

## Child Safeguarding Policy

*This policy is inclusive of all day and boarding pupils in the school including those in the Early Years Foundation Stage. It is available to parents on the school website and upon request.*

**Reviewed: November 2023**

**Reviewed by: J Hamilton-Smith**

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## **POLICY STATEMENT AND PRINCIPALS**

Moulsford is a preparatory school, preparing pupils for the next step in their education. We aim to educate and nurture the whole child, providing opportunities for each child to discover and develop their unique talents and abilities including their emotional, spiritual, academic, cultural, moral, linguistic and physical development. We create a culture of achievement within a vibrant and quality learning environment ensuring positive reinforcement at all levels of ability. Our mission is for Moulsford pupils to stand on their own as lifelong learners, growing in confidence and independence and where good habits become second nature. Above all we want the pupils to enjoy their school.

We aim to provide a holistic approach, wherein the Spiritual, Moral, Social and Cultural values we promote are embedded in every aspect of school life. We aim to foster and develop a caring community where everyone feels respected and valued and children are happy.

- **RESPECT FOR ALL** - We aim to establish a courteous, caring and disciplined community in which self-respect, self-discipline and a sense of responsibility are fostered along with concern for others. We want our children to feel supported and to support each other, sustaining a close partnership between school, home and the local community.
- **CURRICULUM FOR ACHIEVEMENT** - We aim to provide a wide and varied curriculum that is appropriate to the needs of each child. An education that will best develop successful learning strategies, promote autonomous learning and prepare them for the next stage of their education.
- **EVERY CHILD MATTERS** - We aim to embrace the principle of 'Every Child Matters' and work towards the five outcomes: Be Healthy; Stay Safe; Enjoy and Achieve; Make a Positive Contribution; Achieve Economic Well-being. This is built into our PSHE programme known as Learning for Life (LFL).

This policy is one of a series in the school's integrated safeguarding portfolio.

This policy is available on the school website and is included in the staff handbook, as well as being accessible through our Staff Documents.

Our core safeguarding principles are:

- the school's responsibility to safeguard and promote the welfare of children is of paramount importance
- the constant reinforcement of safeguarding principles which creates a transparent, open and clear safeguarding culture
- safer children make more successful learners
- policies will be reviewed at least annually unless an incident or new legislation or guidance suggests the need for an interim review.

### **Child Protection Statement**

We recognise our moral and statutory responsibility to safeguard and promote the welfare of all pupils. We endeavour to provide a safe and welcoming environment where children are respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure

that children receive effective support, protection and justice.

The procedures contained in this policy apply to all staff, volunteers and governors and are consistent with those of Oxfordshire Safeguarding Children Board (OSCB).

### **Policy Principles**

- The welfare of the child is paramount
- All children, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection
- All staff have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm
- Pupils and staff involved in child protection issues will receive appropriate support

### **Policy Aims**

- To provide all staff with the necessary information to enable them to meet their child protection responsibilities
- To ensure consistent good practice
- To demonstrate the school's commitment with regard to child protection to pupils, parents and other partners

#### **Terminology**

**Safeguarding** and promoting the welfare of children refers to the process of protecting children from maltreatment, preventing the impairment of health or development, ensuring that children grow up in circumstances consistent with the provision of safe and effective care and taking action to enable all children to have the best outcomes.

**Child protection** refers to the processes undertaken to protect children who have been identified as suffering, or being at risk of suffering significant harm.

**Staff** refers to all those working for or on behalf of the school, full time or part time, temporary or permanent, in either a paid or voluntary capacity.

**DSL** refers to the designated safeguarding lead at the school

**Child** includes everyone under the age of 18.

**Parent** refers to birth parents and other adults who are in a parenting role, for example step-parents, foster carers and adoptive parents.

## **SAFEGUARDING LEGISLATION AND GUIDANCE**

This policy has been developed in accordance with the Oxfordshire Safeguarding Children Board (OSCB).

Schools LADO: Jo Lloyd [jado.safeguardingchildren@oxfordshire.gov.uk](mailto:jado.safeguardingchildren@oxfordshire.gov.uk)

Assistant LADO: Donna Crozier [donna.crozier@oxfordshire.gov.uk](mailto:donna.crozier@oxfordshire.gov.uk)

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Multi Agency Safeguarding Hub (MASH): Katrina Johnson 0345 050 7666

The following safeguarding legislation and guidance has been considered when drafting this policy:

- Section 157 of the Education Act, 2002 (Independent schools only, including academies and CTCs)
- The Education (Independent Schools Standards) (England) Regulations 2014 (Independent schools only, including academies and Free Schools)
- The Safeguarding Vulnerable Groups Act, 2006
- The Teacher Standards, June 2013
- Working Together to Safeguard Children, 2018
- Keeping Children Safe in Education, 2023
- What to do if you're worried a child is being abused, 2015
- Prevent Duty Guidance: for England and Wales, 2015

An annual Safeguarding Audit is completed in partnership with the Safeguarding Governor, before completion of our annual Safeguarding Report and ratified by the Governing Body. The Safeguarding policy is updated on an annual basis.

The Safeguarding Policy is updated annually, or whenever is needed, to keep it up-to-date with safeguarding issues as they emerge and evolve, including lessons learnt.

