

Safeguarding Policy

This policy applies to the Whole School.

The purpose of Bradford Grammar School's ("the School") Safeguarding Policy is:

- to give clear guidance to employees and others about the appropriate response to child protection and safeguarding issues; and
- to ensure that child protection concerns and referrals are handled sensitively, professionally and in ways that support the needs of the child.

The Safeguarding Policy is part of Safeguarding at the School and should be read alongside the Supervision of Pupils Policy, Educational Visits Guidance, Student Wellbeing Guidance, Safer Recruitment Policy, Whistleblowing Policy, Behaviour Policy and Code of Conduct. (All employees are required to sign that they have read the School's Safeguarding Policy, Behaviour Policy and Code of Conduct.)

The School recognises its duty to safeguard and promote the welfare of every child entrusted to its care. It is important to be aware that if a concern is raised about a "child in need", in accordance with Section 17 of the Children Act 1989, this is always a Safeguarding matter and should be handled accordingly. If the School has reasonable cause to suspect that a child is suffering or is likely to suffer significant harm and is a "child at risk" in accordance with Section 47 of the Children Act 1989, the matter is a Child Protection one.

1. Introduction

The School fully recognises the part that it can play in safeguarding and promoting the health, safety and welfare of the young people entrusted to its care. The School will safeguard and promote the welfare of children who are pupils at the School, in compliance with the guidance issued by HM Government: *Keeping Children Safe in Education: Information for all school and college employees and Statutory Guidance for Schools and Colleges September 2023 (KCSIE23)* and *Working Together to Safeguard Children: A guide to multi-agency working to help, safeguard, protect and promote the welfare of children (September 2023)*; *The Prevent Duty: what it means for schools and childcare providers (April 2019)*; *Mandatory reporting of female genital mutilation: procedural information (October 2015)*; *Relationships education, relationships and sex education (RSE) and health education (2019)*. The policy is compliant with the *Independent Schools (Standards) Regulations 2014* and takes into account the *Independent Schools Standards: guidance for independent schools 2019*.

The School works closely with the Bradford Safeguarding Partnership (BSP) which provides training and other support. BSP and the School follow the code of practice set out in the West Yorkshire Consortium Inter Agency Safeguarding and Child Protection Procedures available at <http://westyorkscb.proceduresonline.com>.

Child Protection at the School has three main elements:

- *Prevention* - through the promotion of a positive School atmosphere and the provision of careful and vigilant teaching and pastoral support;
- *Protection* - by following agreed procedures and ensuring that all employees are appropriately recruited and then trained and supported to respond sensitively to child protection concerns; and
- *Support* - for all those pupils who may have been abused.

This policy applies to all employees and volunteers working in the School, as well as to governors. The School recognises that high self-esteem, confidence, supportive friends and clear lines of communication with a trusted adult will help to protect its pupils against potential abuse.

The School will therefore:

- continue to maintain an ethos in which young people feel secure and know that their concerns will be taken seriously;
- ensure that the pupils know that there are adults in School who can be approached if they are worried or are in any kind of difficulty; and
- include within the Junior School Personal, Social and Health Education (PSHE) and Senior School Personal Development (PD) programmes sessions that help its pupils to gain an awareness of the issues involved, promote their own safety (including online safety), and understand the responsibilities of adult life, particularly with regard to the care of children.

2. Roles and responsibilities

Child protection is the responsibility of all adults, especially those who work with young people.

All employees at the School are expected to comply with the Code of Conduct.

Everyone who comes into contact with children and their families has a role to play in safeguarding children. School employees are particularly important as they are in a position to identify concerns early, provide help for children and prevent concerns from escalating. Schools and their employees form part of the wider safeguarding system for children. This system is described in statutory guidance *Working Together to Safeguard Children 2023*. Schools and colleges should work with social care, the police, health services and other services to promote the welfare of children and protect them from harm. All schools are required to have a Named Person with safeguarding responsibilities known as the Designated Safeguarding Lead (DSL).

From September 2023, the DSL structure for the School will be:

Jane Chapman	DSL for the Senior School mjc@bradfordgrammar.com
Felicity Robertshaw Hughes	DSL for the Junior School fh@bradfordgrammar.com
Kate Wilde	Deputy DSL for the Senior School kew@bradfordgrammar.com

(The Headmaster and the Deputy Headmaster of the Senior School and the Headmaster of the Junior School are also DSL trained.)

The DSLs have special responsibilities to:

- lead safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place)
- foster a School culture that places the safety and wellbeing of pupils at the centre of everything that the School does, including coordinating early help arrangements (see below), for example, through in-house SEND processes and the Assistant Head (Pastoral) and Heads of Year working in tandem with external agencies such as the Child and Adolescent Mental Health Services (CAMHS) to review annually the Safeguarding Policy;
- put relevant and timely training in place for all employees, including volunteers and the Headmasters of both the Senior and Junior Schools;
- liaise with employees, parents and the relevant agencies on matters of safety and safeguarding and welfare (including online and digital safety) so that children's needs are considered holistically;
- ensure that the appropriate employees know if a child has or has had a social worker to ensure their educational outcomes;

- deal with reports of child abuse and complaints against employees, volunteers and governors by children;
- keep records of child protection issues and cases up to date;
- ensure that, when a pupil leaves the School, their child protection file is transferred to the new school or college as soon as possible, and that appropriate information is shared ahead of their leaving in order to ensure continuity of support;
- make referrals to child protection agencies such as the relevant Local Safeguarding Partners and the Disclosure and Barring Service, and to the Local Authority Designated Officer (LADO), where appropriate; inform the Headmaster of the Junior or Headmaster of the Senior School, as appropriate, of any child protection issues that arise; work with the Bursar and HR department to ensure that appropriate child protection checks and procedures apply to all employees employed by the School and other organisations working on the School site (e.g. contractors) or on another site (e.g. on educational visits);
- encourage a climate where employees feel secure to share concerns (see the School's Whistle-blowing Guidance), including via the NSPCC whistle-blowing helpline number 0800 028 0285;
- guarantee that any deficiencies or weaknesses in child protection arrangements are remedied without delay;
- fulfil all other responsibilities as set out in KCSIE 23 annex C.

If the School is invited to attend a child protection conference, one of the DSLs will attend and provide information relevant to the case.

Employees, volunteers and governors, must act to share their concerns with a DSL if:

- they have a suspicion that a child is being abused or is at risk of abuse, neglect or other safeguarding issues;
- there is evidence that a child is being abused; and
- a complaint is made by a child against a member of the School.

The *Teachers' Standards 2012* state that teachers, including headteachers, should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties. These standards also apply to trainees working towards Qualified Teacher Status (QTS) and all teachers completing their statutory induction period (early career teachers [ECTs]).

In accordance with the DfE guidance on *Disqualification from Childcare: statutory guidance for schools (August 2018)*, the School ensures that its policies make clear the expectations placed on employees whose relationships both within and outside the School may have implications for the safeguarding of children in the School.

