



This policy is approved for publication by: **Natalie Taylor, Principal**

This policy was approved for publication on: **10th September 2023**

This policy will be next reviewed on: **September 2024**

Statutory Framework

- Section 157 of the Education Act 2002 (as amended) and the Education (Independent School Standards) Regulations 2014 for independent schools, place a statutory duty on proprietors to have policies and procedures in place that safeguard and promote the welfare of children and young people who are pupils of the school which must have regard to any guidance given by the Secretary of State.
- In accordance with statutory guidance, Working Together to Safeguard Children 2018, local safeguarding arrangements must be established for every local authority area by the three safeguarding partners (Local Authority, Police and Integrated Care Boards). All three partners have equal and joint responsibility for a range of roles and statutory functions including developing local safeguarding policy and procedures and scrutinising local arrangements. In Suffolk, all schools have been named by the Suffolk Safeguarding Partnership (SSP) as relevant agencies, this means staff in schools must work in accordance with the multi-agency procedures developed by the Suffolk Safeguarding Partnership (SSP) which can be found on their website at: <https://suffolksp.org.uk/>.

Abbreviations

Organisations, publications and papers with multiple references throughout this document will appear as follows:

-	Keeping Children Safe in Education	KCSiE
-	Working Together to Safeguard Children	WTTSC
-	UK Council for Child Internet Safety	UKCCIS
-	Local Authority Designated Officer	LADO
-	Suffolk Safeguarding Partnership	SSP (Formerly SSCB)
-	Multi-Agency Safeguarding Hub	MASH

Annexes to this policy:

- Annex 1 Types of abuse and neglect (as identified in KCSiE)
- Annex 2 Further information on Female Genital Mutilation (FGM)
- Annex 3 Further Information on Preventing Radicalisation – ‘Prevent’
- Annex 4 E–Safety
- Annex 5 Role of Designated Safeguarding Leads

Introduction

The proprietor recognises the need to ensure that it complies with its duties under legislation and this policy has regard to statutory guidance, Keeping Children Safe in Education (2023) (KCSiE), Working Together to Safeguard Children (WTTSC) and locally agreed inter-agency procedures put in place by the Local Safeguarding Partnership.

This policy will be reviewed annually, as a minimum, and will be made available publicly via the school website or on request.

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

This policy is for all staff, parents, governors, volunteers and the wider school community. It forms part of the child protection and safeguarding arrangements for our school and is one of a suite of policies and procedures which encompass the safeguarding responsibilities of the school. In particular, this policy should be read in conjunction with the school's Code of Conduct/Staff Behaviour Policy (including Acceptable Use of ICT), Safer Recruitment Policy, E-Safety Policy and Behaviour and Anti-Bullying Policy, school's guidance on low level concerns, Child on Child Abuse Policy and procedures, and Part Five of KCSiE, copies of which will be provided to all to all staff on induction.

The aims of this policy are to:

- Provide staff with a framework to promote and safeguard the wellbeing of children and young people and ensure that they understand and meet their statutory responsibilities;
- Ensure consistent good practice across the school.

The proprietor expects that all staff will have read and understand this child protection and safeguarding policy and their responsibility to implement it. Staff must, as a minimum, have read and understand Part One of KCSiE and Appendix B. The proprietor will ensure that they and senior leaders have read and understand Parts One and Two of KCSiE. The proprietor will ensure that those staff who do not work directly with children have read either Part One or Annex A of KCSiE together with Annex B. There may be some staff whom the proprietor requires them to read additional sections.

The proprietor will ensure that arrangements are in place for all staff members to receive appropriate safeguarding and child protection training which is regularly updated.

Compliance with the policy will be monitored by the Principal, Designated Safeguarding Lead (DSL) and the named safeguarding proprietor.

Statement of Intent

Brookes UK wants to safeguard and promote the welfare of children who are pupils at the school, including boarders, Boarding Schools National Minimum Standards and EYFS which complies with the Department for Education (DfE) KCSiE – statutory guidance for schools and colleges – and has regard to WTTSC.

Safeguarding Children is the action we take to promote the welfare of children and protect them from harm.

Children includes everyone under the age of 18

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

- protecting children from maltreatment;
- preventing impairment of children's mental and physical health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care;
- taking action to enable all children to have the best outcomes

This policy includes guidance on procedures when a member of staff, volunteer, Senior Designated Safeguarding Lead for safeguarding and child protection (DSL) or Principal faces allegations of abuse.

This policy covers both our Early Years provision and the whole School, including boarding.

Parents and Carers can access this policy on the [school's website](#) and reference is made to safeguarding duties in the Parent Handbook and in the Statement on Child Protection displayed in the school entrance and other key locations.

The school recognises that effective child protection work requires sound procedures, good inter-agency co-operation (Section 10 of the Children's Act) and a workforce that is competent and confident in responding to child protection situations.

The welfare of pupils at Brookes UK is safeguarded and promoted by the drawing up and effective implementation of our written risk assessment policy at whole school, site, section and department level, and with appropriate action taken to reduce risks that are identified.

Children who may be particularly vulnerable

We recognise specifically that children living away from home in a boarding setting can face additional safeguarding challenges. We also recognise the particular vulnerabilities of children with special educational needs and disabilities (SEND) to abuse. Children with SEND can face additional safeguarding challenges and we recognise that additional barriers can exist when recognising abuse and neglect in this group of children.

This can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- children with SEN and disabilities can be disproportionately impacted by things like bullying- without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.

Contact Information

Multi-agency Safeguarding Hub (MASH) Professional Helpline: 03456061499

MASH [Webchat facility](#)

Customer First free phone Number: 0808 800 4005

Lines are open 8.00 am to 6.45 pm Monday to Friday

Outside these hours your call will be diverted to the Emergency Duty Service

Suffolk Police: Main switchboard Number: 01473 613500 or 999

Suffolk Police Cybercrime Unit: 101

Suffolk Local Safeguarding Partnership : www.suffolksp.org.uk

The NSPCC child protection helpline on 0808 800 5000

For allegations against all staff and volunteers Safeguarding Managers can be contacted via email on LADOCentral@suffolk.gcsx.gov.uk or using the LADO central telephone number 0300 123 2044

We advise use of the 101 (non-emergency police number), not just for cases of serious harm but where there are concerns about extremism, for example. The DfE dedicated helpline and mailbox for non-emergency advice for staff and proprietors: 020 7340 7264 and counter-extremism@education.gsi.gov.uk.

Children absent from education

All new arrivals to the school, of compulsory school age, must be recorded on the required Suffolk County Council form and e-mailed to the Suffolk Children Missing In Education (CME) team. Where reasonably possible the school should hold more than one emergency contact number for each pupil/student. This form must be completed **within 5 days** of the pupil/s arriving at the school, (not new intakes such as Reception or Y7)

- The parent of any pupil who leaves the school must be asked for the name and address of the school they are moving to. Parents must also provide a forwarding home address and telephone number. This information must be sent to Suffolk CME team **within 5 days** of the child leaving the school.

If a child does not return to school after a break, and you have not been given a reason for this, you must inform Suffolk County Council. You are required to make investigations on behalf of the CME team to find out any information from friends of the family. E.g. ask basic questions of parents you know were friends with the family of the missing child. A friend might be able to say, for example, they've moved to Spain, but don't know the address. This information would mean the CME officer would be able to make contact with contacts in Spain to see if they can find any indication if the child has appeared in the education system there.

