

SAFEGUARDING POLICY

Policy Owner: Director of Wellbeing

This is a whole School policy and applies to all members of Cophorne Preparatory School including EYFS and those children who board at the school. This policy is a Legal Requirement and an ISI Reporting Standard (ISSR 7).

References:

- ISI Handbook for the Inspection of Schools, Commentary on the Regulatory Requirements September 2017 www.isi.net
- 'The Early Years Foundation Stage: Statutory Framework September 2017'
- 'Keeping children safe in education' DfE guidance September 2019
- 'Working Together to Safeguard Children', DfE guidance Feb 2019
- 'Working Together to Safeguard Children' information sharing DfE guidance 2015
- The definition and signs of child abuse (<http://www.nspcc.org.uk/signsofabuse>)
- The National Minimum Standards for Boarding Schools (NMS) 2015
- Statutory guidance issued under section 29 of the Counter-Terrorism and Security Act 2015
- Prevent Duty Guidance: for England and Wales (2015)
- Sexual violence and sexual harassment between children in schools and colleges May 2018
- What to do if you are worried a child is being abused 2015
- Searching, screening and confiscation Jan 2018
- Disqualification under the childcare act June 2016
- Use of social media for on-line radicalisation July 2015
- Children Act 1989
- Voyeurism (Offences) Act 2019

Policies available from Government websites and on myconcern.

This policy has been written in accordance with locally agreed inter-agency procedures and is made available to all parents. A copy is posted on the school web site.

Advice is also available from the Surrey Local Children's Safeguarding Board. Please see www.surreycc.gov.uk for a list of members and Terms of Reference. As well as www.westsussexscb.org.uk

Review

The policy was reviewed and signed off by Charlie Lee (Designated Safeguarding Leads responsible for Child Protection) Chris Jones (Head & Deputy DSL), Susie Swadling (DSL for EYFS) Kathryn Bell (Head of Governors) Dr Haworth (Governor responsible for Child Protection) in Summer 2019.

The policy will be presented to all Staff in August 2019 and is reviewed annually.

REVIEW: SUMMER 2017

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Presented to Governors – SUMMER 2019

NEXT REVIEW: SUMMER 2020

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Introduction

The need to have effective child protection policies and procedures in place must be top of the priority list for any school or organisation catering for children and young people. Recent years have seen considerable changes to the regulatory framework. New strategies targeted at providing support to vulnerable children and young people, together with initiatives aimed at improving practice in social care have followed each other as the Government has responded to intense public and media concerns. The Independent School Standards Regulations (ISSR) are rigorous and prescriptive covering appointments and pre-appointment checks on staff, supply staff, Governors, proprietors and volunteer helpers (see references) and the prevent duty requires schools to protect children who may be vulnerable to radicalisation. Boarding schools are required to promote and protect pupils' welfare. Adult relatives who live in boarding houses are also required to be checked if they could have unsupervised contact with children. Checks on adults living in boarding accommodation who are not employed by the School apply to all those over the age of 16. Further, the mandatory requirement for teachers to report to the police where they have discovered signs that Female Genital Mutilation has taken place on a girl under the age of 18 came into force from October 2015.

Contents of Policy

Policies need to be developed from the core themes of:

- Safeguarding and Child protection
- Promoting welfare and the best interests of a child

All of them should be reviewed at least annually by Governors [at a meeting in which detailed formal minutes are recorded and held on file]. The ISI handbook September 2017 states

"A review of the School's child protection policies must take place at least annually, including an update and review of the effectiveness of procedures and their implementation. KCSIE 2019 indicates that the DSL should work with the proprietors on this. Proprietors should also ensure that the School contributes to interagency working in line with WT through effective communication and good cooperation with local agencies.

KCSIE indicates that the proprietor should draw on the expertise of staff, including the DSL, in shaping the safeguarding arrangements and policies"

Related Safeguarding Policies

- Anti-Bullying Policy
- Induction of New Staff, Governors and Volunteers in Child Protection Policy
- Staff Standards and Behaviour Policy (Code of Conduct)
- Guidance on Missing Child Policy and Procedures when a Child is not collected on time.
- Recruitment, Selection and Disclosures Policy and Procedure
- Recruitment Pack

- E-Safety Policy
- Whistleblowing Policy
- Educational Visits Policy
- Health and Safety Policy
- Data Retention Policy

Child Protection Policy

1.Statement of Intent

At Copthorne we are committed to safeguarding children and young people and we expect everyone who works in our school to share this commitment. Adults in our school take all welfare concerns seriously and encourage children and young people to talk to us about anything that is worrying them. We will always act in the best interest of the child.

The safety and welfare of all our pupils at Copthorne Prep School is our highest priority. Our business is to know everyone as an individual and to provide a secure and caring environment so that every pupil can learn in safety. In all matters relating to child protection the School will follow the locally agreed inter-agency procedures laid down by our own (or where appropriate the relevant child's) Local Safeguarding Children Board (LSCB) which is either Surrey or West Sussex, **0300 123 1620 (Surrey) or 0330 222 3339 (West Sussex)** together with DfE guidance contained in Working Together to Safeguard Children (2018), Prevent Duty (July 2015) and Keeping Children Safe in Education (September 2019)

) <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>. This policy is applicable to the whole School community, including those pupils in the Early Years Foundation Stage (EYFS).

All members of staff have a duty to safeguard our pupils' welfare and must therefore familiarise themselves and comply at all times with this policy; safeguarding and promoting the welfare of children is everyone's responsibility. This includes a duty both to children in need and to children at risk of harm. All staff should read at least Part 1 of KCSIE 2019 and Annex A. All School staff should be aware that child protection incidents can happen at any time and anywhere and are required to be alert to any possible concerns. The Governors ensure that the following mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in Part 1 of KCSIE 2019

2.What is child abuse?

The departmental advice: What to do if you are worried a child is being abused - Advice for Practitioners (<https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2>) should be referred to by all staff in raising their awareness of and helping them to identify the signs of child abuse. The NSPCC website (<https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/>) also provides helpful information on types of abuse and what to look out for which staff are encouraged to refer to.

Annex A of KCSIE 2019 should also be referred to by all senior members of staff and those staff working directly with children – this includes admin, catering, grounds, domestic staff, volunteers and

Governors, as well as page 14 of KCSIE 2019- this list can also be found in Appendix 1 of this document.

3. Child Wishes

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. The School manages this by providing pupils an opportunity to talk with a trusted adult as well as the DSL and explaining clearly the procedures that will take place as well as ensuring the child of their safety at all times. The School will operate processes with the best interests of the pupil at their heart.

4. Transparency

Cophorne Prep School prides itself on its respect and mutual tolerance. Parents/guardians have an important role in supporting the School. Copies of this policy, together with our other policies relating to issues of child protection are on our website and we hope that parents and guardians will always feel able to take up any issues or worries that they may have with the School. Allegations of child abuse or concerns about the welfare of any child will be dealt with consistently in accordance with this policy. Open communications are essential.

5. Designated Safeguarding Lead (DSL)

Mrs Charlie Lee, Director of Wellbeing & Head of Maths is our Designated Safeguarding Lead (DSL). In her absence, Mr Chris Jones Head or Mrs Susie Swadling EFYS are her Deputies. Their contact details are set out below. All DSL staff have been fully trained for the demands of this role in child protection and inter-agency working in accordance with the locally agreed procedures and as set out in Annex B of Keeping Children Safe in Education. The Senior DSL is a member of the senior leadership team at our School.

Mrs Charlie Lee – clee@copthorneprep.co.uk (07970 937403)

Mr Chris Jones – cjones@copthorneprep.co.uk (07900 947823)

Mrs Susie Swadling – sswadling@copthorneprep.co.uk (07803 306607)

The deputies will be trained to the same standard as the DSL and all undergo training at least every two years in order to provide them with the knowledge and skills to carry out their role. Both the DSL and her deputies will also attend refresher updated at regular intervals, as required, but at least annually to ensure that they remain conversant with best practice and to keep up with developments relevant to their role. They have a job description for their safeguarding roles and key activities. The DSL role is to ensure that each member of staff has access to and is aware of and understands the School's safeguarding policy and procedures. Their training meets the requirements of the DfE's 'Keeping Children Safe in Education' (KCSIE 2019). The DSL has ultimate responsibility for safeguarding and child protection in the School. This responsibility should not be delegated.

The DSL and/or the Deputy DSL can be contacted at any time for staff in School to raise or discuss any safeguarding concerns. Boarding staff have an emergency contact telephone number for the DSL and her deputies.

Mrs Susie Swadling is the DSL for EYFS.

During Hi5 club, which runs outside of term time the DSL is Sophia Pavlo hi5@copthorneprep.co.uk

The DSL maintains close links with the LSCB for both Surrey and West Sussex and reports at least once a year to the Governors' on the child protection issues outlined above. The DSL will make prompt contact with children's social care where there are concerns that a child may be in need of help or is at risk of harm. The DSL will also make prompt contact with the Local Authority Designated Officer ("LADO") in relation to allegations against someone working at the School and/or the police if a criminal offence is suspected.

The DSL will liaise with the local authority when necessary and work with other agencies in line with Working Together to Safeguard Children 2018 and attendance at strategy meetings. The DSL will work with partner agencies to seek advice, support and guidance, drawing on multi agency expertise, knowledge and experience to support pupils at risk of harm including emotional and intellectual harm via social media and use of the internet.

The DSL receives focused training to support learning and understanding of the ever changing landscape of safeguarding which is underpinned by legislation and guidance and includes issues such as radicalisation and on-line safety. The DSL will undertake Prevent awareness training to enable them to provide advice and support to staff on protecting children from the risk of radicalisation. The DSL's and the School's focus is to support children in need through seeking early help and/or inter agency working, including using the Team around the Child Approach and/or the Common Assessment Framework.

If the DSL and the Deputies are not available, staff should speak to a member of the SLT and/or take advice from the local children's social care.

The School's records on child protection are kept securely in the DSL's office, and are separated from routine pupil records. Access is restricted to the DSL, Deputy DSL and the Head.

All data on the safeguarding file potentially forms part of an important story that may be needed retrospectively for many years. The elements of a pupil's file (name, address) that are needed to identify children with certainty are needed to be retained along with those records until at least 25 years. Please refer to our Data Retention Policy for more information.