All School employees have a responsibility to provide a safe environment in which children can learn.

All School employees have a responsibility to identify children who may be in need of extra help or who are suffering, or are likely to suffer, significant harm. All employees should be aware that children can be at risk of harm inside and outside of the School, inside and outside of home and online. Employees should exercise professional curiosity and know what to look for. All employees then have a responsibility to take appropriate action, working with other services as needed. In addition to working with the DSLs, employees should be aware that they may be asked to support social workers to take decisions about individual children.

Where a child is suffering significant harm, or is likely to do so, action should be taken to protect that child. Action should also be taken to promote the welfare of a child in need of additional support, even if they are not suffering harm but are at immediate risk.

The DSLs keep a full record of the reports and makes referrals to child protection agencies as necessary. Whilst the DSLs have a formal responsibility to make referrals, **any employee can make a referral.**

The School has a named Governor, with a specific responsibility for child protection who is fully involved in the annual review of the Safeguarding Policy. The name of the Governor currently holding this role is Lynne Morrison, the Chairman of Governors.

The Board of Governors has overall responsibility for ensuring that the School's Safeguarding Policy is in place and that the DSLs are supported properly.

The Board of Governors must ensure that they comply with their duties under legislation. They must also have regard to this guidance to ensure that the policies, procedures and training in the School are effective and comply with the law at all times.

The Board of Governors should ensure that the School contributes to inter-agency working in line with statutory guidance *Working Together to Safeguard Children 2023*. This includes providing a co-ordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children subject to child protection plans. The School should allow access for children's social care from the local authority.

The Board of Governors should ensure that their safeguarding arrangements take into account the procedures and practice of the local authority as part of the inter-agency safeguarding procedures set up by the Bradford Safeguarding Partnership. Section 10 of the Children Act 2004 requires a local authority to make arrangements to promote cooperation between itself and its relevant partners and other organisations who are engaged in activities relating to children. Under section 14B of the Children Act 2004 and section 19 of the Children and Social Work Act 2017 the Local Safeguarding Partnership (LSP) can require a school to supply information in order to perform its functions; this must be complied with.

The Board of Governors has identified a member of the governing body, the Chairman, to liaise with the LADO(s) for Bradford MDC and partner agencies in the event of allegations of abuse made against the Headmaster of the Senior School or a member of the Board of Governors. In the event of allegations of abuse being made against the Headmaster, those allegations should be reported directly to the LADO.

Safeguarding training

All employees and governors must receive child protection and safeguarding training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) which is regularly updated and are required to read and understand either Part 1 (*Safeguarding information for all staff*) of KCSIE23 with Annex B (*Further Information*), or Annex A (a condensed version of Part 1 for employees who do not work directly with children). In addition, all employees are made aware of the systems within the School which support safeguarding, including the Safeguarding Policy, the student Behaviour Policy, the role and identity of the DSLs.

All employees will receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings), as required, and at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. The School has mechanisms in place to ensure that all employees have read and understood KCSIE23 guidance and the Safeguarding Policy. Employees also receive online safety training delivered by external agencies, and through additional updates as required (for example, via email, e-bulletins and staff briefings).

The DSLs and Deputy DSL will update their own child protection training every two years to provide them with the knowledge and skills required to carry out the role. In addition to their formal training, their knowledge and skills should be updated (for example, via e-bulletins, meeting other DSLs and deputy DSLs, regular in-house supervision and safeguarding team meetings or by reading and digesting safeguarding developments), at regular intervals, but at least annually, to keep up with any developments relevant to their role.

All new employees, volunteers and governors undergo child protection and safeguarding training as part of their induction. Induction for new employees includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring. They are also required to confirm that they have read and understood the Safeguarding Policy, Staff Code of Conduct, either Part 1 or Annex A of KCSIE23 and the student Behaviour Policy.

Governor training including updates should equip them with the knowledge to provide strategic challenge to test the School's safeguarding policies and procedures.

3. Early help

Early help means taking action to support a child or their family early in the life of a problem, as soon as it emerges, and can prevent further problems arising. Providing early help is more effective in promoting the welfare of children than reacting later.

Early help for a child can be provided by the School in the first instance to prevent or reduce the need for specialist interventions unless they are identified as being the correct response to meet the need and resolve the problem. School employees know that they may be called upon to play a part in providing early help for a pupil at the School.

Early help requires that agencies should work together as soon as a problem emerges or a need is identified to ensure the child gets the right support. The School's aim is to meet need early and avoid a problem escalating or the need increasing, but if the need for an early help response which extends beyond the School is identified, a DSL will lead on liaising with other agencies and professionals and setting up an inter-agency assessment, which may result in an Early Help Plan being put in place to address a child's or a family's needs and improve outcomes for the child.

Within the School's curriculum and in co-curricular activities, children and young people are taught how to keep themselves safe, including staying safe online. The School's PSHE and Personal Development programmes pay particular attention to promoting the welfare and wellbeing of students and to educating them about risks relating to their safety.

4. Definition of child abuse

Safeguarding and promoting the welfare of children is defined by DfE guidance 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. The term 'children' includes everyone under the age of 18 years.

The term "child abuse" is used to describe a range of ways in which people (usually adults) harm children. This harm can be in the form of physical injury, sexual or emotional abuse or neglect (failing to take steps to protect a child). Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to prevent harm. They may be abused by an adult or adults or another child or children.

Points to note:

- children can suffer from one or a combination of these forms of abuse;

- abuse can take place at home, at School or anywhere where children spend time;
- it can happen to children and young people of any age, sex, ethnicity, sexual orientation or disability; and
- in almost all cases, the abuser is someone known to (and often trusted by) the child such as a parent, carer, teacher, relative or friend.

Appendix 1 contains signs and indicators for abuse and neglect. It is important to note that many of the signs listed under indicators of abuse could have other explanations and do not represent firm proof that abuse is taking place, however all employees should be vigilant and always raise any concerns with the DSL (or Deputy DSL).

The definition of abuse as outlined in *Working Together to Safeguard Children 2023* is: "A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults, or another child or children." The 2015 Department for Education advice for practitioners *What to do if you are worried a child is being abused* provides more information on understanding and identifying abuse and neglect. Examples of potential signs of abuse and neglect are highlighted throughout the advice and are particularly helpful for school employees. The NSPCC website also provides useful additional information on types of abuse and what to look out for (<https://www.nspcc.org.uk/what-is-child-abuse/spotting-signs-child-abuse>).

Abuse can be associated with factors outside a child's school and family. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including sexual exploitation, criminal exploitation, radicalisation, forced marriage and serious youth violence. Technology is a significant component in many safeguarding issues and children are at risk of extra-familial harms online as well as face to face.

