share information with other agencies, the reason for this will be discussed with the family unless there is good reason not to do so.

## **17. Record Keeping**

Full and accurate records are essential to best ensure safeguarding and child protection practice. The records kept by the School will contain a clear and comprehensive account of the concern which has been reported including how it was pursued, decisions made, actions taken and how the matter was resolved. These will be preserved on CPOMS (Child Protection Online Management System). These requirements are compliant with the latest version of KCSIE.

The School will retain such records in compliance with the Data Protection Act 2018 and the EU General Data Protection Regulations (GDPR) 2018.

Subject to questions of confidentiality the School's records will be disclosed to relevant agencies in appropriate circumstances.

Within 5 days of a pupil leaving the School any relevant child protection records will be transferred to a new school or college as set out in paragraph 9.2 (m) above.

When a new pupil joins the School, child protection records will be requested from the previous school in the expectation that the files will be transferred within 5 working days. Any files received will be read by the DSL, relevant DDSs and other relevant staff; e.g., the SENCo, Head of Year.

## **18. Child Abuse**

### **18.1 Types and occurrence of abuse**

- Maltreatment of a child may take the form of abuse resulting in physical injury, sexual abuse, emotional abuse, neglect, exploitation or other harmful outcome. Sexual exploitation, criminal exploitation, participation in serious youth violence, radicalisation and forced marriage may also be the result of abuse. (Further specific guidance is set out below).
- Abuse may occur to children of all ages including those who have a special educational need or are disabled whatever their gender, sexual orientation or ethnicity. (Further specific guidance is set out below).
- Abuse may occur at home, at school, in institutional or community settings whether residential or otherwise or at any other place.
- Abuse may occur mainly or wholly online or by means of other technologies used to facilitate offline abuse.
- Children may suffer from one or more forms of abuse.

### **18.2**

#### **People who abuse children**

In most cases the person or persons who are responsible for the abuse of children are known to and often trusted by the abused child, for example, parents, carers, relatives, friends, peers, teachers, coaches or other professionals.

### **18.3**

#### **Indicators of abuse**

Various forms of behaviour and conduct and/or various facts and circumstances may amount to signs or indicators of abuse of one kind or another. (Examples of these are set out in Appendix 1).

- 18.4 Physical abuse  
This form of abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child.
- Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
- 18.5 Sexual abuse  
This form of abuse involves forcing or enticing a child 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. Abuse can take place wholly online, or technology may be used to facilitate offline abuse.
- Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education (as set out in paragraph 18.13).
- 18.6 Emotional abuse  
This form of abuse involves the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. Some level of emotional abuse is implicit in all types of maltreatment of a child. However, it may occur standing on its own, examples of which are as follows:
- conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person;
  - not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate;
  - age or developmentally inappropriate expectations being imposed on a child, for example interactions that are beyond a child's developmental capability;
  - overprotection and limitation of exploration and learning;
  - preventing the child from participating in normal social interaction.
  - seeing or hearing the ill-treatment of another including domestic violence within the home;
  - serious bullying (including cyberbullying), causing a child frequently to feel frightened or in danger;
  - exploitation or corruption of a child.
- 18.7 Neglect  
The persistent failure to provide a child's basic physical and/or psychological needs is likely to result in the serious impairment of the child's health or development. Neglect may occur in 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 or emotional harm or danger;
- ensure adequate supervision (including the use of inadequate care givers);
- provide suitable education; and
- ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

18.8

#### Domestic abuse

Domestic abuse includes any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members.

Domestic abuse can be psychological, physical, sexual, financial, and/or emotional. The Domestic Abuse Act 2021 is concerned with the impact of domestic abuse on children as victims in their own right, if they see, hear or experience the effects of domestic abuse in the context of their home life where abuse occurs between family members.

Exposure to domestic abuse can have a serious, long-lasting emotional and psychological impact on a child. Young people can also experience "teenage relationship abuse" within their own intimate relationships, which may be properly described as domestic abuse.

The police will usually inform the School (as part of Operation Encompass) when they have been called to a domestic abuse incident at the home of a pupil. This ensures that the School has up-to-date relevant information about the child's circumstances and can enable support to be given to the child.

18.9

#### Honour-based abuse

So-called 'honour-based' abuse (HBA) concerns practices which, although amounting to criminal offences, are pursued in order to protect or defend the honour of the family and/or the community. They include breast ironing, FGM and forced marriage. Reliance on religious or cultural norms may be the motivation to coerce children into compliance but, if so, does not afford a lawful defence to perpetrators of such abuse.

Forcing a person into a marriage is a crime in England and Wales; it is an offence to cause a child under the age of 18 to enter a marriage in any circumstances.

The School must be vigilant as to the possibility of a pupil being at risk of HBA or already having suffered HBA and must respond appropriately where there is concern or suspicion about any kind of abuse.

18.10

#### Female genital mutilation (FGM)

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. This practice amounts to a criminal offence in the UK. It is a form of child abuse with long-lasting harmful



consequences.

Some children in the UK are at risk of Female Genital Mutilation (FGM). The School must be vigilant as to the possibility of a pupil being at risk of FGM or already having suffered FGM.

Victims of FGM are most likely to come from a community that is known to practise FGM. There is a specific risk that girls aged 5-8 or thereabouts whose mother or older sister have themselves been victims of FGM may become subjects of the same abuse. The practice of this abuse may occur in the UK but often occurs overseas in the family's country of origin during school holidays and employees must be vigilant in this respect.

Any suspicion that this might have occurred should be reported immediately to the DSL or DDSLs.

There is a specific mandatory legal duty on teachers and health professionals to report to the police a discovery that an act of FGM appears to have been carried out on a girl under the age of 18.

#### Indicators

There is a range of potential indicators that a girl may be at risk of FGM. Potential victims may be heard to talk about 'a special procedure' or 'becoming a woman' and these are regarded as warning signs and grounds for early intervention and/or referral.

