



# SEVENOAKS PREPARATORY SCHOOL

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### Child Protection Policy

Status and Review Cycle:	Statutory / Annual
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Governor Lead:	Mrs. Jan Berry
Policy Holder:	Mr. James Ashcroft

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## KEY EXTERNAL CONTACT DETAILS

<b>Local Authority Designated Officer</b>	TEL: 03000 410 888 EMAIL: <a href="mailto:kentchildrenslado@kent.gov.uk">kentchildrenslado@kent.gov.uk</a> Kroner House, Eurogate business park, Ashford, Kent, TN248XU
<b>Area safeguarding advisor - Sevenoaks</b>	Anup Kandela 03000 412445
<b>Early Help - Sevenoaks</b>	03000 413 527 (Mon – Wed) or 03000414 239 (Wed – Fri) <a href="mailto:SevenoaksEarlyHelp@Kent.gov.uk">SevenoaksEarlyHelp@Kent.gov.uk</a> Further Early Help contacts can be found at: <a href="https://www.kelsi.org.uk/special-education-needs/integrated-childrens-services/early-help-contacts/sevenoaks">https://www.kelsi.org.uk/special-education-needs/integrated-childrens-services/early-help-contacts/sevenoaks</a>
<b>Integrated Front Door</b>	TEL: 03000 41 11 11 (Outside office hours – 03000 419191)
<b>Police</b>	EMERGENCY: 999 NON EMERGENCY NUMBER: 101
<b>Support and Advice about Extremism</b>	<b>Department for Education</b> – dedicated telephone helpline and mailbox for non-emergency advice for staff and governors TEL: 020 7340 7264 EMAIL: <a href="mailto:counter.extremism@education.gov.uk">counter.extremism@education.gov.uk</a> Sevenoaks: Sally Green 03000 413 439
<b>Action Counters Terrorism - ACT</b>	<a href="https://act.campaign.gov.uk/">https://act.campaign.gov.uk/</a>
<b>Area Education officer – North Kent</b>	Ian Watts – TEL: 03000 414302
<b>NSPCC Whistleblowing Advice Line</b>	ADDRESS: Weston House, 42 Curtain Road London EC2A 3NH TEL: 0800 028 0285 EMAIL: <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>
<b>Disclosure and Barring Service</b>	ADDRESS: PO Box 181, Darlington, DL1 9FA TEL: 01325 953795 EMAIL: <a href="mailto:dbsdispatch@dbs.gsi.gov.uk">dbsdispatch@dbs.gsi.gov.uk</a>
<b>Teaching Regulation Agency</b>	ADDRESS: 53-55 Butts Road, Earlsdon Park, Coventry, CV1 3BH TEL: 0207 593 5393 EMAIL: <a href="mailto:misconduct.teacher@education.gov.uk">misconduct.teacher@education.gov.uk</a>
<b>OFSTED Safeguarding Children</b>	TEL: 0300 123 4666 (Monday to Friday from 8am to 6pm) EMAIL: <a href="mailto:Whistleblowing@ofsted.gov.uk">Whistleblowing@ofsted.gov.uk</a>
<b>Kent Safeguarding Children Multi-agency Partnership (KSCMP)</b>	<a href="mailto:KSCMP@kent.gov.uk">KSCMP@kent.gov.uk</a> 03000 421126 Room 2.71, Sessions House, Maidstone, ME141XQ
<b>Online Safety</b>	03000 415797

## KEY SCHOOL CONTACT DETAILS

<p style="text-align: center;"><b>Governors</b></p>	<p><b>Nominated Safeguarding Governor and Chair of Governors</b>  Jan Berry  <b>Mobile:</b> 07977 497 324  <b>Email:</b> <a href="mailto:jan.berry@theprep.org.uk">jan.berry@theprep.org.uk</a></p>
<p><b>Designated Safeguarding Lead (DSL) including EYFS</b></p> <p><b>Deputy Designated Safeguarding Leads (DDSLs)</b></p> <p><b>Deputy Designated Safeguarding Lead (DDSL) (EYFS):</b></p>	<p><b>DSL for the School</b>  Mr. James Ashcroft  Deputy Head  Email: <a href="mailto:James.ashcroft@theprep.org.uk">James.ashcroft@theprep.org.uk</a>  Tel: 07869 128969</p> <p>Mrs Helen Cook,  Head of Pre Prep  <a href="mailto:helen.cook@theprep.org.uk">helen.cook@theprep.org.uk</a>  07886 502979</p> <p>Mrs Sophie Fuller  Head of Art  <a href="mailto:Sophie.fuller@theprep.org.uk">Sophie.fuller@theprep.org.uk</a>  07908 530224</p> <p>Mrs Louisa Rowland  Leader of Nursery  <a href="mailto:louisa.rowland@theprep.org.uk">louisa.rowland@theprep.org.uk</a>  01732 764 832</p>
<p><b>Designated Teacher for Looked After Children</b></p>	<p>Mr. James Ashcroft  Deputy Head  Email: <a href="mailto:James.ashcroft@theprep.org.uk">James.ashcroft@theprep.org.uk</a>  Tel: 07869 128969</p>
<p style="text-align: center;"><b>Head</b></p>	<p>Mr Luke Harrison  <a href="mailto:luke.harrison@theprep.org.uk">luke.harrison@theprep.org.uk</a>  07585 770447</p>

## **POLICY STATEMENT**

This policy applies to Sevenoaks Preparatory School, which includes the EYFS setting: This policy is reviewed and updated annually (as a minimum) and is available on the School website or in paper format from the School office.

Sevenoaks Prep is committed to ensuring a whole school approach to safeguarding which provides a safe environment for children to learn in, identifies children who are suffering, or likely to suffer, significant harm and takes appropriate action to see that such children are kept safe, both at home and at school. Sevenoaks Prep will protect children from maltreatment, prevent impairment of children's mental and physical health or development, ensure that they grow up in circumstances consistent with the provision of safe and effective care and will take action to enable all children to have the best outcomes.

At Sevenoaks Prep we believe that safeguarding is of paramount importance and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families and carers has a role to play in safeguarding children. In order to fulfil this responsibility effectively, all professionals should make sure their approach is child-centred. This means that they should consider, at all times, what is in the best interests of the child.

No single professional can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

This policy has regard to the following guidance and advice:

- Keeping Children Safe in Education (September 2021) (KCSIE)
- Non-statutory interim supplements to KCSIE: Coronavirus (COVID-19): safeguarding in schools, colleges and other providers (2020 subject to DfE updates) and Safeguarding and remote education during coronavirus (COVID-19)
- KCSIE incorporates the additional statutory guidance, Disqualification under the Childcare Act 2006 (September 2018)
- KCSIE also refers to the non-statutory advice for practitioners: What to do if you're worried a child is being abused (March 2015)
- When to call the police, non-statutory guidance from the National Police Chiefs' Council
- Working Together to Safeguard Children (September 2018 – updated in 2019 but without changing the date on the published version) (WT)
- WT refers to the non-statutory but important advice: Information sharing (2018)
- Prevent Duty Guidance: for England and Wales (July 2015) (Prevent). Prevent is supplemented by non-statutory advice and a briefing note:
- The Prevent duty: Departmental advice for schools and childminders (June 2015)
- The use of social media for on-line radicalisation (July 2015)
- Sexual violence and sexual harassment between children in schools and colleges (2018)

This policy also takes into account the procedures and practice of Kent County Council as part of the inter-agency safeguarding procedures set up by the KSCMP.

