



## Safeguarding Policy

This policy is for Langley School, which includes the Senior School and Prep School (including Pre-Prep and EYFS).

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Children's Advice and Duty Service	<b>CADS</b>	0344 800 8021 Emergency out of hours (after 8pm) 0344 800 8020
Channel Helpline	<b>Staff and governors can call to raise concerns about extremism with respect to a pupil</b>	020 7340 7264
LADO		<a href="mailto:LADO@norfolk.gov.uk">LADO@norfolk.gov.uk</a>

		01603 223473/01603 307797
Early Help	<b>Norwich Centre</b>	01603 224101
NSPCC Whistleblowing Hotline		0800 028 0285 <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>
Children's Commissioner	<b>Enquiries about Help at Hand, the advice service for children living away from home, receiving social care services or living in care.</b>	08000 528 0731
Kidscape	<b>Advice, training and practical tools to prevent bullying and protect young lives.</b>	0207 823 5430 <a href="mailto:info@kidscape.org.uk">info@kidscape.org.uk</a>
NSPCC	<b>Helpline for victims of sexual abuse in schools.</b>	0800 136 663

## 1. Introduction and Aims

As well as statutory responsibilities in relation to children's learning, the School has a pastoral and legal responsibility towards their pupils and must recognise that the children and young people in their charge have a fundamental right to be protected from harm.

Langley School is committed to safeguarding and promoting the welfare and well-being of children, young people and staff. We believe that everyone, without exception, has a right to be safe and to be treated with dignity and respect regardless of background and free from discrimination. The School recognises that children learn best when they are healthy, safe and secure. Any allegation of child abuse or a safeguarding issue will be treated with the utmost concern. We will always liaise with relevant external agencies in accordance with locally agreed protocols.

This policy is available on the School website and can also be obtained on request from the Head. This policy applies to Langley Senior School (including Boarding) and Langley Preparatory School, and is in accordance with Norfolk Safeguarding Children Board's locally agreed inter-agency procedures. It should be read in conjunction with the School's Staff Code of Conduct and Safer Recruitment Policy, the latter of which is also available on the School website

The school aims to ensure that:

- appropriate action is taken in a timely manner to safeguard and promote children's welfare;
- all staff are aware of their statutory responsibilities with respect to safeguarding;
- staff are properly trained in recognising and reporting safeguarding issues;
- pupils/students are educated about how to keep themselves safe, including when on-line.

## 2. Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance [Keeping Children Safe in Education \(Sept 2021\)](#) and [Working Together to Safeguard Children \(2018\)](#), and the [Governance Handbook](#). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

- Section 175 of the Education Act 2002, which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- The School Staffing (England) Regulations 2009, which set out what must be recorded on the single central record and the requirement for at least one person conducting an interview to be trained in safer recruitment techniques
- Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children
- Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The Equality Act 2010

This policy also meets requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage.

Our safeguarding policy also takes into account the local procedures for reporting concerns, using Norfolk County Council guidance.

### 3. Definitions

**Safeguarding and promoting the welfare of children** means:

- 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.

**Child protection** is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

**Abuse** is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

**Neglect** is a form of abuse and 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. Appendix 1 defines neglect in more detail.

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

The following **3 safeguarding partners** are identified in Keeping Children Safe in Education (Sept 2021). The DSL (and deputies) should liaise with the three partners to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs. This is done in line with Working Together to Safeguard Children (2018) and the NPCC's guidance on 'When to call the Police'. The partners are:

- the local authority (LA);
- a clinical commissioning group for an area within the LA;
- the chief officer of police for a police area in the LA area.

#### 4. Equality statement

Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- have special educational needs (SEN) or disabilities (see section 9);
- are young carers;
- may experience discrimination due to their race, ethnicity, religion, gender identification or sexuality;
- have English as an additional language;
- are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence;
- are at risk of FGM, sexual exploitation, forced marriage, or radicalisation;
- are asylum seekers;
- are at risk due to either their own or a family member's mental health needs;
- are looked after or previously looked after.

#### 5. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in the school and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

##### 5.1 All staff

At Langley safeguarding and promoting the welfare of children is **everyone's** responsibility. Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all staff should adopt a child-centered approach, at all times considering what is in the best interests of the child. All staff has a responsibility to provide a safe environment in which children can learn, but are also advised to maintain an attitude of '**it could happen here**'.

All staff will read and understand part 1 and Annex A of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education (Sept 2021), and review this guidance at least annually.