Signs that FGM may already have occurred include discomfort, difficulty in walking and standing, spending longer in the toilet/bathroom than might be ordinarily expected, complaints of menstrual and/or stomach problems, changes in patterns of behaviour and increased absence.

Discovery of an act of FGM or concern that one may have been carried out does not require there to be visual evidence of this practice. It will be rare for teachers to see such evidence and they should **not** examine pupils.

18.11

#### Harmful sexual behaviour

Children's sexual behaviour exists on a wide continuum, ranging from behaviour which is normal and developmentally expected and, therefore, acceptable to developmentally inappropriate, abusive and violent behaviour which is, therefore, unacceptable. Such unacceptable behaviour (sometimes referred to as Harmful Sexual Behaviour (HSB)) is harmful or potentially so both to the perpetrator and to the child against or towards whom such behaviour is directed.

HSB may occur face-to-face and/or online. When considering HSB, both the ages and the stages of development of the children are critical factors. In some cases HSB will progress on a continuum.

Children displaying HSB have often experienced their own abuse and trauma.

Addressing and dealing with HSB promptly is important with a view to preventing further and/or more serious behaviour in the future.

Child-on-child abuse

Children are capable of abusing other children. Child-on-child abuse may include:

- intimate personal relationships between children;
- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- physical abuse;
- sexual violence and sexual harassment;
- causing someone to engage in sexual activity without consent (such as forcing someone to strip, touch themselves sexually, or engage in sexual activity with a third party);
- consensual and non-consensual sharing of nudes and semi-nudes images and/or videos (also known as sexting or youth produced sexual imagery);
- upskirting; and
- initiation/hazing type violence and rituals.

This list of misconduct is not exhaustive. Any concerns relating to child-on-child abuse should be reported directly to the DSL or DDSLs. The School has a number of staff trained in AIM who will use the AIM risk and needs assessment tools to help determine next steps.

Child-on-child abuse should never be passed off as “banter”, “just having a laugh”, “horseplay”, “part of growing up” or “boys being boys”. Downplaying abusive behaviour in this way may lead to a culture in which such misconduct becomes the norm resulting in an unsafe environment for children in which there is reluctance to report it rather than encouragement to do so.

Child-on-child abuse is more likely to be perpetrated by boys against girls although the reverse is possible.

Safeguarding incidents and behaviours can be associated with factors outside School. In assessing such incidents and behaviours, employees need to be aware of the context in which they occur. Contextual safeguarding requires consideration of the wider environmental factors (extra-familial harms) present in a pupil’s life which may pose a threat to their safety or welfare. Addressing inappropriate behaviour, even if it appears to be relatively innocuous, can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

Pupils are educated within the PSHE and Personal Development programmes and within the wider curriculum so that they can confidently report abuse, knowing their concerns will be treated seriously.

Bullying is behaviour by an individual or group, repeated over time, that intentionally hurts another individual or group either physically or emotionally. Bullying can take many forms (including online bullying via social media or gaming platforms, which can involve the use of images and video), and is often motivated by prejudice against particular groups, for example on grounds of race, religion, gender or sexual orientation, special educational needs or disabilities.

18.13

Sexual violence and sexual harassment between children

Sexual violence and sexual harassment are never acceptable in any circumstances. Reports of sexual violence and sexual harassment between children are likely to be complex. Sexual violence includes rape, assault by penetration, sexual assault and causing someone to engage in sexual activity without consent. Sexual harassment includes unwanted conduct of a sexual nature, including sexual comments, remarks, jokes, upskirting and online sexual harassment. Neither of these lists is exhaustive. Sexual violence and sexual harassment may overlap and may be perpetrated as part of a broader pattern of abuse.

All employees should maintain an attitude of “it could happen here” and also understand the importance of challenging inappropriate behaviour. Vigilance must extend to understanding that the mere fact of an absence of reports of child-on-child abuse is no guarantee that such misconduct is not taking place. Training for employees is provided in connection with sexual violence and sexual harassment and, in particular, how to manage reports and concerns of the same both online and offline and whether having occurred at or away from school.

18.14

Child sexual exploitation (CSE)

Child sexual exploitation occurs where an individual or a group of people, for their own benefit financial or otherwise, takes advantage of an imbalance of power to coerce, manipulate or deceive a child into participating in sexual activity in exchange for something the child either needs or wants. Whilst age may be the most obvious feature of power imbalance there may be a range of other factors contributing to this imbalance including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. Sexual exploitation can take many forms ranging from a seemingly ‘consensual’ relationship where sex is exchanged for affection or gifts, to serious crime organised by gangs and groups.

Indicators of CSE may include a child having older boyfriends or girlfriends, suffering from sexually transmitted infections, displaying sexual behaviours beyond expected sexual development or becoming pregnant.

CSE does not always involve physical contact; it can also occur using technology and may occur without the child’s immediate knowledge (for example, through the copying of videos or images by others which are then posted on social media). This abuse may be a one-off occurrence or a series of incidents over time which range from opportunistic to complex organised misconduct.

CSE can affect any child under the age of 18 years, including 16 and 17 year-olds who are ordinarily assumed to be able to give legal consent to have sex. However, no child can consent to being abused or exploited.

18.15

Child criminal exploitation (CCE)

Child criminal exploitation involves an individual or a group of people, for their own benefit financial or otherwise, taking advantage of an imbalance of power to coerce, manipulate or deceive a child into participating in criminal activity in exchange for something the child either needs or wants. The conduct of the

perpetrator may be accompanied by violence or the threat of violence. Whilst the child's participation in crime may have the appearance of being consensual, the reality is that the child is controlled by the perpetrator.

Exploitation of this kind does not necessarily require face-to-face contact between the perpetrator and the child. Control may be exercised via an intermediary or by the use of technology.

Such exploitation may result in a variety of criminal conduct. For example, children may be forced:

- to work in cannabis factories;
- to store, transport or sell drugs or money across the country (county lines);
- to shoplift or pickpocket;
- to commit vehicle crime;
- to threaten or to use serious violence against others;
- to carry weapons whether to use them or to induce a sense of protection
- storing weapons;
- storing the proceeds of crime.