6. The Role of the Governors

Dr Richard Howarth is the liaison Governor for safeguarding issues in the Prep and Pre-Prep sections of the school and Heather Beeby for the EYFS. The role of the designated Governors is to liaise with the local authority on issues of child protection or in case of allegations against the Head or a member of the Governing Body. The Governors, in conjunction with the Designated Safeguarding Lead (DSL), carry out an annual review of the School's safeguarding policy and procedures with day-to-day issues being delegated to its education committee, which both the Head and the designated safeguarding lead attend. The Governing Body is responsible for:

- reviewing the procedures for and the efficiency with which the safeguarding duties have been discharged on an annual basis;
- ensuring that any deficiencies or weaknesses in safeguarding arrangements are remedied without delay; and
- approving amendments to safeguarding arrangements in the light of changing Regulations or recommended best practice.

In particular the Governing Body must monitor:

- Child protection policy and procedures
- Safe recruitment procedures
- Appointment of a DSL who is a senior member of school leadership team
- Relevant safeguarding children training for school staff/volunteers is attended
- Safe management of allegations
- Deficiencies or weaknesses in safeguarding arrangements are remedied without delay
- A member of the Governing Body (usually the Chair) is nominated to be responsible in the event of an allegation of abuse being made against the Head Teacher- Mrs Kathryn Bell
- mackinnon.bell@btinternet.com Safeguarding policies and procedures are reviewed annually and information provided to the local authority about them and about how the above duties have been discharged
- Governors will also receive any relevant Child Protection updates
- Governors will monitor the log of bullying incidents

We recognise that the School plays a significant part in the prevention of harm to our pupils by providing good lines of communication with trusted adults, supported friends and an ethos of protection. We include within this the emotional wellbeing of our pupils and recognise the role school plays in recognising and protecting our children who may be vulnerable to radicalisation or exposed to extremist views.

7.Safer Employment Practices

Copthorne Prep School follows the Government's recommendations for the safer recruitment and employment of staff who work with children and acts at all times in compliance with the Independent School Standards Regulations. Please also see the School's recruitment, selection and disclosures policy and procedure, recruitment pack, policy on induction of new staff, Governors and volunteers in child protection and model staff behaviour policy.

In line with the DfE's guidance 'Keeping Children Safe in Education' (KCSIE 2019), the Governing Body prevents people who pose a risk of harm from working with pupils by adhering to statutory responsibilities to check all staff who work with children, taking proportionate decisions on whether to ask for any checks beyond the minimum required, and ensuring volunteers are appropriately supervised. Organisations providing contractors or consultants working on site are asked for assurances that where relevant and required, their staff have been suitably vetted in line with legal requirements.

The School works with external agencies where appropriate including inter-agency working on the part of the DSL and attendance at strategy meetings.

As part of carrying out safe recruitment procedures under KCSIE 2019, members of the teaching and non-teaching staff at the School including part-time staff, temporary and supply staff, and visiting staff, such as musicians and sports coaches are subject to the necessary statutory child protection checks before starting work. For 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.

Further to the DBS check, anyone appointed to carry out teaching work will require an additional check to ensure they are not prohibited from teaching by order of the Secretary of State. Further checks will also include a check for information about any teacher sanction or restrictions that an EEA professional regulating authority has imposed. Those undertaking management posts will be subject to prohibition from management of independent schools checks.

For those working in the EYFS setting we will inform OFSTED of allegations against people living or working at the premises, or any other abuse alleged to have taken place on the premises as soon as practical and within 14 days at the latest.

All Governors, volunteers and contractors working regularly during term-time (such as contract catering staff) are also subject to the statutory DBS checks. Confirmation is obtained that appropriate child protection checks and procedures apply to any staff employed by another organisation and working with the School's pupils at School or on another site.

Should the School develop concerns about an existing staff member's suitability to work with children, it will carry out all relevant checks as if the individual were a new member of staff.

This policy is reviewed by Governors annually. Please also refer to the School's Recruitment Policy for further details.

8. Induction and Training

Every new member of staff, including part-time, temporary, visiting, volunteers and contract staff working in the School, receives appropriate induction training on their responsibilities in being alert to the signs of abuse, bullying or children at risk of radicalisation and on the procedures for recording and referring any concerns to the DSL or the Head and, if required, to the main points of local procedures of Surrey and West Sussex to which referrals are made.

Child Protection training is also given to new Governors and volunteers. The particular training arrangements for the prevention of radicalisation are as follows; either via INSET training – last held January 2018 or via 'educare' an online provider of 'prevent' training and child protection.

Training in child protection and safeguarding is an important part of the induction process. Induction training includes:

- Safeguarding policy
- KCSIE 2019 and Annex A
- Staff code of conduct
- Behaviour Policy
- Anti-bullying policy
- Children Missing in Education
- Identification and role of DSL and Deputy DSL's
- Online safety (E-safety)

Training also promotes staff awareness of child sexual exploitation, Prevent (including referrals to Channel programmes), so called 'honour based' violence, and forced marriage and female genital mutilation. Training on the early help process and process for making a referral to children's social care and for statutory assessment that may follow a referral (including what role they may be expected to play in such an assessment) will also be provided together with the importance of maintaining an appropriate level of confidentiality whilst at the same time liaising with relevant professionals.

Staff are made aware of the signs, symptoms and indicators of such practices and are required to take action *without delay* if such a practice is suspected.

All new staff must read and sign to confirm that they have read Part 1 of KCSIE 2019 and Annex A, as well as the relevant school policies listed in our Induction of New Staff in Child Protection Policy. Temporary staff and volunteers will also undergo appropriate induction in Child Protection from the school DSL.

The Head and all staff receive appropriate safeguarding and child protection training which is regularly updated in line with advice from the School's LSCB of both Surrey and West Sussex. In addition, the Head and all staff receive safeguarding and child protection updated as required, but at least annually to provide them with relevant skills and knowledge to safeguard children effectively.

The DSL and Deputy DSL's undergo training at least every two years in order to provide them with the knowledge and skills to carry out their role. Both the DSL and her deputies will also receive regular updates as required, but at least annually to ensure that they remain conversant with best practice and to keep up with developments relevant to their role.

9. Staff Obligations

All staff in our School are required to notify the School immediately if there are any reasons why they should not be working with children. This includes any staff who are disqualified from childcare or registration including 'by association' i.e. they live in the same household (or someone is employed in their household) as someone who has unspent cautions or convictions for a relevant offence (please see a list of the relevant offences set out here: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/384712/DBS_referrals_guide_-_relevant_offences_v2.4.pdf).

The 'by association' requirement also applies if you live in the same household as or someone is employed in your household who has been disqualified from working with children under the Childcare Act 2006.

The Childcare (Disqualification) Regulations 2009 apply to those providing early years childcare or later years childcare, including before school and after school clubs, to children who have not attained the age of 8 AND to those who are directly concerned in the management of that childcare.

The School takes its responsibility to safeguard children very seriously and any staff member who is aware of anything that may affect his/her suitability to work with children must notify the School immediately. This will include notification of any convictions, cautions, court orders, reprimands or warnings he/she may receive. He/she must also notify the School immediately if he/she is living in a household where anyone lives or works who has been disqualified from working with children or from registration for the provision of childcare.

Staff who are disqualified from childcare or registration, including 'by association', may apply to Ofsted for a waiver of disqualification. Such staff may not be employed in the areas from which they are disqualified, or involved in the management of those settings, unless and until such waiver is confirmed. Please speak to the Bursar for more details.

All members of staff should be alert to the possibility of signs of abuse.

If any member of staff is concerned about a child he or she must inform the Designated Safeguarding Lead.

The member of staff must record information regarding the concerns on the same day. The recording must be a clear, precise, factual account of the observations. (Pro-forma in Appendix 2, and guidance in Appendix 3) See Appendix 6 and Appendix 7 for further information on what happens when a concern is raised and what to do. This should then be recorded on 'my concern' and all other details held on the child be deleted from staff email boxes in line with GDPR.

The Designated Safeguarding Lead and Head will decide whether the concerns should be referred to Children's Services: Safeguarding and Specialist Services. If it is decided to make a referral to Children's Services: Safeguarding and Specialist Services this will be discussed with the parents, **unless to do so would place the child at further risk of harm.**

Particular attention will be paid to the attendance and development of any child about whom the school has concerns, or who has been identified as being the subject of a child protection plan and a written record will be kept.

If a pupil who is/ or has been the subject of a child protection plan changes school, the Designated Safeguarding Lead will inform the social worker responsible for the case and transfer the appropriate records to the Designated Safeguarding Lead at the receiving school, in a secure manner, and separate from the child's academic file.

The Designated Safeguarding Lead is responsible for making the senior leadership team aware of trends in behaviour that may affect pupil welfare. If necessary, training will be arranged.

Staff should ensure that their behaviour and actions do not place pupils or themselves at risk of harm or of allegations of harm. Refer to the following policies

- E-safety Policy
- Mobile phone policy
- Staff Handbook
- Staff Code of Conduct
- Data Retention Policy

All staff and volunteers should be aware that the main categories of abuse are

- Physical abuse
- Emotional abuse
- Sexual abuse
- Neglect

See Appendix 1 for more details.

All staff and volunteers should be concerned about a child if he/she presents with indicators of possible significant harm. Anyone who cares for a child may be responsible for abuse. Parents, step-parents, baby-sitters, brothers and sisters, other relatives and people in positions of responsibility have

all been known to be abusers as have peers and other children, either within school or outside. Usually the abuser is well known to the child, and it is possible for abuse to be carried out by one pupil to another. If this is the case the same procedures apply.

Abuse happens in families that are well-off as well as in poor homes. Even the most apparently respectable person or sibling can be an abuser.

It is vital that even vague worries are passed on at the earliest stage to the Designated Member of Staff, who is in a position to involve other agencies, collate information and make decisions about further referral. By receiving information promptly and accurately it allows the right help to be given at the right time and may help prevent issues from escalating.

In some cases abusers may try and contact the child via the school by letter because they have exhausted all other channels. It is the School's policy to read all correspondence to any child prior to giving it to them.

A bullying incident should be treated as a child protection concern when there is 'reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm'. Refer to 'Anti-bullying policy'

If, at any point, there is a risk of immediate serious harm to a child a referral should be made to Children's Social Care immediately. Anybody can make a referral. If the child's situation does not appear to be improving the staff member with concerns should press for re-consideration. Concerns should always lead to help for the child at some point.

See Appendix 4 for flow chart on what happens when a concern is raised.

10. Preventing Radicalisation

We recognise that it is a key role of the School to support children and that School may provide stability in the lives of children who may be at risk of harm. We also recognise that our pupils can be vulnerable and exploited by others. Staff will be alert to the signs of vulnerability and/or susceptibilities to any extremist indoctrination.