All staff will be aware of:

- our systems which support safeguarding, including this child protection and safeguarding policy (as well as how to manage a report of child on child sexual violence and sexual harassment), the staff code of conduct, the E-safety policy, the role and identity of the designated safeguarding lead (DSL) and deputies, the behaviour policy (including procedures for dealing with peer-on-peer abuse), the

safeguarding response to children who go missing from education and the intimate care policy (Prep School);

- the early help process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment;
- the process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play;
- what to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals;
- the signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), Sex abuse of children by children, FGM and radicalisation;
- the fact that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence;
- the need 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. All staff need to make sure that victims do not feel ashamed for making a report.
- should be aware that children can abuse other children (often referred to as peer on peer abuse). And that it can happen both inside and outside of school or college and online. It is important that all staff recognise the indicators and signs of peer on peer abuse and know how to identify it and respond to reports.

Section 13 and appendix 3 of this policy outline in more detail how staff are supported to do this.

## 5.2 The designated safeguarding lead (DSL)

The DSL is a member of the senior leadership team. The Prep School DSL is **Mr Ed Wood** and the Senior School DSL is **Mr Paul Clark**. The DSL takes lead responsibility for child protection and wider safeguarding (including on-line safety).

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.

Out of normal school hours, the DSL can be contacted via email (please see 'Contact Details' for contact information).

When the DSL is absent, the deputies will act as cover. One or more of the Deputy DSL team is specifically trained as an EYFS DSL, within the Preparatory School. Within the Senior School, one or more of the DSL team is a designated Boarding DSL.

The DSL will be given the time, funding, training, resources and support to:

- provide advice and support to other staff on child welfare and child protection matters;
- take day to day responsibility for online safety issues and has a leading role in establishing and reviewing the school online safety policies/documents;

- regularly monitor (alongside the Network Administrator or equivalent) the online filtering system at school, to ensure that the highest level of security is maintained when reviewing staff and pupil access to online risks;
- take part in strategy discussions and inter-agency meetings and/or support other staff to do so;
- contribute to the assessment of children;
- refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly.

The DSL will also keep the Deputy Head (Pastoral) and Headmaster informed of any issues and liaise with local authority case managers and designated officers for child protection concerns as appropriate.

The DSL meets termly with the Governor for Safeguarding to co-ordinate the review of the Safeguarding policy, its procedures and the efficiency with which safeguarding duties have been discharged.

The full responsibilities of the DSL and deputies are set out in their job description.

### 5.3 The governing board

The governing board will approve this policy at each review, ensure it complies with the law and hold the Headmaster to account for its implementation.

The governing board will appoint a safeguarding governor to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL.

The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the Headmaster, where appropriate (see appendix 2).

All governors will read Keeping Children Safe in Education (Sept 2021).

The named Governor for Safeguarding will conduct a regular check (at least once a year) on Safeguarding and the SCR in order to report the findings to the Education Committee and to the full board.

Section 13 has information on how governors are supported to fulfil their role.

### 5.4 The Headmaster

The Headmaster is responsible for the implementation of this policy, including:

- ensuring that staff (including temporary staff) and volunteers are informed of our systems which support safeguarding, including this policy, as part of their induction;
- communicating this policy to parents when their child joins the school and via the school website;
- ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent;
- ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly;
- acting as the 'case manager' in the event of an allegation of abuse made against another member of staff (including supply staff and volunteers), where appropriate (see appendix 2);
- ensuring the relevant staffing ratios are met, where applicable;
- making sure each child in the Early Years Foundation Stage is assigned a key person.

## 6. Confidentiality

The school's staff will keep information confidential with respect to safeguarding and will only share information on a need to know basis, where knowledge of the situation will facilitate the support of a pupil. Staff will use caution when sharing data or information with respect to safeguarding but will take into account that:

- timely information sharing is essential to effective safeguarding;
- fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children;
- the Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children;
- if staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent where there is a good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner but it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk;
- staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests;
- the government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information;
- if staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy);
- confidentiality is also addressed in this policy with respect to record-keeping in section 13, and allegations of abuse against staff in appendix 2.

## 7. Recognising abuse and taking action

Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue.

Please note – in this and subsequent sections, you should take any references to the DSL to mean "the DSL (or deputy DSL)".

### 7.1 If a child is suffering or likely to suffer from harm, or in immediate danger

Make a referral to children's social care and/or the police (if a crime has been committed) **immediately** if you believe a child is suffering or likely to suffer from harm, or in immediate danger. **Anyone can make a referral (this may even be done without parental consent).**

Tell the DSL (see section 5.2) as soon as possible if you make a referral directly.