Indicators which may signal that pupils are or are at risk of being victims of such exploitation include, for example:

- increased absence from school;
- changes in friendships;
- relationships with older individuals or groups;
- a significant decline in performance;
- signs of self-harm;
- a significant change in wellbeing;
- signs of assault or unexplained injuries;
- unexplained gifts or possessions.

18.16

#### Serious violence

It may be that pupils are at risk from or are involved with serious violent crime. Indicators of this may include absence from school, a change in friendship groups, a significant decline in performance, signs of assault, unexplained injuries, signs of self-harm or a significant change in wellbeing. Unexplained gifts or new possessions could also indicate involvement with criminal networks or gangs.

## **19. Support for Victims of Child Abuse**

Pupils who are abused or who witness abuse (possibly of their siblings) may find it difficult to develop a sense of self-worth and a positive view of life. The process of dealing with an allegation against employees can be particularly daunting for the pupil involved. The School may be the only stable, secure and predictable element in the lives of the pupil at risk. Such pupils may exhibit challenging and defiant behaviour. Their circumstances will influence the way in which these behavioural problems are resolved. Some pupils who have experienced abuse may in turn abuse others. Such situations will require considered and sensitive handling.

The School will support all of its pupils through:

- the development of self-esteem and self-confidence;
- the School ethos which promotes a positive, supportive and secure environment and which gives all pupils and adults a sense of being respected and valued;
- the consistent implementation of the School's behaviour policies by all employees so that, whilst poor behaviour is not tolerated, the pupil's sense of self-worth is not damaged;
- regular consultation with other professionals and agencies who support pupils and their families;
- the development of supportive and constructive relationships with parents; and
- the development and support of an experienced group of employees trained to respond appropriately to child protection situations.

## **20. Mental Health**

### Recognising poor mental health

Mental health encompasses emotional, psychological and social well-being. Mental health is something that all people have, just like physical health. It can include poor mental health, low mood and / or diagnosed medical conditions and disorders. In some cases, be an indicator that a pupil 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. School employees, however, are well placed to observe pupils day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

### Impact of poor mental health

Abuse and neglect, or other potentially traumatic adverse childhood experiences, can have a lasting impact through childhood, adolescence and into adulthood.

Such experiences can have an impact on a pupil's mental health, behaviour and education. The School has an important role to play in supporting the mental health and wellbeing of its pupils. If a member of staff has a mental health concern about a pupil they should share it with a member of the School's Pastoral Team or the DSL or DDDSL.

### Response to mental health concerns

The School has systems in place for recognising and responding to mental health concerns. All School employees receive regular training about how to respond to mental health issues as part of their annual safeguarding training and know when to escalate their concerns to a member of the Pastoral Team. Referrals to the School Counsellor can be made by a member of staff, a parent or the pupil themselves. The School Counsellor will always share any safeguarding concerns with the DSL, if a pupil is judged to be at risk of serious harm. If a pupil is admitted to a mental health provision, the School has a statutory responsibility to make a referral to Children's Social Care under Section 47 of the Children Act 1989.

## **21. Specifically vulnerable children**

### **21.1 Special Educational Needs and Disabilities**

Children with SEND can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group of pupils. These may include assumptions that indicators of possible abuse relate to the pupil's special educational needs or disability without further exploration. This may arise because these pupils are likely to be:

- more prone to peer group isolation than other pupils;

- disproportionately impacted by behaviours such as bullying without outwardly displaying this; and
- more affected by communication and cognitive understanding difficulties in overcoming these barriers.

#### 21.2 Children who are Looked After (CLA)

Children who are looked after by the local authority are identified and supported by the School. The fact that a pupil may be CLA is not in itself an inherent risk but these pupils can face additional safeguarding challenges.

#### 21.3 Pupils who are lesbian, gay, bi or trans (LGBTQIA+)

The School will take steps to counter homophobic, biphobic and transphobic bullying and abuse.

The fact that a pupil may be LGBTQIA+ is not in itself an inherent risk factor for harm. However, pupils who are LGBTQIA+ can be targeted by other pupils. In some cases, a pupil who is perceived by other children to be LGBTQIA+ (whether they are or not) can be just as vulnerable as a pupil who identifies as LGBTQIA+.

#### 21.4 Pupils who experience particular difficulties at home

Some pupils may be vulnerable due to particular difficulties at home including, for example, domestic abuse, intra-familial abuse, bereavement and children in care or with family members in prison.

#### 21.5 Pupils who are absent from education

All children are entitled to a full-time education which is suitable to their age, ability, aptitude and any special educational needs they may have. Effective sharing of information between parents, the School and local authorities is critical to ensuring that all pupils are safe and receiving suitable education.

A pupil who is absent from education, particularly repeatedly and/or for long periods, is a potential indicator of a range of problems including neglect and abuse of one or more kinds. It may also indicate mental health problems, substance abuse, travelling to conflict zones, FGM or forced marriage. The School shall report a pupil who is absent for a longer than the expected period to the relevant local authority.

The School shall follow its established procedures for dealing with unauthorised absence and with pupils who go missing from education, particularly on repeat occasions, with a view to identifying the reasons for absence and preventing the same in the future.

When a pupil is removed from school with a view to educating at home, the School shall liaise with local authorities and other key professionals to coordinate a meeting with parents. If the pupil has an EHCP the School must work with the local authority to review the plan.

When a pupil joins or leaves the School throughout the School year, the School shall inform the local authority including out of area authorities, where appropriate.

## **22. Extremism and Radicalisation**

Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to negate or destroy the fundamental rights and freedoms of others; or undermine, overturn

or replace the UK's system of liberal parliamentary democracy and democratic rights; or intentionally create a permissive environment for others to achieve

Protecting pupils from the risk of radicalisation is part of the School's wider safeguarding duties and is similar in nature to protecting pupils from other forms of harm and abuse. During the process of radicalisation, it is possible for the School to intervene with the aim of preventing vulnerable pupils from being radicalised.