Roles and Responsibilities

Safeguarding and promoting the welfare of children is everyone's responsibility.

Proprietor

The proprietor has a strategic leadership responsibility for the school's safeguarding arrangements and must ensure that they comply with their duties under legislation. The proprietor has a legal responsibility to make sure that there are appropriate policies and procedures in place, which have regard to statutory guidance, in order for appropriate action to be taken in a timely manner to safeguard and promote children and young people's welfare. The proprietor will also ensure that the policy is made available to parents and carers by publishing this on the school website or in writing if requested.

The proprietor will ensure they facilitate a whole school approach to safeguarding. This means involving everyone in the school and ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development, and that all systems, processes and policies are transparent, clear and easy to understand and operate with the best interests of the child at their heart.

The proprietor will ensure that where there is a safeguarding concern school leaders will make sure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems will be in place that are well promoted, easily understood and easily accessible for children to confidently report any form of abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

The proprietor will ensure that the school contributes to multi-agency working in line with statutory guidance Working Together to Safeguard Children and that the school's safeguarding arrangements take into account the procedures and practice of the locally agreed multi-agency safeguarding arrangements in place.

The proprietor will ensure that, as a minimum, the following policies are in place to enable appropriate action to be taken to safeguard and promote the welfare of children and young people as appropriate:

- child-on-child abuse
- online safety,
- behaviour, including measures to prevent bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- special educational needs and disability
- supporting pupils in school with medical conditions
- staff code of conduct/behaviour policy (which should also include the procedures that will be followed to address low-level concerns and allegations made against staff, and acceptable use of IT, including the use of mobile devices and communications, including the use of social media.)
- procedure for responding to children who go missing from education, particularly on repeat occasions.
- safer recruitment

It is the responsibility of the proprietor to ensure that staff and volunteers are properly vetted to make sure they are safe to work with the pupils who attend our school and that the school has procedures for appropriately managing safeguarding allegations made against, or low level concerns involving, members of staff (including the headteacher, supply teachers, contractors, and volunteer helpers).

The proprietor will ensure that a Designated Safeguarding Lead (DSL) who is a senior member of the leadership team and has lead responsibility for safeguarding and child protection, and a designated teacher to promote the educational achievement of children who are looked after, or previously looked after, and will ensure that these people have the appropriate training.

The proprietor will have regard to their obligations under the Human Rights Act 1998 and the Equality Act 2010 (including the Public Sector Equality Duty).

The proprietor will inform Suffolk County Council and the SSP annually about the discharge of their safeguarding duties ensuring that the safeguarding self-assessment audit is completed.

Designated Safeguarding Lead (DSL)

The DSL will take lead responsibility for safeguarding and child protection (including online safety, including and understanding the filtering and monitoring systems in place). This will be explicit in the role-holder's job description. (The broad areas of responsibility and activities related to the role of the DSL are set out in Annex C of KCSiE and Annex 6 (Role of Designated Safeguarding Leads) of this policy.

The DSL will have the appropriate status and authority to carry out the duties of the post effectively.

The DSL and any alternate DSLs will provide advice and support to staff in school and will liaise with the local authority and work with other agencies in line with Working Together to Safeguard Children.

During term time, the DSL and/or an alternate should always be available during school hours for staff to discuss any safeguarding concerns. The DSL will make arrangements for adequate and appropriate cover arrangements for any out of hours/out of term time activities.

The DSL will undergo training to provide them with the knowledge and skills to carry out the role. This training will be updated every two years.

The different sections of the school will have a specific DSL Brookes/Boarding/CHerry Trees.

Principal

The Principal will ensure that the policies and procedures adopted by the proprietor are fully implemented and that sufficient resources, time and training are provided to enable staff members to discharge their safeguarding responsibilities and contribute effectively to a whole school approach to safeguarding.

The Principal will be responsible for ensuring a culture of safety and ongoing vigilance that fosters the belief that 'it could happen here'.

All staff

- All staff have a responsibility to provide a safe environment in which children can learn.
- All staff must read and ensure they understand Part One of KCSiE and all other statutory safeguarding documentation as outlined in staff training sessions. A record of this as well as attendance at training is kept.
- All staff must ensure they are familiar with the systems within school which support safeguarding, including the safeguarding and child protection policy, the code of conduct/staff behaviour policy, the safeguarding response to children who go missing from education, and the role of the DSL (including the identity of the DSL and any deputies). These will be explained to all staff on induction.

All staff should be aware of indicators of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection. All staff should maintain a belief that 'it could happen here' where safeguarding is concerned and if staff have any concerns about a child's welfare they must act on them immediately.

- All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.
- All staff should be aware of the process for making referrals to children's social care and for statutory assessments under the Children Act 1989 that may follow a referral, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) along with the role they might be expected to play in such assessments.
- All staff should be aware of, and understand their role within the [early help process](#) for all services, at both a Local Authority and school level. This includes providing support as soon as a problem emerges, liaising with the DSL, and sharing information with other professionals in order to support early identification and assessment, focussing on providing interventions to avoid escalation of worries and needs. In some cases, staff may be asked to act as the lead professional in undertaking an early help assessment.

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

- is disabled or has certain health conditions and has specific needs
- has special educational needs (whether or not they have a statutory education, health and care plan)
- Has a mental health need
- is a young carer
- is showing signs of being drawn in to antisocial or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from care or from home
- is misusing drugs or alcohol themselves
- is at risk of modern slavery, trafficking or sexual or criminal exploitation
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse
- has returned home to their family from care
- Is absent on repeated occasions
- is showing early signs of abuse and/or neglect
- is at risk of being radicalised or exploited
- is a privately fostered child
- Is at risk of 'honour-based abuse such as Female Genital Mutilation (FGM) or forced marriage
- Is a privately fostered child
- Is persistently absent from education, including persistent absences for part of the school day

Knowing what to look out for is vital to the early identification of abuse and neglect and specific safeguarding issues such as child criminal exploitation and child sexual exploitation. If staff are unsure, they should always speak to the DSL (or deputy). If in exceptional circumstances the DSL (or deputy) is not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the senior leadership team and/or take advice from children's social care. In these circumstances, any action taken should be shared with the DSL as soon as is practically possible.

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. **See Annex 5 - Staff Code of Conduct**

Induction & Training

The proprietor will ensure that all staff receive appropriate safeguarding and child protection training ((including online safety, which amongst other things includes an understanding of the expectations, applicable role and responsibilities in relation to filtering and monitoring) which is regularly updated and in line with [advice from SSP](#). In addition, all staff members will receive regular safeguarding and child protection updates (for example, via email, e-bulletins, staff meetings) as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

All new staff members will undergo safeguarding and child protection training at induction. This will include training on the school's safeguarding and child protection policy, the code of conduct/staff behaviour policy, low level concerns guidance, the behaviour policy, the safeguarding response to children who are absent from education, whistleblowing procedures/policy and the role of the designated safeguarding lead. Copies of the school's policies, procedures and Part One of KCSiE (or Appendix A for those staff who do not work directly with children) will be provided to new staff at induction.

NB If there are circumstances which meant that a copy of KCSiE could not be read (for example by way of language or lack of literacy) we would ensure that they would understand the key information.

The proprietor will ensure that safeguarding training for staff, including online safety training, is integrated, aligned and considered as part of the whole school safeguarding approach and wider staff training and curriculum planning.