## ROLES AND RESPONSIBILITIES

### Key Personnel

**The designated safeguarding lead (DSL) for child protection is MR JAMES HAMILTON-SMITH**

Contact details: email: [jhamiltonsmith@moulsford.com](mailto:jhamiltonsmith@moulsford.com) tel: 01491651438

**The deputy designated lead(s) is/are MR BEN BEARDMORE-GRAY / MR JAIMIE NOBLE**

Contact details: email: [bbeardmoregray@moulsford.com](mailto:bbeardmoregray@moulsford.com) / [jnoble@moulsford.com](mailto:jnoble@moulsford.com) tel: 01491651438

**The deputy designated lead for EYFS is MRS CECILIA McKENZIE**

Contact details: email: [cmckenzie@moulsford.com](mailto:cmckenzie@moulsford.com)

**The nominated child protection governor is MRS ANNA CUTTS**

Contact details: email: [a.cutts@cheltenhamcollege.org](mailto:a.cutts@cheltenhamcollege.org) tel: 07973684894

**The Headmaster is MR BEN BEARDMORE-GRAY**

Contact details: email: [bbeardmoregray@moulsford.com](mailto:bbeardmoregray@moulsford.com) tel: 01491651438

### The Designated Safeguarding Lead (DSL):

- has the status and authority within the school to carry out the duties of the post, including committing resources and supporting and directing other staff
- is appropriately trained (Designated Lead Safeguarding Training 2023: Specialist Level 3) and updated at least every two years.
- acts as a source of support and expertise to the school community
- has a working knowledge of OSCB procedures

- makes staff aware of OSCB training courses and the latest policies on safeguarding
- keeps detailed written records of all concerns, ensuring that such records are stored securely and flagged on, but kept separate from, the pupil's general file
- refers cases of suspected abuse to children's social care or police as appropriate
- ensures that when a pupil leaves the school, their child protection file is passed to the new school (separately from the main pupil file and ensuring secure transit) and confirmation of receipt is obtained. This should be carried out within 5 days of moving school, or 5 days from the start of term.
- attends and/or contributes to child protection conferences
- coordinates the school's contribution to child protection plans
- oversees on-line safety
- develops effective links with relevant statutory and voluntary agencies including the OSCB
- ensures that the child protection policy and procedures are reviewed and updated annually liaises with the nominated Governor and Headmaster (where the role is not carried out by the Headmaster) as appropriate
- makes the child protection policy available publicly, on the school's website or by other means.
- helps promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school leadership staff. Ensuring that the school, and staff, know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children."

### **The Deputy Designated Safeguarding Lead(s):**

Are trained to the same level as the DSL and, in the absence of the DSL, carries out those functions necessary to ensure the ongoing safety and protection of pupils. In the event of the long-term absence of the DSL, the deputy will assume all of the functions above.

### **GOOD PRACTICE GUIDELINES AND STAFF CODE OF CONDUCT**

Good practice includes:

- treating all pupils with respect
- setting a good example by conducting ourselves appropriately
- involving pupils in decisions that affect them
- encouraging positive, respectful and safe behaviour among pupils
- being a good listener
- being alert to changes in pupils' behaviour and to signs of abuse, neglect and exploitation
- recognising that challenging behaviour may be an indicator of abuse
- reading and understanding the school's child protection policy, staff behaviour policy and guidance documents on wider safeguarding issues
- being aware that the personal and family circumstances and lifestyles of some pupils lead to an increased risk of abuse
- referring all concerns about a pupil's safety and welfare to the DSL, or, if necessary directly to police or children's social care

See Staff **Code of Conduct Policy** (In Staff Handbook)

## **ABUSE OF POSITION OF TRUST**

All school staff are aware that inappropriate behaviour towards pupils is unacceptable and that their conduct towards pupils must be beyond reproach.

Staff understand that under the Sexual Offences Act 2003 it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of the school staff and a pupil under 18 may be a criminal offence.

## **Supporting Children**

Our school will support all pupils by:

- Encouraging self-esteem and self-assertiveness, through the curriculum, our Learning for Life programme and through our relationships, while not condoning aggression or bullying.
- Promoting a caring, safe and positive environment within the school.
- Educating pupils in regard to online behaviours and relationships, in order to keep them safe online.
- Provide a Feeling Safe Survey on an annual basis.

## **MENTAL HEALTH**

- All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Schools and colleges can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies.
- Identifying and supporting those pupils who may be suffering from mental health issues, including access to a school counsellor and training of staff on Mental Health and Wellbeing. (If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following the procedures in the Safeguarding Policy and speaking to the DSL.)

## **CHILDREN WHO MAY BE PARTICULARLY VULNERABLE**

Some children may have an increased risk of abuse, more prone to peer group isolation or bullying (including prejudice-based bullying) than other children. Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse can occur. To ensure that all of our pupils receive equal protection, we will give special consideration to children who are:

- disabled or have special educational needs
- young carers
- affected by parental substance misuse, domestic violence or parental mental health needs
- asylum seekers
- living away from home
- vulnerable to being bullied, or engaging in bullying
- living in temporary accommodation
- live transient lifestyles
- living in chaotic and unsupportive home situations
- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability or sexuality
- at risk of sexual exploitation
- do not have English as a first language
- at risk of female genital mutilation (FGM)
- at risk of forced marriage
- at risk of being drawn into extremism.

This list provides examples of additionally vulnerable groups and is not exhaustive. Special consideration includes the provision of safeguarding information and resources in community languages and accessible formats for children with communication needs.

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 condition without further exploration.
- The potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties may make it more difficult to manage or report these challenges.

## **CHILDREN WHO ARE ABSENT FROM EDUCATION**

Attendance, absence and exclusions are closely monitored. A child being absent from education for prolonged periods and/or on repeat occasions, and a child going missing from education is a potential indicator of abuse and neglect, including sexual abuse or exploitation, child criminal exploitation or mental health problems. The DSL will monitor unauthorised absence and take appropriate action including notifying the local authority, particularly where children are absent or go missing on repeated occasions and/or are missing for periods during the school day. Staff must also be alert to signs of children at risk of travelling to conflict zones, female genital mutilation and forced marriage.

## **WHISTLE BLOWING IF YOU HAVE CONCERNS ABOUT A COLLEAGUE**

Staff who are concerned about the conduct of a colleague towards a pupil are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood the situation and they will wonder whether a report could jeopardise their colleague's career. All staff must remember that the



welfare of the child is paramount. The school's whistleblowing code, which can be found in the Whistleblowing Policy, enables staff to raise concerns or allegations, initially in confidence and for a sensitive enquiry to take place.