## **CONCERNS ABOUT A CHILD**

The School has a duty to consider at all times the best interests of the pupil and take action to enable all pupils to achieve the best outcome. Safeguarding and promoting the welfare of children is everyone's responsibility at Sevenoaks Prep.

The School has arrangements for listening to children and providing early help. At Sevenoaks Prep, all school staff should be prepared to identify children who may benefit from early help. This means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years. In the first instance staff should discuss early help requirements with the Designated Safeguarding Lead or Deputies and staff may be required to support other agencies and professionals in an early help assessment. All staff must be conscious to identify emerging problems, liaising with the Designated Safeguarding Lead, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking an early help assessment.

The Designated Safeguarding Lead plays a crucial role in early help. If early help is appropriate the DSL should support the staff member in liaising with other agencies and setting up an inter-agency assessment as appropriate. If early help and /or other support is appropriate the case should be kept under constant review and consideration given to a referral to children's social care if the child's situation does not appear to be improving. The school will offer all the available evidence and enable a contextual approach to address such harm to the relevant external agencies.

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

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

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

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

Please refer to Appendix 1 of this policy for further detail of the types of abuse and possible signs of abuse.

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. All staff, but especially the designated safeguarding lead (and deputies) will consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence. Behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education and consensual and non-

consensual sharing of nudes and semi-nudes images and/or videos can be signs that children are at risk.

### **Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)**

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online. It is important to note that the experience of girls who are criminally exploited can be very different to that of boys

### **Mental Health**

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

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

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

If staff have a mental health concern about a child, immediate action should be taken, following their child protection policy and speaking to the designated safeguarding lead or a deputy.

The department has published advice and guidance on **Preventing and Tackling Bullying**, and **Mental Health and Behaviour in School**. In addition, Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among young people including its guidance **Promoting children and young people's emotional health and wellbeing**. Its resources include social media, forming positive relationships, smoking and alcohol. See **Rise Above** for links to all materials and lesson plans.

## **PROCEDURES FOR DEALING WITH CONCERNS ABOUT A CHILD**

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

All staff should:

- listen carefully
- avoid asking leading questions
- reassure the individual that the allegation/complaint will be taken seriously
- not guarantee absolute confidentiality (as this may ultimately not be in the best interests of the child) and explain that the information needs to be passed to the appropriate person who will ensure that the correct action is taken.
- not view or forward illegal images of a child. Click on the link for more information: [UKCCIS](#)

All concerns, discussions and decisions (together with reasons) made under these procedures should be recorded in writing. The record should include the date, time and place of the conversation and detail of what was said and done by whom and in whose presence and signed by the person making it. There are detailed 'cause for concern' sheets available on the school computer network and paper copies of the form are available in both the Pre-Prep and Prep staff rooms. Where the allegation relates to harmful sexual behaviours, if possible the disclosure should be managed with two members of staff present (preferably one of them being the Designated Safeguarding Lead (DSL) or a DDSL. Any notes taken at the time of discussion will be attached to the 'cause for concern' sheets and the notes will include the time, date and details of where the discussion took place.

Where there is a safeguarding concern, the School will ensure the pupil's wishes and feelings are taken into account when determining what action to take and what services to provide. This is particularly important in the context of harmful behaviours, such as sexual harassment and sexual violence. The School manages this by allowing children the time to talk, finding the child a suitable staff member who the child feels able to talk with alongside the DSL and through constant dialogue with the child. The School operates its processes with the best interests of the pupil at their heart.

### **Early Help**

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

- is disabled and has specific additional needs;
- has special educational needs (whether they have a statutory education, health and care plan or not);
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
- is frequently missing/goes missing from care or from home;
- is misusing drugs or alcohol themselves;
- is at risk of modern slavery, trafficking or exploitation;
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;

- has returned home to their family from care;
- is at risk of being radicalised or exploited;
- is a privately fostered child.

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

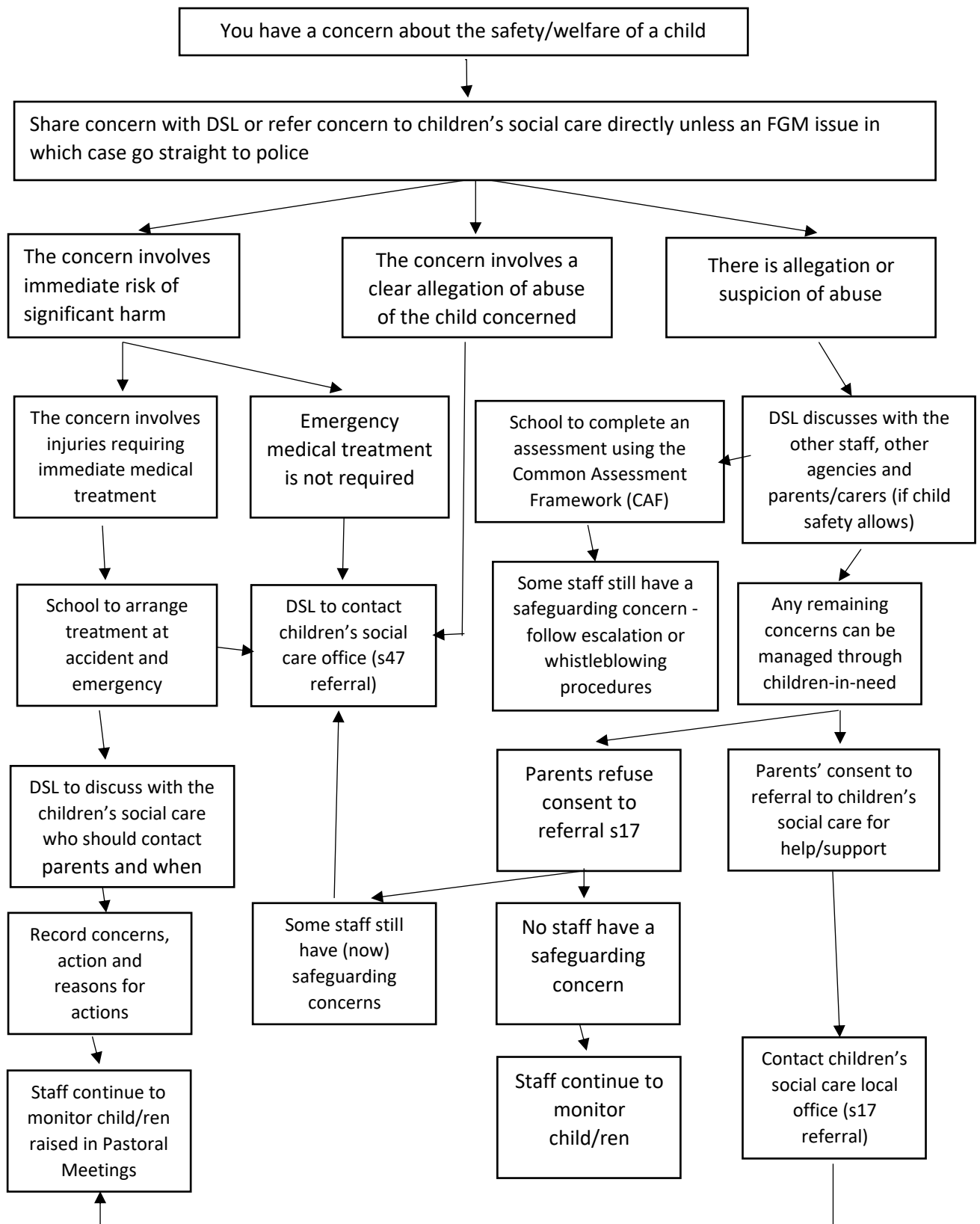
In the first instance, staff who consider that a pupil may benefit from early help should discuss this with the School's DSL. The DSL will consider the appropriate action to take in accordance with KSCMP referral threshold document. The DSL will support staff in liaising with external agencies and professionals in an inter-agency assessment, as appropriate. If early help is appropriate, the matter will be kept under review and consideration given to a referral to children's social care if the pupil's situation does not appear to be improving.