Staff acknowledge the need for a culture of vigilance to be present in the School to support safeguarding. This includes awareness and sensitivity to attitudinal changes of pupils which may indicate they are at risk of radicalisation and may need help or protection. However, staff acknowledge that there is no single way of identifying an individual who is likely to be susceptible to an extremist ideology and family, friends and online influences can all play a major factor in the radicalisation of young people.

Staff will consider the level of risk to identify the most appropriate referral, which could include reference to Channel or Children's Social Care. Contact details for support and advice on the Prevent Duty can be found below.

The Home Office statutory Prevent duty guidance can be accessed on:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/445977/3799_Revised_Prevent_Duty_Guidance_England_Wales_V2-Interactive.pdf

The Department for Education non-statutory Prevent duty guidance can be accessed on:

<https://www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty>

The Channel General Awareness course can be accessed on the link below:

http://course.ncalt.com/Channel_General_Awareness/01/index.html

The School, in recognition that pupils may be at risk of being drawn into terrorism, 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 Deputy DSL and Governor responsible for safeguarding where appropriate, 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.

The School's particular training requirements are that all staff complete online training via educare prior to commencing employment or are trained by the DSL. The technical details of the filters used by the School are as follows 'Smoothwall'.

11. Visiting Speakers

The Prevent statutory guidance requires schools to have clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable. The School's responsibility to our pupils is to ensure that they can critically assess the information that 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 document 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.

12. Children Missing From Education

The School's policy and procedures is detailed in the missing pupil policy and is available online. Staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, FGM and forced marriage.

We fulfil our legal requirement to have an admissions and attendance register for all our pupils

We are aware of our duty under Regulation 4 of the Education (Pupil Registration) (England) Regulations 2006 to inform the local authority of any pupil who is going to be deleted from the admission register where they:

- have been taken out of school by their parents and are being educated outside the school system e.g. home education;
- have ceased to attend school and no longer live within reasonable distance of the school at which they are registered;
- have been certified by the school medical officer as unlikely to be in a fit state of health to attend school before ceasing to be of compulsory school age, and neither he/she nor his/her parent has indicated the intention to continue to attend the school after ceasing to be of compulsory school age;
- are in custody for a period of more than four months due to a final court order and the proprietor does not reasonably believe they will be returning to the school at the end of that period; or, have been permanently excluded.

The School will monitor all pupil absences from school and promptly address concerns about irregular attendance with the parent/carer. 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 will be reported to the local authority. For further details on when the School has a duty to report to the local authority, please see the Missing Child Policy and Procedures when a Child is not collected on Time.

The school will also hold 2 emergency contact numbers for every pupil on role.

13. Looked After Children

The most common reason for children becoming looked after is as a result of abuse and/or neglect. Governing bodies and proprietors should ensure that staff have the skills, knowledge and understanding necessary to keeping looked after children safe. In particular, they should ensure that appropriate staff have the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility. They should also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. The designated safeguarding lead, through the designated teacher for looked after children, should have details of the child's social worker and the name of the virtual school head in the authority that looks after the child.

14. Children with SEN and disabilities

Children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Our Governing body and staff are aware that additional barriers can exist when recognising abuse and neglect in this group of children. These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- The potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- Communication barriers and difficulties in overcoming these barriers.

At Copthorne Prep School we identify pupils who might need more support to be kept safe or to keep themselves safe by weekly Pastoral/SEN meetings, along with liaisons between teachers and year groups.

15. Private Fostering (Children staying with host families)

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.

Schools quite often make arrangements for their children to have learning experiences where, for short periods, the children may be provided with care and accommodation by a host family to which they are not related. This might happen, for example, but not only, as part of a foreign exchange visit or sports tour. Such arrangements could amount to “private fostering” under the Children Act 1989 or the Safeguarding Vulnerable Groups Act 2006, or both.

DBS check request by a regulated activity provider

Where a private fostering arrangement is made by Cophorne Prep School, then they adhere to the guidelines for being a regulated activity provider for the purposes of the Safeguarding Vulnerable Groups Act 2006. A regulated activity provider will be committing an offence if they allow a person to carry out a regulated activity whilst barred and they know or have reason to believe that the person was barred. Where the school is the regulated activity provider, it will request a DBS enhanced check (which will include barred list information) to help determine their suitability for the arrangement. However, where the parents make the arrangements themselves, this will be a private matter between the child’s parents and the host parents and in these circumstances the school will not be the regulated activity provider.

Local Authority notification when private fostering is discovered

Where the school has not been involved in making the arrangement but a member of staff or volunteer at a school becomes aware that a pupil may be in a private fostering arrangement, where a child under the age of 16 (or 18 if disabled) is provided with care and accommodation by someone to whom they are not related in that person’s home, they should raise this in the first instance with the Lead DSL. The Lead DSL should notify the local authority of the circumstances, and the local authority will check that the arrangement is suitable and safe for the child.

Home Stays (Annex E of KCSIE 2019)

If the school arranges home stays for pupils, the school should obtain an enhanced DBS for the adult(s) in the household who are responsible for the visiting child. Schools are ‘free to decide’ whether they consider it necessary to obtain a DBS enhanced certificate for anyone aged 16 or over in the household where the child will be staying.

16. Online Safety

The DSL alongside the Head of ICT ensures that pupils are aware of safety online as well as staff’s responsibilities. The School makes provision for teaching children to keep themselves safe, including on-line and will ensure that:

- appropriate filters and monitoring systems are in place to keep children safe online. The School's systems are 'Smoothwall'. 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;
- children are taught about safeguarding, including online; and
- staff are equipped with the knowledge to safeguard children online by attending online safety training.

When children use the school's network to access the internet, they are protected from inappropriate content by our filtering and monitoring systems. However, boarding pupils are able to access their own data plan. To minimise inappropriate use, as a school boarding staff regularly monitor these as well as keeping them 'safe' during school hours and providing monitored access of these out of school hours.

Staff are aware that abuse can take place wholly online or technically may be used to facilitate online abuse.

The School's E-Safety Policy also sets out the School's approach to online safety

17. Use of Mobile Phones and Cameras

In accordance with the Local Children's Safeguarding Board and the DfE KCSIE guidelines 2018, we do not permit parents, visitors or staff to use personal devices with a camera facility to photograph or record the children (e.g. Smart phones, iPods and iPads) in the EYFS settings, Nursery and Pre-Prep department.

Staff working within the Prep, Pre-prep and EYFS must not use mobile phones whilst they are working with the children, except in the case of an emergency. Staff must leave their personal mobile devices with camera facility or video recording facility in the staff room or in their office while children are onsite. Photographs taken of the children should be part of planned activities and should be taken with school cameras or school iPads only. Staff must check for parental consent on the ISAMS database before placing a child's photo on display within the school, on the School website or within any other publication. School iPads are regularly checked as part of our safeguarding procedures.

18. Searching personal possessions

Staff should not conduct a search of pupil's personal possessions. The Lead DSL and the Headmaster will decide if a search is appropriate and will direct appropriate staff when necessary. An example of when a search may be considered appropriate would be in the case of "Sexting" or suspicion of an offensive weapon. Or in the case that 'peer on peer' abuse is suspected.

19. Allegations of suspected abuse by one or more pupils against another pupil (Peer on Peer Abuse)

Staff should be aware that safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but not limited to:

- bullying (including cyberbullying);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;

- sexual violence and sexual harassment;
- gender-based violence
- sexting (also known as youth produced sexual imagery); and
- initiation-type violence and rituals.
- Sex abuse of children by children

Abuse is abuse and should never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”. Different gender issues can be prevalent when dealing with peer on peer abuse. This could for example include girls being sexually touched/assaulted or boys being subject to initiation-type violence.

At Copthorne Prep School we believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm by adults in the school and other students.

We recognise that some students will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the school’s Behaviour Policy.

Occasionally, allegations may be made against students by others in the school, which are of a safeguarding nature. Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse and sexual exploitation. It is likely that to considered a safeguarding allegation against a pupil, some of the following features will be found.

The allegation:

- is made against an older pupil and refers to their behaviour towards a younger pupil or a more vulnerable pupil
- is of a serious nature, possibly including a criminal offence
- raises risk factors for other pupils in the school
- indicates that other pupils may have been affected by this student
- indicates that young people outside the school may be affected by this student

At Copthorne Prep School we will support the victims of peer on peer abuse by offering counselling, a member of staff (normally their form tutor) as a regular port of call as well as regular meetings with Director of Wellbeing.

Sexting

In cases of ‘sexting’ we follow guidance given to schools and colleges by the UK Council for Child Internet Safety (UKCCIS) published in 2017: ‘Sexting in schools and colleges, responding to incidents, and safeguarding young people’.

If an allegation is made from a pupil against another pupil including sexting, banter, gender based issues or sexual assault, this must follow the same guidelines with the DSL taking notes and following procedures as set out, both parents will need to be involved and informed. The school deems this behaviour as unacceptable. The school also recognises that some children, particularly those with SEND may be more vulnerable to peer abuse.

Victims will be supported by the school. The legal threshold for dealing with an issue of pupil behaviour or bullying under the safeguarding policy is, subject to local specifics as in any other case, when there is reasonable cause to suspect that a child is suffering, or is likely to suffer significant harm.

Decisions will be made as to whether or not the police would need to be contacted or a referral made. In the case of pupil-on-pupil abuse which the School has reported to the LADO and which the LADO or statutory child protection authority decides not to investigate further, the matter will be dealt with under the School Behaviour and Sanctions Policy after discussion with the LADO.

Where the suspicion or complaint is in relation to terrorism or extremism ideas involving a pupil, staff must firstly raise this with the Head or DSL without delay. The Head or DSL will consult with external agencies, as appropriate in accordance with this policy. Where the level of risk is such that there is an immediate risk of harm or staff have a genuine concern that there is an immediate risk of harm, any member of staff may make a referral directly to children's social care or the police. The School will not discuss any concerns in relation to possible radicalisation without first agreeing with children's social care or the police what information can be disclosed.

The DSL will report safeguarding concerns to the Head (provided they do not concern the Head).

For children in need of additional support from one or more agencies, the School will liaise with relevant agencies to ensure the child's needs are being met and meet regularly with the team and feedback when appropriate. The School's local authorities are West Sussex who operates MASH and Surrey who operate SSCB- all contact details are listed in this policy.