### 22.1 Radicalisation

Radicalisation is the process of a person legitimising support for, or use of, terrorist violence. Most people who commit terrorism offences do so of their own agency and their dedication to an ideological cause.

Terrorism is a strategy which endangers or causes serious violence to a person or persons; and/or serious damage to property; and /or seriously damages or interferes with an electronic system. The use or threat of terrorism is designed to influence government or to intimidate the public. Its purpose is to advance a political, religious or ideological cause.

There is no single way of identifying an individual who is likely to be susceptible to a extremism and / or radicalisation. This can be due to many different circumstances. Specific background factors may contribute to a pupil's vulnerability such as the influence of family members, friends or online contacts, or a pupil may have specific needs for which an extremist or terrorist group appear to provide an answer. The internet and the use of social media in particular has become a major factor in the radicalisation of young people.

As with managing other safeguarding risks, employees should be alert to changes in a pupil's behaviour which might indicate a need of help or protection. School employees should use their professional judgement in identifying pupils who might be at risk of radicalisation. Any concerns should be referred to the DSL or directly to the Channel programme.

The DSL is the designated lead for the Prevent duty in School.

### 22.2 Prevent

All schools are subject to a duty under Section 26 of the Counter Terrorism and Security Act 2015, to have due regard to the need to prevent people from being drawn into terrorism. This is known as the Prevent duty. Section 29 of this Act sets out the Prevent guidance the requirements of which must be met in connection with the following:

- Risk assessment

The School is required to take steps to identify individual pupils who may be at risk of exposure to extremist ideas which are part of terrorist ideology, and who may thereby become radicalised, and how this may occur. The School has procedures in place in order to meet this requirement, including identifying specific risks and developing an action plan to mitigate these.

- Working in partnership

The School has working relationships with local agencies and ensures that its safeguarding arrangements take into account the policies and procedures of relevant safeguarding partnerships.

- Employee training

The School provides training to all employees with a view to identifying pupils who may be at risk of being drawn into terrorism by exposure to extremist ideas. The DSL is able to provide advice and support to employees on methods which may be helpful to protect pupils from the risk of radicalisation. DSL training on the Prevent Duty is updated every two years.

- IT policies

The School ensures that pupils are protected from terrorist and extremist material when accessing the internet within School both by filtering and monitoring online activity and by educating pupils about online safety more generally.

The School aims to build pupils' resilience to radicalisation by promoting fundamental British values and enabling pupils to challenge extremist views, including through the curriculum and wider school life.

The Prevent duty is not intended to stop pupils debating controversial issues. On the contrary, the School should aim to provide a safe space in which pupils and employees can understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments.

### 22.3 Referrals

Referrals to the Channel Programme are made using the national referral form. The Channel Programme focuses on providing support at an early stage to people who may be vulnerable to being drawn into terrorism. An individual's engagement with the Channel programme is entirely voluntary at all stages. (Further details are set out in Appendix 2.)

## **23. Online safety**

### **23.1 Risk**

The School recognises that the use of technology is a significant component of many safeguarding issues, including CSE, CCE, radicalisation, child-on-child abuse and sexual harassment, and understands that technology can be used as a platform to facilitate harm, including bullying, sexual harassment and the sharing of indecent images. The School aims to protect and educate pupils in their use of technology and has in place mechanisms to identify, intervene in, and escalate any incident where appropriate. It recognises the particular vulnerability of pupils with SEND online.

Online safety education of pupils at the School aims to cover the following areas of risk:

- content (exposure to illegal, inappropriate or harmful material);
- contact (being subject to harmful online interaction with other users);
- conduct (personal online behaviour that increases or causes harm); and
- commerce (gambling, inappropriate advertising, phishing or financial scams).

### **23.2 Filtering and Monitoring**

The School ensures that it has appropriate filters and monitoring systems on School devices and networks to safeguard pupils from potentially harmful and inappropriate online material and does all it reasonably can to limit pupils' exposure to such material.

The School has regard to *Meeting digital and technology standards in schools and colleges (March 2023)*, which requires that schools should:

- identify and assign roles and responsibilities to manage filtering and monitoring systems.



- review filtering and monitoring provision at least annually.
- block harmful and inappropriate content without unreasonably impacting teaching and learning.
- have effective monitoring strategies in place that meet their safeguarding needs.

### 23.3 Education

The School has regard to the DfE guidance *Teaching Online Safety in School (June 2019)* and the DfE guidance *Relationships education, relationships and sex education (RSE) and health education (2019)*, and also to the UKCIS framework *Education for a Connected World (June 2020)* in teaching pupils about how to behave and how to stay safe online.

### 23.4 Mobile Devices and EYFS

All employees working directly with pupils in EYFS must ensure that their mobile phone and any other personal device is stored safely away from the pupils and is not used whilst in the presence of EYFS pupils.

Mobiles belonging to visitors must be either switched off or stored securely in the Reception/Year 1 staff room within the setting. There are specific notices in the reception area regarding mobile device use. If a visitor uses any aforementioned device in the Early Years setting, employees shall address this with the visitor.

## 24. **Responding to concerns or allegations**

24.1 It can take a great deal of courage for a pupil to talk to an adult about the abuse affecting them because the pupil is 'telling on' someone more powerful than they are. The pupil may have to betray a person who is not only close to them but also loved by them and they may be risking a great deal in the hope that the adult will believe what they say.

- Helpful responses
- Remain calm, approachable and receptive and do not pre-judge.
- Listen carefully, without interrupting.
- If you need to ask questions to clarify what you are being told, ask the pupil to 'tell/explain/describe' rather asking than closed questions.
- While leading/closed questions should be avoided wherever possible, it is important that staff understand that they can ask a pupil directly whether they are being harmed, and the nature of that harm.
- Take the situation seriously.
- Acknowledge the courage and good sense being shown.
- Reassure the pupil that they are right to tell the adult and that they should not feel guilty.
- Let them know that you are going to do everything you can to help; and explain what may happen as a result of what they have told said.
- What to avoid when a pupil makes an allegation of abuse
- Never give the pupil the impression that they are creating a problem by reporting the abuse affecting them whatever it may be.
- Do not allow shock or distaste to show.
- Do not probe for more information than is offered.
- Do not interrogate or attempt to counsel the pupil.
- Do not speculate or make assumptions.