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

If staff (including governors, agency staff and volunteers) have any concerns about a child (as opposed to a child being in immediate danger), they should, where possible, speak with the School's DSL to agree a course of action although staff can make a direct referral to children's social care. Staff should not assume that somebody else will take action and share information that might be critical in keeping children safe. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. If a child's situation does not appear to be improving, the DSL should press children's social care for reconsideration. Staff should challenge any inaction and follow this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.



## Procedure to follow if you have a concern about a child



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

If staff (including governors, agency staff and volunteers) believe that a child is in immediate danger or at risk of harm, they should make an immediate referral to children's social care and/or the police. Anyone can make a referral. Any such referral must be made immediately and in any event within 24 hours (one working day) of staff being aware of the risk. Parental consent is not needed for referrals to statutory agencies such as the police and children's social care. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. Staff should challenge any inaction and follow this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

Sevenoaks Preparatory School adheres to the Kent Safeguarding Children Multi-agency Partnership (KSCMP) Procedures. The full KSCMP procedures and additional guidance relating to specific safeguarding issues can be found on the [KSCMP website](#).

For any children who are engaged in close one to one teaching, teachers are asked to ensure that doors (without windows) are never locked or closed, so that the child can be seen and is never completely out of sight.

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

Staff should follow the School's normal referral processes when there are concerns about children who may be at risk of being drawn into terrorism, as set out on page 7. This may include a referral to Channel or children's social care depending on the level of risk. However, if staff have concerns that there is an immediate/significant risk of a child being drawn into terrorism they must call 999 or refer the case to the County Channel Panel or contact Early Help or the Central Referral Unit. Advice and support can also be sought from children's social care.

The School, in recognition that pupils may be at risk of being drawn into terrorism or other forms of extremism, carries out appropriate risk assessments (following consultation with local partners, such as the police) of the potential risk in the local area. Such risk assessments are discussed with the Head, DSL and DDSL's and the Chair of Governors to ensure the School's safeguarding arrangements are sufficiently robust to help prevent and protect children from being drawn into terrorism and are regularly revised.

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

Staff must report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the member of staff has a good reason not to, they should still consider and discuss any such case with DSL and involve children's social care as appropriate. More information on this can be found in Appendix 1 of this policy for the procedure to be followed where they suspect that a pupil may be at risk of FGM.

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

Children who go missing from education, particularly on repeat occasions, is a potential indicator of abuse or neglect. The School's procedures for unauthorised absence and for dealing with children who go missing from education are available in the 'Missing Children' policy. Further detail can also be found at Appendix 1 of this policy.

The School will report to Kent Local Authority, a pupil who fails to attend school regularly or has been absent from school without the School's permission for a continuous period of 10 school days or more.

### **What staff should do if they have safeguarding concerns about another staff member (including supply staff and volunteers)**

If staff have concerns about another staff member, then this should be referred to the Head. Where there are concerns about the Head, this should be referred to the Chair of Governors, who will contact the LADO (without informing the Head). In the event of allegations of abuse being made against the Head, staff are referred to the procedure regarding managing allegations of abuse against staff (including supply staff and volunteers).

If there are concerns or allegations made about a governor, this should be referred to the Head who will then contact the LADO.

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

The School aims to ensure there is a culture of safety and raising concerns and an attitude of 'it could happen here'. Where staff have concerns about poor or unsafe practices and potential failures in the School's safeguarding systems, these should be raised in accordance with the School's whistleblowing procedures which can be found within the Employee Manual and in the policy directory available to all staff in school. There will be no disciplinary action taken against a member of staff for making such a report provided that it is done in good faith.

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

### **Arrangements for dealing with peer-on-peer allegations**

Peer-on-peer abuse is abuse by one or more pupils against another pupil and can happen both inside and outside of school. It can manifest itself in many ways and can include sexting (youth produced sexual imagery), bullying, online bullying, physical abuse, initiation/hazing type violence and rituals and harmful sexual behaviours including sexual violence and sexual harassment. Upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause them humiliation, distress or alarm. Abusive comments and interactions will never be passed off or dismissed as "banter" or "part of growing up". Nor will harmful sexual behaviours be dismissed as the same or "just having a laugh" or "boys being boys" as these can lead to a culture of unacceptable behaviours, an unsafe environment for children and can normalise abuse leading to children accepting it as normal and not coming forward to report it.

The school recognises the gendered nature of peer-on-peer abuse but finds all peer-on-peer abuse unacceptable and will be taken seriously. Even if there are no reports of peer on peer abuse in the school does not mean it is not happening, it may be the case that it is just not being reported. The School recognises that a child is likely to disclose an allegation to someone they trust: this could be any member of staff. By making such a disclosure the pupil is likely to feel that the member of staff is in a position of trust. Peer on peer abuse is often initiated via social media. Please see flow chart on page 10 for responding to an online safety concern.

Peer on peer abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise
- causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as sexting or youth produced sexual imagery);
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

The School recognises that children with special educational needs and disabilities can be more prone to peer on peer group isolation than other children and will consider extra pastoral support for those children. These children may be allocated a mentor at school, who will support them in their day to day management at school and provide a safe avenue for them to discuss their concerns. Staff discuss pastoral issues each week in their staff meetings and any problems arising from this will be passed on to the DSL who will then manage appropriately.