All concerns of poor practice or possible child abuse by colleagues should be reported to the head teacher. Complaints about the head teacher/principal should be reported to the chair of governors. Staff may also report their concerns directly to children's social care or the police if they believe direct reporting is necessary to secure action.

## **ALLEGATIONS AGAINST STAFF**

When an allegation is made against a member of staff, our set procedures must be followed. This would include immediate referral to LADO before commencing any investigation. The full procedures for dealing with allegations against staff can be found in *Keeping Children Safe in Education (DfE 2023)*.

Where an allegation relates to a member of supply staff provided by an agency, the agency should be fully involved. Allegations concerning staff who no longer work at the school, or historical allegations will be reported to the police.

Where there may be a conflict of interest in reporting the matter to the Head, the LADO should be contacted directly.

The school will report promptly to the DBS any person (whether employed, contracted, a volunteer or student) whose services are no longer used for regulated activity and the DBS referral criteria are met, that is, they have caused harm or posed risk of harm to a child.

The school will also consider making a referral to the Teaching Regulation Agency (TRA) where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and a prohibition order may be appropriate. The reasons such an order may be considered are: 'unacceptable professional conduct', 'conduct that may bring the profession in disrepute', or a 'conviction, at any time, for a relevant offence'.

## **STAFF TRAINING**

It is important that all staff receive training to enable them to recognise the possible signs of abuse, neglect and exploitation and to know what to do if they have a concern.

New staff and governors will receive a briefing during their induction, which includes the following:

- Child Protection Policy
- Staff Behaviour Policy
- Acceptable Use Policy
- Pupil Code of Conduct
- Reporting and recording arrangements
- Children missing in education (including the close monitoring of attendance, absence and exclusion)

- Details for the DSL and DDSLs.

All staff, including the DSL, Head and Safeguarding Governor will receive training that is regularly updated. All staff with direct contact to children will read and understand Part One of *Keeping Children Safe in Education (DfE 2023)* including Annex B. Where appropriate some staff may read Annex A (a condensed version of Part One). All staff will also receive safeguarding and child protection updates via email, e-bulletins, website access and staff meetings throughout the year. All Governors will receive appropriate training at induction.

## **SAFER RECRUITMENT**

Our school complies with the requirements of *Keeping Children Safe in Education (DfE 2023)* and the OSCB by carrying out the required checks and verifying the applicant's identity, qualifications and work history, as well as online searches as part of due diligence. The school will inform shortlisted candidates that online searches may be done as part of due diligence checks. The school's Staff Recruitment policy and procedures set out the process in full and can be found on the school website.

At least one member of each recruitment panel will have attended safer recruitment training.

All relevant staff (involved in early years settings and/or before or after school care for children under eight) are made aware of the disqualification and disqualification by association legislation and their obligations to disclose relevant information to the school. All staff will sign documentation to this end.

The school obtains written confirmation from supply agencies or third party organisations that agency staff or other individuals who may work in the school have been appropriately checked.

Trainee teachers will be checked either by the school or by the training provider, from whom written confirmation will be obtained.

The school maintains a single central record of recruitment checks undertaken.

## **Volunteers**

Volunteers, including governors will undergo checks commensurate with their work in the school, their contact with pupils and the supervision provided to them. Under no circumstances will a volunteer who has not been appropriately checked be left unsupervised.

## **Contractors**

The school checks the identity of all contractors working on site and requests DBS with barred list checks where required by statutory guidance. Contractors who have not undergone checks will not be allowed to work unsupervised during the school day.

## **SITE SECURITY**

Visitors to the school, including contractors, are asked to sign in and are given a badge, which confirms they have permission to be on site. Parents who are simply delivering or collecting their children do not need to sign in. All visitors are expected to observe the school's safeguarding and health and safety regulations. The Headmaster will exercise professional judgement in determining whether any visitor should be escorted or supervised while on site.

## **EXTENDED SCHOOL AND OFF-SITE ARRANGEMENTS**

All extended and off site activities are subject to a risk assessment to satisfy health and safety and safeguarding requirements. Where extended school activities are provided by and managed by the school, our own child protection policy and procedures apply. If other organisations provide services or activities on our site on behalf of our school we will check that they have appropriate procedures in place, including safer recruitment procedures.

When our pupils attend off-site activities, including day and residential visits and work related activities, we will check that effective child protection arrangements are in place.

## **STAFF/PUPIL ONLINE RELATIONSHIPS**

The school provides advice to staff regarding their personal online activity and has strict rules regarding online contact and electronic communication with pupils. (See *Acceptable Use Policy* in Staff Handbook). Staff found to be in breach of these rules may be subject to disciplinary action or child protection investigation.

The use of mobile and smart technology by pupils is outlined in the ICT Acceptable Use Policy.

## **CHILD PROTECTION PROCEDURES**

### **Recognising Abuse**

To ensure that our pupils are protected from harm, we need to understand what types of behaviour constitute abuse and neglect.

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm, for example by hitting them, or by failing to act to prevent harm, for example by leaving a small child home alone.

Abuse may be committed by adult men or women and by other children and young people. *Keeping Children Safe in Education (DfE 2023)* refers to four categories of abuse. These are set out at Appendix I along with indicators of abuse.

## **BULLYING**

While bullying between children is not a separate category of abuse and neglect, it is a very serious issue that can cause anxiety and distress. All incidences of child on child abuse, bullying, including cyber-bullying and prejudice-based bullying should be reported and will be managed through our tackling-bullying procedures which can be accessed in the Anti-Bullying Policy.