The Principal will ensure that an accurate record of safeguarding training undertaken by all staff is maintained and updated regularly.

In considering safeguarding training arrangements the governing body/proprietor will also have regard to the Teachers' Standards which set out the expectation that all teachers manage behaviour effectively to ensure a good and safe educational environment, and require teachers to have a clear understanding of the needs of all pupils.

Recognising concerns - signs and indicators of abuse

All staff should be aware of indicators of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection. Staff should be aware that children can be at risk of harm inside and outside of school, inside and outside of home and online. Staff should exercise professional curiosity and know what to look for as this is vital for the early identification of abuse or neglect.

All 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.

All staff should consider whether children might be at risk of abuse or exploitation in situations outside their families – harms take a variety of different forms and children can be vulnerable to multiple harms including sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation.

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues and recognise that children are at risk of abuse and other risks online as well as face to face. In many cases abuse will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

In all cases, if staff are unsure, they should always speak to the DSL.

KCSiE refers to four categories of abuse. These are set out in Appendix One along with indicators of abuse.

If staff have significant concerns about any child they should make them known to the school's Senior Designated Safeguarding Lead (DSL), **Mrs Natalie Taylor, Principal** or **Mrs Sarah Elford, Deputy Principal** (Deputy DSL) **Mr Paul Jackson, Boarding Parent**(Deputy DSL) , **Laura Nevill, Brookes SENDCo**, (Deputy DSL) **Mrs Helena Jackson, Boarding House Parent** (Deputy DSL) and **Jenny Donlon, Early Years SENDCo** (Deputy DSL)

By phone: (via the main school switchboard)

01284 760531

By email:

[Natalie Taylor \(Lead DSL\)](#)
[Sarah Elford \(Deputy DSL\)](#)
[Paul Jackson \(Deputy DSL\)](#)
[Laura Nevill \(Deputy DSL\)](#)
[Helena Jackson \(Deputy DSL\)](#)
[Jennie Donlon \(Deputy DSL\)](#)

By letter to:

Brookes UK, Flempton Road, Risby, Bury St Edmunds IP28 6QJ

Mr David Rose (Proprietor) is responsible for the employment of staff.

The Proprietor will have an oversight of this policy and will be kept informed of any concerns or changes to staff and procedures.

Contact email:

[David Rose \(Proprietor\)](#)

Contact Telephone:

07943 256605

Taking Action

Consider what you know, what you have seen and things about the child which cause concern.

If a child chooses to disclose, you **SHOULD**:

- be accessible and receptive;
- listen carefully and uncritically at the child's pace;
- take what is said seriously;
- reassure the child that they are right to tell;
- tell the child that you must pass this information on;
- make a careful record of what was said.
- Discuss your concerns urgently with the DSL or Deputy DSL.
- Log the concern on ISAMs Wellbeing manager (Brookes), for Cherry Trees complete a nagging doubt or Cause for concern form, available in all rooms and in the Cherry Trees office. It is important to make a note as soon as possible following a disclosure if a form or a computer is not available.
- Log the concern via iSAMS 'Well being'
- Staff are advised not to use email to write down or report abuse or concerns. If for any reason an email is considered appropriate to communicate to another party, the child's full name or other features that would identify him/her should not be included.
- The Principal views the Wellbeing Manager daily, Cherry Trees DSL monitors forms as soon as they are completed and both will take action as appropriate and all records are kept confidential, and reviewed regularly so that concerning patterns of behaviour can be spotted.
- **It is essential that all concerns, discussions and decisions and the reason for those decisions are recorded in writing/on the Wellbeing Manager.**

You should NEVER:

- take photographs or examine an injury;
- investigate or probe aiming to prove or disprove possible abuse – never ask leading questions;
- make promises to children about confidentiality or keeping 'secrets';
- assume that someone else will take the necessary action;
- jump to conclusions or react with shock, anger or horror;
- speculate or accuse anybody;
- confront another person (adult or child) allegedly involved;
- offer opinions about what is being said or about the persons allegedly involved;
- forget to record what you have been told;
- fail to pass the information onto the correct person;
- ask a child to sign a written copy of the disclosure.
- For children with communication difficulties or who use alternative/augmented communication systems, you may need to take extra care to ensure that signs of abuse and neglect are identified and interpreted correctly, but concerns should be reported in exactly the same manner as for other children.

Taking concerns forward

When a record of a safeguarding concern is passed to the DSL, they will record the time and date the record of concern was received. The DSL will assess the concern and taking into account any other safeguarding information known about the child/young person, consider whether it suggests that the threshold of significant harm, or risk of significant harm, has been reached. If the DSL is unsure whether the threshold has been met they will contact the MASH Professional Consultation Line for advice (0345 606 1499). Where appropriate, the DSL will complete and submit a [Multi Agency Referral Form \(MARF\)](#).

Where the DSL believes that a child or young person may be at imminent and significant harm or risk of harm they should call Customer First (0808 800 4005) immediately and then complete the SSCB MARF within 24 hours to confirm the referral. In these circumstances, it is important that any consultation should not delay a referral to Customer First.

Where a safeguarding concern does not meet the threshold for completion of a MARF, the DSL should record how this decision has been reached and should consider whether additional needs of the child have been identified that might be met by a coordinated offer of early help.

School staff might be required to contribute to multi-agency plans to provide additional support to children. This might include attendance at child protection conferences or core group meetings. The school is committed to providing as much relevant up to date information about the child as possible, including submitting reports for child protection conference in advance of the meeting in accordance with SSCB procedures and timescales.

Informing 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 well being 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.

Confidentiality, sharing information, record keeping

Information sharing is vital in safeguarding children by identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including in relation to their educational outcomes. Schools have clear powers to share, hold and use information for these purposes.

As part of meeting a child's needs, the school understands that it is critical to recognise the importance of information sharing between professionals and local agencies and will contribute to multi-agency working in line with Working Together to Safeguard Children. Where there are concerns about the safety of a child, the sharing of information in a timely and effective manner between organisations can reduce the risk of harm. Whilst the Data Protection Act 2018 places duties on organisations and individuals to process personal information fairly and lawfully, and to keep the information they hold safe and secure, it is not a barrier to sharing information where the failure to do so would result in a child or vulnerable adult being placed at risk of harm. Similarly, human rights concerns, such as respecting the right to a private and family life would not prevent sharing where there are real safeguarding concerns. Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. Staff will have regard to the Government guidance: [Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers](#) which supports staff who have to make decisions about sharing information. This advice includes the seven golden rules for sharing information and considerations with regard to the Data Protection Act 2018 and General Data Protection Regulation (GDPR). If in any doubt about sharing information, staff should speak to the DSL or a deputy.

Well-kept records are essential to good child protection practice. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing. If in doubt about recording requirements, staff should discuss with the DSL.

The school recognises that confidentiality should be maintained in respect of all matters relating to child protection. Information on individual child protection cases may be shared by the DSL or alternate DSL with other relevant members of staff. This will be on a 'need to know' basis and where it is in the child's best interests to do so.

A member of staff must never guarantee confidentiality to anyone about a safeguarding concern (including parents/carers or pupils), or promise a child to keep a secret which might compromise the child's safety or wellbeing.

As well as allowing for information sharing, in circumstances where it is warranted because it would put a child at risk of serious harm, the DPA 2018 and the GDPR allow schools to withhold information. This may be particularly relevant where a child is affected by domestic abuse perpetuated by a parent or carer, is in a refuge or another form of emergency accommodation, and the serious harm tests is met.