The School recognises that children who need a social worker (i.e., are the subject of a Child in Need or Child Protection Plan) are potentially at greater risk of abuse, as well as educationally disadvantaged by facing barriers to attendance, learning, behaviour and mental health. The DSLs will use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes, and to inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

4.1 Emotional abuse

- The persistent emotional maltreatment of a child such as to cause severe and persistent 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 from participating in normal social interaction.
- It may involve seeing or hearing the ill-treatment of another (including domestic violence within the home). 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, though it may occur alone.

4.2 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); and
- ensure access to appropriate medical care or treatment.

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

4.3 Sexual 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.

4.4 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.
- Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

4.5 Serious violence

The School is aware of indicators that may signal that children are at risk from or are involved with serious violent crime. These 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. The School will refer to Home Office guidance *Advice to schools and colleges on gangs and youth violence (August 2013)* and *Criminal Exploitation of children and vulnerable adults: county lines (September 2018)* if concerns in this area are raised.

5. Specific areas of child abuse

The School is aware of the specific areas of safeguarding concern as identified in Annex B of KCSIE23, including but not limited to the additional vulnerabilities of children who have a family member in prison, children who are required to give evidence in criminal or family courts, children involved in child abduction and community safety incidents, children who are, or are at risk of being,

homeless and children affected by modern slavery who will need to be referred to the National Referral Mechanism.

5.1 Child sexual exploitation

Child sexual exploitation (CSE) occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator. 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. Sexual exploitation can take many forms ranging from a seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. Indicators of CSE may include children who have older boyfriends or girlfriends, suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

CSE does not always involve physical contact; it can also occur through the use of technology and may occur without the child's immediate knowledge (e.g., through others copying videos or images they have created and posted on social media). The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. CSE can affect any child under the age of 18 years, including 16 and 17 year-olds who can legally consent to have sex.

In the event any concern is raised about this issue, further guidance can be obtained from the DfE publication *Child Sexual Exploitation: Definition and Guide for Practitioners* (February 2017).

5.2 Child criminal exploitation

Child criminal exploitation (CCE) also involves an individual or group taking advantage of an imbalance of power to coerce, manipulate or deceive a child into criminal activity in exchange for something the victim needs or wants, for the financial or other advantage of the perpetrator who may use violence or the threat of violence. As with CSE, the victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact but can also occur through the use of technology. CCE can include children being forced by gangs and organised criminal networks to work in cannabis factories, move drugs or money across the country (county lines), shoplift or pickpocket, commit vehicle crime or threaten/commit serious violence to others. Children may be coerced into carrying weapons such as knives or carry a knife for a sense of protection. They may be targeted and recruited by organised criminal networks to move, store and sell illegal drugs around the country (county lines) online using social media as well as face to face.

Indicators which may signal that children are at risk from, or are involved in, serious violent crime include increased absence from school, changes 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.

5.3 Female Genital Mutilation

The School is aware that some children in the UK are currently at risk with respect to Female Genital Mutilation (FGM). Whilst all employees should speak to a DSL if they have any concerns about FGM, there is a specific **legal duty on teachers and health professionals**. If a teacher or nurse discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the

teacher or nurse **must** report this to the police. Unless the teacher or nurse has a good reason not to, they should still discuss any such case with a DSL and involve children's social care as appropriate.

Victims of FGM are most likely to come from a community that is known to practise FGM. The School is alert to the possibility of girls being at risk of FGM, in particular between those individuals aged 5-8 whose mother or older sister have themselves been victims of FGM. The abuse may happen in the UK but very often occurs overseas in the family's country of origin during school holidays and employees must be vigilant in this respect.

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

Indicators

There is a range of potential indicators that a girl may be at risk of FGM. Details of risk factors can be found in the *Multi-agency statutory guidance (October 2019)*. 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.

The School also looks out for signs that FGM has already occurred including discomfort, difficulty in walking and standing, spending longer in the toilet/bathroom, menstrual and/or stomach problems, changes in patterns of behaviour and increased absence.

It will be rare for teachers to see visual evidence, and they should **not** examine pupils, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies.

5.4 Honour-based abuse (HBA)

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

Forcing a person into a marriage is a crime in England and Wales. Some communities use religion and culture as a way to coerce a child into marriage. The School recognises that it can play an important role in safeguarding children from forced marriage.

All forms of so-called HBA are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubts, staff should speak to one of the DSLs. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

5.5 Children who are absent from education

The School recognises that 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 information sharing between parents, the School and local authorities is critical to ensuring that all children are safe and receiving suitable education. A child absent from education, particularly repeatedly and/or for long periods, is a potential indicator of a range of safeguarding possibilities, including abuse and neglect, which may include sexual abuse or exploitation and child criminal exploitation (including involvement in county lines). It may also indicate mental health problems, or the risks of substance abuse, travelling to conflict zones, FGM, so-called 'honour'-based abuse or forced marriage. Early intervention is essential. School employees will follow procedures for unauthorised absence and for

dealing with children that go missing from education, particularly on repeat occasions, to help identify the risk of abuse, neglect or wider safeguarding issues and to help prevent the risks of going missing in future. When a child is removed from school with a view to educating at home, the School will work with local authorities and other key professionals to coordinate a meeting with parents. The School will refer to the DfE guidance *Children Missing Education: statutory guidance for local authorities* (September 2016) and *Elective home education* (April 2019).

5.6 Child on Child Abuse

Employees should recognise that children are capable of abusing other children. Child on child abuse is likely to include, but may not be limited to, 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 (a criminal offence since 2019) and initiation/hazing type violence and rituals.

The School has a zero-tolerance approach to child on child abuse which will never be passed off as “banter”, “just having a laugh”, “part of growing up” or “boys being boys”. The School recognises that downplaying certain behaviours can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Any concerns relating to child on child abuse should be reported directly to a DSL. All allegations will be recorded, investigated and dealt with appropriately. Support will be offered for victims, perpetrators and any other children affected, in line with the School’s Anti-Bullying Policy. The School recognises that all members of the school community have a responsibility to minimise the risk of child on child abuse. Pupils are educated within the PSHE and Personal Development programmes and the wider curriculum about the damage that can be done by such behaviour, and they know how and where to report it if they have such concerns. The School has clear processes in place to support victims, perpetrators and any other child affected by child on child abuse. Procedures for the recording, investigation and response of child on child abuse are contained the School’s Anti-Bullying Policy.

The School recognises the gendered nature of child on child abuse (i.e., that it is more likely that girls will be victims and boys perpetrators), but that all child on child abuse is unacceptable and will be taken seriously.

Any child can be subjected to child on child abuse or other forms of abuse. Research shows the particular vulnerability of the following:

- children with special educational needs and disabilities (SEND): see the School’s SEND policies for the Junior and Senior Schools for details regarding the identification of such children;
- children with intra-familial abuse in their histories or those living with domestic abuse;
- children in care and those who have experienced the loss of a parent, sibling or friend through bereavement;
- girls and young women are more frequently identified as those who are abused by other children; and
- black and minority ethnic children for whom abuse often goes unreported.