All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report

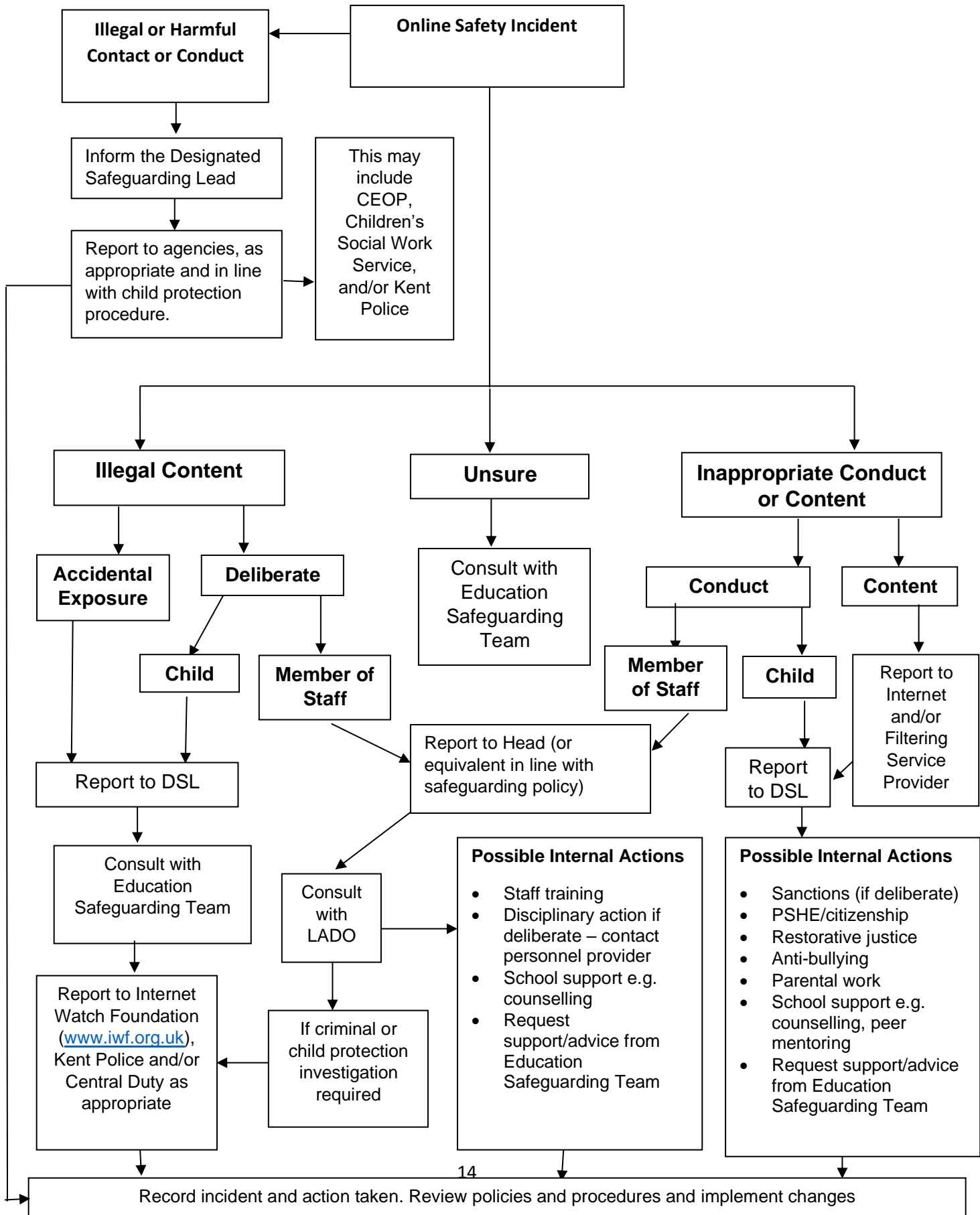
Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers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

Local authorities will share the fact a child has a social worker, and the designated safeguarding lead will hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This will be considered as a matter of routine. There are clear powers to share this information under existing duties on both local authorities and schools and colleges to safeguard and promote the welfare of children.

Where children need a social worker, this will inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks)

and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

## Responding to an Online Safety Concern



All staff should be aware of how peer on peer abuse may manifest itself: bullying (including cyber-bullying), gender-based violence or touching, sexual assaults and sexting are examples of this. The school seeks to minimise the risk of peer on peer abuse through: clear supervision of pupils and regular education on high standards of courtesy and respect expected in the language and behaviour of pupils to one another, whether online or in person.

Where an issue of pupil behaviour or bullying gives 'reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm', the DSL should follow the procedures on page 7.

A pupil against whom an allegation of abuse has been made may be suspended from the School during the investigation. The School will take advice from KSCMP on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the alleged victim and perpetrator. If it is necessary for a pupil to be interviewed by the police in relation to allegations of abuse, the School will ensure that, subject to the advice of KSCMP, parents are informed as soon as possible and that the pupils involved are supported during the interview by an appropriate adult and until the investigation is completed. Confidentiality will be an important consideration for the School and advice will be sought as necessary from KSCMP and / or the police as appropriate.

Police may be informed of any harmful sexual behaviours which are potentially criminal in nature, such as grabbing bottoms, breasts and genitalia. Rape, assault by penetration and sexual assaults will be passed to the police. If the DSL decides to make a referral to children's social care and/or a report to the police against a victim's wishes, the reasons should be explained to the pupil and appropriate specialist support offered.

The School's approach to sexting is:

1) Understand what 'sexting' is

'Sexting' is the exchange of self-generated sexually explicit images, through mobile picture messages or webcams over the internet.

Young people may also call it:

- Cybersex
- Sending a nudie, picture or selfie

'Sexting' is an increasingly common activity among children and young people, where they share inappropriate or explicit images online or through mobile phones. It can also refer to written messages.

2) In the event of a sexting incident:

The DSL will take advice from the Kent Area Safeguarding Officer, who may also take advice from the Online Safety Officer for Kent. Their advice will then form the next stages of the school's processes.

In the event of disclosures about pupil-on-pupil abuse, all children involved (both victim and perpetrator) will be treated as being at risk and safeguarding procedures in accordance with this policy will be followed. Victims will be supported by the DSL and support from external agencies will be sought, as appropriate.

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

- the victim;
- the alleged perpetrator; and
- the other children (and, if appropriate, staff) at the School.

Risk assessments will be recorded and kept under review. In relation to a report of sexual violence or sexual harassment, the DSL will reassure any victim that they are being taken seriously and that they will be supported and kept safe. The victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment; nor would a victim ever be made to feel ashamed for making a report. The DSL will consider the risks posed to pupils and put adequate measures in place to protect them and keep them safe. This may include consideration of the proximity of the victim and alleged perpetrator and considerations regarding shared classes, sharing school premises and school transport.