- Do not make negative comments about the alleged abuser.
- Do not make promises that cannot be kept (e.g. by saying "everything will be all right").
- Do not agree to keep the information a secret, and make sure that the pupil knows that the information will be passed on to the DSL.

#### What to do next

- 1) Immediately contact the DSL or a DDSL. They will make a decision based on the report, judging whether or not the issue should be referred to outside agencies. In the absence of the DSL, the Headmaster of Senior School should be informed.
- 2) The DSL or a DDSL will then ask the member of staff to immediately make a careful record of what has been said, using the pupil's actual words wherever possible (not an interpretation of them). If opinions are recorded, then ensure that these cannot be confused with facts. This record will usually be made directly onto CPOMS or, if that is not possible, on paper
- 3) Remain caring and supportive to the pupil.

When employees fear for the immediate safety of a pupil, they must not hesitate to contact the police or social services department.

(All relevant telephone numbers are set out in Appendix 3.)

Employees should state that they are making a child protection referral. Thereafter they should follow the normal procedures as set out within both the Policy and Guidance sections of this document.

#### Doubts about making a report

If an employee has any doubts about making a report, they should seek advice from the DSL or a DDSL. All staff should consider the possible consequences of not reporting for both the pupil and the employee. Failure to report may amount to neglect of care and therefore itself may constitute abuse.

#### Concern about a pupil's behaviour or injuries

- If an employee is concerned about a pupil's behaviour or injuries, but the pupil has not said anything to suggest that they are being abused, the employee should:
  - be available and be prepared to listen;
  - discuss their concerns with the DSL or a DDSL;
  - make a record on CPOMS; and
  - not rely on someone else to take action.
- The employee's role is to:
  - be vigilant and responsible;
  - exercise professional curiosity;
  - report accurately and carefully to the DSL; and
  - support the pupil by being caring.

## 24.2

#### Referrals

Where necessary, the DSL will make a referral to the relevant Children's Social Care team in a timely manner (within 24 hours). The DSL will take into account the Data Protection Act 2018, GDPR, the latest version of KCSIE and the BSP criteria for action when determining the appropriate processing conditions needed to share information with other agencies.

In all cases the DSL will consider whether it is possible to inform the parent before making a referral to social services. Where the School has a statutory duty to share information in order to safeguard or promote the welfare of a pupil, the DSL may decide that it is not appropriate to inform the parent before making a referral.

The DSL will always discuss with parents / carers or the pupil the School's intention to make referrals under Section 17 (i.e. Child in Need) or for Early Help processes, recognising that for older pupils their agreement to access or engage with services may be needed rather than, or in addition to, the agreement or wishes of their parent(s).

Where the DSL shares information with another agency in order to safeguard or promote the welfare of a pupil, the relevant processing conditions should be recorded clearly within the referral and on the pupil's CPOMS record.

The DSL must consider whether it is safe and appropriate to tell the parent that a referral will be made. A discussion will be needed with local authority children's social care services and the police (if involved) to determine which professional should inform the parent.

Exceptions to the general principle of informing the parent include the following:

- where a pupil has disclosed child sexual abuse.
- where there is a suspected danger of forced marriage.
- in possible cases of fabricated illness.
- if more than one adult is suspected to be implicated in the abuse suspected or disclosed.

In any of the above circumstances, the DSL should seek advice from local authority children's social care services before speaking to parents.

24.3

#### Initial response

Appropriate action should always be taken to provide assistance and support for a pupil or their family as soon as the need emerges. Whilst such intervention may be appropriate in circumstances wider than suspicion of abuse, it is likely to be essential where there is suspicion of abuse. Early help (i.e. prompt as opposed to delayed action by the School) is likely to have greater effect in:

- resolving the problem;
- preventing the development of further problems;
- avoiding the need for specialist interventions.

When required, early help should extend to prompt cooperation with other agencies and/or professionals with such action led by the DSL or DDSL. Inter-agency assessment and the setting up of an Early Help Plan may follow. When required, the School will provide a lead practitioner for the Early Help Plan.

24.4

#### Allegations of abuse against employees (including supply teachers) and volunteers

An allegation against an employee, volunteer or governor concerning a pupil or pupils at the School should be made directly to the DSL or Junior School DDSL, as appropriate, who will then share information with the Headmaster to determine whether it meets the harms threshold (i.e. that the employee against whom the allegation has been made poses, or may pose, a risk of harm to a pupil/pupils).

If the initial assessment establishes that the allegation does not meet the harms threshold and is deemed to be a “low level” concern, the DSL will lead an investigation to determine an appropriate response from the School. If the initial assessment establishes that the allegation meets the harms threshold, the Headmaster will inform the LADO immediately (including in the case of allegations against the DSL or the Head of the Junior School). If the Headmaster is the subject of an allegation, the Chairman of Governors will lead the investigation.

The DSL will be responsible for working with local authority children’s social care services and other external agencies to support the welfare of the pupil.

Clear consideration is needed to manage cases of allegations that might indicate that a person would pose a risk of harm if they continue to work in regular or close contact with children in their position, or in any capacity. It should be used in respect of all cases in which it is alleged that an employee, volunteer or governor has:

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

Historical allegations and allegations against an employee who is no longer teaching at the School should be referred to the Headmaster of the Senior School, who will inform the LADO.

Allegations against an employee, volunteer or governor can be traumatic for the accused individual too, particularly when the allegation is false. The School also has a duty of care to its employees and will ensure that appropriate support is offered not least in advising the employee to seek the help and guidance of their professional association. The School’s Code of Conduct for employees contains further information about what happens when an allegation is made against an employee or volunteer.