Many of these factors make young people more visible to professionals, as well as those who abuse them, and as such it may be that those without characteristics that bring them into contact with

professionals are vulnerable as a result of invisibility.

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 child'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 encouraged to speak up and make a report to an adult if they, or someone else, is the victim of child on child abuse; however, the School recognises that even when there are no reported cases of child on child abuse, such abuse may still be taking place but is going unreported.

5.7 Sexual violence and sexual harassment between children

The School has a zero-tolerance approach to sexual violence and sexual harassment, which are never acceptable in any circumstances. The School recognises that reports of sexual violence and sexual harassment between children are likely to be complex, and that decisions will always need to be made on a case-by-case basis. Sexual violence includes rape, assault by penetration, sexual assault and causing someone to engage in sexual activity without consent; sexual harassment means unwanted conduct of a sexual nature, including sexual comments, remarks, jokes, upskirting and online sexual harassment, both stand-alone and part of a broader pattern of abuse. Pupils are educated within the PSHE and Personal Development programmes and the wider curriculum so that they can confidently report abuse, knowing their concerns will be treated seriously.

All employees are advised to maintain an attitude of "it could happen here" and understand the importance of challenging inappropriate behaviour. Training is given explain what sexual violence and sexual harassment constitute and how to manage reports and concerns of child on child sexual violence and sexual harassment both online and offline, including those that have happened outside school. Sexual violence and sexual harassment exist on a continuum and may overlap. The School recognises, acknowledges, and understands the scale of harassment and abuse and that even if there are no reports it does not mean it is not happening, it may be the case that it is just not being reported.

The following steps will be taken in response to a report of sexual violence or sexual harassment:

- the alleged victim will be reassured that he/she will be taken seriously, supported and kept safe and will never be given the impression that he/she is creating a problem or should feel ashamed for making a report;
- it is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them;
- their disclosure will be dealt with in accordance with section 14 of this policy;
- reports that include an online element will require careful management; the key consideration is for employees not to view or forward illegal images of a child.
- a risk assessment will be made immediately by a DSL (or deputy DSL), taking into consideration the alleged victim, the alleged perpetrator and other children within the School;
- the School will give immediate consideration to how best to support and protect the children involved;
- an instance of child on child sexual harassment or sexual violence will lead to one of the following outcomes (i) internal management, (ii) early help measures, (iii) a referral to

local authority children's social care services, (iv) a report to the police.

In the handling of a report, consideration will be given to the wishes of the victim in terms of how they want to proceed, the nature of the alleged incident(s) and whether harmful sexual behaviour (HSB) and/or a crime may have been committed, the ages and developmental stages of the children involved, the relationship between the children involved (including power imbalances, intimate personal relationships), the possibility of a sustained pattern of abuse, the ongoing risks to the victim and other members of the School community and any other related or contextual issues, including the importance of understanding intra familial harms and any necessary support for siblings following an incident. The School recognises that children with special educational needs and disabilities (SEND) are also three times more likely to be abused than their peers.

The School will regularly review its practice and update relevant policies to reflect lessons learnt and will look out for potential patterns of concerning, problematic or inappropriate behaviour, taking into account what local processes are in place, guidance from statutory safeguarding partners and what support can be accessed when an incident has occurred.

The School will refer to the DfE advice given in Part 5 of KCSIE23.

5.8 Harmful Sexual Behaviour (HSB)

Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. HSB can occur online and/or face-to-face and can also occur simultaneously in both contexts. HSB should be considered in a child protection context.

When considering HSB, both ages and the stages of development of the children are critical factors. HSB can, in some cases, progress on a continuum. Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Children displaying HSB have often experienced their own abuse and trauma. It is important that they are offered appropriate support.

5.9 Special Educational Needs and Disabilities

The School recognises that children with SEND can face additional safeguarding challenges, and that additional barriers can exist when recognising abuse and neglect in this group of children. These can include assumptions that indicators of possible abuse relate to the child's special educational needs or disability without further exploration, their being more prone to peer group isolation than other children, their being disproportionately impacted by behaviours such as bullying without outwardly displaying this, and there being communication and cognitive understanding difficulties in overcoming these barriers.

5.10 Children who are lesbian, gay, bi, or trans (LGBT)

The School is committed to countering homophobic, biphobic and transphobic bullying and abuse.

The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children 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. It is therefore vital that employees endeavour to reduce the additional barriers faced and provide a safe space for children to speak out or share their concerns with employees.

5.11 Mental Health

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

The School recognises that such experiences can have an impact on a child's mental health, behaviour and education and that it has an important role to play in supporting the mental health and wellbeing of its students. If a member of staff has a mental health concern about a child, they should share it with a member of the School's pastoral team or a DSL (or deputy).

The School has clear systems in place for recognising and responding to mental health problems. 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 an employee, a parent or the pupil themselves. The School Counsellor will always share any safeguarding concerns with a DSL, if a child is judged to be at risk of serious harm. Additional guidance for employees supporting pupils' mental health and wellbeing can be found in the Senior School's Student Wellbeing Guidance and Junior School's Mental Health and Emotional Wellbeing Guidance for Pupils, and the DfE guidance: *Mental health and behaviour in schools (November 2018)*.

5.12 Domestic Abuse

The cross-government definition of domestic abuse is "any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members". Domestic abuse can be psychological, physical, sexual, financial, and/or emotional. The Domestic Abuse Act 2021 recognises 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 recognised in law as domestic abuse.

The police will usually inform the School 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 according to their needs.

6. Radicalisation

Protecting children from the risk of radicalisation should be seen as part of the School's wider safeguarding duties and is similar in nature to protecting children from other forms of harm and abuse. During the process of radicalisation, it is possible to intervene to prevent vulnerable people being radicalised.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Terrorism is an action that endangers or causes serious violence to a person/people or serious damage to property, or seriously interferes with an electronic system. The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause. Extremism is the vocal or active opposition to the fundamental British values, which include democracy, the rule of law, individual

liberty and the mutual respect and tolerance of different faiths and beliefs.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to a child's vulnerability such as the influence of family members, friends or online contacts, or a child 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 children's behaviour which could indicate that they may be in need of help or protection. School employees should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately, if they have concerns, by making a referral to a DSL or directly to the Channel programme.

These issues must be brought to the attention of all employees, so that they can be vigilant with respect to the threats of extremism and radicalisation, through regular training and as part of their induction process. All employees receive Prevent training every three years and additionally the DSLs access further training more regularly than this, via additional courses and updates.

6.1 Prevent

From 1 July 2015 all schools are subject to a duty under Section 26 of the Counter Terrorism and Security Act 2015, to have due regard to the need to prevent people from being drawn into terrorism. This duty is known as the Prevent duty. Section 29 of this Act sets out the Prevent guidance.