*To refer to children's social care, staff should call the Children's Advice and Duty Service (CADS) line on: 0344 800 8021 (See Appendix 6)*

When making a call to CADS, the staff member should have the following details to hand:

- all of the details known to you/your agency about the child;
- their family composition including siblings, and where possible extended family members and anyone important in the child's life;
- the nature of the concern and how immediate it is;

- any and what kind of work/support you have provided to the child or family to date;
- where the child is currently and whether you have informed parents/carers of your concern.

**The collection of this information should not hinder urgent calls.** More information can be found on the links below.

<https://www.norfolkscb.org/wp-content/uploads/2015/04/CADS-Professional-Guide.pdf>

<https://www.gov.uk/report-child-abuse-to-local-council>

Although the CADS team will send through a record of the conversation, the staff member making the call should record details of the conversation and place it on the pupil/student's file (ideally via CPOMS).

## 7.2 If a child makes a disclosure to you

If a child discloses a safeguarding issue to you, you should:

- listen to and reassure them that you are taking them seriously. Allow them time to talk freely and do not ask leading questions;
- stay calm and do not show that you are shocked or upset;
- tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner;
- explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret;
- ensure that any discussion is **confirmatory and not investigative**. Staff must not investigate as this is the legal duty of the local authority where the child is living at the time of the actual concern;
- write up your conversation, using the school's '**Reporting Form for Safeguarding Concerns**' (or **raise a concern via CPOMS – Senior School**) as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it. The form should record the time, date, place and people who were present, as well as what was said. Signs of physical injury observed **should be described in detail**, or sketched, but under no circumstances should a child's clothing be removed. Your note of the discussion may need to be used in any subsequent court proceedings and must therefore distinguish fact from opinion.
- Sign and date the write-up and pass it on to the DSL (or Deputy in their absence). **Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so.**

### When abuse is alleged, the trusted adult must NOT:

- give an undertaking of confidentiality or say that they can keep 'secrets', but must reassure the child that information will only be disclosed to those who need to know;
- tell the child that everything will be alright;
- ask leading questions - this could be interpreted later as putting ideas into the child's mind. e.g. staff should not ask "Did they do X to you?" (leading question) but rather "Tell me what happened" (open-ended). Staff should not ask "Did x do this to you?" (leading) but rather "Do you want to tell me who did this?" (open-ended);
- take photos or examine the injury;
- react with shock, anger or horror, or jump to conclusions;
- confront or accuse another person allegedly involved;
- fail to record what they have been told;
- fail to pass the information on.

### The child's wishes

Where there is a safeguarding concern, all staff should ensure that the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Pupils/students will always have the opportunity to express their views and give feedback. The School will always operate with the best interests of the child at heart.

### **7.3 If you discover that FGM has taken place or a pupil is at risk of FGM**

The Department for Education's Keeping Children Safe in Education (Sept 2021) explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 3.

**Any teacher** who discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a **pupil under 18** must immediately report this to the police, personally. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have good reason not to, they should also discuss the case with the DSL and involve children's social care as appropriate.

**Any other member of staff** who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must speak to the DSL and follow our local safeguarding procedures.

The duty for teachers mentioned above does not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.

**Any member of staff** who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out must speak to the DSL and follow our local safeguarding procedures. This should also be noted on the school's '**Reporting Form for Safeguarding Concerns**' (or raise a concern via **CPOMS – Senior School**).

*The DSL or member of staff should call CADS on 0344 800 8021 to make a referral. (See Appendix 6)*

### **7.4 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)**

Figure 1 on page 13 illustrates the procedure to follow if you have any concerns about a child's welfare.

Where possible, speak to the DSL first to agree a course of action. Your concerns should be recorded on the school's '**Reporting Form for Safeguarding Concerns**' (or raise a concern via **CPOMS – Senior School**) and passed to the DSL. The DSL will then decide on the most appropriate course of action which may involve contacting the CADS team as they will then advise what action to take.

If in exceptional circumstances the DSL or Deputies are not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care, *call CADS on 0344 800 8021*. You can also seek advice at any time from the NSPCC helpline on **0808 800 5000**.

Staff can make a referral to local authority children's social care directly, if appropriate (see 'Referral' below) but should share any action taken with the DSL as soon as possible.

### **Early help**

If early help is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

*A step by step guide on how to make an Early Help referral can be found here:*

<https://www.norfolk.gov.uk/children-and-families/early-help-and-family-support/support-for-professionals/family-support-process-and-documents>

## **Referral**

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so.