#### **ARRANGEMENTS FOR DEALING WITH ALLEGATIONS OF ABUSE AGAINST TEACHERS AND OTHER STAFF (INCLUDING THE HEAD, GOVERNORS, supply teachers AND VOLUNTEERS)**

Staff should adhere to the school's Code of Conduct at all times, which can be found in the employee manual and in the policy folder in the staff shared area.

The School's procedures for managing allegations against staff who are currently working in the School follows Department for Education statutory guidance and KSCMP arrangements and applies when staff (including volunteers) have (or are alleged to have):

- behaved in a way that has harmed a pupil, or may have harmed a pupil;
- possibly committed a criminal offence against or related to a pupil or;
- behaved towards a pupil in a way that indicated that they may pose a risk of harm if they were to work regularly or closely with children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Allegations against a teacher who is no longer employed by the school should be referred to the police by the Head. Historical (non-recent) allegations of abuse should be referred to the police (and also the LADO), by the Head.

If an allegation is made against anyone working with children in the School, the School should not undertake their own investigation of allegations without prior consultation with the Local Authority 'designated officer' or, in the most serious cases, the police, so as not to jeopardise statutory investigations. In borderline cases, the School may discuss informally with the 'designated officer' on a no-names basis.

All allegations should be investigated as a priority to avoid any delay.

1. All allegations which appear to meet the above reporting criteria are to be reported straight away to the 'case manager' who is the DSL. If an allegation is reported to the DSL, the DSL will

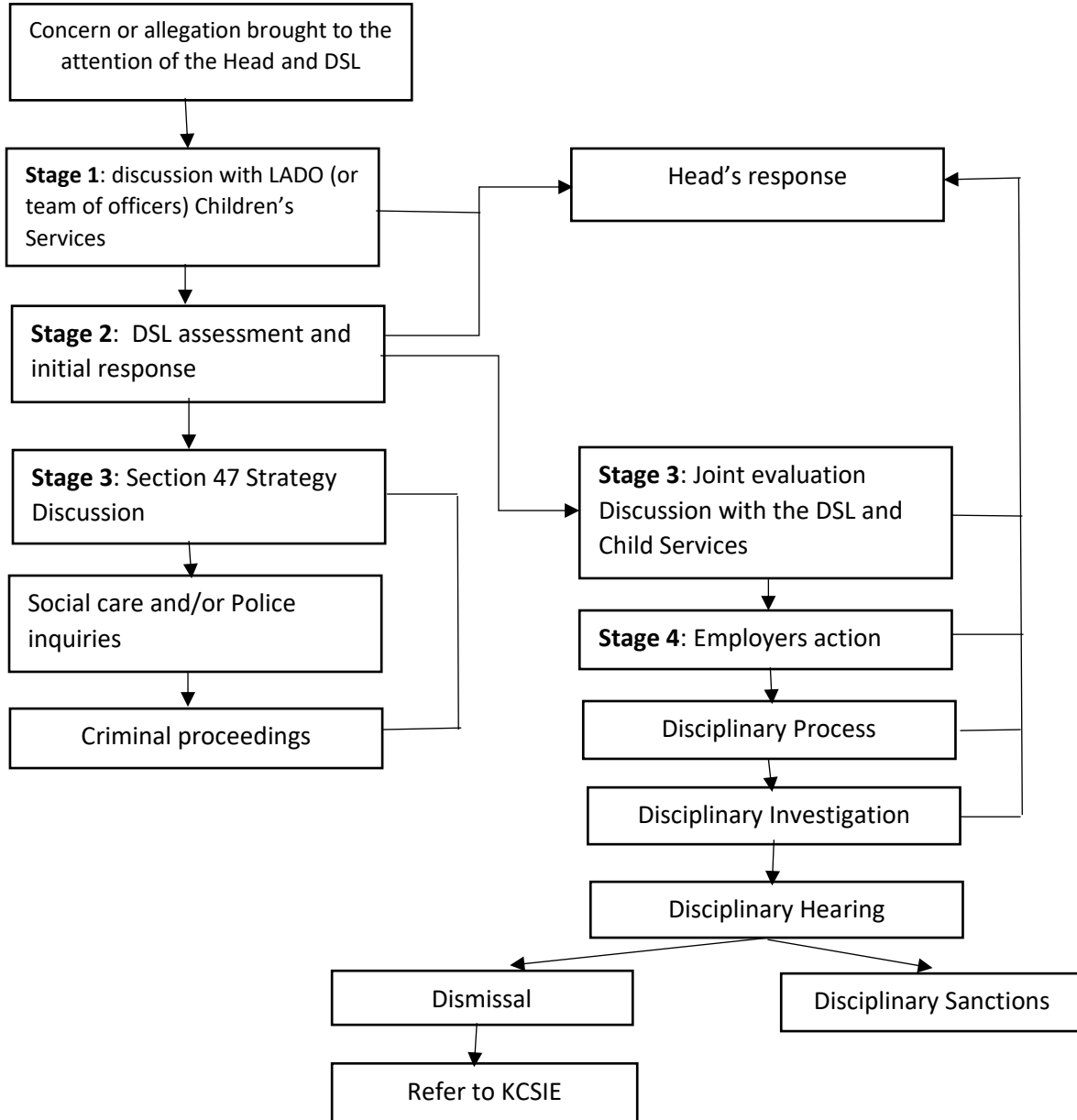


keep the Head informed. Where the DSL is absent or is the subject of the allegation or concern, reports should be made to the Head. Where the Head is the subject of the allegation or concern, the Head must not be informed of the allegation prior to contact with the Chair of Governors and Local Area Designated Officer. If the Head is absent then the reports from the DSL will go to the Chair of Governors. Where a governor is the subject of an allegation, the DSL must be informed who will inform the LADO prior to discussions with the Chair of Governors.

2. The case manager should immediately discuss the allegation with the designated officer and consider the nature, content and context of the allegation and agree a course of action including any involvement of the police. (Where the case manager deems there to be an immediate risk to children or there is evidence of a possible criminal offence, the case manager may involve the police immediately.) All discussions should be recorded in writing, and any communication with both the individual and the parents of the child(ren) agreed. The designated officer should be informed within one working day of all allegations that come to the School's attention and appear to meet the criteria or that are made directly to the police and/or children's social care.
3. The case manager will ensure that the individual who is subject of the allegation is informed as soon as possible and given an explanation of the likely course or action, unless there is an objection by children's social care or the police. The case manager will appoint a named representative to keep the individual informed of the progress of the case and will consider what other support is appropriate for the individual.
4. The case manager should give careful consideration as to whether the circumstances of the case warrant suspension or whether alternative arrangements should be put in place until the allegation is resolved. The case manager will give due weight to the views of the designated officer and *KCSIE* when making a decision about suspension. Where the individual is suspended, the case manager will ensure they know who their point of contact is in the School and shall provide them with their contact details.
5. The case manager will ensure that parents are informed as soon as possible and kept informed about progress of the case, subject to any advice from children's social care or the police.
6. The case manager will discuss with the designated officer whether a referral to the Disclosure and Barring Service or Teaching Regulation Agency should be made where an allegation is substantiated and the person is dismissed or the School ceases to use their services, or the person resigns or otherwise ceases to provide their services. The School has a legal obligation to report promptly to the Disclosure and Barring Service any person (whether employed, contracted, a volunteer or a student) who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. Further, or in the alternative, if an investigation leads to the dismissal or resignation prior to dismissal of a member of teaching staff specifically, the School must consider making a referral to the Teaching Regulation Agency and a prohibition order may be appropriate (because that teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence).