## 25. Appendices

### 25.1 Appendix 1 Signs and Indicators of Abuse

<p><b><u>Indicators of emotional abuse</u></b></p> <ul style="list-style-type: none"><li>• Physical, mental and emotional development lags</li><li>• Over-reaction to mistakes</li><li>• Continual self-deprecation</li><li>• Sudden speech disorders</li><li>• Fear of new situations</li><li>• Inappropriate emotional responses to painful situations</li><li>• Neurotic behaviour (e.g. rocking, hair twisting, thumb sucking)</li><li>• Self-harm</li><li>• Fear of parents being contacted</li><li>• Extremes of passivity or aggression</li><li>• Drug or solvent abuse</li><li>• Running away</li><li>• Compulsive stealing or scavenging.</li></ul>	<p><b><u>Indicators of sexual abuse</u></b></p> <ul style="list-style-type: none"><li>• Sudden changes in behaviour or school performance</li><li>• Displays of affection in a sexual way inappropriate to age</li><li>• Tendency to cling or need constant reassurance</li><li>• Tendency to cry easily</li><li>• Regression to younger behaviour (e.g. thumb sucking, acting like a baby, playing with toys)</li><li>• STIs, complaints of genital itching or pain</li><li>• Distrust of a family adult, or anxiety about being left with a relative, baby-sitter or lodger</li><li>• Unexplained gifts or money</li><li>• Depression and withdrawal</li><li>• Apparent secrecy</li><li>• Wetting, day or night</li><li>• Sleep disturbances or nightmares</li><li>• Chronic illnesses, especially throat infections and venereal disease</li><li>• Anorexia or bulimia</li><li>• Self-harm, attempted suicide, frequent running away</li><li>• Unexplained pregnancy</li><li>• Fear of undressing for PE and sport</li><li>• Phobias or panic attacks.</li></ul>
<p><b><u>Indicators of neglect</u></b></p> <ul style="list-style-type: none"><li>• Constant hunger</li><li>• Poor personal hygiene</li><li>• Constant tiredness</li><li>• Poor state of clothing</li><li>• Emaciation</li><li>• Frequent lateness to or non-attendance at School</li><li>• Untreated medical problems</li><li>• Destructive tendencies</li><li>• Low self-esteem</li><li>• Neurotic behaviour (e.g. rocking, hair twisting, thumb sucking)</li><li>• No social relationships</li><li>• Running away</li><li>• Compulsive stealing or scavenging.</li></ul>	<p><b><u>Indicators of physical abuse</u></b></p> <ul style="list-style-type: none"><li>• Unexplained injuries or burns, particularly if they are recurrent</li><li>• Improbable excuses given to explain injuries</li><li>• Refusal to discuss injuries</li><li>• Untreated injuries</li><li>• Fear of parents being contacted</li><li>• Bald patches</li><li>• Withdrawal from physical contact</li><li>• Arms and legs kept covered in hot weather</li><li>• Fear of returning home</li><li>• Fear of medical help</li><li>• Self-destructive tendencies</li><li>• Aggression towards others</li><li>• Running away.</li></ul>

**STEP 1** When a concern is identified, as with all safeguarding concerns, the employee must share their concern at the earliest opportunity with the DSL explaining what they have noticed, who was involved, why they feel the pupil concerned may be vulnerable to radicalisation.

**STEP 2** The DSL will discuss the concern with the member of staff, document the report and then investigate further by speaking to the pupil themselves, their friends, their teachers, other colleagues and their parents as appropriate.

**STEP 3** The DSL will check whether any additional concerns are known or documented in the School's safeguarding records and will alert the Headmaster of the Senior School. A decision will be made as to whether the concern falls within general safeguarding concerns or whether a Prevent referral should be made. The DSL will seek advice from the Local Prevent Officer and/or the West Yorkshire Police Safer Schools Officer.

**STEP 4** If, after carrying out the appropriate checks, it is felt that a Prevent referral is necessary, the DSL will complete the [National Referral Form](#).

**STEP 5** Following the referral, the information received will be assessed by the Police and a decision will be made regarding the progression of the referral to the Bradford Channel Panel. If the case is deemed not to be suitable for progression, the Police will notify the DSL of the outcome of the assessment and, if necessary, will make a referral to other external agencies for support.

**STEP 6** Following assessment, if the case is deemed suitable for Channel support, the referrer may be invited to the next Bradford Channel Panel meeting. The DSL will continue to monitor the case and keep the Prevent Team (01274 376215) updated with any additional information which could lead to an increase in the pupil's vulnerability to radicalisation.

**STEP 7** If deemed suitable by the Channel Panel, a holistic package of support will be determined and delivered. The School is likely to be involved as part of the multi-agency support offered.

**STEP 8** As with all aspects of safeguarding, whether or not Channel support is offered, the School retains a duty of care to the pupil concerned. As such employees should remain vigilant and report any further or new concerns to the DSL at the earliest opportunity.

### 25.3 Appendix 3 Useful Contacts List

Jess Watson - Designated Safeguarding Lead	07527 663066
Felicity Robertshaw-Hughes – Junior School Deputy Designated Safeguarding Lead	07527 676728
Kate Wilde – Senior School Deputy Designated Safeguarding Lead	01274 553757

Concerns may also be raised using [shareit@bradfordgrammar.com](mailto:shareit@bradfordgrammar.com)

The School's catchment area covers a number of Local Authorities.

**In the event the identified people are not available and there is a safeguarding concern, please refer to Children's Initial Contact Point on  
01274 433999.**

**On receipt of the information the DSL should take the following steps:**

Where it is clear that a Child Protection Referral is needed contact Children's Initial Contact Point without delay **Tel: 01274 433999**

Out of hours Emergency Duty Team **Tel: 01274 431010**

Where the DSL is not sure whether it is a child protection issue, they may seek advice from the Education Safeguarding Team **Tel: 01274 437043**



If you are asked to monitor the situation, make sure you are clear what you are expected to monitor, for how long, and how and to whom you should feedback information.