If you make a referral directly (see section 7.1), you must tell the DSL as soon as possible.

The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

***CADS should be called to make a referral, on 0344 800 8021***

Callers should have the necessary information to hand, as mentioned under point 7.1.

## **7.5 If you have concerns about extremism**

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action. As with all concerns, this should be recorded using the school's **'Reporting Form for Safeguarding Concerns' (or raise a concern via CPOMS – Senior School)**.

If in exceptional circumstances the DSL or Deputies are not available, this should not delay appropriate action being taken. Speak to a member of the leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above).

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include Channel, the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.

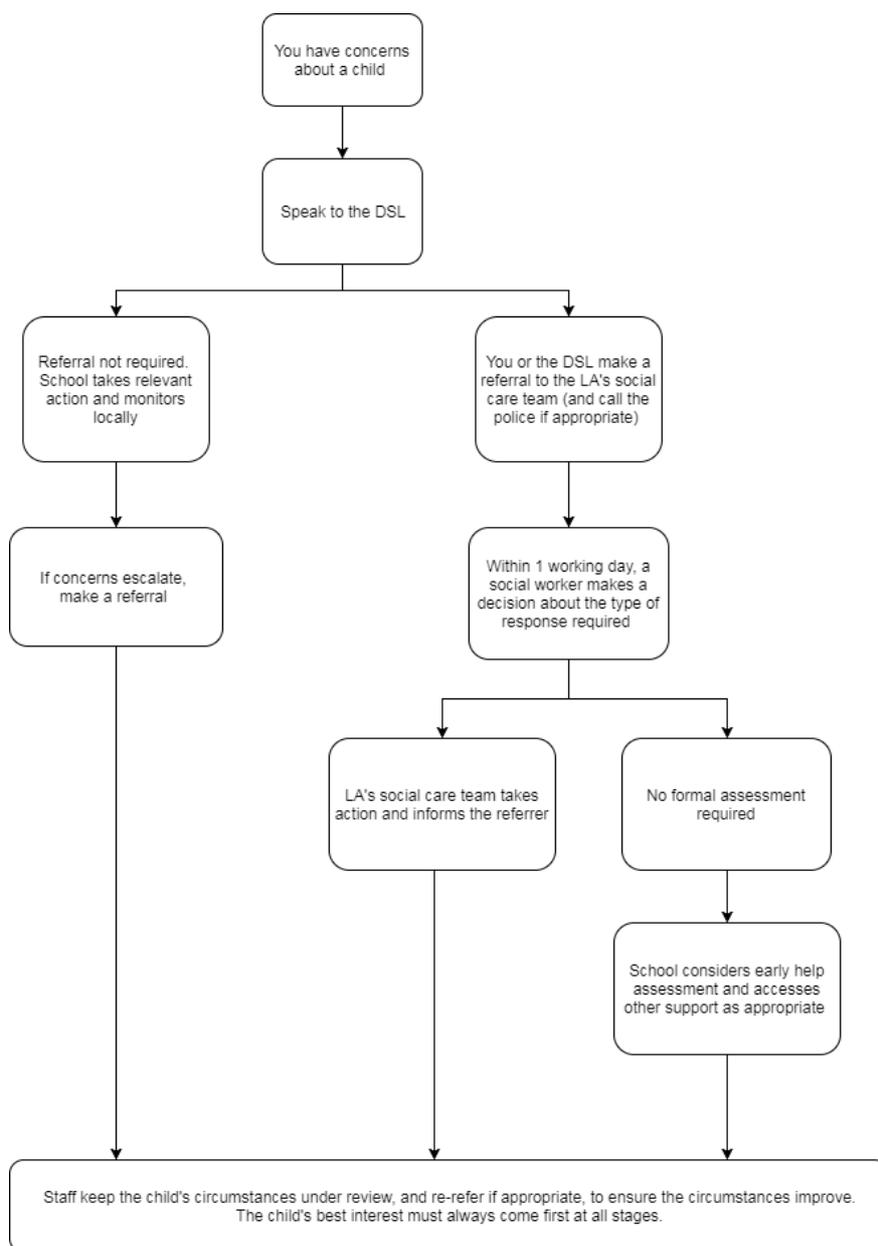
The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk). Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- think someone is in immediate danger;
- think someone may be planning to travel to join an extremist group;
- see or hear something that may be terrorist-related.