## CHILD ON CHILD ABUSE

Children may be harmed by other children or young people. Staff will be aware of the harm caused by bullying and will use the school's anti-bullying procedures where necessary. However, all staff recognise that children are capable of abusing their peers and should be clear about the school's policy and procedures regarding child on child abuse. All child on child abuse is unacceptable and will be taken seriously with a zero-tolerance approach. The school is aware that although there may not be any reported cases of child on child abuse, this does not mean that it is not happening and staff will be constantly vigilant.

Child on child abuse can take many forms, including:

- **physical abuse** such as biting, hitting, kicking or hair pulling
- **sexually harmful behaviour/sexual abuse** such as inappropriate sexual language, touching, sexual assault, causing someone to engage in sexual activity without consent.
- **sexting**, including pressuring another person to send a sexual imagery or video content
- **teenage relationship abuse** - defined as a pattern of actual or threatened acts of physical, sexual or emotional abuse, perpetrated against a current or former partner
- **initiation/hazing** - used to induct newcomers into an organisation such as sports team or school groups by subjecting them to a series of potentially humiliating, embarrassing or abusing trials which promote a bond between them
- **upskirting** - typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- **prejudiced behaviour** - a range of behaviours which causes someone to feel powerless, worthless or excluded and which relates to prejudices around belonging, identity and equality, in particular prejudices linked to disabilities, special educational needs, ethnic, cultural and religious backgrounds, gender and sexual identity.
- **Online Abuse** – including threatening and derogatory language.

Abuse is abuse and should never be tolerated or passed off as 'banter' or 'part of growing up'. Different gender issues can be prevalent when dealing with child on child abuse, for example girls being sexually touched/assaulted or pupils being subject to initiation/hazing type violence. It is more likely that girls will be victims and pupils will be perpetrators, but that all child on child abuse is unacceptable and will be taken seriously.

At our school, we take the following steps to minimise or prevent the risk of child on child abuse.

- An open and honest environment where young people feel safe to share information about anything that is upsetting or worrying them.
- Assemblies are used to provide a moral framework outlining acceptable behaviour and stressing the effects of bullying.
- RE and PSHE are used to reinforce the message through stories, role play, current affairs and other suitable activities.
- Staff will endeavour always to create surroundings where everyone feels confident and at ease in school.
- We will ensure that the school is well supervised, especially in areas where children might be vulnerable.

Pupils are aware of how to report any child on child abuse. This is highlighted regularly in assemblies and form time and includes speaking to senior pupils, any members of staff, the school counsellor or through any agency (including NSPCC) which have contact information posted around the school. All allegations of child on child abuse should be passed to the DSL immediately. They will then be investigated and dealt with as follows.

- **Information gathering** – children, staff and witnesses will be spoken with as soon as possible to gather relevant information quickly to understand the situation and assess whether there was intent to cause harm.
- **Decide on action** – if it is believed that any young person is at risk of significant harm, a referral will be made to children’s social care. The DSL will then work with children’s social care to decide on next steps, which may include contacting the police.
- **Inform parents** - as with other concerns of abuse, the school will normally seek to discuss concerns about a pupil with parents. Our focus is the safety and wellbeing of the pupil and so if the school believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children’s social care and/or the police before parents are contacted.

Where allegations of sexual violence or sexual harassment are made, the school will act in accordance with the guidance set out in Part 5 of *Keeping Children Safe in Education (DfE 2023)*.

### **Supporting Those Involved**

The support required for the pupil who has been harmed will depend on their circumstance and the nature of the abuse. Support could include counselling, mentoring, the support of family and friends and/or support with improving peer relationships or some restorative justice work.

Support may also be required for the pupil that was the aggressor. . We will seek to understand why the pupil acted in this way and consider what support may be required to help the pupil and/or change behaviours. Once those needs have been met, the consequences for the harm caused or intended will be addressed.

When needed the school can refer to the Oxfordshire County Council Child on child guidance [https://schools.oxfordshire.gov.uk/cms/sites/schools/files/folders/folders/documents/safeguarding/Peer toPeer-ChildtoChildabuse.pdf](https://schools.oxfordshire.gov.uk/cms/sites/schools/files/folders/folders/documents/safeguarding/Peer%20toPeer-ChildtoChildabuse.pdf)

### **SEXTING**

There is no accepted definition of ‘sexting’ but most professionals agree that it refers to the sending or posting of sexually suggestive images, including nude or semi-nude photographs of a person under 18 years of age, via mobiles or over the internet. The [UKCCIS advice document](#) refers to this as ‘youth produced sexual imagery’.

All incidents involving youth produced sexual imagery will be responded to as follows:

- The incident will be referred to the DSL immediately and the DSL will hold an initial review meeting with appropriate staff. If appropriate, there will be subsequent interviews with the young people involved.
- Parents will be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm.
- At any point in the process, if there is a concern a young person has been harmed or is at risk of harm a referral will be made to children's social care and/or the police immediately in accordance with this policy.

In some instances, it may be necessary to refer the matter to the police. Once a report is made to the police, the report must be recorded and the police will investigate. This may include seizure of devices and interviews with the young people involved.

### **Taking Action**

**Any child, in any family in any school could become a victim of abuse. Staff should always maintain an attitude of “it could happen here”.** Key points for staff to remember for taking action are:

- in an emergency take the action necessary to help the child, if necessary call 999
- report your concern as soon as possible to the DSL, definitely by the end of the day
- do not start your own investigation
- share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family
- complete a record of concern
- seek support for yourself if you are distressed.

### **Concerns about a Pupil's Welfare**

There will be occasions when staff may suspect that a pupil may be at risk. The pupil's behaviour may have changed, their artwork could be bizarre, they may write stories or poetry that reveal confusion or distress, or physical signs may have been noticed. In these circumstances, staff will try to give the pupil the opportunity to talk and ask if they are OK or if they can help in any way.