20. Child Sexual Exploitation/Domestic Violence/Gangs

The definition of 'Child Sexual Exploitation' is Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

Indicators of child sexual exploitation may include:

- Acquisition of money, clothes, mobile phones, etc. without plausible explanation;
- Gang-association and/or isolation from peers/social networks;
- Exclusion or unexplained absences from school, college or work;
- Leaving home/care without explanation and persistently going missing or returning late;
- Excessive receipt of texts/phone calls;
- Returning home under the influence of drugs/alcohol;
- Inappropriate sexualised behaviour for age/sexually transmitted infections;
- Evidence of/suspicious of physical or sexual assault;
- Relationships with controlling or significantly older individuals or groups;
- Multiple callers (unknown adults or peers);
- Frequenting areas known for sex work;
- Concerning use of internet or other social media;
- Increasing secretiveness around behaviours; and
- Self-harm or significant changes in emotional well-being.

Potential vulnerabilities include:

Although the following vulnerabilities increase the risk of child sexual exploitation, it must be remembered that not all children with these indicators will be exploited. Child sexual exploitation can occur without any of these issues.

- Having a prior experience of neglect, physical and/or sexual abuse;
- Lack of a safe/stable home environment, now or in the past (domestic violence or parental substance misuse, mental health issues or criminality, for example);
- Recent bereavement or loss;
- Social isolation or social difficulties;
- Absence of a safe environment to explore sexuality;
- Economic vulnerability;
- Homelessness or insecure accommodation status;
- Connections with other children and young people who are being sexually exploited;
- Family members or other connections involved in adult sex work;
- Having a physical or learning disability;
- Being in care (particularly those in residential care and those with interrupted care histories); and
- Sexual identity.

More information can be found in:

Child sexual exploitation: Definition and a guide for practitioners (DfE 2017)

The School recognises that children who are victims of child sexual exploitation may go missing from education. School staff will be alert to possible indicators of child sexual exploitation and any concerns will be managed in accordance with this policy. Similarly staff should be vigilant for any signs of domestic violence (or a reasonable cause to be concerned) and signs of ‘Gang’ membership. All concerns should be reported to the DSL at the earliest opportunity.

21. Criminal Exploitation of children and vulnerable adults: *County Lines guidance*

County lines is the police term for urban gangs supplying drugs to suburban areas and market and coastal towns using dedicated mobile phone lines or “deal lines”. It involves child criminal exploitation (CCE) as gangs use children and vulnerable people to move drugs and money. Gangs establish a base in the market location, typically by taking over the homes of local vulnerable adults by force or coercion in a practice referred to as ‘cuckooing’.

County lines is a major, cross-cutting issue involving drugs, violence gangs, safeguarding, criminal and sexual exploitation, modern slavery, and missing persons; and the response to tackle it involves the police, the National Crime Agency, a wide range of Government departments, local government agencies and VCS (voluntary and community sector) organisations. County lines activity and the associated violence, drug dealing and exploitation has a devastating impact on young people, vulnerable adults and local communities.

How does it affect young people and vulnerable adults?

Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

One of the key factors found in most cases of county lines exploitation is the presence of some form of exchange (e.g. carrying drugs in return for something). Where it is the victim who is offered, promised or given something they need or want, the exchange can include both tangible (such as money, drugs or clothes) and intangible rewards (such as status, protection or perceived friendship or affection). It is important to remember the unequal power dynamic within which this exchange occurs and to remember that the receipt of something by a young person or vulnerable adult does not make them any less of a victim. It is also important to note that the prevention of something negative can also fulfil the requirement for exchange, for example a young person who engages in county lines activity to stop someone carrying out a threat to harm his/her family.

Who is vulnerable to county lines exploitation?

The national picture on county lines continues to develop but there are recorded cases of:

- Children as young as 12 years old being exploited by gangs to courier drugs out of their local area; 15-16 years is the most common age range.
- Both males and females being exploited.
- White British children being targeted because gangs perceive they are more likely to evade police detection.
- The use of social media to make initial contact with children and young people.

Signs to look out for

A young person's involvement in county lines activity often leaves signs. A young person might exhibit some of these signs, either as a member or as an associate of a gang dealing drugs. Any sudden changes in a young person's lifestyle should be discussed with them. Some indicators of county lines involvement and exploitation are listed below, with those at the top of particular concern:

- Persistently going missing from school or home and / or being found out-of-area;
- Unexplained acquisition of money, clothes, or mobile phones
- Excessive receipt of texts / phone calls
- Relationships with controlling / older individuals or groups
- Leaving home / care without explanation
- Suspicion of physical assault / unexplained injuries
- Parental concerns
- Carrying weapons
- Significant decline in school results / performance
- Gang association or isolation from peers or social networks
- Self-harm or significant changes in emotional well-being

As with all concerns about a child refer to the DSL or if you feel the pupil is in immediate danger phone the police or social services.

22. Sexual violence and sexual harassment between children.

To be read in conjunction with the ‘Sexual violence and sexual harassment between children in schools and colleges’ May 2018

Sexual violence and sexual harassment can occur between two children of any sex. They 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. Schools and colleges should consider the following:

- It is more likely that girls will be the victims of sexual violence and more likely that sexual harassment will be perpetrated by boys. Schools and colleges 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 (which are potentially criminal in nature), such as grabbing bottoms, breasts and genitalia . Dismissing or tolerating such behaviours risks normalising them.
- Children with Special Educational Needs and Disabilities (SEND) can be especially vulnerable. Disabled and deaf children are three times⁶ more likely to be abused than their peers. Additional barriers can sometimes exist when recognising abuse in SEND children. These can include:
 - assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child’s disability without further exploration;
 - the potential for children with SEND being disproportionately impacted by behaviours such as bullying and harassment, without outwardly showing any signs; and
 - communication barriers and difficulties overcoming these barriers.
- Children who are Lesbian, Gay, Bi, or Trans (LGBT) can be targeted by their peers. In some cases, a child 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.⁷

Sexual violence

It is important that schools and colleges are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence in this advice, we do so in the context of child on child sexual violence.

For the purpose of this advice, when referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 20038 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.

What is consent? 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. 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.

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: deliberating 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, which might include: non-consensual sharing of sexual images and videos and sharing sexual images and videos (both often referred to as sexting); inappropriate sexual comments on social media; exploitation; coercion and threats. Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.¹¹

As a school we consider sexual harassment in broad terms. Sexual harassment (as set out above) creates an atmosphere that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence.

23. Harmful sexual behaviours

Children’s sexual behaviours exist on a wide continuum, from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviours are developmentally inappropriate and may cause developmental damage. **Harmful sexual behaviours can occur online and offline and can occur simultaneously between the two.**

When considering harmful sexual behaviours, ages and the stages of development of the children are critical factors to consider. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' difference in age or if one of the children is pre-pubescent and the other is not. Brook sexual behaviours traffic light tool can help when considering harmful sexual behaviours. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature.

Harmful sexual behaviours can, in some cases, progress on a continuum. Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Children displaying harmful sexual behaviours have often experienced their own abuse and trauma. It is important that they are offered appropriate support.

All concerns should be referred to the DSL.

24. So-called 'Honour Based' Violence ('HBV')

So-called HBV can include forced marriage and Female Genital Mutilation ('FGM'). School staff will be alert to possible indicators of HBV. Guidance on the warning signs of HBV can be found on pages 38-41 of the Multi-agency statutory guidance of FGM (<https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation>) and pages 13-14 of the Multi-agency guidelines: Handling case of forced marriage (<https://www.gov.uk/guidance/forced-marriage>).

From October 2015, all teachers (along with social workers and healthcare professionals) have a statutory duty 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 will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils.

For the purposes of the mandatory reporting duty, a teacher is someone who undertakes teaching work as follows (including through distance learning or computer aided techniques):

- planning and preparing lessons and courses for pupils;
- delivering lessons to pupils;
- assessing the development, progress and attainment of pupils; and
- reporting on the development, progress and attainment of pupils.

These activities are not teaching work if the person carrying out the activity does so (other than for the purposes of induction) subject to the direction and supervision of a qualified teacher or other person nominated by the Head to provide such direction. The mandatory reporting duty will not therefore apply to supervised teaching assistants.

If staff have concerns that FGM has taken place, as well as reporting this to the police, they should also activate local safeguarding procedures using existing and national and local protocols. West Sussex 01403 229 900 or Surrey 0300 200 1006. Unless the teacher has a good reason not to, they should still consider and discuss any case of FGM with the DSL and involve children's social care as appropriate. Information on when and how to make a report can be found at Mandatory reporting of female genital mutilation: procedural information

<https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information>

The local police non-emergency number is 101

25. Female Genital Mutilation, Breast Ironing & Voyeurism

From October 2015, section 5B of the Female Genital Mutilation Act 2003 placed a statutory duty on teachers along with social workers and healthcare professionals to report to the police where they discover that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the School's designated safeguarding lead and involve children's social care as appropriate.

Should historical allegations of child abuse be made against a teacher who is no longer teaching, the School will, in accordance with Keeping Children Safe in Education, report the matter to the police. Similarly, allegations against a teacher who is no longer working at the School will also be referred to the police. All allegations of historical abuse should be referred to the Head or DSL straight away.

What is breast ironing / flattening?

Breast flattening, also known as breast ironing, is the process during which young pubescent girls' breasts are ironed, massaged, flattened and/or pounded down over a period of time (sometimes years) in order for the breasts to disappear or delay the development of the breasts entirely.

In some families, large stones, a hammer or spatula that have been heated over scorching coals can be used to compress the breast tissue. Other families may opt to use an elastic belt or binder to press the breasts so as to prevent them from growing.

Breast flattening usually starts with the first signs of puberty, which can be as young as nine years old and is usually carried out by female relatives under the 'misguided intention' of protecting her from rape and sexual harassment.

As well as extreme pain and psychological damage, the practice puts the young women at increased risk of developing cysts, infections and even cancer.

It should also be acknowledged that some adolescent girls and boys may choose to bind their breast using constrictive material due to gender transformation or identity, and this may also cause health problems.

Where does it happen?

According to UN estimates, up to 3.8 million girls worldwide are affected. Breast ironing is particularly widespread in the West African nations of Cameroon, Guinea-Bissau, Chad, Togo and Benin.

It is thought that about 1,000 girls in West African communities across the UK have been subjected to the practice, but the figure could be much higher.

Why is it not illegal?

There is no specific law banning breast ironing in the UK and no-one has ever been prosecuted for carrying out the practice. However, offenders can be prosecuted for a range of crimes, including common assault, child cruelty and grievous bodily harm.

Professionals may be reluctant to tackle the issue because of ‘cultural sensitivities’ – the words ‘culture’, ‘tradition’ or ‘religion’ might come up when trying to explain this harmful practice, but as in the case of female genital mutilation (FGM), breast ironing is a ritualised form of child abuse.