Ordinarily, the school will always undertake to share its intention to refer a child to Social Care with their parents /carers unless to do so could put the child at greater risk of harm, or impede a criminal investigation. It would be legitimate to share information without consent where: it is not possible to gain consent; it cannot reasonably be expected that a practitioner gains consent; and, if to gain consent would put a child at risk. If in doubt, staff will consult with the MASH Professional Consultation Line on this point.

The school will have regard to SCC Guidance for schools on maintaining and transferring pupil safeguarding/child protection records. Where a child leaves the school, the DSL will ensure their child protection file is transferred to the new school as soon as possible (within 5 days for an in-year transfer or within the first 5 days of the start of a new term). The file will be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained.

The school's Confidentiality and Information-Sharing Policy is available to parents and pupils on request.

Boarding School and children staying with host families

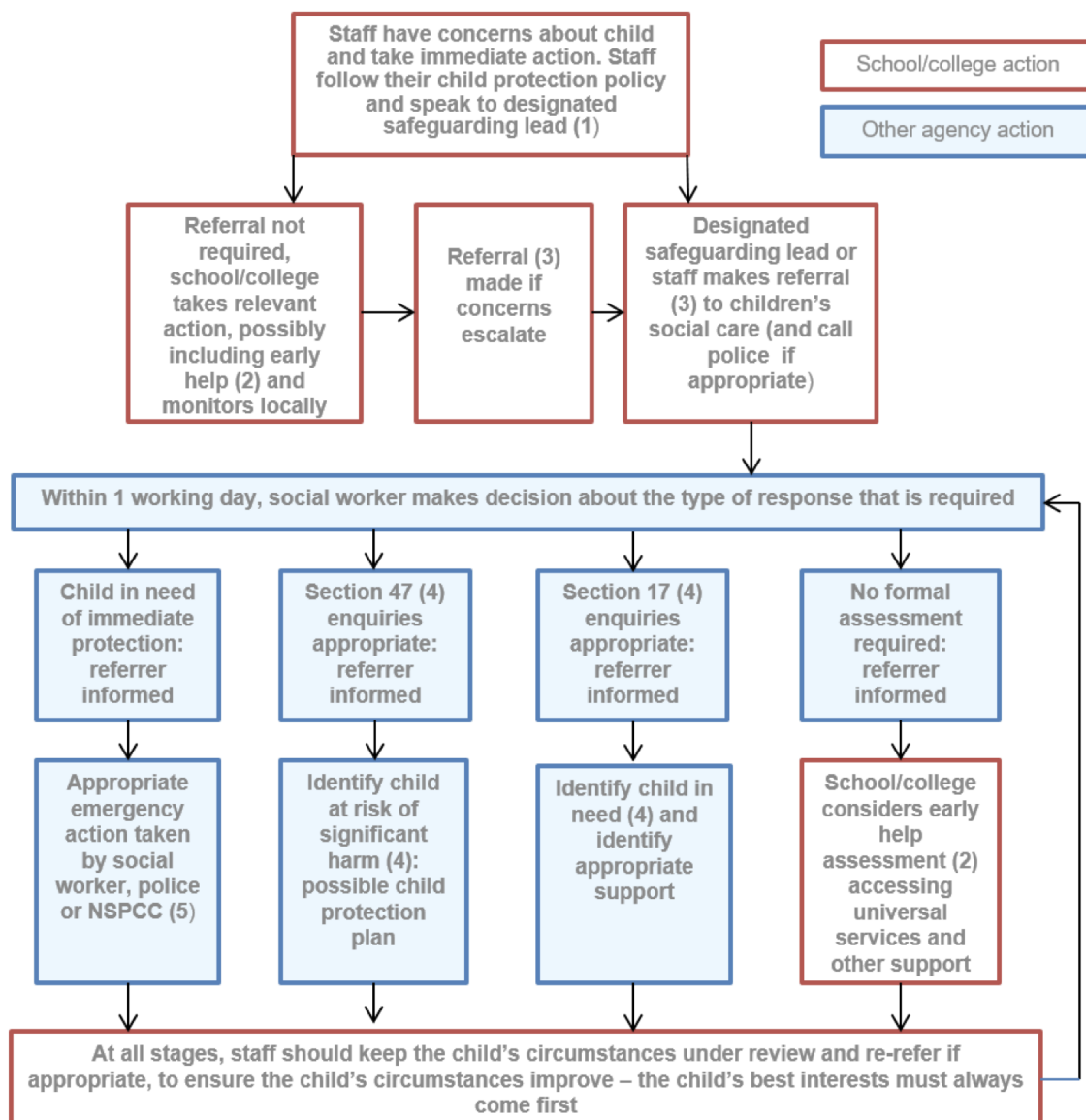
Research has shown that children can be particularly vulnerable in residential settings. Our boarding accommodation in Gryphon House complies with the National Minimum Standards and is appropriately inspected.

The school may make arrangements for pupils to stay with a host family during a foreign exchange trip or sports tour. Some boarding pupils may reside with host families during school terms.

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 our sister 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 KCSiE (KCSiE 2023) to ensure that hosting arrangements are as safe as possible.

Actions where there are concerns about a child



(1) In cases which also involve an allegation of abuse against a staff member, see Part Four of this guidance.

- (2) Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from coordinated early help, an early help inter-agency assessment should be arranged. Chapter one of WTTSC provides detailed guidance on the early help process.
- (3) Referrals should follow the local authority's referral process. Chapter one of WTTSC
- (4) Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. This can include section 17 assessments of children in need and section 47 assessments of children at risk of significant harm. Full details are in Chapter one of WTTSC
- (5) This could include applying for an Emergency Protection Order (EPO).

Specific Safeguarding issues

Child on Child abuse

All staff should be aware that children can abuse other children (often referred to as child-on-child abuse). And that it can happen both inside and outside of school and online. It is important that all staff recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports.

All staff should understand, that even if there no reports in school it does not mean it's not happening, it may be the case that it is just not being reported. As such, it is important if staff have any concerns regarding child-on-child abuse they should speak to the DSL (or deputy) and record these using the Wellbeing Manager system.

It is essential that all staff understand the importance of challenging inappropriate behaviours between children, many of which are listed below, that are abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

All child and child abuse is unacceptable and will be taken seriously.

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
- **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
- **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.
- **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.

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 boys being subject to initiation/hazing type violence.

At Brookes UK 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.

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 KCSiE.

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 who harmed. 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.

Honour-Based Violence

FGM is a form of honour-based violence and is illegal in the UK. In addition to reporting cases of FGM to the police, teachers should also discuss the case with the DSL and should involve children's social care as appropriate.

See Annex 2.

Child Sexual Exploitation

Child sexual exploitation is a form of child sexual abuse. Sexual abuse 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 clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse (including via the internet).

The definition of child sexual exploitation is as follows:

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.

Any practitioner working with a child who they think may be at risk of child sexual exploitation should follow the guidance set out in WTTSC and share this information with local authority children's social care. You should refer any concerns about a child's welfare to local authority children's social care. If you believe a child is in immediate risk of harm, you should contact the police. (Child Sexual Exploitation DfE February 2017)

Child criminal exploitation: county lines

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity where drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the [National Referral Mechanism](#). The National crime agency information on human-trafficking should be considered.