Remember to always make and keep a written record of all events and actions taken, date and sign each entry to this record.

Keep records confidential and secure and separate from the child's curriculum file.



Always demonstrate professional curiosity by following up with the DSL whether action has been taken and where appropriate how it has been resolved.

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

Always remember, safeguarding is everyone's responsibility.

Children's Initial Contact Point without delay Tel: 01274 433999

Emergency Duty Team 01274 431010

Education Safeguarding Team: 01274 437043

NSPCC Whistleblowing Helpline: 0800 0280285

#### USEFUL CONTACTS

Team	Email	Telephone
Access Team	<a href="mailto:Education.Access@bradford.gov.uk">Education.Access@bradford.gov.uk</a>	01274 439393
Attendance Support Team	<a href="mailto:Attendance@bradford.gov.uk">Attendance@bradford.gov.uk</a>	01274 435743
CE Hub	<a href="mailto:Child.Exploitation@bradford.gov.uk">Child.Exploitation@bradford.gov.uk</a>	01274 435080
Child Employment / Entertainment	<a href="mailto:cee@bradford.gov.uk">cee@bradford.gov.uk</a>	01274 437607
Children Missing Education	<a href="mailto:CME@bradford.gov.uk">CME@bradford.gov.uk</a>	01274 438877
Council switchboard		01274 431000
Customer Contact Centre	<a href="mailto:childrens.enquiries@bradford.gov.uk">childrens.enquiries@bradford.gov.uk</a>	01274 432111
Early Years	<a href="mailto:earlyeducationfund@bradford.gov.uk">earlyeducationfund@bradford.gov.uk</a>	01274 437503
Educational Psychology Team	<a href="mailto:EducationalPsychologyTeam@bradford.gov.uk">EducationalPsychologyTeam@bradford.gov.uk</a>	01274 439444
Elective Home Education	<a href="mailto:electiveheducation@bradford.gov.uk">electiveheducation@bradford.gov.uk</a>	01274 439340
Holidays in term time fines	<a href="mailto:PN@bradford.gov.uk">PN@bradford.gov.uk</a>	01274 439651
LADO	<a href="mailto:LADO@Bradford.cov.uk">LADO@Bradford.cov.uk</a>	01274 435600
Missing team	<a href="mailto:Childrens.enquiries@bradford.gov.uk">Childrens.enquiries@bradford.gov.uk</a>	01274 439999
Prevent Coordinator	<a href="mailto:Danielle.King@bradford.gov.uk">Danielle.King@bradford.gov.uk</a>	07788264621
Prosecution/Penalty Notice	<a href="mailto:Attlegal@bradford.gov.uk">Attlegal@bradford.gov.uk</a>	01274 439651
Safeguarding complaints, compliance & advice	<a href="mailto:EdSafeTeam@bradford.gov.uk">EdSafeTeam@bradford.gov.uk</a>	01274 437043
School Admissions Team	<a href="mailto:schooladmissions@bradford.gov.uk">schooladmissions@bradford.gov.uk</a>	01274 439200
Social Communication Interaction & Learning Team (SCIL)	<a href="mailto:SCILTeam@bradford.gov.uk">SCILTeam@bradford.gov.uk</a>	<b>01274 439500</b>
Special Educational Needs & Disability Team (SEND)	<a href="mailto:SEN@bradford.gov.uk">SEN@bradford.gov.uk</a>	01274 435750



<b>Policies</b>	<b>Guidance</b>
<ul style="list-style-type: none"><li>• Safeguarding Policy</li><li>• Anti-Bullying Policies (JS and SS)</li><li>• First Aid, Medication and Chronic Illness Policy</li><li>• Health and Safety Policy</li><li>• Online Safety Policy</li><li>• Safer Recruitment Policy</li><li>• SEND Policy</li><li>• Supervision of Students Policy</li></ul>	<ul style="list-style-type: none"><li>• Attendance Guidance</li><li>• Bereavement Guidance</li><li>• Counselling Guidance</li><li>• Eating Disorders Guidance</li><li>• Managing Images of Children Guidance</li><li>• Mental Health and Emotional Wellbeing Guidance for Pupils (JS)</li><li>• Online Safety Guidance</li><li>• PSHE Guidance</li><li>• Protocol for a Student's Return to School following a Mental Health Crisis</li><li>• Relationships, Sex and Health Education Guidance</li><li>• Self-harm Guidance</li><li>• Student Wellbeing Guidance (SS)</li></ul>

## **25.5 Appendix 5 Acts of Parliament, Regulations, statutory guidance, non-statutory guidance and other materials.**

### **Regulations and Statutory Guidance**

Keeping Children Safe in Education (KCSIE) 2024 – statutory guidance

Working Together to Safeguard Children (December 2023) – statutory guidance

Information sharing: advice for professionals (DfE April 2024) – statutory guidance

Children Missing Education – statutory guidance for local authorities (DfE September 2016)

Elective home education (April 2019)

Prevent Duty Guidance: for England and Wales (July 2023)

Terrorism and Security Act 2015

Human Rights Act 1998

The Children Act 1989

Equality Act 2010

Children and Social Work Act 2017

Domestic Abuse Act 2021

Rehabilitation of Offenders Act 1974 – outlines when people with criminal convictions can work with children.

Police and Criminal Evidence Act 1984 - Code C

The Safeguarding Vulnerable Groups Act 2006

Disqualification under the Childcare Act 2006 (Regulations 2018)

Schedule 4 of the Safeguarding Vulnerable Groups Act 2006 and the Protection of Freedoms act 2012, which define what 'regulated activity' is in relation to children and adults.

Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school and sets out the vetting requirements and what must be recorded on the single central record.

Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM.

### **Non-statutory guidance**

Guidance for safer working practice for those working with children and young people in education settings (GSWP) (Safer Recruitment Consortium Feb 2022).