- On conclusion of the case, the case manager should review the circumstances of the case with the designated officer to determine whether there are any improvements to be made to the School's safeguarding procedures or practices to help prevent similar events in the future.

**Procedures for handling allegations made against school staff**



Whilst Sevenoaks Prep are not the employer of supply teachers, they will ensure allegations are dealt with properly. In no circumstances will Sevenoaks Prep decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the local authority designated officer (LADO) to determine a suitable outcome. The governing body will discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation.

Agencies will be fully involved and co-operate in any enquiries from the LADO, police and/or children's social services. The school or college will usually take the lead because agencies do not have direct access to children or other school staff, so they will not be able to collect the facts when an allegation is made, nor do they have all the relevant information required by the LADO as part of the referral process. Supply teachers, whilst not employed by the school or college, are under the supervision, direction and control of the governing body when working in Sevenoaks Prep. They will be advised to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting which is often arranged by the LADO should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the Sevenoaks Prep during the investigation. Sevenoaks Prep will make every reasonable effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered.

Allegations found to be malicious will be removed from the individual's personnel records. In all other circumstances a written record will be made of the decision and retained on the individual's personnel file in accordance with *KCSIE* and a copy will only be provided to the individual concerned.

Allegations proven to be false, unsubstantiated, unfounded or malicious will not be included in employer references. If an allegation is shown to be deliberately invented or malicious, the Head will consider whether any disciplinary action is appropriate against a pupil who made it; or whether the police should be asked to consider if action might be appropriate against the person responsible even if they are not a pupil.

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

## **STAFF CODE OF CONDUCT**

The School's staff code of conduct can be found within the Employee Manual or is available on the school's policy directory. The aim of the staff code of conduct is to provide clear guidance about behaviour and actions so as to not place pupils or staff at risk of harm or of allegation of harm to a pupil.

## **SAFER RECRUITMENT**

The School is committed to safer recruitment processes. Members of the teaching and non-teaching staff at the School including part-time staff, temporary and supply staff, and visiting staff, such as musicians and sports coaches as well as governors are subject to the necessary statutory child protection checks before starting work, for example, right to work checks, additional overseas checks (if necessary), verifying identity, taking up references, checking work history and confirming medical fitness for the role. For most appointments, an enhanced DBS check with 'barred list' information will be appropriate. A DBS certificate will be obtained from the candidate before or as soon as practicable after appointment. Alternatively, if the applicant has subscribed to it and gives permission, the School may undertake an online update check through the DBS Update Service.

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

The School's protocols for ensuring that any visiting speakers, whether invited by staff or pupils themselves, are suitable and appropriate supervised is set out on page 18 and in the School's Supervision Policy.

## **MANAGEMENT OF SAFEGUARDING**

The School's DSL is James Ashcroft who is a member of the senior management team. The school ensures that the DSL has sufficient time, funding, supervision and support to fulfil his child welfare and safeguarding responsibilities effectively.

There is a team of Deputy Designated Safeguarding Leads whose details are available at the start of this policy. In the absence of the DSL, reports should be made to any of the DDSLs. This ensures there is the required cover for the role at all times.

The DSL (and DDSLs) contact details can be found on the Key Contacts page at the start of this policy.

The DSL's role is to take lead responsibility for safeguarding and child protection matters in the School. The DSL's responsibility is to maintain an overview of safeguarding within the School, to open channels of communication with local statutory agencies, support staff in carrying out their safeguarding duties and to monitor the effectiveness of the School's policies and procedures in practice. The DSL works with the governors to review and update the School's safeguarding policy. Safeguarding is a standing item on the Governor's and Executive agenda and all record keeping is regularly monitored by the safeguarding governor. Where a pupil leaves the School, the DSL will also ensure their child protection file is transferred to the new school (separately from the main pupil file) as soon as possible. The DSL will ensure secure transit and obtain confirmation of receipt. This will occur proactively to ensure that key staff, such as the SENCO, are aware of needs and to encourage a smooth transition for the child/ren involved.

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

The DSL or DDSLs will always be available to discuss safeguarding concerns. During term time, the DSL and DDSL's will always be available (during school hours) for members of the school community to discuss any safeguarding concerns. For out of hours/out of term activities, the School's arrangements are:

- 1) DSL will continually review email and phone number on contact sheet to provide cover whenever possible;
- 2) the DDSL's will also be available outside of school hours if required;
- 3) out of term time, there is always someone available at school who will be able to provide necessary contact details for people who can support and advise.

The safeguarding team meet weekly, during term time, to discuss any safeguarding concerns across the school and to ensure that training is up to date and relevant for all staff members. The DSL will chair these meetings, in the absence of the DSL the DDSLs will still meet. The minutes of these meetings are kept in a secure file on the school's safeguarding drive, which only the safeguarding team have access to.

Full details of the DSL's role can be found in Annex B of this document.

Ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility should not be delegated.

## **TRAINING**

Induction and training are in line with advice from KSCMP.

All Staff (including Governors)

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

- the Child Protection Policy including information about the identity and role of the DSL and DDSL's;
- the behaviour policy;
- The Online Safety Policy
- the staff code of conduct, including the School's whistleblowing procedure and the acceptable use of technologies policy, staff/pupil relationships and communications including the use of social media, which can be found within the Employee Manual;
- the safeguarding response to children who go missing from education;
- a copy of Part one of *KCSIE*;

All school leaders and staff who work directly with children will also be required to read Annex A of *KCSIE (and Part five of KCSIE)*.

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

Temporary staff and volunteers are provided with safeguarding induction training and copies of all of the above.

All staff (including Governors) are also required to:

- read Part one of *KCSIE* and confirm that they have done so. (Each time Part one of *KCSIE* is updated by the Department for Education, staff will be updated on the changes via email and staff training);
- understand key information contained in Part one of *KCSIE*. The School will ensure staff understanding by providing necessary updates to staff through training, INSET and staff meetings;
- receive training in safeguarding and child protection regularly, in line with advice from the KSCMP. Training will include online safety and harmful sexual behaviour. It will also include Prevent awareness training to equip staff to raise concerns appropriately by ensuring all staff have the knowledge and confidence to identify children at risk of being drawn into terrorism; are able to challenge extremist ideas; and know how to refer children and young people for further help;
- undertake regular informal updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. The School provides these via, for example, emails, e-bulletins and staff meetings.

DSL

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

In addition to their formal training, the DSL's knowledge and skills are updated at least annually to keep up with any developments relevant to their role.