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.

Preventing Radicalisation - Prevent

Protecting children from the risk of radicalisation is similar in nature to protecting children from other forms of harm and abuse. As with other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include making a referral to the Channel programme. All staff have Prevent training through Educare so they are aware of potential risks. **See Annex 3 - Further Information on Preventing Radicalisation – 'Prevent'.**

Domestic Abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or pattern of incidents. That's abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long term impact on their health, well-being, development, and ability to learn.

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.

Staff can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following the school's policy, and speaking to the DSL or a deputy.

Online safety and filtering and monitoring

The use of technology has become a significant component of many safeguarding issues such as child sexual exploitation, radicalisation and sexual predation and technology often provides the platform that facilitates such harm.

The proprietor has had due regard to the additional information and support set out in KCSiE and ensures that the school has a whole school approach to online safety, and has a clear policy on use of communications technology in school. Online safety will be a running and interrelated theme when devising and implementing policies and procedures. This will include considering how online safety is reflected in all relevant policies and whilst planning the curriculum, any teacher training, the role of the DSL and any parental engagement.

It is essential that children are safeguarded from potentially harmful and inappropriate online material. The school adopts a whole school approach to online safety to protect and educate pupils and staff in their use of technology, and establishes mechanisms to identify, intervene in, and escalate any concerns as appropriate.

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

- § Content: being exposed to illegal, inappropriate or harmful content, for example, pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, or radicalisation or extremism;
- § Contact: being exposed to harmful online interaction with other users, for example, peer to peer pressure, commercial advertising, and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes;
- § Conduct: online behaviour that increases the likelihood of, or causes, harm, for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images, and online bullying); and

§ Commerce: risks such as online gambling, inappropriate advertising, phishing and/or financial scams. If staff feel that either they or pupils are at risk this should be reported to the Anti-Phishing Working Group (<https://apwg.org/>).

The proprietor will ensure that an annual review is undertaken of the school's approach to online safety including the school's filtering and monitoring provision, supported by an annual risk assessment that considers and reflects the risks pupils face online. The review should include a member of the senior leadership team, the DSL, the IT service provider. The school should ensure they have the appropriate level of security protection procedures in place in order to safeguard their systems, staff and learners and review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies. Guidance on cyber security including considerations can be found at [Cyber security training for school staff - NCSC.GOV.UK](https://www.ncsc.gov.uk/learning/cyber-security-training-for-school-staff)

The school's online safety policy outlines the appropriate filtering and monitoring which take places on school devices and school networks. It also outlines the expectations, applicable roles and responsibilities in relation filtering and monitoring.

School staff can access resources, information and support as set out in Annex B of KCSiE.

Use of Mobile Phones and Cameras

We take 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 and cameras in the setting. Please refer to **Acceptable Use of ICT and Mobile Devices and Social Networking by Staff** and the **Boarding Handbook**.

Personal mobile phones

- Personal mobile phones belonging to members of staff are not to be used for personal reasons in classrooms during working hours. All phones must be switched to silent during teaching time. Early Years staff put their phones in their cloakroom area during their time in the classroom. Use of mobile phones is only allowed in staff rooms, offices or where there are no children present
- Members of staff taking photographs of children/work will follow the upload and deletion procedure..
- Parents and visitors are requested not to use their mobile phones whilst on the premises. There is an exception if a visitor's company or organisation operates a lone working policy that requires contact with their office periodically throughout the day. Visitors will be advised of a quiet space where they can use a mobile phone, where they can get a signal, and where there are no children present.
- Workmen will be accompanied whilst they are using their phones.
- Any person using a phone onsite must be challenged.

Cameras and videos

- Members of staff must not bring their own cameras or video recorders into the school, unless they have prior permission from the Principal.
- Photographs and recordings of children are only taken for valid reasons, i.e. to record development, for displays within the setting or for publicity purposes.
- Where parents request permission to photograph or record their own children at school, permission will first be gained from all parents for their children to be included. This permission is sought annually through the data collection forms procedure.
- Photographs and recordings of children are only taken of children if there is written permission

Safer recruitment

Our school complies with the requirements of KCSiE and the LSCB by carrying out the required checks and verifying the applicant's identity, qualifications and work history. This is detailed in the school's Safer Recruitment policy.

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 from childcare legislation and their obligations to disclose relevant information to the school.

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 Principal 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 Obligations

- All staff in our school are required to notify the Principal immediately if there are any reasons why they should not be working with children.
- [The Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) replaces version of Disqualification under the Childcare Act 2006, which was last issued by the Department for Education in June 2016 and applies 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 Principal immediately.
- The lead member of staff for ICT liaises frequently and meets at least once a term with the DSL to review actions with regards to technology and online safety, and recommendations from such meetings notified to staff.
- Staff who are disqualified from childcare or registration, 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 Principal for more details.

Staff, volunteers or workers leaving

- The school will promptly report 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 a risk of harm to a child.
- In addition, consideration will also be given to making a referral to the Teaching Regulation Agency (TRA) where a teacher has been dismissed for misconduct (or would have been dismissed had s/he not resigned) and a prohibition order may be appropriate. The reasons for such an order include “unacceptable professional conduct”, “conduct that might bring the profession into disrepute, or a “conviction”, at any time, for a relevant offence.

Managing allegations made against teachers, other staff, volunteers and contractors

The school will follow the SSP [Arrangements for Managing Allegations of Abuse Against People Who Work With Children or Those Who Are in A Position of Trust](#) if a safeguarding concern or allegation is raised against an adult in a position of trust.

An allegation that may meet the harm threshold is any information which indicates that a member of staff /volunteer may have:

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

This applies to any child the member of staff, supply teacher, volunteer or contractor has contact with in their personal, professional or community life. It also applies regardless of whether the alleged abuse took place in our school.

Concerns that do not meet the harm threshold will be dealt with in accordance with the school's policy for managing low-level concerns.

If any member of staff has concerns that a colleague, supply teacher, volunteer or contractor might pose a risk to children, it is their duty to report these to the headteacher. Where the concerns or allegations are about the headteacher, these should be referred to the Chair of Governors.

The headteacher/Chair of Governors should report the concern to the Local Authority Designated Officer (LADO) within one working day.

The corporate director for Children and Young People's Services, has identified dedicated staff to undertake the role of LADO. LADOs can be contacted via email on LADO@suffolk.gov.uk or by using the LADO central telephone number: 0300 123 2044 for allegations against all staff and volunteers.

Whom should allegations be reported to?	
Allegations against Staff, volunteer or the Lead DSL (if not Head) should be reported to:	Allegations against the Principal should be reported to: (Principal should not be informed if allegation is against them)
Natalie Taylor, Principal 01284 760531 ntaylor@uk.brookes.org	David Rose, Proprietor 07943 256605 drose@brookes.org

Protecting yourself against allegations of abuse

You should seek to keep your personal contact with children under review and seek to minimise the risk of any situation arising in which misunderstandings can occur. The following sensible precautions can be taken when working alone with children especially in a boarding setting:

- work in a room where there is a glass panel in the door or leave the door open
- make sure that other adults visit the room occasionally
- avoid working in isolation with children unless thought has been given to safeguards
- must not give out personal mobile phone numbers, other than boarding staff in connection with trips and visits or private email addresses
- must not give pupils lifts home in your cars
- must not arrange to meet them outside of school/boarding hours
- must not chat to pupils on social networking websites
- must not have pupils as friends on any social networking site

Under the Sexual Offences Act 2003 it is a criminal offence for anyone working in an education setting to have a sexual relationship with a pupil even when the pupil is over the age of consent.