Staff should use the **Wellbeing Concern Form on iSams** to record these early concerns. If the pupil does reveal that they are being harmed, staff should follow the advice below. Following an initial conversation with the pupil, if the member of staff has concerns, they should discuss their concerns with the DSL.

### **Pupil Disclosures**

It takes a lot of courage for a child to disclose that they are being abused. They may feel ashamed, particularly if the abuse is sexual; their abuser may have threatened what will happen if they tell; they may have lost all trust in adults; or they may believe, or have been told, that the abuse is their own fault. Sometimes they may not be aware that what is happening is abusive.

If a pupil talks to a member of staff about any risks to their safety or wellbeing, **the staff member**

**will, at the appropriate time, let the pupil know that in order to help them they must pass the information on to the DSL.** The point at which they tell the pupil this is a matter for professional judgement. During their conversations with the pupils staff will:

- allow them to speak freely
- remain calm and not overreact
- give reassuring nods or words of comfort – ‘I’m so sorry this has happened’, ‘I want to help’, ‘This isn’t your fault’, ‘You are doing the right thing in talking to me’
- not be afraid of silences
- **under no circumstances** ask investigative questions – such as how many times this has happened, whether it happens to siblings, or what does the pupil’s mother think about it
- at an appropriate time tell the pupil that in order to help them, the member of staff must pass the information on and explain to whom and why
- not automatically offer any physical touch as comfort
- avoid admonishing the child for not disclosing earlier. Saying things such as ‘I do wish you had told me about this when it started’ may be interpreted by the child to mean that they have done something wrong
- tell the pupil what will happen next
- report verbally to the DSL even if the child has promised to do it by themselves
- complete the **Wellbeing Concern form** and hand it to the DSL as soon as possible
- seek support if they feel distressed.

### **Notifying Parents**

The school will normally seek to discuss any concerns about a pupil with their parents. This must be handled sensitively and the DSL will make contact with the parent in the event of a concern, suspicion or disclosure.

Our focus is the safety and wellbeing of the pupil. Therefore, if the school believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children’s social care and/or the police before parents are contacted. However, parental consent is not required for referrals to statutory agencies.

### **CONFIDENTIALITY AND SHARING INFORMATION**

All staff will understand that child protection issues warrant a high level of confidentiality, not only out of respect for the pupil and staff involved but also to ensure that information being released into the public domain does not compromise evidence.

Staff should only discuss concerns with the DSL, head teacher or chair of governors (depending on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a ‘need-to-know’ basis.

However, following a number of cases where senior leaders in school had failed to act upon concerns raised by staff, *Keeping Children Safe in Education (DfE 2023)* emphasises that **any** member of staff can contact children’s social care if they are concerned about a child.

Child protection information will be stored and handled in line with the Data Protection Act 1998. Information sharing is guided by the following principles. The information is:

- necessary and proportionate
- relevant
- adequate
- accurate
- timely
- secure.

Information sharing decisions will be recorded, whether or not the decision is taken to share.

Record of concern forms and other written information will be stored in a locked facility and any electronic information will be password protected and only made available to relevant individuals.

Child protection information will be stored separately from the pupil's school file and the school file will be 'tagged' to indicate that separate information is held.

The DSL will normally obtain consent from the pupil and/or parents to share sensitive information within the school or with outside agencies. Where there is good reason to do so, the DSL may share information *without* consent, and will record the reason for not obtaining consent.

Child protection records are normally exempt from the disclosure provisions of the Data Protection Act 2018, which means that children and parents do not have an automatic right to see them. If any member of staff receives a request from a pupil or parent to see child protection records, they will refer the request to the head teacher [or DSL].

The GDPR and Data Protection Act do not prevent school staff from sharing information with relevant agencies, where that information may help to protect a child.

The school's confidentiality and information sharing policy is available to parents on request.

## **EARLY HELP ASSESSMENT**

Early help can make the biggest difference when support for families is provided before problems escalate. The concept of early help, or early intervention as it is sometimes known, reflects the widespread recognition that it is better to identify and resolve problems early, rather than respond when difficulties have become acute.

Staff should contact the Locality Community Support Service (LCSS) if they:

- have emerging concerns for a child that do not require an immediate safeguarding response
- need support or guidance with an Early Help Assessment
- wish to complete a No Names Consultation



## **REFERRAL TO CHILDREN'S SOCIAL CARE**

The DSL will make a referral to children's social care (Multi Agency Safeguarding Hub (MASH) 03450507666) if it is believed that a pupil is suffering or is at risk of suffering significant harm. The pupil (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child.

Any member of staff may make a direct referral to children's social care if they genuinely believe independent action is necessary to protect a child.

## **REPORTING DIRECTLY TO CHILD PROTECTION AGENCIES**

Staff should follow the reporting procedures outlined in this policy. However, they may also share information directly with children's social care, police or the NSPCC if:

- the situation is an emergency and the Designated Safeguarding Lead, their Deputy, the Headmaster and the Chair of Governors are all unavailable
- they are convinced that a direct report is the only way to ensure the pupil's safety
- for any other reason they make a judgement that direct referral is in the best interests of the child.

## **CHILDREN WITH SEXUALLY HARMFUL BEHAVIOUR**

Children may be harmed by other children or young people. Staff will be aware of the harm caused by bullying and will use the school's **anti-bullying procedures** where necessary. However, there will be occasions when a pupil's behaviour warrants a response under child protection rather than anti-bullying procedures.

Young people who display such behaviour may be victims of abuse themselves and the child protection procedures will be followed for both victim and perpetrator. Staff who become concerned about a pupil's sexual behaviour, including any known online sexual behaviour, should speak to the DSL as soon as possible.