The School recognises that it must meet the requirements of the statutory Prevent guidance for schools in terms of four areas: risk assessment, working in partnership, employee training and IT policies.

- Risk assessment: the School recognises the risk of children and young people being drawn into terrorism, or exposed to extremist ideas that are part of terrorist ideology. It has an understanding of the need to identify individual children who may be at risk of radicalisation and of what to do to support them. The School has clear procedures in place for protecting children at risk of radicalisation.
- Working in partnership: the School has established effective working relationships with local agencies and ensures that its safeguarding arrangements take into account the policies and procedures of Bradford Safeguarding Partnership.
- Employee training: the School equips all its employees to identify children at risk of being drawn into terrorism and to challenge extremist ideas. Employees undertake Prevent awareness training and the DSLs are able to provide advice and support to other employees on protecting children from the risk of radicalisation.
- IT policies: the School ensures that children are safe 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 Department for Education has also published advice for schools on the Prevent duty, *The Prevent Duty: departmental advice for schools and childcare providers (June 2015)*. This advice is intended to complement the Prevent guidance and signposts other sources of advice and support.

The School recognises that in order to fulfil the Prevent duty, employees should be able to identify children who may be vulnerable to radicalisation and know what to do when they are identified. Protecting children from the risk of radicalisation is part of the School's wider safeguarding duties and is similar in nature to protecting children from other harms (e.g., drugs, gangs, neglect, sexual exploitation), whether these come from within their family or are the product of outside influences.

The School also builds pupils' resilience to radicalisation by promoting fundamental British values and enabling pupils to challenge extremist views (i.e., vocal or active opposition to the fundamental British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs; also included in the government's definition of extremism are calls for the death of members of our armed forces, whether in this country or overseas.)

It is important to emphasise that the Prevent duty is not intended to stop pupils debating controversial issues. On the contrary, the School aims to provide a safe space in which children, young people and employees can understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments.

6.2 Channel

School employees should understand when it is appropriate to make a referral to the Channel programme. Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages. (See Appendix 2 for the School's Prevent Protocol.)

7. Online Safety

The School recognises that the use of technology has become a significant component of many safeguarding issues, including CSE, radicalisation, child on child abuse and sexual harassment, and understands that technology can be used as a platform to facilitate harm. 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.

The School has regard to *Meeting digital and technology standards in schools and colleges (March 2023)*, which sets out that schools and colleges 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.

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).

The School ensures that it has appropriate filters and monitoring systems on school devices and school networks to safeguard children from potentially harmful and inappropriate online material and does all it reasonably can to limit pupils' exposure to the above risks from the School's IT system. Pupils' access to the internet via their personal mobile devices on school premises is limited and regulated.

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 its education of pupils about how to behave and how to stay safe online.

The School recognises that many children have unlimited and unrestricted access to the internet via mobile phone networks. This access means some children, whilst at school or college, sexually

harass, bully, and control others via their mobile and smart technology, share indecent images consensually and non-consensually (often via large chat groups) and view and share pornography and other harmful content.

The School recognises the risks posed to children by cybercrime (i.e., criminal activity using computers and/or the internet), including unauthorised access to computers (illegal 'hacking'), denial of service ('booting') and malware activity. If there are concerns about a pupil inadvertently or deliberately becoming involved in cyber-dependent crime, the DSL will take advice from the National Crime Agency's [Cyber Choices](#) department.

8. Children who go missing from School

The School's 'Missing Pupil Procedure' can be found in the Supervision of Pupils Policy.

9. Professional confidentiality

Confidentiality is essential when dealing with child protection issues. However, professionals can only work together to safeguard children if there is an exchange of relevant information between them. Normally, personal information should only be disclosed to third parties with the consent of the subject of that information. In some circumstances, obtaining consent may not be possible nor in the best interests of the child and the law permits the disclosure of confidential information necessary to safeguard children without consent.

10. Records and monitoring

Well-kept records are essential to good child protection practice. The School will record its concerns and be ready to share them with other agencies as appropriate. Records will include a clear, comprehensive summary of the concern, details of how the concern was followed up and resolved, a note of actions taken, decisions reached and the outcome. Written records are particularly helpful as evidence should a complaint be made against the School about how a case has been handled. All child protection records will be transferred to a child's new school or college as soon as possible if they move from the School.

All of the School's records are kept in a manner which ensures compliance with the Data Protection Act 2018 and EU General Data Protection Regulation (GDPR) 2018. The software system Child Protection Online Management System (CPOMS) is used by School employees to report and record pastoral concerns. Employees with access to this system are expected to log any safeguarding concerns or incidents on CPOMS without delay.

As required in KCSIE23 "All concerns, discussions and decisions made and the reasons for those decisions should be **recorded in writing**."

11. Recruitment

When recruiting employees to work at the School, the School will ensure that it operates safe recruitment procedures (including Disclosure and Barring Service ("DBS") checks and complies with Independent School Standards Regulations) as described in the Safer Recruitment Policy.

For most appointments, an enhanced DBS certificate, which includes barred list information, will be required as the majority of employees will be engaging in regulated activity. In summary, a person will be considered to be engaging in regulated activity if as a result of their work they:

- will be responsible, on a regular basis in a school or college, for teaching, training instructing, caring for or supervising children;
- will carry out paid, or unsupervised unpaid work regularly in a school or college where that work provides an opportunity for contact with children; or
- engage in intimate or personal care or overnight activity, even if this happens only once.

In addition, employees who are involved in the wrap around care of children under the age of 8 are required to complete the School's Disqualification Declaration form. The form consists of a series of questions relating to criteria set out in The Childcare Act 2006 and the Childcare (Disqualification) Regulations 2018. This will be done on an annual basis and upon appointment. Individuals are required to notify the School immediately of any change(s) in circumstances.

12. Visiting speakers

Any employee who invites an external speaker into School must follow the Visits by External Speakers Guidance. The speaker must be supervised while they are on site and must at no point be left unattended with any pupil(s). The employee responsible for the speaker's visit must ascertain beforehand the appropriateness of what will be delivered during their talk to pupils.

13. Close, one-to-one, supervision of pupils

Close, one-to-one, supervision of pupils, for example in specialist music and sports provision, is carefully managed at the School and employees, visiting music teachers and volunteers are aware of the risks involved. The School's Code of Conduct states that employees will:

- avoid arranging to meet a pupil in a remote or secluded part of the School;
- ensure that there is a visual access and/or an open door;
- ensure that there are other employees around or at least aware of a meeting;
- arrange for a colleague to be present if there is a concern about the likely nature of the meeting particularly when there is a gender difference; and
- not arrange meetings with pupils away from the School premises, except with the approval of the parent and a member of the Senior Leadership Team.

14. Responding to disclosure by pupils

Employees have a vital role in both the prevention and detection of abuse and may well be the first to observe that a child has started to behave atypically. Employees may be the ones the abused child turns to for help. It is essential that all employees of the School are aware of the procedures adopted by the School and who should be informed when disclosures are made.