Any use of physical force or restraint against pupils will be carried out and documented in accordance with the Safe Restraint Policy. If it is necessary to use physical action to prevent a child from injury to themselves or others parents will be informed.

Children will not be punished by any form of hitting, slapping, shaking or other degrading treatment.

Whistleblowing

The school aims to create and maintain an environment where staff feel supported in their safeguarding role and able to raise concerns, including about poor or unsafe practice and potential failures in the school's safeguarding regime.

The school has a separate Whistleblowing Policy which is contained within the staff handbook; a copy may also be requested in confidence. All staff are required to report to the Principal, or Proprietor in the Principal's absence, any concern or allegations about school practices or the behaviour of colleagues which are likely to put pupils at risk or abuse or other serious harm. There will be no retribution or disciplinary action taken against a member of staff for making such a report provided that it is done in good faith.

Curriculum

The proprietor will ensure that children and young people are taught about how to keep themselves and others safe, including online.

The proprietor recognises that effective education should be tailored to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with SEND.

Relevant topics will be included within Relationships Education (*Lower School*) and Relationships and Sex Education (also known as Sex and Relationship Education) (*Senior School*) and through Health Education, having regard to statutory guidance.

Preventative education is most effective in the context of a whole-school approach that prepares children and young people for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment.

The proprietor expects that the school's values and standards should be upheld and demonstrated throughout all aspects of school life. These will be underpinned by the school's behaviour policy and pastoral support system, as well as by a planned programme of evidence-based RSHE delivered in regularly timetabled lessons and reinforced throughout the whole curriculum. This whole-school approach will be fully inclusive and developed to be age and stage of development appropriate, and will tackle (in age-appropriate stages) issues such as:

- Healthy and respectful relationships
 - Boundaries and consent
 - Stereotyping, prejudice and equality
 - Body confidence and self-esteem
 - How to recognise and abusive relationship, including coercive and controlling behaviour
 - The concepts of, and laws relating to – sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so called honour-based violence such as forced marriage and FGM, and how to access support, and
 - What constitutes sexual harassment and sexual violence and why these are always unacceptable.

The school will ensure that there are appropriate filters and monitoring systems in place to safeguard children and young people from potentially harmful and inappropriate online material.

Related Policies and Documents

Related Documents

Staff Code of Conduct
Low Level Concerns Policy
Complaints Policy
Whistleblowing Policy
Special Educational Needs Policy
Intimate Care Policy
Missing Children Policy
Safer Recruitment Policy
Behaviour Policy
Safe Physical Restraint Policy
Preventing and Tackling Bullying Policy
First Aid Policy
PSHE Curriculum
E Safety Policy
Confidentiality and Information Sharing
Retention and Destruction Policy

Related Documents

ICT Code of Practice Agreement
Acceptable Use of ICT and Mobile Devices and Social Networking by Staff
Acceptable Use of ICT and Mobile Devices and Social Networking by Students x2
Multi-Agency Practice Guidelines: Female Genital Mutilation
Child Sexual Exploitation DfE February 2017
Keeping Children Safe in Education – Statutory Guidance for Schools and Colleges September 2018
Children Missing in Education Guidance September 2016
Boarding Schools – National Minimum Standards 2015
Boarders Handbook

Expert and Professional Organisations

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example NSPCC offers information for schools and colleges on its own website www.nspcc.org.uk. Schools and colleges can also access guidance on the issues listed below via the GOV.UK website. <https://www.gov.uk>

The [BSA](#) offer guidance and advice on boarding matters.

Additional Advice and Support

Abuse or Safeguarding issue	Link to Guidance/Advice	Source
Abuse	What to do if you're worried a child is being abused	DfE advice
	Domestic abuse: Various Information/Guidance	Home Office
	Faith based abuse: National Action Plan	DfE advice
	Relationship abuse: disrespect nobody	Home Office website
Bullying	Preventing bullying including cyberbullying	DfE advice
Children and the courts	Advice for 5-11 year old witnesses in criminal courts	MoJ advice
	Advice for 12-17 year old witnesses in criminal courts	MoJ advice
Children missing from education, home or care	Children missing education	DfE statutory guidance
	Children missing from home or care	DfE statutory guidance
	Children and adults missing strategy	Home Office strategy
Children with family members in prison	National Information Centre on Children of Offenders	Barnardo's in partnership with Her Majesty's Prison and Probation Service (HMPPS) advice
Child Exploitation	County Lines: criminal exploitation of children and vulnerable adults	Home Office guidance
	Child sexual exploitation: guide for practitioners	DfE

	Trafficking: safeguarding children	DfE and HO guidance
Drugs	Drugs: advice for schools	DfE and ACPO advice
	Drugs strategy 2017	Home Office strategy
	Information and advice on drugs	Talk to Frank website
	ADEPIS platform sharing information and resources for schools: covering drug (& alcohol) prevention	Website developed by Mentor UK
“Honour Based Violence” (so called)	Female genital mutilation: information and resources	Home Office
	Female genital mutilation: multi agency statutory guidance	DfE, DH, and HO statutory guidance
	Forced marriage: information and practice guidelines	Foreign Commonwealth Office and Home Office
Health and Wellbeing	Fabricated or induced illness: safeguarding children	DfE, Department for Health and Home Office
	Rise Above: Free PSHE resources on health, wellbeing and resilience	Public Health England resources
	Medical conditions: supporting pupils at school	DfE statutory guidance
	Mental health and behaviour	DfE advice
Homelessness	Homelessness: How local authorities should exercise their functions	HCLG
Online	Sexting: responding to incidents and safeguarding children	UK Council for Child Internet Safety
Private fostering	Private fostering: local authorities	DfE – statutory guidance
Radicalisation	Prevent duty guidance	Home Office guidance
	Prevent duty advice for schools	DfE advice

	Educate Against Hate Website	DfE and Home Office
Violence	Gangs and youth violence: for schools and colleges	Home Office advice
	Ending violence against women and girls 2016-2020 strategy	Home Office strategy
	Violence against women and girls: national statement of expectations for victims	Home Office guidance
	Sexual violence and sexual harassment between children in schools and colleges	DfE advice
	Serious violence strategy	Home Office Strategy

Annex 1

INDICATORS OF ABUSE AND NEGLECT (AS IDENTIFIED IN KCSiE)

Abuse is defined as a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or another child or children.

The following indicators listed under the categories of abuse are not an exhaustive list:

Physical Abuse

This can 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

This is 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 children 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 the child's developmental capability, as well as over protection and limitation of exploration and learning, or preventing the child from participating in normal social interactions. 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, though it may occur alone.

Evidence of abuse could be:

- Excessively clingy or attention seeking
- Very low self-esteem or excessive self-criticism
- Withdrawn behaviour or fearfulness
- Lack of appropriate boundaries with strangers; too eager to please
- Eating disorders or self-harm

Neglect

This 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)
- Ensure access to appropriate medical care or treatment.
- It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Sexual Abuse

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

INDICATORS OF ABUSE

Physical Indicators of Neglect

(Many indicators listed in the physical abuse section can also indicate neglect.)