## **CHILD SEXUAL EXPLOITATION (CSE)/CHILD CRIMINAL EXPLOITATION (CCE)**

Sexual exploitation involves an individual or group of adults taking advantage of the vulnerability of an individual or groups of children or young people, and victims can be pupils or girls. Children and young people are often unwittingly drawn into sexual exploitation through the offer of friendship and care, gifts, drugs and alcohol, and sometimes accommodation. Sexual exploitation is a serious crime and can have a long-lasting adverse impact on a child's physical and emotional health. It may also be linked to child trafficking.

The school includes the risks of sexual exploitation in the PSHE (LFL) curriculum. A common feature of sexual exploitation is that the child often doesn't recognise the coercive nature of the relationship and doesn't see themselves as a victim. The child may initially resent what they perceive as interference by staff, but staff must act on their concerns, as they would for any other type of abuse.

All staff are made aware of the indicators of Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) and all concerns are reported immediately to the DSL.

## **HONOUR-BASED VIOLENCE**

'Honour-based' violence (HBV) encompasses crimes, which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of HBV are abuse.

FGM is the collective name given to a range of procedures involving the partial or total removal of external female genitalia for non-medical reasons. In England, Wales and Northern Ireland, the practice is a criminal offence under the Female Genital Mutilation Act 2003. The practice can cause intense pain and distress and long-term health consequences, including difficulties in childbirth.

FGM is carried out on girls of any age, from young babies to older teenagers and adult women, so school staff are trained to be aware of risk indicators. Many such procedures are carried out abroad and staff should be particularly alert to suspicions or concerns expressed by female pupil about going on a long holiday during the summer vacation period.

A forced marriage is a marriage in which a female (and sometimes a male) does not consent to the marriage but is coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse. In England and Wales the practice is a criminal offence under the Anti-Social Behaviour, Crime and Policing Act 2014.

A forced marriage is not the same as an arranged marriage. In an arranged marriage, which is common in several cultures, the families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the prospective spouses. Children may be married at a very young age, and well below the age of consent in England. School staff receive training and should be particularly alert to suspicions or concerns raised by a pupil about being taken abroad and not be allowed to return to England.

## **RADICALISATION AND EXTREMISM**

The government defines extremism 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.

Some children are at risk of being radicalised: adopting beliefs and engaging in activities which KCSIE are harmful, criminal or dangerous. Islamic extremism is the most widely publicised form and schools should also remain alert to the risk of radicalisation into white supremacy extremism.

School staff receive training to help to identify signs of extremism. Staff are also required to undertake Prevent Training (Educare) which is regularly updated. Opportunities are provided in the curriculum to enable pupils to discuss issues of religion, ethnicity and culture and the school follows the DfE advice Promoting fundamental British Values as part of SMCS (spiritual, moral, social and cultural education) in Schools (2014).

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/380595/SMSC\\_Guidance\\_Maintained\\_Schools.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/380595/SMSC_Guidance_Maintained_Schools.pdf)

**Channel Duty Guidance:** Protecting vulnerable people from being drawn into terrorism (2015) notes the following:

There is no single way of identifying who is likely to be vulnerable to being drawn into terrorism. Factors that may have a bearing on someone becoming vulnerable may include: peer pressure, influence from other people or via the internet, bullying, crime against them or their involvement in crime, anti-social behaviour, family tensions, race/hate crime, lack of self esteem or identity and personal or political grievances.

Example indicators that an individual is engaged with an extremist group, cause or ideology include:

- spending increasing time in the company of other suspected extremists;
- changing their style of dress or personal appearance to accord with the group;
- day-to-day behaviour becoming increasingly centred around an extremist ideology, group or cause;
- loss of interest in other friends and activities not associated with the extremist ideology, group or cause;
- possession of material or symbols associated with an extremist cause (e.g. the swastika for far-right groups);
- attempts to recruit others to the group/cause/ideology; or
- communications with others that suggest identification with a group/cause/ideology.

Example indicators that an individual has an intention to cause harm, use violence or other illegal means include:

- clearly identifying another group as threatening what they stand for and blaming that group for all social or political ills;
- using insulting or derogatory names or labels for another group;
- speaking about the imminence of harm from the other group and the importance of action now;
- expressing attitudes that justify offending on behalf of the group, cause or ideology;
- condoning or supporting violence or harm towards others; or
- plotting or conspiring with others."

Further guidance on Prevent can be found at the OSCB website:

<https://www.oscb.org.uk/safeguarding-themes/prevent/>

## ONLINE SAFETY

As schools increasingly work online, it is essential that children are safeguarded from potentially harmful and inappropriate material. The use of technology has become a significant component of many safeguarding issues, such as child sexual exploitation, radicalisation and sexual predation.

We have ensured that appropriate and effective filters and monitoring systems are in place to block harmful and inappropriate content by managing the content available to pupils, who can contact our pupils and the personal conduct of our pupils online. We take care to ensure that these systems do not unreasonably impact on teaching and learning, and staff have been identified and assigned suitable roles and responsibilities to manage these systems. We also have effective monitoring strategies in place to meet the safeguarding needs of our pupils. Our filtering and monitoring systems are reviewed regularly (at least annually) to ensure their effectiveness.

We tell parents and carers what filtering and monitoring systems we use, so they can understand how we work to keep children safe. We will also inform parents and carers of what we are asking children to do online, including the sites they need to access, and with whom they will be interacting online.

We have also ensured that appropriate level of security protection procedures are in place to safeguard our systems, staff and learners. We review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.

Online safety risks can be categorised into four areas of risk:

- **content** - being exposed to illegal, inappropriate or harmful content such as pornography, fake news, misogyny, self-harm, suicide, radicalisation and extremism
- **contact** - being subjected to harmful online interaction with other users such as peer to peer pressure and adults posing as children or young adults to groom or exploit children
- **conduct** - personal online behaviour that increases the likelihood of, or causes, harm such as making, sending and receiving explicit images, sharing other explicit images and online bullying
- **commerce** - risks such as online gambling, inappropriate advertising, phishing or financial scams.

All staff are aware of these risk areas and should report any concerns to the DSL.