Professionals working with children and young people must be able to identify the signs and symptoms of girls who are at risk of or have undergone breast ironing or flattening. As with Female Genital Mutilation (FGM), breast ironing or flattening is classified as physical abuse.

26. Forced Marriages

This is an important issue for schools, especially those with high levels of ethnicity amongst pupils. It is certain significant numbers of young girls and some boys are removed from school each year and forced into marriage against their will. Frequently the children are returned to their original family homes on the Asian subcontinent to begin their family life.

Schools could become involved if distressed pupils decide to tell all to a teacher and seek guidance and support and in such an instance immediate contact should be made with the social services. The importance of English law and the protection of English citizens are important in such cases. Above all, and in view of the new legislation, schools and LAs must not shy away from addressing this issue for fear of offending parents and the local community. The fact remains forced marriages are a serious matter for child protection agencies especially when families are using power, bullying and intimidation to control young people. If schools and colleges tip-toe around the problem they are likely to be putting the lives of young people at risk.

Statutory Guidance

Statutory guidance emanating from the *Forced Marriages Act 2007* came into effect in late 2008. Public authorities, including schools and colleges, will be obliged to have regard to the guidance and therefore its status is much more significant than previous guidance on the DCSF (as was) website from the Forced Marriages Unit.

The guidance makes it clear that forced marriage is a form of child abuse and a breach of human rights. It says that when dealing with community groups or families which view forced marriages as acceptable, public bodies should make it clear that forced marriage is contrary to British law, that it can lead to a range of criminal offences and civil orders and that the public body has a duty to prevent breaches of the law.

If there are concerns that a child, male or female, is in danger of a forced marriage, schools or colleges should contact the Forced Marriage Unit (FMU) <http://www.fco.gov.uk/en/travel-and-living-abroad/when-things-go-wrong/forced-marriage/> on 020 7008 0151 where experienced caseworkers are able to offer support and guidance. The police and Children’s Social Care should also be contacted.

Schools and colleges should bear in mind that mediation as a response to forced marriage can be extremely dangerous. Refusal to go through with a forced marriage has, in recent years, been linked to a number of so-called ‘honour killings’.

In July 2009 the government’s Forced Marriages Unit published new guidelines for those working in education, health and social services. The guidelines point out that teachers are often ideally placed to

spot early signs that a pupil may be about to be forced into marriage. The following warning signals are listed:

- depression, anxiety or low self-esteem, often accompanied by self-harming behaviour;
- persistent absence or being withdrawn from school by parents;
- failure to return from a visit to country of origin;
- fear about forthcoming school holidays;
- pupils being watched by older brothers or cousins during school hours;
- decline in behaviour, interest in lessons, academic performance or punctuality;
- pupils not allowed to participate in extra-curricular activities;
- Conflict with parents over whether a pupil can continue with GCSEs, A Levels or a degree.

It is hoped teachers can create an environment in which pupils feel able to talk about any concerns. For example forced marriage can be mentioned during PSHE discussions about relationships or human rights, and survivors of forced marriages can be invited to address pupils. The guidance can be found at: www.fco.gov.uk/forcedmarriage

As from June 2010 there is an official website which outlines the dos and don'ts of dealing with the problems of forced marriages. Teachers who suspect their pupils may be at risk will now be able to find advice and support from a new resource. The e-learning website launched by the government's Forced Marriage Unit, is designed to help teachers, doctors and social workers identify and support potential victims.

The site is intended to help school staff spot an impending forced marriage before it actually takes place. Along with official guidance and links to specialist organisations, it offers interactive tutorials, outlining what teachers should and should not do. For example, reporting concerns to the teenager's parents is invariably the wrong move and can lead to honour-based violence or a rushed wedding. The bottom line is that forced marriage is about rape, sexual assault, occasionally death. It is also about a young person finding out who they want to be, what they want to do and who they want as a life partner.

Common misconceptions about forced marriages

- Forced marriages are not limited to the South Asian community. There have been cases involving families from the Middle East, Europe and Africa.
- There is a strict distinction between forced and arranged marriages. A forced marriage is carried out without the consent of the child and often involves duress.
- Some forced marriages have no overseas element. They are carried out in the UK as well.
- Some parents see nothing wrong with their behaviour and may be motivated by the wish to build stronger families and preserve cultural or religious traditions.
- Forced marriage should not be treated with apprehension or fear of offending cultural sensitivities as it is not a religious issue.

27. Voyeurism – Upskirting

As referred to in the Voyeurism Act 2019 placing equipment such as a camera or mobile phone beneath a person's clothing to take a voyeuristic photograph without their permission.

Applies equally whether men or women are wearing kilts, cassocks shorts or trousers.

Often carried out in crowded public places, for example on public transport or at music festivals, which can make it difficult to notice offenders.

28. Procedures for Dealing with Concerns or Suspicions of Abuse or Neglect

The School treats the safeguarding of the pupils in its care as the highest priority and recognises the important role it has to play in the recognition and referral of children who may be in need (Children in Need) and those who may be at risk (Children at Risk). All our school staff are made aware of their duty to safeguard and promote the welfare of children in the School's care. Staff members are alerted to the particular potential vulnerabilities of looked after children. Mrs Charlie Lee is the appropriately trained teacher for liaising with virtual school heads for those looked after children in the School.

The School recognises that there may also be children who, whilst not suffering harm or at immediate risk, require additional support from external agencies. Where appropriate, the School may consult with the child concerned and their parents regarding a referral to external agencies (such as Children's Social Care). This may lead to a written plan to support a child in need being drawn up or an early help assessment, such as the Common Assessment Framework, being carried out. In either case, the School will liaise and take advice from external agencies as appropriate.

If a member of staff is made aware of **any** allegation of abuse, or if knowledge of possible abuse comes to his/her attention it is his/her duty to listen to the child, to provide re-assurance and to record the child's statements, but not to probe or put words into the child's mouth. On hearing an allegation of abuse or complaint about abuse directly from a child, a member of staff should limit questioning to the minimum necessary for clarification. Leading questions should be avoided. No inappropriate guarantees of confidentiality should be given; rather the child should be told that the matter will be referred in confidence to the appropriate people in positions of responsibility.

Every member of staff, including part-time, temporary, visiting, contract and volunteer staff working in School should report any concerns (including those where a pupil may benefit from early help or where it includes alleged abuse by one or more pupils against another pupil) to the DSL and submit an accurate written record of the disclosure or concerns. However, any staff member can make a direct referral to Children's Social Care or other external services such as early help services in accordance with the referral threshold set out by Surrey or West Sussex LSCB. Parental consent is not required for referrals to statutory agencies.

Where staff have concerns that a child is in immediate danger or is at risk of harm a referral should be made to children's social care and/or the police immediately. **Anyone** can make a referral. If anyone other than the DSL makes a referral, they should inform the DSL that a referral has been made as soon as possible. Staff must share information with children's social care and/or the police where there are any concerns that a child may be at risk of harm or neglect.

If staff members are unsure about whether or not a referral should be made, they should speak to the DSL. The DSL will contact the Local Authority Designated Officer (LADO also known as DO) for advice or direction and will inform Ofsted if appropriate. In relation to our nursery/EYFS setting, the School will inform Ofsted as soon as is reasonably practicable, in any event within 14 days of any allegations of serious harm or abuse by any person living, working or looking after children at the premises (whether that allegation relates to harm or abuse committed on the premises or elsewhere) or any other abuse which is alleged to have taken place on the premises, and of the action taken in respect of these allegations.

The DSL will refer **all** allegations or suspicions of abuse or cases where there is reasonable cause to suspect a child is suffering, or is likely to suffer significant harm, to the local authority designated officer (LADO) within 24 hours.

Borderline cases will be discussed with the LADO without identifying individuals in the first instance and following discussions the LADO will judge whether or not an allegation or concern meet the relevant threshold. The LADO will decide in the circumstances what further steps should be taken. This could involve calling the police.

Where the outcome of a referral is not reported to the referring member of staff or DSL and/or where a child's situation does not appear to be improving, the School will follow this up with the children's social care and push for reconsideration where appropriate. Any member of staff who has concerns that a child's situation does not appear to be improving should press for re-consideration.

The School will not do anything that may jeopardise any external investigation. Once the matter has been referred, all further responsibility for gathering information and deciding what happens next will rest with social services and the police.

With regard to the Prevent Duty, the School will co-operate with Channel panels and the police with assessments are being undertaken.

If you need to make a referral and you do not wish to do this via the DSL or the Head or they are unavailable please refer to the following contacts.

29. External Agency Contact Information

West Sussex

Multi-Agency Safeguarding Hub (MASH)

From the 1st April the workforce of the Children's Access Point and the Early Help Resource Centre were combined. The Multi-Agency Safeguarding Hub (MASH) will be single point of contact for all safeguarding concerns regarding children and young people in West Sussex which includes front door access for Early Help.

It brings together expert professionals, from services that have contact with children, young people and families, and makes the best possible use of their combined knowledge and resources to keep children safe from harm and promote these and their families wellbeing.

The MASH will do this by:

- Acting as a front door to manage all safeguarding concerns
- Researching information held on professional databases to inform decisions
- Continuing to provide support to professionals working in Early Help. Especially identifying families who need Think Family Keyworker Services and other key working services, and family network responses
- Providing a secure and confidential environment for professionals to share information
- Identifying low –level repeat referrals which taken in isolation may not appear concerning, but do when the child's journey is reviewed

Child Protection (W) Policies & Procedures

- Accessing quickly and efficiently the child protection investigation staff both within children's social care, the Police and Health (holding strategy discussion centrally)
- Email: MASH@westsussex.gov.uk
- Telephone: 01403 229 900
- Out of Hours: 0330 222 6664

West Sussex LADO

Lindsey Tunbridge-Adams
Lindsey.Tunbridge-Adams@westsussex.gov.uk
0330 222 3339

Surrey Contact Details

www.surreyscb.org.uk

Surrey Safe Guarding Children Board

MASH details

0300 470 9100
Out of hours 01483 517898
Email mash@surreycc.gov.uk

Surrey LADO

Geraldine Allen

geraldine.allen@surreycc.gov.uk

0300 123 1650 (option 3)

Other contact information

Police Emergency - 999

Police Non-Emergency - 101 or 0845 60 70 999

OFSTED Safeguarding Children

08456 404046 (Monday to Friday from 8am to 6pm)

Extremism:

Department for Education dedicated helpline for staff and Governors: 020 7340 7264 and

counter-extremism@education.gsi.gov.uk

Other useful contacts

Disclosure and Barring Service

Child Protection (W)
Policies & Procedures
PO Box 181, Darlington, DL1 9FA

Tel: 01325 953795

National College for Teaching and Leadership

Tel: 0345 609 0009

30. Procedures for Managing Allegations of Abuse against Staff, Volunteers, the DSL and the Head

The School's procedures for dealing with allegations against any staff member (and volunteers who work with children) aims to strike a balance between the need to protect children from abuse and the need to protect staff and volunteers from vexatious allegations. The School will make every reasonable effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered. If an allegation is made against a member of staff and meets with the reporting criteria set out in KCSIE2018 then they must report this straight away to the Head who will liaise with relevant agencies as appropriate.