- abandonment
- lack of shelter
- unattended medical and dental needs
- consistent lack of supervision
- ingestion of cleaning fluids, medicines, etc.
- consistent hunger
- nutritional deficiencies
- inappropriate dress for weather conditions
- poor hygiene
- persistent (untreated) conditions (e.g. scabies, head lice, diaper rash, or other skin disorders)
- developmental delays (e.g. language, weight)
- irregular or non-attendance at school or child care
- not registered in school
- not attending school
- underweight and is very small for their age
- if they are regularly left alone, or in charge of younger brothers or sisters

Behavioural Indicators of Neglect

- depression
- poor impulse control
- demands constant attention and affection
- lack of parental participation and interest
- delinquency
- misuse of alcohol/drugs
- regularly displays fatigue or listlessness, falls asleep in class
- overeats when food is available
- steals food, or begs for food from classmate(s)
- reports that no carer or parent is at home
- frequently absent or late
- self-destructive
- drops out of school (adolescent)
- takes over adult caring role (of parent)
- lacks trust in others, unpredictable
- plans only for the moment

Indicators of Physical Abuse

Bruises, black eyes and broken bones are obvious signs of physical abuse. Other signs might include:

- Injuries that the child cannot explain or explains unconvincingly
- Untreated or inadequately treated injuries
- Injuries to parts of the body where accidents are unlikely, such as thighs, back, abdomen, face
- Bruising which looks like hand or finger marks or have the shape of an object
- Cigarette burns, human bites
- Scalds and burns.
- presence of several injuries (3+) that are in various stages of healing
- repeated injuries / accidents over a period of time
- injuries not consistent with the child's age and development
- bald patches on child's head where hair may have been torn out
- injuries where the child and parents' account of their happening differ

Behavioural indicators of Physical Abuse

- Child is sad, withdrawn or depressed
- Has trouble sleeping
- Behaves aggressively or is disruptive
- Shows fear of certain adults
- Has a lack of confidence and low self-esteem
- Uses drugs or alcohol
- Attempts to run away and fear of going home
- Stilted conversation, vacant stares or frozen watchfulness, no attempt to seek comfort when hurt
- Describes self as bad and deserving to be punished
- Lack of confidence and low self esteem
- Cannot recall how injuries occurred, or offers an inconsistent explanation
- Wary of adults or reluctant to go home
- Often absent from school/child care
- May flinch if touched unexpectedly
- Extremely aggressive or withdrawn
- Displays indiscriminate affection-seeking behaviour
- Abusive behaviour and language in play
- Overly compliant and/or eager to please
- Poor sleeping patterns, fear of the dark, frequent nightmares
- Cries frequently
- Drug/alcohol misuse
- Poor memory and concentration
- Depression
- Suicide attempts

Indicators of Sexual Abuse

Physical

- pain, itching, bruising or bleeding in the mouth or genital or anal areas
- genital discharge or urinary tract infections
- stomach pains or discomfort walking or sitting
- sexually transmitted infections
- fatigue due to sleep disturbances
- sudden weight change
- cuts or sores made by the child on the arm (self-mutilation)
- recurring physical ailments
- difficulty in walking or sitting
- torn, stained or bloody underwear
- pregnancy

Behavioural

In a younger child:

- sad, cries often, unduly anxious
- poor concentration
- inserts objects into the vagina or rectum
- change or loss of appetite
- sleep disturbances, nightmares
- excessively dependent
- fear of home or a specific place, excessive fear of men or women, lacks trust in others
- age-inappropriate sexual play with toys, self, others (e.g. replication of explicit sexual acts)
- age-inappropriate sexual language
- age-inappropriate, sexually explicit drawings and/or descriptions
- bizarre, sophisticated or unusual sexual knowledge
- reverts to bed wetting/soiling
- dramatic behavioural changes, sudden non-participation in activities
- poor peer relationships, self-image
- overall poor self-care
- absence from school
- child talks of receiving special attention from a particular adult, or refer to a new, "secret" friendship with an adult or young person

In an older child:

- sudden lack of interest in friends or activities
- fearful or startled response to touching
- overwhelming interest in sexual activities
- hostility toward authority figures
- fire setting
- need for constant companionship
- regressive communication patterns (e.g. speaking childishly)
- academic difficulties or performance suddenly deteriorates
- truancy and/or running away from home
- wears provocative clothing or wears layers of clothing to hide bruises (e.g. keeps jacket on in class)
- recurrent physical complaints that are without physiological basis (e.g. abdominal pains, headache, nausea)
- lacks trust in others

- unable to "have fun" with others
- suicide attempts
- drug/alcohol misuse
- poor personal hygiene
- promiscuity
- sexual acting out in a variety of ways

Indicators of Emotional Abuse

Physical

- bedwetting and/or diarrhoea
- frequent psychosomatic complaints, headaches, nausea, abdominal pains

Behavioural

- mental or emotional development lags
- behaviours inappropriate for age
- fear of failure, overly high standards, reluctance to play
- fears consequences of actions, often leading to lying
- extreme withdrawal or aggressiveness, mood swings
- overly compliant, too well-mannered
- excessive neatness and cleanliness
- extreme attention-seeking behaviours
- poor peer relationships
- severe depression, may be suicidal
- runaway attempts
- violence is a subject for art or writing
- complains of being left out
- contact is forbidden with other children
- low self esteem

Annex 2

Further information on Female Genital Mutilation

Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM.

Indicators: there is a range of potential indicators that a girl may be at risk of FGM. Warning signs that FGM may be about to take place, or may have already taken place can be found on pages 16-17 of the Multi-Agency Practice Guidelines, and Chapter 9 of those Guidelines (pp42-44) focuses on the roles of schools and colleges.

Section 5C of the Female Genital Mutilation Act 2003 (as inserted by section 75 of the Serious Crime Act 2015) gives the Government powers to issue statutory guidance on FGM to relevant persons. Once the government issues any statutory multi-agency guidance this will apply to schools and colleges.

Actions: If staff have a concern they should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. When mandatory reporting commences in October 2015 these procedures will remain when dealing with concerns regarding the potential for FGM to take place. Where a teacher discovers that an act of FGM appears to have been carried out on a girl who is aged under 18, there will be a statutory duty upon that individual to report it to the police.

Mandatory Reporting Duty Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) will place a statutory duty upon teachers, along with social workers and healthcare professionals, 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, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies. The mandatory reporting duty will commence in October 2015. Once introduced, teachers must report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the school's DSL and involve Children's Social Care as appropriate.

Annex 3

Further Information on Preventing Radicalisation – ‘Prevent’

Protecting children from the risk of radicalisation should be seen as part of schools’ wider safeguarding duties, and is similar in nature to protecting children from other forms of harm and abuse. During the process of radicalisation it is possible to intervene to prevent vulnerable people being radicalised. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular has become a major factor in the radicalisation of young people.

As with managing other safeguarding risks, staff should be alert to changes in children’s behaviour which could indicate that they may be in need of help or protection. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately which may include making a referral to the Channel Programme. (Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation).

Prevent

From 1 July 2015 specified authorities, including all schools as defined in the summary of this guidance, are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (“the CTSA1 2015”), in the exercise of their functions, to have “due regard to the need to prevent people from being drawn into terrorism”. This duty is known as the Prevent duty.