## MOBILE PHONES AND CAMERAS

Our school takes steps to ensure that there are effective procedures in place to protect children, young people, and vulnerable adults from the unacceptable use of mobile phones, cameras and other digital recording devices in school, as well as in the EYFS setting.

- Personal mobile phones belonging to members of staff are not used during teaching sessions.
- If members of staff take their own personal mobile phones on outings, for use in the case of an emergency, they must not make or receive personal calls as this will distract them.

- Photographs and recordings of children are only taken for valid reasons i.e: to record their learning and development, for displays within the setting, and for the school controlled social media channels.
- Photographs or recordings of children are only taken either on equipment belonging to the setting, or on equipment authorised by the setting. All images and recordings will be downloaded on the premises and deleted from the photographic equipment.
- Photographs and recordings of children are only taken if there is permission to do so (see registration documents).

(See school **Mobile Phone Policy**)

## **PRIVATE FOSTERING ARRANGEMENTS**

A private fostering arrangement occurs when someone other than a parent or a close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16, or aged under 18 if the child is disabled. By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify children's services as soon as possible.

Further information can be found at:

<http://www.oscb.org.uk/parents-carers/private-fostering/>

When a member of staff becomes aware that a pupil may be in a private fostering arrangement they will raise this with the DSL and the school should notify the local authority of the circumstances.

## **RELATED SAFEGUARDING PORTFOLIO POLICIES**

This policy should be read alongside our other safeguarding policies, which are set out in Appendix 2.

### **Looked After Children**

The most common reason for children becoming looked after is as a result of abuse or neglect. The school ensures that staff have the necessary skills and understanding to keep looked after children safe. Appropriate staff have information about a child's looked after legal status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child. The designated teacher for looked after children and the DSL have details of the child's social worker and the name and contact details of the local authority's virtual head for children in care.

### **Work Experience**

The school has detailed procedures to safeguard pupils undertaking work experience, including arrangements for checking people who provide placements and supervise pupils on work experience which are in accordance with the guidance in *Keeping Children Safe in Education (DfE, 2022)*. The DSL has responsibility for overseeing the checking and supervision of pupils on work experience.

## **Children Staying with Host Families**

The school may make arrangements for pupils to stay with a host family during a foreign exchange trip or sports tour. Some overseas pupils may reside with host families during school terms and we will work with the local authority to check that such arrangements are safe and suitable.

It is not possible for schools to obtain criminal record information from the DBS about adults abroad. Where pupils stay with families abroad we will agree with partner schools a shared understanding of the arrangements in place. Staff will use their professional judgement to satisfy themselves that the arrangements are appropriate and sufficient to safeguard the pupils, which will include ensuring pupils understand who to contact should an emergency occur or a situation arise which makes them feel uncomfortable. We will also make parents aware of these arrangements.

The school follows the guidance in Annex E of *Keeping Children Safe in Education (DfE 2023)* to ensure that hosting arrangements are as safe as possible.

## **Boarding Schools and Children's Homes**

Research has shown that children can be particularly vulnerable in residential settings. All boarding schools and residential special schools comply with the National Minimum Standards for their particular setting and are appropriately inspected.

The school Boarding policies can be found in Staff Documents/Inspection Ready to Go/ Boarding.



## Appendix I

### FOUR CATEGORIES OF ABUSE

#### Physical Abuse

Physical abuse is 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 (this used to be called Munchausen's Syndrome by Proxy, but is now more usually referred to as fabricated or induced illness).

#### Emotional Abuse

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

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

Neglect is 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.

### **Indicators of Abuse**

Physical signs define some types of abuse, for example, bruising, bleeding or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The identification of physical signs is complicated, as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or trauma if they 'tell'. It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty. For these reasons it is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the designated safeguarding lead. This may include mental health problems that can be a sign of abuse, neglect or exploitation.

**It is the responsibility of staff to report their concerns. It is not their responsibility to investigate or decide whether a child has been abused.**

A child who is being abused, neglected or exploited may:

- have bruises, bleeding, burns, fractures or other injuries
- show signs of pain or discomfort
- keep arms and legs covered, even in warm weather
- be concerned about changing for PE or swimming
- look unkempt and uncared for
- change their eating habits
- have difficulty in making or sustaining friendships
- appear fearful
- be reckless with regard to their own or other's safety
- self-harm
- frequently miss school, arrive late or leave the school for part of the day
- show signs of not wanting to go home
- display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn
- challenge authority
- become disinterested in their school work
- be constantly tired or preoccupied
- be wary of physical contact
- be involved in, or particularly knowledgeable about drugs or alcohol
- display sexual knowledge or behaviour beyond that normally expected for their age
- acquire gifts such as money or a mobile phone from new 'friends'.



Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw, and each small piece of information will help the DSP to decide how to proceed.

### **Further Categories of Abuse**

Further categories of abuse may include:

- Child abduction and community safety incidents
- Children and court system
- Children Missing Education
- Children with family members in prison
- County lines and/or gangs
- Modern slavery and the National Referral Mechanism
- Cybercrime
- Homelessness
- Sexual violence and sexual harassment between children in schools and colleges

All of these are listed in Annex B of *Keeping Children Safe in Education (DfE 2023)*.

## Appendix 2

### **RELATED SAFEGUARDING POLICIES**

- Staff Code of Conduct
- Behaviour/Code of Conduct
- Complaints Procedure
- Anti-Bullying
- Restraint
- Health and Safety
- Whistleblowing
- SEN
- Recruitment and Selection
- Staff/Pupil Online Communication
- Acceptable Use Policy

### **SAFEGUARDING ESSENTIAL INFORMATION**

Essential Safeguarding information can be found on the School's intranet page. This document provides contact details for the DSL and Deputy DSLs, as well as external agencies. It also provides answers to frequently asked questions and links to further policies and documentation.