Employees are reminded that it is not their task to identify abuse. The correct identification of abuse is a highly complex task and is the remit of other professional agencies to which employees will refer.

Children trust and depend on adults to protect and safeguard them from harm. It is the responsibility of adults who come into contact with children on a daily basis, to report any suspicions or evidence of abuse which may have occurred or is occurring to a child, whether it is outside or inside the School.

Employees should recognise that not all children may feel comfortable disclosing abuse, exploitation or neglect, and that they themselves may not even realise their experiences are harmful. Employees should still exercise professional curiosity and report concerns to the DSL where they have concerns. Employees should focus on building a relationship with the children to facilitate communication.

Many of the children that employees might come into contact with may exhibit one or more of the

indicators outlined above at some stage in their school career and it is extremely important that whilst being vigilant employees assume nothing and do not jump to conclusions. If any employee of the School has any concerns or is in any doubt, then they must inform a DSL immediately.

The School recognises that abuse may be perpetrated by adults or by other children. If there is reasonable cause to suspect that a child is suffering or is likely to suffer significant harm that may warrant an early intervention or a referral, then all the children involved, whether perpetrator or victim, will be treated as 'at risk'.

The School will liaise with the relevant local safeguarding partners and work with other agencies in line with *Working Together to Safeguard Children 2023* and may need to refer serious cases or crimes to the police, in line with guidance provided by the *NPCC When to Call the Police: Guidance for Schools and Colleges*.

14.1 Managing disclosures

It can take a great deal of courage for a child to talk to an adult about their abuse because the child is 'telling on' someone more powerful than they are. The child may have to betray a person who is not only close to them but also loved by them and they are 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 child to 'tell / explain / describe' rather than asking closed questions
- take the situation seriously;
- acknowledge the courage and good sense being shown;
- reassure the child that they are right to tell an 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 the disclosure.

What to avoid if a disclosure is made:

- never give the child the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment;
- do not allow shock or distaste to show;
- do not probe for more information than is offered;
- do not interrogate the child or attempt to counsel the child;
- 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"); and
- do not agree to keep the information a secret, and make sure that the child knows that the information will be passed on to a DSL.

What to do next:

- immediately make a careful record of what has been said, using the child's actual words wherever possible (not an interpretation of them). If opinions are recorded, then ensure that these cannot be confused with facts;
- immediately contact one of the DSLs. 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 a DSL, the Headmaster of the Senior School should be informed;
- for protection, employees who are reporting abuse or suspected abuse must record the fact that they have reported the situation to a DSL in writing (an email to a DSL would suffice); and remain caring and supportive to the child.

When employees fear for the immediate safety of a child, they must not hesitate to contact the police or social services department (local authority children's social care services, or Emergency Duty Team – see below in Appendix 3 for telephone numbers) stating that they are making a child protection referral. When this has been done, they should follow the normal procedures as laid down in this Safeguarding Policy.

If an employee has any doubts about making a report, they should consider the possible consequences of not reporting for both the child and the employee. Not to report may be construed as neglect of care and therefore itself may constitute abuse.

If an employee becomes worried about a child's behaviour or injuries, but the child says nothing to suggest that they are being abused, the employee should:

- be available and be prepared to listen;
- discuss their concerns with a DSL; and
- not rely on someone else to take action.

The employee's role is to:

- be vigilant and responsible;
- report accurately and carefully to a DSL; and
- support the child by being caring.

14.2 Referrals

Where necessary, DSLs will make a referral to the relevant Safeguarding Partnership in a timely manner (within 24 hours). DSLs will take into account the Data Protection Act 2018, GDPR, KCSIE 2023 and the BSP criteria for action when determining whether consent is needed to share information with other agencies.

In cases where consent is not required (e.g., Section 47 referrals to local authority children's social care services) the DSLs will still consider in each individual case whether it is possible to inform the parent before making a referral to social services. In some child protection cases the DSL may decide that it is not appropriate to inform the parent before making a referral. Listed below is a set of circumstances where legislation and statutory guidance indicate that a professional may dispense with obtaining parental consent and / or informing the parent:

- if it is not possible to gain consent or inform the parent,
- if it cannot be reasonably expected that a professional gains consent or informs the parent, or
- if doing so would place a child at risk.

The DSLs will always seek appropriate consent to make referrals under Section 17, Child in Need or Early Help processes, recognising that for older pupils, their consent to access or engage with services may be needed rather than, or in addition to, the consent of their parent(s).

Where a DSL makes a referral without gaining consent of the parent, the reason for not doing so should be recorded clearly within the referral.).

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 tell the parent.

Exceptions to the general principle of informing the parent include where a child has disclosed child sexual abuse, where there is a suspected danger of forced marriage, in possible cases of fabricated illness dependency and / or if more than one adult is implicated in the abuse. In these instances, the DSL should seek advice from local authority children's social care services before speaking to

parents.

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

Managing allegations of abuse is one of the most difficult tasks that schools have to face. A child may be permanently damaged, and the damage may be compounded, if complaints of abuse are not believed. However, some allegations which are made appear on investigation to be without foundation. Although the Children Act 1989 established that the interests of the child are paramount, the School's procedures must aim to strike a balance between the need to protect children from abuse, and the need to protect employees from false or unfounded allegations. To this end, the School's procedures must be, and be seen to be, fair and effective.

An allegation against employees and volunteers concerning a pupil or pupils at the School should be made directly to the Senior School or Junior School DSL, as appropriate, who will then share information with the Headmaster to determine whether it meets the harms threshold. 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 child. The Headmaster will inform the LADO immediately in the case of an allegation against an employee or volunteer at the School (including in the case of allegations against a DSL or the Headmaster of the Junior School) which has met the harms threshold.

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 present 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; and/or
- possibly committed a criminal offence against or related to a child; and/or
- behaved towards a child or children in a way that indicates 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.

The School has a duty of care to its employees. The School should ensure that effective support is provided for anyone facing an allegation and provide the employee with a named contact if they are suspended. It is essential that any allegation of abuse made against an employee or volunteer in the School is dealt with very quickly, in a fair and consistent way that provides effective protection for the child and at the same time supports the person who is the subject of the allegation.

Appendix 3 contains further details of what happens when an allegation is made against an employee or volunteer.

16. Support for child victims of abuse

The School recognises that children who are abused or who witness abuse 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 child involved. The School may be the only stable, secure and predictable element in the lives of the children at risk. Such children may exhibit challenging and defiant behaviour. Their circumstances will influence the way in which these behavioural problems are resolved. The School also recognises that some children 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-motivation;
- 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.

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.