Advice to schools and colleges on gangs and youth violence (August 2013) and Criminal Exploitation of children and vulnerable adults: county lines (September 2018)

Child Sexual Exploitation: Definition and Guide for Practitioners (February 2017)

Information sharing advice for safeguarding practitioners (May 2024)

**Other publications**

Meeting digital and technology standards in schools and colleges (2023)

Relationships Education, Relationships and Sex Education (RSE) and Health Education (2019)

The use of social media for on-line radicalisation (July 2015)

What to do if you're worried a child is being abused (March 2015)

The Teacher Standards (2012)

Mental health and behaviour in schools (November 2018).

25.6 **Appendix 6 – Required Sections of KCSIE (to be read and understood)**

Part 1	Part 2	Part 3	Part 4	Part 5	Annex A	Annex B
<ul style="list-style-type: none"> <li>• DSL</li> <li>• DDSLs</li> <li>• SLT</li> <li>• HR</li> <li>• Teachers</li> <li>• Teaching Assistants</li> <li>• Technicians</li> <li>• Library staff</li> <li>• School Nurses</li> <li>• Counsellor</li> <li>• Coaches</li> <li>• Sports Graduates</li> <li>• After Care Supervisors</li> <li>• Receptionists</li> <li>• Line managers</li> <li>• Estates team</li> <li>• Catering team</li> </ul>	<ul style="list-style-type: none"> <li>• DSL</li> <li>• DDSLs</li> <li>• SLT</li> <li>• The Governing Body</li> </ul>	<ul style="list-style-type: none"> <li>• DSL</li> <li>• DDSLs</li> <li>• SLT</li> <li>• HR</li> </ul>	<ul style="list-style-type: none"> <li>• DSL</li> <li>• DDSLs</li> <li>• SLT</li> <li>• HR</li> </ul>	<ul style="list-style-type: none"> <li>• DSL</li> <li>• DDSLs</li> <li>• SLT</li> </ul>	<ul style="list-style-type: none"> <li>• DSL</li> <li>• DDSLs</li> <li>• SLT</li> <li>• Cleaning team</li> <li>• Reprographics</li> </ul>	<ul style="list-style-type: none"> <li>• DSL</li> <li>• DDSLs</li> <li>• SLT</li> <li>• HR</li> <li>• Teachers</li> <li>• Teaching Assistants</li> <li>• Technicians</li> <li>• Library staff</li> <li>• School Nurses</li> <li>• Counsellor</li> <li>• Coaches</li> <li>• Sports Graduates</li> <li>• After Care Supervisors</li> <li>• Receptionists</li> <li>• Line managers</li> <li>• Estates team</li> <li>• Catering team</li> </ul>
Annex C	Annex D	Annex E	Annex F			
<ul style="list-style-type: none"> <li>• DSL</li> <li>• DDSLs</li> <li>• SLT</li> <li>• HR</li> <li>• The Governing Body</li> </ul>	<ul style="list-style-type: none"> <li>• DSL</li> <li>• DDSL</li> <li>• SLT</li> <li>• EV Coordinator</li> <li>•</li> </ul>	<ul style="list-style-type: none"> <li>• DSL</li> <li>• DDSL</li> <li>• SLT</li> <li>• HR</li> </ul>	<ul style="list-style-type: none"> <li>• DSL</li> </ul>			

## **25.7 Appendix 7 Best Practice when logging CPOMS entries**

### **Key Reminders**

- It is vital that concerns are recorded and reported accurately by all staff (including visitors, and staff not directly employed by the school, e.g. contractors and third-party staff). The Safeguarding Team are proactive in responding to concerns raised as early as possible.
- All staff should record their concerns on CPOMS as soon as possible. If the concern is urgent, an email / Teams message or phone call to the DSL must be sent to ensure that it is picked up immediately.
- Logging on CPOMS does not replace a conversation.
- Promoting the welfare of and safeguarding pupils is the responsibility of all school staff. Staff working with children should maintain an attitude of 'it could happen here' where safeguarding is concerned.
- When concerned about the welfare of a pupil, staff should always act in the best interests of the pupil.
- However small or apparently insignificant the concern may seem at the time; the importance of recording and reporting cannot be underestimated when considering welfare and child protection. Not all welfare concerns result in a referral to children's social care.

### **Handling allegations**

If a pupil discloses or makes an allegation that they have been abused in some way, the member of staff / volunteer should:

- Listen carefully to what the pupil is saying, without displaying any signs of shock or disbelief.
- Allow the pupil to talk freely without interrupting.
- Reassure the pupil but do not make promises about keeping the information a secret. Never promise confidentiality to a pupil.
- Reassure the pupil that this is not their fault.
- Only ask questions if you need to clarify, take care not to put words in the pupil's mouth by asking leading questions.
- Stress to the pupil that they have done the right thing by telling you and explain what you will do next. You must tell the pupil what you are going to do with the information they have shared (unless there is a reason not to).
- Report what the pupil has told you as soon as possible so that details are fresh in your mind and action can be taken quickly.
- Consideration needs to be given to children with communication difficulties. It is important to communicate with them in a way that is appropriate to their age, understanding and preference.

### Recording concerns

When recording a concern, the record must:

Be specific and accurate	Include who, when, why, what	Use a date and time stamp of the event, with any other dates and times as required
Use full names and titles, avoid any abbreviations & initials	Use a body map when needed	Include a summary of context
Use neutral language and avoid opinions (be careful, punctuation can give opinion too)	Be "court ready". Different professional audiences may need to read the report	Include the voice of the pupil using their exact words and phrases
Include actions taken and any further actions that are still required	Reminder: Never say you can keep a promise to a pupil Never keep quiet about a concern you have Never edit or change the time or date on a CPOMS entry	

**Staff can be assigned actions so that follow up can be delegated and followed up. All staff should log on to CPOMS frequently to ensure they have completed any given actions.**

**Policy reviewed by: J Watson Assistant Head, DSL**

**Last policy review date: 1<sup>st</sup> September 2024**

**Next policy review date: 31<sup>st</sup> August 2025**