The School will liaise with the LADO, police and social services as to managing confidentiality as appropriate. The School's procedures for managing allegations against staff (including the Head and DSL) and volunteers follows Departmental guidance and LSCB arrangements and apply when staff, including volunteers, have (or 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 would pose a risk of harm if they were to work regularly or closely with children.

Should the allegation of abuse concern the DSL the member of staff should inform the Head and the Deputy to the DSL who will act in the place of the DSL. Should the allegation be against the Head or School Governor the DSL will immediately inform the Chairman of Governors without the Head or School Governor being informed first. Staff may also discuss any concerns with the DSL and make a referral via them. It will be the Chair's responsibility to contact the LADO.

If the concerns are about the Head Teacher, then the Chair of Governors (Kathryn Bell) should be notified immediately and she should speak to the Local Area Designated Officer (LADO) on **0300 123 1620 (Surrey) or 0330 222 3339 (West Sussex)** without informing the Head. In the case of serious harm the police should be informed from the outset. Head Governor Mrs Kathryn Bell can be contacted on mackinnon.bell@btinternet.com or 07786 074303

If the allegation concerns a member of staff, the Head or a volunteer he/she would normally be informed as soon as possible after the result of any initial investigation authorised or conducted by the LADO is known. Advice will always be sought from the LADO first, however the School will normally appoint a member of staff to keep the person informed of the likely course of action and the progress of the case.

The outcome of investigation of an allegation will record whether it is substantiated (sufficient evidence either to prove or disprove it), unsubstantiated (insufficient evidence either to prove or disprove it), false (sufficient evidence to disprove it) or malicious (sufficient evidence to disprove it and that there has been a deliberate act to deceive). If it is established that the allegation is malicious, no details of the allegation will be retained on 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 DfE advice. A copy will only be provided to the individual concerned following consultation with appropriate agencies and agreement has been reached as to what information can be disclosed. Allegations proven to be false, unsubstantiated or malicious will not be included in employer references.

If the LADO or any of the statutory child protection authorities decide to take the case further, any staff member concerned may be suspended if this is felt appropriate. The reasons and justification for suspension will be recorded and the staff member informed of them. Where a member of the residential staff is suspended pending an investigation of a child protection nature, suitable arrangements must be put in place for alternative accommodation away from children. The School recognises it has a duty of care to staff but may take action in the event of allegations against staff in accordance with its disciplinary procedures. The School will ensure support is in place for individuals facing an allegation and a representative will be appointed to keep the individual informed of progress of the case and to consider what other support is available and appropriate for the individual.

During the course of the investigation the School in consultation with the LADO will decide what information should be given to parents, staff and other pupils and how press enquiries are to be dealt with. In reaching their decision due consideration will be given to the provisions in the Education Act 2011 and in Keeping Children Safe in Education September 2019 relating to reporting restrictions identifying teachers who are the subject of allegations from pupils.

Allegations against a member of staff who is no longer at the School (including historical allegations) should be referred to the police.

Any pupils who are involved will receive appropriate care.

Staff should also have regard to the Staff Standards and Behaviour (Code of Conduct) Policy to minimise the risk of allegations being made.

31. Whistle Blowing

If staff and volunteers have concerns about poor or unsafe practices or potential failures in the School's safeguarding regime, these should be raised in accordance with the School's Whistleblowing Policy. Concerns regarding the behaviour of colleagues which are likely to put pupils at risk of abuse or other serious harm may be dealt with in accordance with the School's Managing Allegations of Abuse against staff procedure (see above). 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 feels that their genuine concerns are not being addressed, they may use other whistleblowing channels, such as the NSPCC whistleblowing helpline (tel: 08000280285 or email: help@nspcc.org.uk).

Whistleblowing@ofsted.gov.uk

32. External Referrals

We follow Disclosure and Barring Service (DBS) guidance and procedures regarding referrals and barring decisions and the Safeguarding Vulnerable Groups Act 2006 and the Safeguarding Vulnerable Groups Act (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009. Separate to involvement of the LADO, schools have a legal duty to refer to the DBS anyone 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.

Cophthorne Prep School will make such a referral as soon as possible after the resignation or dismissal of any individual (whether employed, contracted, a volunteer or a student) whose services are no longer used because he or she is considered unsuitable to work with children. This includes dismissal, non-renewal of a fixed term contract, no longer using supply teacher engaged directly or supplied by an agency, terminating the placement of a trainee or volunteer, no longer using staff employed by a contractor and resignation and voluntary withdrawal from any of the above.

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 will consider making a referral to the National College for Teaching and Leadership (NCTL) as required by sections 141D and 141E of the Education Act 2002 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). The Secretary of State may investigate the case, and if s/he finds there is a case to answer, must then decide whether to make a prohibition order in respect of the person.

The School will make a serious incident report to the Charity Commission whenever the Commission's guidelines deem it appropriate to do so.

33. Parents

In general, we believe that parents should be informed about any safeguarding concerns regarding their children. It is important that we are honest and open in our dealings with parents. However, concerns of this nature must be referred to the DSL or the Head who will decide on the appropriate response. In a very few cases, it may not be right to inform them of our concerns immediately as that action could prejudice any investigation, or place the child at further risk. In such cases, advice will be sought from the LADO.

34. Promoting Awareness

The School's curriculum and pastoral systems are designed to foster the spiritual, moral, social and cultural development of all our pupils. All teaching staff play a vital role in this process, helping to ensure that all pupils relate well to one another and feel safe and comfortable within the School. We expect all the teaching and medical staff to lead by example and to play a full part in promoting an awareness that is appropriate to their age amongst all our pupils on issues relating to health, safety and well-being. All staff, including all non-teaching staff, have an important role in insisting that pupils always adhere to the standards of behaviour set out in our behaviour policy and in enforcing our Anti-Bullying Policy.

Time is allocated in PSHE to discussions of what constitutes appropriate behaviour and on why bullying and lack of respect for others is never right. Assemblies, drama and RE lessons are used to promote tolerance and mutual respect and understanding.

As we seek to listen to children and provide for early help, it is important that all pupils know that there are adults to whom they can turn to if they are worried, including the School counsellor, and the medical staff. If the School has concerns about a child there is always a recognised requirement for sensitive communication and designated staff members are aware of the need to avoid asking leading questions. Our support to pupils includes the following:

- All pupils have access to a telephone helpline enabling them to call for support in private.
- Every child has a homework diary which contains guidance on where to turn for advice, including confidential help lines such as childline.
- Our medical centre and the boarding house displays advice on where pupils can seek help.
- We provide regular lessons to pupils on e-safety and ensure that all pupils understand and adhere to the School's guidelines in this area. This includes guidance on educating pupils to stay safe including e-safety and online protection. For more details on cyber-bullying please refer to the School's anti-bullying policy. E-safety to pupils is taught during ICT lessons.

35. Position of Trust

As a result of their knowledge, position and/or the authority invested in their role, all adults working with children and young people in education settings are in positions of trust in relation to the young people in their care. A relationship between a member of staff and a pupil cannot be a relationship between equals. There is potential for exploitation and harm of vulnerable young people and all members of staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.

Wherever possible, staff should avoid behaviour which might be misinterpreted by others, and report and record any incident with this potential. Staff should refer the School's Staff Handbook which also includes its Social Media Policy.

36. Reasonable restraint

Our policy on reasonable restraint by staff is set out separately and available on the school website.

- Staff may use reasonable restraint as a last resort
- Staff are empowered to use reasonable restraint to prevent pupils from hurting themselves or others, from damaging property, or from causing disorder
- Any incident where reasonable restraint has been used is recorded and signed by a witness.

37. Records

Within education, we do process some sensitive information about children that is not set out in the legislation as a 'special category personal data', Notably information about children's services interactions, elements of special educational need information, safeguarding information and some behaviour data. We consider it best practice that when considering security and business processes about such data, that they are also treated with the same 'high status' as special categories set out in law.

All concerns, discussions and decisions (with reasons) made in accordance with this policy will be recorded in writing.

Monitoring and Evaluation of this Policy

The School monitors and evaluates its safeguarding policy and procedures through the following activities:

- Governing Body visits to the School;
- Senior leadership team discussion sessions with children and staff
- Pupil questionnaires
- Frequent scrutiny of attendance data
- Regular analysis of a range of risk assessments
- Frequent scrutiny of Governing Body meeting minutes
- Logs of bullying, serious sanctions and racist behaviour incidents are reviewed regularly by the senior leadership team and the governing body
- Regular review of parental concerns and parental questionnaires
- Regular review of training offered to staff, including e-safety training.

Appendix 1 – Abuse and Injury

Types of abuse and neglect KCSIE 2019 pg 14

All school and college 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 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). They may be abused by an adult or adults or by another child or children.

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

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

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

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food,

clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Specific safeguarding issues

All staff should have an awareness of safeguarding issues, some of which are listed below. Staff should be aware that behaviours linked to the likes of drug taking, alcohol abuse, truanting and sexting put children in danger.

All staff should be aware that safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but may not be limited to, bullying (including cyberbullying), gender

based violence/sexual assaults and sexting. Staff should be clear as to the school or college's policy and procedures with regards to peer on peer abuse.