The DDSLs are trained to the same level as the DSL and their training is updated also every two years in line with the DSL.

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

Safeguarding duties are the responsibility of the governing body and Jan Berry is the nominated safeguarding governor designated to take a lead in relation to responsibility for the safeguarding arrangements in the School. She is the Chair of Governors. The Governors are responsible for:

- ensuring staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children;
- creating an environment where staff feel supported in their safeguarding role and able to raise concerns;
- ensuring 'practitioners' (such as those who work directly with children) have regular reviews of their own practice so that they have knowledge, skills and experience which improve over time.

A review of the School's Safeguarding Policy takes place at least annually, including an update and review of the effectiveness of procedures and their implementation. The lead safeguarding governor will meet with the DSL and the DDSLs to complete an annual audit of the safeguarding practices and safer recruitment practices across the school. The lead governor then produces a report that is shared with governors. The School draws on the expertise of staff, including the DSL, in shaping the School's safeguarding arrangements and policies.

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

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

### **Teaching children how to stay safe**

The governing body ensures that all pupils are taught about safeguarding, including online safety, through the curriculum and PSHE to help children to adjust their behaviours in order to reduce risks and build resilience, including to radicalisation. This includes teaching pupils about the safe use of electronic equipment and the internet and the risks posed by adults or young people, who use the internet and social media to bully, groom, abuse or radicalise other people, especially children, young people and vulnerable adults.

Internet safety is an integral part of the School's CDC curriculum and also embedded in PSHEe as is Relationships Education (for Pre-Prep) and Relationship and sex education (RSE) (for Prep).

The School has appropriate filters and monitoring systems in place to safeguard children from potentially harmful and inappropriate material online. The School's systems are secure, robust and reliable and include the use of appropriate web filtering software. Such systems aim to reduce the risk of children being exposed to illegal, inappropriate and harmful materials online; reduce the risk of children being subjected to harmful online interaction with others; and help manage online behaviour that can increase a child's likelihood of, or causes, harm. Further detail of the School's approach to online safety can be found in the School's Online Safety Policy which also includes detail on the use of mobile technology in school (and accessing 3G and 4G technology on school premises) and the School's IT arrangements to ensure that children are safe from terrorist and extremist material when accessing the internet through the School's systems.

### **Looked after children**

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

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

### **Arrangements for visiting speakers**

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

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

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

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

## **EARLY YEARS PROVISION SAFEGUARDING ARRANGEMENTS**

### **Use of mobile phones and cameras**

The School's policy on the use of mobile phones and cameras in the setting can be found in the School's Acceptable Use Policy. Staff are not permitted to use their personal mobile devices or cameras in school. Staff who wish to use or take photographs or videos of pupils (whether on a

personal or school device) must first speak with the Head or The Head of the Pre-Prep to obtain their approval before taking any image of a pupil. Staff who wish to use their personal mobile devices or cameras in school for any other reason must first speak with the Head. Staff who act in breach of this may be subject to disciplinary action. Parents are not permitted to use their mobile phones or camera in or around the EYFS setting without prior approval from the Head or Head of Pre Prep.

#### **DSL for the EYFS**

The practitioner designated to take lead responsibility for safeguarding children in the Early Years is James Ashcroft and Louisa Rowland is the DDSL for Early Years.

#### **Disqualification under the childcare act 2006**

The school does not knowingly employ people to work in childcare or allow them to be directed concerned in its management, if they themselves are directly 'disqualified' from childcare.



## APPENDIX 1 –SIGNS AND TYPES OF ABUSE

All school staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

**Abuse:** 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 by other children or adults, in a family or in an institutional or community setting by those known to them or, more rarely, by others.

**Physical abuse:** a form of abuse that may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child.

**Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

**Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Females can also be abusers as can other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as peer on peer abuse) in education and all staff should be aware of it and their school or colleges policy and procedures for dealing with it.

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

All staff should be aware that child sexual and child criminal exploitation are forms of child abuse.

**Specific safeguarding issues:** behaviours linked to drug taking, alcohol abuse, truancy and sexting put children in danger. Safeguarding issues can also manifest themselves via peer-on-peer abuse, such as bullying (including cyberbullying), gender-based violence/sexual assaults and sexting. Safeguarding issues can also be linked to, for example, children missing education; child sexual exploitation; domestic violence; fabricated or induced illness; faith abuse; female genital mutilation; forced marriage; gangs and youth violence; gender-based violence / violence against women and girls; hate; mental health; preventing radicalisation; relationship abuse; sexting; and trafficking.

## **Child Criminal Exploitation (CCE)**

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity

(a) in exchange for something the victim needs or wants, and/or

(b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence.

The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines, see page 85 for more information), forced to shoplift or pickpocket, or to threaten other young people.

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who suffer from changes in emotional well-being;
- children who misuse drugs and alcohol; • children who go missing for periods of time or regularly come home late; and
- children who regularly miss school or education or do not take part in education.

## **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

(a) in exchange for something the victim needs or wants, and/or

(b) for the financial advantage or increased status of the perpetrator or facilitator.

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

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

- children who have older boyfriends or girlfriends; and
- children who suffer from sexually transmitted infections or become pregnant.

The department provide: Child sexual exploitation: guide for practitioners

## **County lines**

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of “deal line”.

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children’s homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

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

## **Domestic abuse**

The cross-government definition of domestic violence and abuse is: any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to: psychological; physical; sexual; financial; and emotional.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and 103 National Crime Agency - Modern slavery and human-trafficking psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

## **Operation Encompass**

Operation Encompass operates in the majority of police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child’s circumstances and

can enable support to be given to the child according to their needs. Police forces not signed up to operation encompass will have their own arrangements in place.

### **National Domestic Abuse Helpline**

Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked.

Additional advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

- NSPCC- UK domestic-abuse Signs Symptoms Effects
- Refuge what is domestic violence/effects of domestic violence on children
- Safelives: young people and domestic abuse.

### **Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes in to the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the new duties: Homeless Reduction Act Factsheets. The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

In most cases school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's services will be the lead agency for these young people and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. The department and the Ministry of Housing, Communities and Local Government have published joint statutory guidance on the provision of accommodation for 16 and 17 year olds who may be homeless and/or require accommodation: here

## **So-called ‘honour-based’ abuse (including Female Genital Mutilation and Forced Marriage)**

So-called ‘honour-based’ abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving “honour” often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. 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.

### **Actions**

If staff have a concern regarding a child that might be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding lead (or deputy). As appropriate, they will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children’s social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers that requires a different approach (see following section).

### **FGM**

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. FGM mandatory reporting duty for teachers Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases may face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils or students, 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. Information on when and how to make a report can be found at: **Mandatory reporting of female genital mutilation procedural information**

Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has good reason not to, they should still consider and discuss any such case with the school’s designated safeguarding lead (or deputy) and involve children’s social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures.