**Policy reviewed by: Mrs M J Chapman, Senior School DSL and
Mrs F Robertshaw-Hughes Junior School DSL**

Last policy review date: Summer 2023

Next policy review date: Summer 2024

Appendix 1 Signs and Indicators of Abuse

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

Appendix 2

Bradford Grammar School Prevent Referral Protocol

STEP 1 When a concern is identified, as with all safeguarding concerns, the employee must share their concern at the earliest opportunity with a DSL explaining what they have noticed, who was involved, why they feel the child 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 child 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 West Yorkshire Police Safer Schools Officer and Bradford Safeguarding Partnership.

STEP 4 If, after carrying out the appropriate checks, it is felt that a Prevent referral is necessary, the DSL will complete the West Yorkshire Police Prevent Referral Form and email it to ctuleeds.intel@westyorkshire.pnn.police.uk

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 progressions, 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 child'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 child concerned. As such employees should remain vigilant and report any further or new concerns to a DSL at the earliest opportunity.

Appendix 3 What happens when an allegation is made against an employee or volunteer

1. When an allegation is made

Concerns may be raised with employees through a direct disclosure by a pupil or indirectly through their work or via friends. A parent may approach the School directly or may contact social services or the police. An anonymous report will be acted on, but this fact will be kept in mind when considering the context of the allegation.

When an allegation is made to the DSL or Headmaster, they will establish in writing the general nature of the allegation including what is alleged to have happened, where and when the incident is alleged to have occurred, who was involved and whether there were any others present. At this initial stage, no attempt will be made to determine the truth or otherwise of the allegation by investigating the incident as this may jeopardise any subsequent investigations by external agencies.

If the initial assessment establishes that the allegation meets the harms threshold (i.e., that the employee against whom the allegation has been made poses a risk of harm to a child/children), the Headmaster will make immediate contact with the LADO to discuss the allegation, consider its nature, content and context and to agree a course of action. If it is decided that the allegation does not meet the harms threshold and is deemed to be a 'low level concern', the School will deal with it appropriately.

2. Initial assessment

When making the initial assessment, the context in which the alleged incident occurred may provide important information. This includes: the conduct of an employee (e.g., previous concerns, past disciplinary action, exemplary professional behaviour), the conduct of the pupil (e.g., record of behaviour and any previous allegations made), any special circumstances (e.g., family problems or special needs), and the perspective of the person making the allegation. An allegation which does not initially appear to meet the threshold level definition of abuse may still result in a child protection referral, because what may initially appear to be a low level concern to employees may be significant to the pupil and may still constitute an assault. The School understands that the welfare of the child remains a focus of concern in terms of investigating an allegation against a person in a position of trust.

There are three possible outcomes of the initial assessment:

- where it is clear that the pupil has suffered, is suffering or is likely to suffer significant harm or has alleged that a criminal offence has been committed, a referral will be made and the police may carry out a criminal investigation;
- the allegation, whilst not in the first category, represents inappropriate or poor practice by an employee that needs to be dealt with by the School's disciplinary procedures; and
- the immediate circumstances show that it is not possible for the allegation to be true.

Some allegations will be so serious that they require immediate intervention by local authority children's social care services and/or the police. The DSLs should be informed of all allegations that come to the School's attention and appear to meet the criteria so they can consult police and local authority children's social care services as appropriate.

The following definitions should be used when determining the outcome of allegation investigations:

- **Substantiated:** there is sufficient evidence to prove the allegation;
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive;
- **False:** there is sufficient evidence to disprove the allegation; and
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence;
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made.

In the first instance, the Headmaster of Senior School, or where the Headmaster is the subject of an allegation, the Chairman of Governors, (the 'case manager') should immediately discuss the allegation with the appropriate DSL. The purpose of an initial discussion is for the DSL and the case manager to consider the nature, content and context of the allegation and agree a course of action. The DSL may be asked by the case manager to provide or obtain relevant additional information, such as previous history, whether the child or their family have made similar allegations previously and the individual's current contact with children. There may be situations when the case manager will want to involve the police immediately, for example if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. Where there is no such evidence, the case manager should discuss the allegations with the DSL in order to help determine whether police involvement is necessary.

The case manager will consider whether the employee against whom the allegation has been made would pose a risk of harm if they continue to work in their present position, or in any capacity with children in a school or college. If it is decided that the allegation does not meet the harms threshold, it will be dealt with as a 'low level concern' (see below Section 3).

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

The case manager or a delegated senior colleague should inform the accused person about the allegation as soon as possible after consulting the DSL. It is extremely important that the case manager provides him/her with as much information as possible at that time. However, where a strategy discussion is needed, or police or local authority children's social care services need to be involved, the case manager should not do that until those agencies have been consulted and have agreed what information can be disclosed to the accused.

The case manager must consider carefully whether the circumstances of a case warrant a person being suspended from contact with children at the School, or whether alternative arrangements can be put in place until the allegation or concern is resolved. All options to avoid suspension should be considered prior to taking that step (see Section 6 below).

The parents of the pupil(s) involved will be formally told about the allegations as appropriate. The case manager will be advised by the LADO and, where involved, by local authority children's social care services and/or the police on what information can be disclosed. The parents will be kept informed about the progress of the case in relation to their child, but no information can be shared regarding the employee concerned. They will be made aware of the requirement to maintain confidentiality and unwanted publicity about any allegations made about teachers in school while investigations are in progress (as set out in section 141F of

the Education Act 2002).

If there is cause to suspect that a child is suffering or is likely to suffer significant harm, a strategy discussion should be convened in accordance with the statutory guidance *Working Together to Safeguard Children 2018*. If the allegation is about physical contact, the strategy discussion or initial evaluation with the police should take into account that employees are entitled to use reasonable force to control or restrain children in certain circumstances, including dealing with disruptive behaviour.

Where it is clear that an investigation by the police or local authority children's social care services is unnecessary, or the strategy discussion or initial evaluation decides that is the case, the DSL should discuss the next steps with the case manager. In those circumstances, the options open to the School depend on the nature and circumstances of the allegation and the evidence and information available. This will range from taking no further action to dismissal or a decision not to use the person's services in future. Suspension should not be the default position: an individual should be suspended only if there is no reasonable alternative.

In some cases, further enquiries will be needed to enable a decision about how to proceed. If so, the DSL should discuss with the case manager how and by whom the investigation will be undertaken. In straightforward cases, the investigation should normally be undertaken by a senior member of the School staff.

However, in other circumstances, such as lack of appropriate resources within the School, or the nature or complexity of the allegation will require an independent investigator. Many local authorities already provide for an independent investigation of allegations.

3. Low level concerns

Concerns which do not meet the harms test should be addressed separately. The School recognises that the term 'low level' concern does not mean that it is insignificant, but rather that it identifies behaviour towards a child which is inconsistent with the Staff Code of Conduct but does not meet the harms threshold or is otherwise not considered serious enough to be referred to the LADO. Examples of such behaviour could include, but are not limited to: being over-friendly with children, having favourites, taking photographs of a child on a personal mobile device, engaging with a child on a one-to-one basis in a secluded area or using inappropriate sexualized, intimidating or offensive language towards a child.