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example, information for schools and colleges can be found on the TES, MindEd and the NSPCC websites. School and college staff can access government guidance as required on the issues listed below via GOV.UK and other government websites:

- bullying including cyberbullying
- children missing education – and Annex A
- child missing from home or care
- child sexual exploitation (CSE) – and Annex A
- domestic violence
- drugs
- fabricated or induced illness
- faith abuse
- female genital mutilation (FGM) – and Annex A
- forced marriage- and Annex A
- gangs and youth violence
- gender-based violence/violence against women and girls (VAWG)

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Signs of abuse

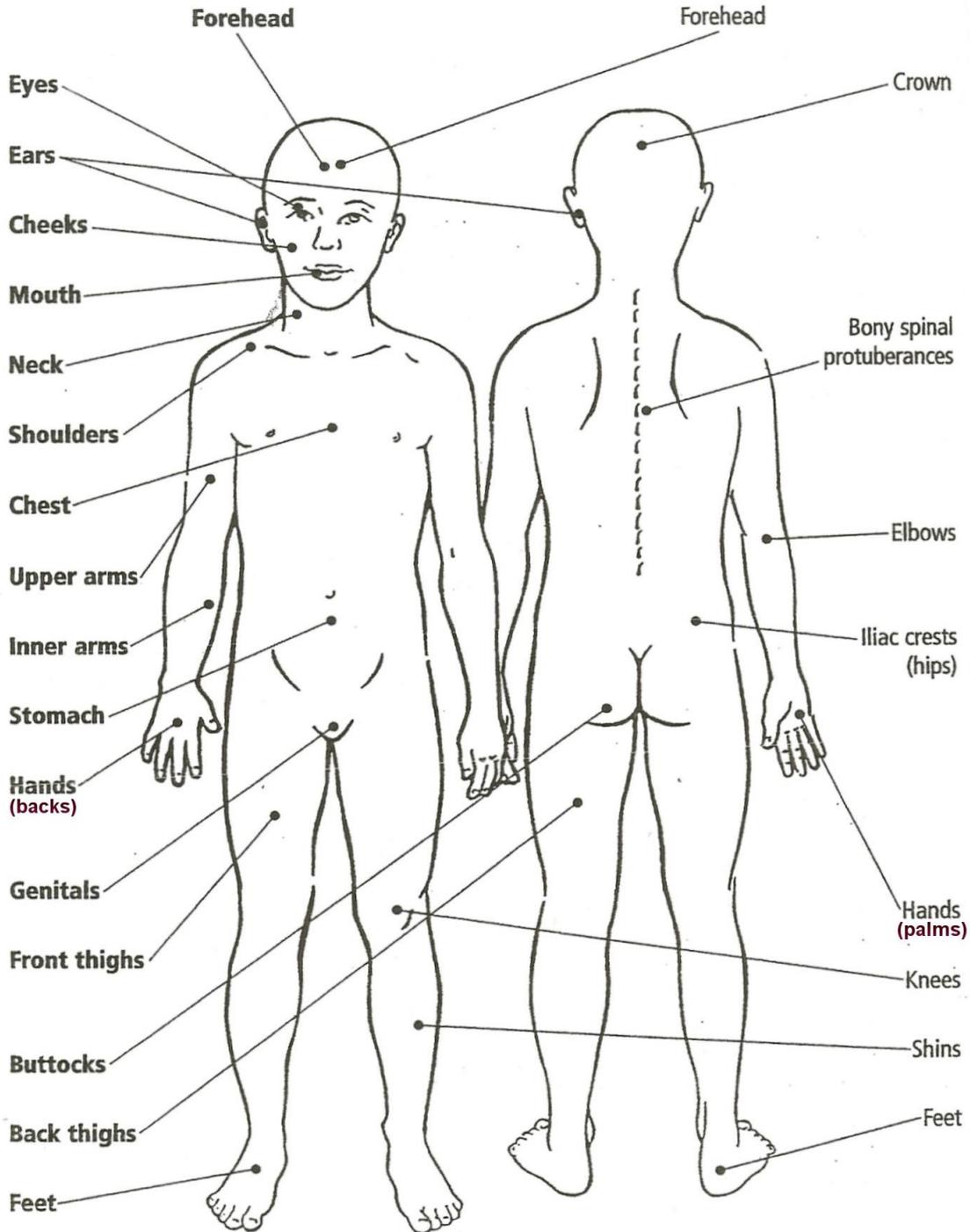
The following may, with other indicators, point to the possibility of abuse:

- Unexplained bruises and grazes
- Unexplained burns and fractures
- Sudden unexplained changes in behaviour and/or deterioration of performance
- Deterioration in their general well-being
- Extremely withdrawn or aggressive behaviour
- Anxiety and/or low self-esteem and/or continual self-blame
- Unexplained changes in concentration and school attainments (in either direction)
- Unexplained delay in growth and development
- Inability to make friends within their own peer group
- Sexual behaviour or knowledge of sexual matters beyond what would be expected of that age group
- Over compliance and/or excessive need for affection
- Difficulty in trusting, or defiance of school staff
- Reluctance to undress for games and medical examinations
- Vague pains, aches and possibly fearing medical help
- Evidence of self-harm or self-neglect
- Evidence of excessive punishment being received
- Extreme neglect and rejection by carer
- Reluctance to go home/running away from home
- Unexpected wetting and soiling patterns
- Poor attendance

Common Sites for Accidental and Non-Accidental Injury

NON-ACCIDENTAL INJURY

ACCIDENTAL INJURY



Signed..... Date

Appendix 2 - Dealing with a disclosure

If a child discloses that he/she has been abused in any way, the member of staff/volunteer should

- Listen to what is being said without displaying shock or disbelief
- Accept what is being said
- Allow the child to talk freely
- Reassure the child, but not make promises which it might not be possible to keep
- Not promise confidentiality – it might be necessary to refer to Children’s Services: Safeguarding and Specialist Services
- Reassure him or her that what has happened is not his or her fault
- Stress that it was the right thing to tell
- Listen, only asking questions when necessary to clarify
- Not criticise the alleged perpetrator
- Explain what has to be done next and who has to be told
- Make a written record (see Record Keeping in Appendix 3)
- Pass the information to the Designated Safeguarding Lead without delay

Support

Dealing with a disclosure from a child, and safeguarding issues can be stressful. The member of staff/volunteer should, therefore, consider seeking support for him/herself and discuss this with the Designated Safeguarding Lead.

Confidentiality

Safeguarding children raises issues of confidentiality that must be clearly understood by all staff/volunteers in schools.

- All staff in schools, both teaching and non-teaching staff, have a responsibility to share relevant information about the protection of children with other professionals, particularly the investigative agencies (Children’s Services: Safeguarding and Specialist Services and the Police).
- If a child confides in a member of staff/volunteer and requests that the information is kept secret, it is important that the member of staff/volunteer tell the child in a manner appropriate to the child’s age/stage of development that they cannot promise complete confidentiality – instead they must explain that they may need to pass information to other professionals to help keep the child or other children safe.
- Staff/volunteers who receive information about children and their families in the course of their work should share that information only within appropriate professional contexts.

Record Keeping

When a child has made a disclosure, the member of staff/volunteer should:

- Make brief notes as soon as possible after the conversation. Use the school record of concern sheet wherever possible, (pro-forma in Appendix 2, and guidance in Appendix 3)
- Not destroy the original notes in case they are needed by a court, instead hand to the DSL.
- Record the date, time, place and any noticeable non-verbal behaviour and the words used by the child
- Use the diagram in Appendix 1 to indicate the position of any injuries
- Record statements and observations rather than interpretations or assumptions
- Place all notes onto ‘myconcern’
- Advice on best practice on Record Keeping is contained in Appendix 3

All records need to be given to the Designated Safeguarding Lead promptly. No copies should be retained by the member of staff or volunteer.

GDPR does not prevent, or limit, the sharing of information for the purposes of keeping children safe. Legal and secure information sharing between schools, Children's Social Care and other local agencies, is essential for keeping children safe and ensuring they get the support they need.

The Designated Safeguarding Lead will ensure that all safeguarding records are managed in accordance with the Education (Pupil Information) (England) Regulations 2005.

Concern Form

Date:		Time:
Pupil's Name		
Staff Member's name		

The Concern	
Notes: Record what you have seen, who told you and when. Make reference to previous information, referencing previous logging where appropriate.	
What?	
Who?	
Where?	
When?	

Signed

Date

Follow Up Concern Form

Follow Up/Discussion		
Received by:		
Date and Time:		
Role:	Designated Member of Staff	
	Other -	
Consideration/Evaluation		
Notes: Has there been any other concerns? What does this information suggest? What are the implications of doing nothing?		

Decision		
Agreed Action	1. Monitor 2. Further Information gathered 3. Initiated Consultation with Helpdesk 4. Referral 5. If Referral followed up in writing?	
Signature and Date		

Appendix 3 - RECORD KEEPING

1 Best Practice for all Staff

1.1.1 Not all child protection information results in a referral – small pieces of information may not be significant on their own, but can help to contribute to a ‘jigsaw’ picture of a child’s experience.

1.1.2 All staff should

- Make a record of all information and their concerns
- Include ‘nagging doubts’ and ‘hearsay’
- Pass information onto the DSL
- Record on ‘myconcern’
- Delete all information once passed to DSL

2 How notes should be made

2.1.1 Notes may be word processed or hand written

2.1.2 Include the following:

- Date of the incident
- Date and time of the record being made
- Name and date of birth of the child (ren) concerned
- A factual account of what happened (verbatim reports from the child if possible)
- A note of any other people involved, eg as witnesses
- Action taken, and any further plans e.g. monitor and review
- Printed name of the person making the record
- Job title of the person making the record
- Signature

2.1.3 A sample form is included

3 Some useful point about record-keeping procedures

3.1.1 Identify the source of the information eg ‘Mrs Smith, a midday supervisor, informed me that ...’ or ‘I saw Fred on the school at break time’

3.1.2 Information should be factual or based on fact

3.1.3 Record what you saw, heard etc. and try to be specific. (Eg ‘Jane was crying and rocking’ rather than ‘Jane was upset’.)

3.1.4 Opinion is okay as long as you can justify it in some way eg 'Becky ran out the classroom and hid in the toilets when her stepfather arrived. She appeared frightened'.

3.1.5 Make a note of the information and with whom you shared it with.

3.1.6 Avoid specialist jargon (eg Jenny scored below 5 on her baseline assessment) which a member of another agency may not understand.

3.2 Information for the designated person re: record-keeping

3.2.1 You are responsible for keeping all child protection information securely and for keeping all the 'pieces of the jigsaw' together. If a pattern begins to emerge, it is your job to seek advice.

3.2.2 If a referral is made to Children Support or the Police, the DSL will fill in the Referral Form.

3.2.3 Copies should be sent to:

- Children Support (confirming the referral), and
- The Designated Local Authority Officer, who will confirm that you have acted in accordance with agreed child protection procedures, or advise you if this is not the case.

3.2.4 Keep all child protection notes together in a secure place ie a locked filing cabinet and on my concern.

3.2.5 Extended family members should be kept together or cross referenced.

3.2.6 Place all information onto 'myconcern' as soon as possible.

3.2.7 For each child protection record for a child to ensure that the file has a facing sheet inside the file which records:

- The child's full name
- Date of birth
- Address
- Name and address of GP
- Information about family members
- An indication of where a piece of information is, if it has been 'lifted' from the file for some reason.
- A note if there is more than one file for the child.