### **Forced marriage**

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or

emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

The Forced Marriage Unit has published **statutory guidance** and **Multi-agency guidelines**, pages 35-36 of which focus on the role of schools and colleges. School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email [fm@fco.gov.uk](mailto:fm@fco.gov.uk).

### **Preventing radicalisation**

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools' or colleges' safeguarding approach.

- Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a Prevent referral.

The school's designated safeguarding lead (and any deputies) is aware of local procedures for making a Prevent referral.

### **The Prevent duty**

All schools and colleges are subject to a duty under section 26 of the Counter Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty.

The Prevent duty should be seen as part of schools' and colleges' wider safeguarding obligations. Designated safeguarding leads and other senior leaders should familiarise themselves with the revised **Prevent duty guidance: for England and Wales** which are specifically concerned with schools (and

also covers childcare). The guidance is set out in terms of four general themes: risk assessment, working in partnership, staff training, and IT policies.

There is additional guidance: **Prevent duty guidance: for further education institutions in England and Wales** that applies to colleges.

### **Channel**

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages.

Guidance on Channel is available at: **Channel guidance**.

### **Additional support**

The department has published further advice for schools on the Prevent duty. The advice is intended to complement the Prevent guidance and signposts to other sources of advice and support.

The Home Office has developed three e-learning modules:

- **Prevent awareness e-learning** offers an introduction to the Prevent duty.
- **Prevent referrals e-learning** supports staff to make Prevent referrals that are robust, informed and with good intention.
- **Channel awareness e-learning** is aimed at staff who may be asked to contribute to or sit on a multi-agency Channel panel.

**Educate Against Hate**, is a government website designed to support school teachers and leaders to help them safeguard their students from radicalisation and extremism. The platform provides free information and resources to help school staff identify and address the risks, as well as build resilience to radicalisation.

For advice specific to further education, the Education and Training Foundation (ETF) hosts the **Prevent for FE and Training**. This hosts a range of free, sector specific resources to support further education settings comply with the Prevent duty. This includes the Prevent Awareness e-learning, which offers an introduction to the duty, and the Prevent Referral e-learning, which is designed to support staff to make robust, informed and proportionate referrals.

The ETF Online Learning environment provides online training modules for practitioners, leaders and managers, support staff and governors/Board members outlining their roles and responsibilities under the duty.

### **Sexual violence and sexual harassment between children in schools and colleges**

#### **Context**

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.

Staff should be aware of the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and
- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

### **What is sexual violence and sexual harassment?**

#### **Sexual violence**

It is important that school and college staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual violence offences under the Sexual Offences Act 2003 as described below:

**Rape:** A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

**Assault by Penetration:** A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

**Sexual Assault:** A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

When there has been a report of sexual violence, the designated safeguarding lead (or a deputy) should make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis.

The risk and needs assessment should consider:

- the victim, especially their protection and support;
- whether there may have been other victims,
- the alleged perpetrator(s); and
- all the other children, (and, if appropriate, adult students and staff) at the school or college, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms.



## **What is consent?**

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

## **Sexual harassment**

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual "jokes" or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
  - online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
    - non-consensual sharing of sexual images and videos;
    - sexualised online bullying;
    - unwanted sexual comments and messages, including, on social media;
    - sexual exploitation; coercion and threats; and
    - upskirting.

## **Upskirting**

The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019. 'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and/or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim.

**Lesbian, gay, bi or trans (LGBT):** Children who are LGBT can be targeted by their peers. In some cases, a pupil who is perceived by their peers to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

**Children who go missing from school:** A child going missing from school is a potential indicator of abuse or neglect. Staff must follow the School's procedures for dealing with children who go missing, particularly on repeat occasions. The School's procedure for dealing with children who go missing can be found in the School's Missing Children Policy. All unexplained absences will be followed up in accordance with the Missing Children Policy.

The School shall inform the local authority of any pupil who is going to be added to or deleted from the School's admission register at non-standard transition points in accordance with the requirements

of the Education (Pupil Registration) (England) Regulations 2006 (as amended). This will assist the local authority to:

- a) fulfil its duty to identify children of compulsory school age who are missing from education; and
- b) follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect or radicalisation.

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

Action should be taken in accordance with this policy if any absence of a pupil from the School gives rise to a concern about their welfare

## **Appendix 2**

### Role of the designated safeguarding lead

The broad areas of responsibility for the DSL are:

#### Managing referrals

The designated safeguarding lead is expected to:

- refer cases of suspected abuse to the local authority children's social care as required;
- support staff who make referrals to local authority children's social care;
- refer cases to the Channel programme where there is a radicalisation concern as required;
- support staff who make referrals to the Channel programme;
- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- refer cases where a crime may have been committed to the police as required.

#### Working with others

The designated safeguarding lead is expected to:

- Act as a point of contact with the three safeguarding parties
- liaise with the head to inform him of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- as required, liaise with the "case manager" and the designated officer(s) at the local authority for child protection concerns in cases which concern a staff member;
- liaise with staff (especially pastoral support staff, school nurse, IT Technicians, and SENCOs) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies; and
- act as a source of support, advice and expertise for all staff.

#### Training

The DSL receives appropriate training carried out every two years. In addition to this the DSL's knowledge and skills are updated at least annually; however, weekly bulletins and updates ensure that the DSL is kept up to date with all relevant developments in order to:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children’s social care referral arrangements.
  - have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
  - ensure each member of staff has access to, and understands, the school child protection policy and procedures, especially new and part time staff;
  - are alert to the specific needs of children in need, those with special educational needs and young carers;
  - understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation;
  - understand the importance of information sharing, both within the school and with the three safeguarding partners, other agencies, organisations and practitioners;
  - are able to keep detailed, accurate, secure written records of concerns and referrals;
  - understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
  - are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school;
  - can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online;
  - obtain access to resources and attend any relevant or refresher training courses; and
  - encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.
- DDSLs and the safeguarding governor will also receive update training at least every two years. Governors receive annual safeguarding update training from the DSL.

### Raising Awareness

The designated safeguarding lead should:

- ensure the school Child Protection policies are known, understood and used appropriately;
- ensure the school Child Protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the governing body regarding this;
- ensure the Child Protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this; and
- link with the KSCMP to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school and college leadership staff. Their role could include ensuring that the school or college, and their staff, know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that

children in this group might face and the additional academic support and adjustments that they could make to best support these children.

### Child protection file

Where children leave the school or college ensure their child protection file is transferred to the new school or college as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools should ensure key staff such as designated safeguarding leads and SENCOs, are aware as required.

In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any information with the new school in advance of a child leaving. For example, information that would allow the new school to continue supporting victims of abuse and have that support in place for when the child arrives.

### Availability

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

It is a matter for individual schools and the designated safeguarding lead to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.

### Deputy Designated Safeguarding Leads

The DDSLs are appropriately trained and, in the absence of the DSL, carries out those functions necessary to ensure the ongoing safety and protection of pupils. In the event of the long-term absence of the DSL, the Deputies will carry out all of the functions above.