## Appendix 3 - Low Level Concerns Policy

*This policy is inclusive of all pupils in the school including those in the Early Years Foundation Stage*

**Reviewed: January 2023**

**Reviewed by: J Hamilton-Smith**

### **LOW LEVEL CONCERNS POLICY**

#### **Policy Statement**

Moulsford School understands the importance of a positive culture where concerns can be identified and spoken about openly and acknowledges that this is a key element of a strong safeguarding system.

This Low-Level Concerns Policy seeks to ensure that all staff who work with children behave appropriately and to enable the early identification and prompt and appropriate management of concerns.

As part of its whole school approach to safeguarding, the School will ensure that it promotes an open and transparent culture in which all concerns about all adults working in or on behalf of the School (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

#### **Definition of a Low-Level Concern**

A low-level concern is any concern, not matter how small, even if no more than a 'nagging doubt', that an adult may have acted in a manner which:

- Is not consistent with the school's Staff Code of Conduct and/or
- does not meet the allegation threshold or is otherwise not serious enough to consider a referral to the LADO
- Examples of such behaviour could include, but are not limited to:
  - being over friendly with children
  - having favourites
  - taking photographs of children on their mobile phone when there is no professional reason to do so
  - engaging with a child on a one-to-one basis in a secluded area or behind a closed door
  - using inappropriate sexualised, intimidating or offensive language.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

It is crucial that any such concerns, including those which do not meet the harm threshold, are shared responsibly and with the right person, and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools and colleges from potential false allegations or misunderstandings.

## **Reporting a Low-Level Concern**

It is important that low-level concerns are shared with the Head as soon as reasonably possible and, in any event, within 24 hours of becoming aware of it (where the concern relates to a particular incident) – although it is never too late to share a low-level concern.

If the Head is absent for any reason, low-level concerns should be shared with the Deputy Head Pastoral/DSL who will ensure they inform the Head immediately on their return.

Low-level concerns about the Head should be referred to the Chair of Governors.

## **How Should Low-Level Concerns be Shared?**

The concern can be shared verbally with the Head, or the Deputy Head Pastoral/DSL or a written summary can be provided with the option of submitting a Low-Level Concerns Form (see Annex I)

## **Responding to Low-Level Concerns**

Where a low-level concern has been raised this will be taken seriously and dealt with promptly. The Head will:

- Speak to the person who raised the concern
- If in any doubt, seek advice from the LADO – on a no names basis if necessary
- Speak to any potential witnesses (unless advised not to do so by the LADO).
- Speak to the individual about whom the low-level concern has been raised (unless advised not to do so by LADO)
- Review the information to determine whether the behaviour:
  - Is consistent with the school's Staff Code of Conduct
  - Constitutes a low-level concern; no further action is required, or additional training/guidance/support may be required to rectify the behaviour via normal day to day management processes.
  - Is serious enough to consult with or refer to the LADO

## **Can the Reporting Person Remain Anonymous?**

Staff are encouraged to consent to be named when sharing low-level concerns, as this will help to create a culture of openness and transparency. Where there is a request to remain anonymous this will be respected as far as possible. However, there may be circumstances where this is not possible eg: where a disclosure is required by a court of local authority or under a fair disciplinary process.

## **Should Staff Self-Report?**

It may be the case that a member of staff finds themselves in a situation that could be misinterpreted or might appear compromising to others, or they may have behaved in a manner which on reflection they consider falls below the standard set out in the Staff Code of Conduct. In these circumstances they should self-report. This will enable a potentially difficult situation to be addressed at an early opportunity if necessary.

## **How Should Low-Level Concerns be Held?**

The school will retain all records of low-level concerns in a central low-level concerns file.

Where multiple low-level concerns have been shared regarding the same individual these will be kept in chronological order as a running record, with a timeline alongside. These records will be kept confidentially and securely, with access only to the Head, Chair of Governors and HR.

Records will be reviewed periodically, and whenever a low-level concern is added, so patterns of concerning or inappropriate behaviour can be identified.

## **References**

Low-level concerns will not be included in references unless it has met the threshold for referral to the LADO and found to be substantiated.

## **Governance**

The Head will regularly inform the Governors about the implementation of the low-level concerns policy including any evidence of its effectiveness. The Safeguarding Governor may also review an anonymised sample to ensure that these concerns have been handled appropriately.

**ANNEX I - LOW LEVEL CONCERNS FORM**

Please use this form to share any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ – that an adult may have acted in a way that:

- is inconsistent with the School’s Staff Code of Conduct, including inappropriate conduct outside of work, and
- does not meet the allegation threshold, or is otherwise not serious enough to consider a referral to the LADO.

You should provide a concise record – including brief context in which the low-level concern arose, and details which are chronological, and as precise and accurate as possible – of any such concern and relevant incident(s) (and please use a separate sheet if necessary).

The record should be signed, timed and dated.

**Details of Concern**

Name of Staff:	Department & Role:
Signed:	Time & Date:

Received by:	At (Time):	On (Date):
Action Taken:		
Signed:	Time & Date:	

This record will be held securely in accordance with the School's Low-Level Concerns Policy. Please note that low-level concerns will be treated in confidence as far as possible, but the School may in certain circumstances be subject to legal reporting requirements or other legal obligations to share information with appropriate persons, including legal claims and formal investigations.

## ANNEX 2 – SHARING LOW LEVEL CONCERNS

### Sharing Low-Level Concerns (LLCs) – Action Required By Staff, Head

If a member of staff has an **allegation that may meet the harm threshold** – they should follow the procedure in the School’s Safeguarding Policy

If a member of staff has what they **believe** to be a concern that does not meet the harm threshold – i.e. LLC – they should take the below action.

**KCSIE 2023 requires low-level concerns to be shared with the Head – unless they relate to the Head – as per paragraph 74 of KCSIE 2023.**