It applies to a wide range of public-facing bodies. Bodies to which the duty applies must have regard to statutory guidance issued under section 29 of the CTSA 2015 (“the Prevent guidance”). Paragraphs 57-76 of the Prevent guidance are concerned specifically with schools (but also cover childcare). It is anticipated that the duty will come into force for Sixth Form Colleges and FE colleges early in the autumn. The statutory Prevent guidance summarises the requirements on schools in terms of four general themes: risk assessment, working in partnership, staff training and IT policies.

Schools are expected to assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. This means being able to demonstrate both a general understanding of the risks affecting children and young people in the area and a specific understanding of how to identify individual children who may be at risk of radicalisation and what to do to support them. Schools and colleges should have clear procedures in place for protecting children at risk of radicalisation.

These procedures may be set out in existing safeguarding policies. It is not necessary for schools and colleges to have distinct policies on implementing the Prevent duty.

The Prevent duty builds on existing local partnership arrangements. For example, governing bodies and proprietors of all schools should ensure that their safeguarding arrangements take into account the policies and procedures of LSCBs. The Prevent guidance refers to the importance of Prevent awareness training to equip staff to identify children at risk of being drawn into terrorism and to challenge extremist ideas. Individual schools are best placed to assess the training needs of staff in the light of their assessment of the risk to pupils at the school of being drawn into terrorism.

As a minimum, however, schools should ensure that the DSL undertakes Prevent awareness training and is able to provide advice and support to other members of staff on protecting children from the risk of radicalisation. Schools must ensure that children are safe from terrorist and extremist material when accessing the internet in schools. Schools should ensure that suitable filtering is in place. It is also important that schools teach pupils about online safety more generally. The Department for Education has also published advice for schools on the Prevent duty.

The advice is intended to complement the Prevent guidance and signposts other sources of advice and support. Channel School staff should understand when it is appropriate to make a referral to the Channel programme. (Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation.)

An individual's engagement with the programme is entirely voluntary at all stages. Section 36 of the CTSA 2015 places a duty on local authorities to ensure Channel panels are in place. The panel must be chaired by the local authority and include the police for the relevant local authority area. Following a referral the panel will assess the extent to which identified individuals are vulnerable to being drawn into terrorism, and, where considered appropriate and necessary consent is obtained, arrange for support to be provided to those individuals. Section 38 of the CTSA 2015 requires partners of Channel panels to cooperate with the panel in the carrying out of its functions and with the police in providing information about a referred individual. Schools and colleges which are required to have regard to Keeping Children Safe in Education are listed in the CTSA 2015 as partners required to cooperate with local Channel panels.

Annex 4

E-Safety

The growth of different electronic media in everyday life and an ever developing variety of devices including PC's, laptops, mobile phones, webcams etc. place an additional risk on our children.

Internet chat rooms, discussion forums or social networks can all be used as a means of contacting children and young people with a view to grooming them for inappropriate or abusive relationships. The anonymity of the internet allows adults, often pretending to be children, to have conversations with children and in some cases arrange to meet them.

Access to abusive images is not a 'victimless' act as it has already involved the abuse of children. The internet has become a significant tool in the distribution of indecent photographs of children, most recently via 'sexting' and should be a concern to all those working with pupils at this school.

Pupils can engage in or be a target of bullying using a range of methods including text and instant messaging to reach their target. Mobile phones are also used to capture violent assaults on other children for circulation (happy slapping).

Protection is Prevention

- Software is in place to minimise access and to highlight any person accessing inappropriate sites or information.
- Pupils will be encouraged to discuss openly their use of technology and anything which makes them feel uncomfortable. (If this results in child protection concerns the schools designated child protection teacher should be informed immediately)
- Pupils should not give out their personal details, phone numbers, schools, home address, computer passwords etc.
- Pupils should adhere to the school policy on mobile phones.

The police will be involved if there is any criminal element to misuse of the internet, phones or any other form of electronic media.

We actively manage our hardware, software and connectivity as follows:

Roles

The Principal and IT Manager have defined roles and responsibilities for online safety.

Guidance

Guidance on the use of technology in the classroom (Desktop Computers and iPads, interactive whiteboards etc.) is provided to teaching and support staff and in turn to students.

Infrastructure

The school uses leading edge internet and network security systems. The structured network, wireless provision (staff, student and guest networks) are controlled using these systems.

Areas of control:

- Web filtering;
- Antivirus and Malware protection;
- Internet search security with full logging and reporting using government keyword database query for Prevent, e-safety and disclosure;
- BYOD management;
- Mobile Phone management (staff and student);

- Building control and security;
- Data protection including GDPR
- Network penetration (external);

Software

Industry standard specialist educational softwares are provided for staff and students across all areas of the school including:

- Curriculum delivery;
- Internet Browsers;
- Peer to peer file sharing (internal);
- School MIS/CRM

Please refer to the IT Systems Management Audit for further information.

Annex 5

Role of Designated Safeguarding Leads

The overarching 'Lead' Designated Safeguarding person (Lead DSL) is **Mrs Natalie Taylor**, Principal, Brookes UK. He is responsible for the implementation of this policy.

The Lead DSL has explicit responsibility for matters relating to safeguarding, and in his absence, Deputy DSLs are **Mrs Sarah Elford**, **Mrs Laura Nevill**, (SENDCo) **Mr Paul Jackson** and **Mrs Helena Jackson** (Boarding Parents) **Mrs Jenny Donlon** (Cherry Trees).

The KCSiE guidance Annex B sets out the broad areas of responsibility to which our DSLs are asked to comply with, having regard for our internal safeguarding policy and in liaison with the Lead DSL as appropriate:

Governing bodies, proprietors and management committees should appoint an appropriate senior member of staff, from the school or college leadership team, to the role of designated safeguarding lead. The designated safeguarding lead should take lead responsibility for safeguarding and child protection. This should be explicit in the role holder's job description. This person should have the appropriate status and authority within the school to carry out the duties of the post. They should be given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and interagency meetings – and/or to support other staff to do so – and to contribute to the assessment of children.

Deputy Designated Safeguarding Leads

It is a matter for individual schools and colleges as to whether they choose to have one or more deputy designated safeguarding lead(s). Any deputies should be trained to the same standard as the designated safeguarding lead.

Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the designated safeguarding lead; this lead responsibility should not be delegated.

Manage referrals

The designated safeguarding lead is expected to:

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

Work with others

The designated safeguarding lead is expected to:

- liaise with the Principal to inform him or her of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- as required, liaise with the "case manager" (as per Part four) and the designated officer(s) at the local authority for child protection concerns (all cases which concern a staff member);
- liaise with staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies. Act as a source of support, advice and expertise for staff.

Training

The designated safeguarding lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years.

The designated safeguarding lead should undertake Prevent awareness training.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, but at least annually, to allow them to understand and keep up with any developments relevant to their role so they:

- understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments;
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- ensure each member of staff has access to and understands the school or college's child protection policy and procedures, especially new and part time staff;
- are alert to the specific needs of children in need, those with special educational needs and young carers;
- are able to keep detailed, accurate, secure written records of concerns and referrals;
- understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- obtain access to resources and attend any relevant or refresher training courses;
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.

Raise Awareness

The designated safeguarding lead should:

- ensure the school or college's child protection policies are known, understood and used appropriately;
- ensure the school or college's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this;
- ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school or college in this;
- link with the local LSCB to make sure staff are aware of training opportunities and the latest local policies on safeguarding.

Child protection file

Where children leave the school or college ensure their child protection file is transferred to the new school or college as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt should be obtained.

Availability

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

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