Who should have access to child protection information?

- Should be on a 'need-to-know' basis among the staff
- Notes are not shared with families, except for child protection reports to the child protection case conference.
- Other statutory agencies (solicitors are not statutory agencies. Where unsure seek advise)

Information can be shared without consent if to gain consent would place a child at risk. Fears about sharing information must not be allowed to stand in the way of promoting the welfare

and protecting the safety of children. With all data sharing, appropriate organizational and technical safeguards should still be in place.

What happens to the information when the child leaves your school?

3.2.8 If a child for who there has been child protection concerns (whether subject to a child protection plan or not) is moving to another school:

- The whole child protection file should be sent, separately from the school file, to the receiving school.
- It should be marked ‘confidential, addressee only’ and should be sent to the Head of the receiving school.
- For extra security, space permitting, keep a copy of the sent file as ‘dormant’, in case the original gets lost in transit.
- Give the name and contact number of the key worker (from Social Services) who dealt with the family if applicable.
- If you do not know the details of the receiving school, wait 21 days for the school to contact you. If you hear nothing by then, contact your Designated Officer for Child Protection for advice.

How long should records be kept?

- All data on the safeguarding file potentially forms parts of an important story that may be needed retrospectively for many years. The elements of a pupil file (name, address) that are needed to identify children with certainty are needed to be retained along with those records until at least 25 years old.

4 Making a Referral

4.1.1 When a referral is made to a Children’s Support Team (or to the Police) it is advisable to provide as much relevant information as possible. It would be useful to have the following information to hand before you make the call:

- The referrer’s details: name, place of work and job title
- The child’s:
 - Name
 - Date of birth
 - Address
 - Gender
 - Ethnic origin
 - Religion
 - Language
- The name and address of the GP
- Whether the child is currently safe – are there any deadlines approaching e.g. the end of the school day?
- When the child was last seen by you/other members of staff
- Other names of the child or family is/has been known by

- Any significant relationships the child has others e.g. child minder or respite care at weekend from foster carers
- Details of your concern
- The source of the information
- If the family is unaware that the referral is being made – reasons why you have not contacted them (only when an allegation of sexual abuse has been made or you have fear that the child would be placed at risk of further harm)
- The parents'/carers/ response to your concerns and their response to you seeking permission to refer unless child is put at risk
- Any changes in the child's behaviour or presentation recently
- Whether or not the child has any disability or special needs, the nature and degree of the disability and the effect, if any, on the child's ability to communicate
- The level of the child's comprehension and concentration
- Any network of support provided to the family
- Any history of your own agency's contact with the family
- The family's contact with other agencies, if known to you
- The names/ages/schools of other children who are living in the household
- If the abuse has been perpetrated by another child refer both children (i.e abuser and abused)

4.1.2 It is important that you tell the child who discloses abuse exactly what you are going to do, and wherever possible allow the child supported by the adult to whom s/he made the disclosure.

4.1.3 This may require some re-organisation of cover within your establishment; it is a good idea to have discussed such an eventuality in advance with your colleagues, and to have drawn up contingency plans.

4.1.4 Having made a referral you should follow it up in writing within 1 working day.

Appendix 4 -WHAT TO DO IF YOU HAVE A PROBLEM

Cophorne prides itself on its happy and caring atmosphere, and both children and adults share in continuing this tradition.

However, from time to time, we can all have problems and worries. Some are large; others small and they may affect just us or other people. You may feel that you are unable to manage alone.

You may be fed up or unhappy, you may feel that you are being bullied, or that you are being treated unfairly by a member of staff. There may be problems at home, or you may have other concerns.

Who can help you?

You could use the Friendship Box. You might talk to a friend, or to a senior boy or girl, or to a prefect, or to the Head Boy or head Girl.

If you prefer, you could talk to one of your teachers, or a member of the House Staff. You could talk to Matron, Mrs Lee, or you might go directly to Mr or Mrs Jones.

In some circumstances, you might find it easier to talk to someone outside school; your parents, a member of your family, or another adult.

Remember also you can contact one of the following:-

Childline	(0800 1111)
NSPCC Helpline	(0800 800 500)
Ofsted	(08456 404040)
Children's Commissioner	(020 7783 8330)
Anne Longfield	

If you are still worried and if you wish to take the matter further' speak to any member of staff or an adult you trust.

Remember that you do not need to be on your own when you do this; you can have a friend with you, an older pupil, a member of staff or another adult.

Chris Jones
Head

Appendix 5

INDICATORS OF VULNERABILITY TO RADICALISATION

1. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.

2. Extremism is defined by the Government in the Prevent Strategy as:
Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.

3. Extremism is defined by the Crown Prosecution Service as:
The demonstration of unacceptable behaviour by using any means or medium to express views which:

Encourage, justify or glorify terrorist violence in furtherance of particular beliefs;

Seek to provoke others to terrorist acts;

Encourage other serious criminal activity or seek to provoke others to serious criminal acts; or

Foster hatred which might lead to inter-community violence in the UK.

4. There is no such thing as a “typical extremist”: those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.

5. Pupils may become susceptible to radicalisation through a range of social, personal and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that school staff are able to recognise those vulnerabilities.

6. Indicators of vulnerability include:

Identity Crisis – the student / pupil is distanced from their cultural / religious heritage and experiences discomfort about their place in society;

Personal Crisis – the student / pupil may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging;

Personal Circumstances – migration; local community tensions; and events affecting the student / pupil’s country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy;
Unmet Aspirations – the student / pupil may have perceptions of injustice; a feeling of failure; rejection of civic life;

Experiences of Criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement / reintegration;

Special Educational Need – students / pupils may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

7. However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.

8. More critical risk factors could include:

Being in contact with extremist recruiters;

Accessing violent extremist websites, especially those with a social networking element;

Possessing or accessing violent extremist literature;

Using extremist narratives and a global ideology to explain personal disadvantage;

Justifying the use of violence to solve societal issues;

Joining or seeking to join extremist organisations; and

Significant changes to appearance and / or behaviour;

Experiencing a high level of social isolation resulting in issues of identity crisis and / or personal crisis.

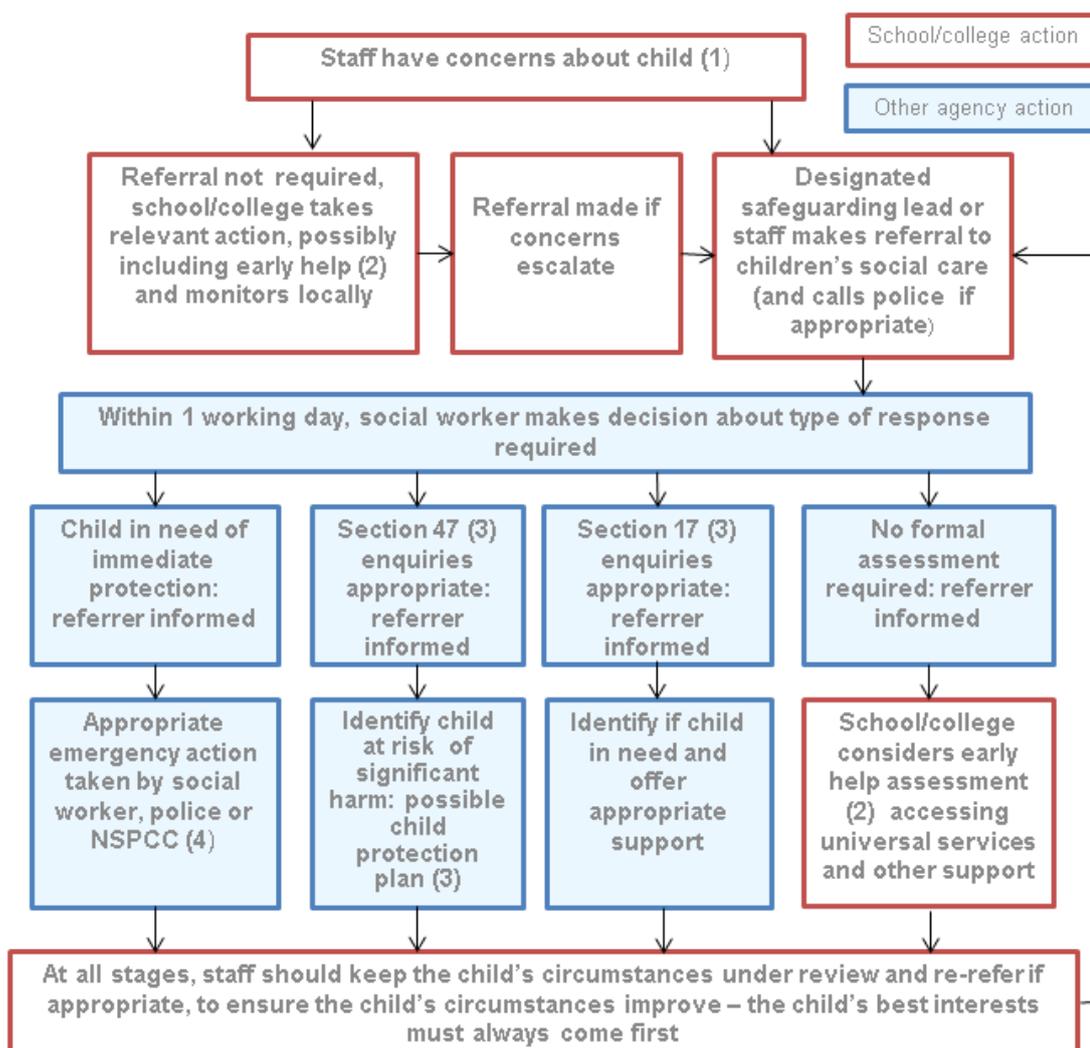
The Department of Education guidance [The Prevent Duty](#) can be accessed via this link.

Appendix 6 What happens when a concern is raised?

This diagram illustrates what action should be taken and who should take it when there are concerns raised about a child. If, at any point, there is a risk of immediate serious harm to a child a referral should be made to Children’s Social Care immediately.

Anybody can make a referral-

Actions where there are concerns about a child



Consideration

DSL will consider whether or not a referral is to be made or other action may be taken. This will be completed within 24 hours and feedback given to staff member.

□

Appendix 7 FLOW CHART FOR RAISING SAFEGUARDING CONCERNS ABOUT A CHILD