Low level concerns about an employee should be reported to the DSL. Reports of low level concerns will be recorded in writing, with details of the concern, the context in which it arose and action taken. The name of the person reporting will be recorded, respecting their wish to remain anonymous as far as reasonably possible. When a low level concern has been raised by a third party, the DSL will collect as much evidence as possible and interviews will be conducted with the person who raised the concern, with the individual involved and with any witnesses.

The School encourages employees to feel confident to self-refer if, for example, they have found themselves in a situation which could be misinterpreted, or if they believe that, on reflection, their behaviour may have fallen below the expected professional standards.

The School will regularly review records of low level concerns to identify and respond to any potential patterns of concerning, problematic or inappropriate behaviour. Where a pattern of behaviour is identified, the School will decide on an appropriate course of action. This might involve internal disciplinary procedures, or referral to the LADO if the harms threshold is met.

Reports about supply staff and contractors will be shared with their employers so any potential patterns of inappropriate behaviour can be identified.

The School recognises the importance of learning lessons from handling all allegations and the importance of creating a culture of openness, trust and transparency in which the School's values and expected behaviour are lived, monitored and reinforced by all employees. The School will consider whether any wider cultural issues within it have enabled the behaviour to occur and if appropriate policies or practices could be revised, or training delivered in order to minimise the risk of recurrence.

4. False or malicious allegations

A false or malicious allegation may still lead to a referral to local authority children's social care services if it is agreed that a child is in need of support. It may be that the pupil has experienced abuse elsewhere or has tried to discredit an employee as an act of displacement. A malicious allegation implies a deliberate act to deceive.

5. Referral and subsequent external investigations

In most cases the investigation starts with a multi-agency strategy meeting to determine whether a full child protection investigation is necessary. However, if a criminal act has been identified, or if the matter has been referred to the police independently, the police may embark on their own investigation. This may happen before the School has been notified of the investigation. Police officers will be given assistance in their enquiries and confidentiality about those enquiries will be maintained.

6. Suspension

Suspension is not an automatic response to an allegation and it is recognised that its effects may subject an innocent person to a serious ordeal. However, the following circumstances will be considered as grounds for suspension: a child or children would be at serious risk; the allegation is so serious that summary dismissal for gross misconduct is possible; or the investigation would in some way be impeded. Suspension is a neutral act, not a disciplinary sanction, and will be on full pay.

Alternatives to suspension will be considered. These include: leave of absence; providing someone else to be present during contact time; and undertaking non-contact duties. It will be important for the employee to have a friend or trade union representative present with them at any interview informing them of the allegation or the suspension. Written confirmation will follow within one working day and the Chairman of Governors will be informed. Due consideration will be given to the views of the LADO.

7. Confidentiality

Confidentiality will be maintained as far as is possible and sensitive information will only be disclosed on a need to know basis. The employee will be informed of any decisions that are made before and during any potential disciplinary process.

Records will be kept of any agreed action including arrangements for supporting the employee and the pupil. Documents relating to the investigation will be retained in a secure place and information relating to any disciplinary action will be kept on the employee's file.

If there are related criminal or civil proceedings, records may be subject to disclosure.

Therefore, no assurances can be given of total confidentiality.

8. Disciplinary action

The internal process is separate from the child protection investigation. If a police or child protection investigation takes place, it has priority over the internal investigation. Whilst the internal process can often be more fully informed once any external investigations have been completed, this does not preclude this from happening.

If an employee is dismissed, or resigns before a disciplinary process is completed, the School has a duty to report the case to the appropriate regulatory body.

The School will also report to the DBS any person (whether employed, contracted, a volunteer or student) whose services are no longer used because he or she is considered unsuitable to work with children. In this context ceasing to use a person's services includes:

dismissal;

- non-renewal of a fixed-term contract;
- non-engagement/refusal to engage a supply teacher provided by an employment agency;
- terminating the placement of a student teacher or other trainee;
- no longer using employees employed by contractors;
- no longer using volunteers;
- resignation; and
- voluntary withdrawal from supply teaching, contract working, courses of initial teacher training or volunteering.

Where a dismissal has not reached the threshold for DBS referral the School has a duty to consider making a referral to the Teaching Regulation Agency (TRA) in circumstances where a teacher has been dismissed (or would have been dismissed had they not resigned) and a prohibition order may be appropriate. The reasons that such an order may be considered are: unacceptable professional conduct; conduct that may bring the profession into disrepute; and conviction, at any time, for a relevant offence.

9. Record keeping

Details of allegations that are found to have been malicious or false should be removed from personnel records, unless the individual employee gives their consent for the retention of the information. For all other allegations, the School will keep the following information on the file of the person accused: a clear, comprehensive summary of the allegation, details of how it was followed up and resolved, and a record of action taken, decisions reached and the outcome as categorised above (in section 2). A copy will be provided to the person concerned, where agreed by local authority children's social care services or the police and a declaration will be recorded as to whether the information will be referred to in any future reference.

In the case of allegations which do not meet the harm threshold ("low level concerns"), the School will record the details of the concern, the context in which the concern arose and the action taken.

10. Non recent allegations

Where an adult makes an allegation to the School that they were abused as a child, the individual will be advised to report the allegation to the police. Non recent allegations made by a child will be reported to the LADO in line with the BSP's procedures for dealing with non recent allegations so that the LADO can coordinate with the local authority children's social care services and the police.

Appendix 4 Useful Contacts List

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

Bradford Children's Services

Bradford Children's Services Contact Centre: 01274 435600

Bradford Children's Services Emergency Duty Team (out of hours): 01274 431010

Dedicated practitioners' advice and referral contact number: 01274 433999

Local Area Designated Officer (LADO) 01274 435600

Leeds MASH

Leeds Children's Social Work Services 0113 222 4403

Leeds Children's Emergency Duty Team (out of hours) 0113 535 0600

Leeds Duty and Advice Team 0113 376 0336

Kirklees Safeguarding Children Partnership

KSCP General Enquiries 01484 225161

KSCP Duty and Advice Team 01484 456848

KSCP Emergency Duty Team (out of hours) 01484 414933

Calderdale Safeguarding Children Partnership

CSCP Multi Agency Screening Team 01422 393336

CSCP Emergency Duty Team (out of hours) 01422 288000

North Yorkshire Safeguarding Children Partnership

NYSCP Multi Agency Screening Team 01609 780780

NYSCP Professionals' Consultation Line 01609 535070

Police: if a child is at immediate risk of harm: 999

Prevent Advice: 01274 432816

NSPCC helpline: 0800 800 5000

Safer Bradford website:

<https://www.saferbradford.co.uk/children/practitioners-who-work-or-volunteer-with-children-and-young-people/>

West Yorkshire Consortium Inter Agency Safeguarding and Child Protection

Procedures website: <http://westyorkscb.proceduresonline.com>.

Appendix 5 Child Protection Action Flow Chart