**Figure 1: procedure if you have concerns about a child’s welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)**

(Note – if the DSL or Deputies are unavailable, this should not delay action. See section 7.4 for what to do.)



**7.6 Concerns about a staff member or volunteer**

If you have concerns, or an allegation is made about a member of staff (including supply staff and volunteers) posing a risk of harm to children, this must be reported to the Headmaster immediately (**without undertaking any investigations**) or, in their absence, to the Chair of Governors, as well as the DSL (unless the concern is regarding the DSL). The Headmaster/Chair of Governors will then follow the procedures set out in appendix 2, which may involve a discussion as soon as is possible (within one working day), with the local authority designated officer (LADO).

In the event of the allegation being made against the Headmaster, the concern must be addressed to the Chair of Governors, the Governor responsible for Safeguarding or the LADO, without notifying the

Headmaster. It will be the Chair of Governor's responsibility to report the matter to the LADO and/or the police in accordance with the process laid out in Appendix 2. Where there is a conflict of interest in reporting the matter to the headmaster, an allegation should be reported directly to the LADO.

Where appropriate, the school will inform ISI and Ofsted (for EYFS) of the allegation and actions taken, within the necessary timescale (see Appendix 2 for more detail).

## 7.7 Allegations of abuse made against other pupils

We recognise that children are capable of abusing their peers. All staff must understand the importance of challenging inappropriate behaviours between peers, many of which are abusive in nature. All staff must recognise that even if there are no reported cases of peer on peer abuse, such abuse may still be taking place and is simply not being reported. The school takes a zero tolerance approach to abuse and staff should never pass abuse off, or down play behaviours as "banter", "just having a laugh", "part of growing up" or "boys being boys". Early intervention, even if it appears to be relatively innocuous, is important in order to prevent more serious abuse or violent behaviour in the future. It is important to note that children may not find it easy to tell staff about their abuse verbally. Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report, or a member of staff may overhear a conversation that suggests a child has been harmed or a child's own behaviour might indicate that something is wrong. If staff have any concerns about a child's welfare, they should act on them immediately rather than wait to be told by raising a concern with the DSL or Deputy.

We also recognise the gendered nature of peer on peer abuse (i.e. that it is more likely that girls will be victims and boys' perpetrators). However, all peer on peer abuse is unacceptable and will be taken seriously.

Safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual abuse of children by children;
- sexual violence, such as rape, assault by penetration and sexual assault;
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their buttocks or genitals, to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence;
- consensual and non-consensual sharing of nudes and semi-nude images and/or videos;
- initiation/hazing type violence and rituals.

Appendix 5 contains further details about sexual violence and sexual harassment, of which staff should be aware. The government has published advice and guidance on Preventing and Tackling Bullying, Mental Health and Behavior in Schools, which all staff should be familiar with.

Most cases of pupils hurting other pupils will be dealt with under our school's behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- is serious, and potentially a criminal offence;
- could put pupils in the school at risk;
- is violent;
- involves pupils being forced to use drugs or alcohol;

- involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, or sexually inappropriate pictures or videos (non-consensual sharing of nudes and semi-nude images and/or videos);

In the case of dealing with abuse of a pupil by one or more pupils, the priority is to protect the interests of the abused pupil in the first instance, working according to procedures laid out in this document.

If a pupil makes an allegation of abuse against another pupil:

- not promise confidentiality at this initial stage as it is very likely a concern will have to be shared further (for example, with the designated safeguarding lead or children's social care) to discuss next steps. Staff should only share the report with those people who are necessary in order to progress it. It is important that the victim understands what the next steps will be and who the report will be passed to;
- listen carefully to the child, be non-judgmental, be clear about boundaries and how the report will be progressed, not ask leading questions and only prompt the child where necessary with open questions – where, when, what, etc;
- reassure the pupil 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 sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report;
- consider the best way to make a record of the report. Best practice is to wait until the end of the report and immediately write up a thorough summary. This allows the staff member to devote their full attention to the child and to listen to what they are saying. It may be appropriate to make notes during the report (especially if a second member of staff is present). However, if making notes, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking. Either way, it is essential a written record is made;
- only record the facts as the child presents them. The notes should not reflect the personal opinion of the note taker. Staff should be aware that notes of such reports could become part of a statutory assessment by children's social care and/or part of a criminal investigation;
- be aware of searching screening and confiscation advice (for schools) and UKCIS guidance on the sharing of nude and semi-nude images (for schools and colleges), where the report includes an online element. The key consideration is for staff not to view or forward illegal images of a child. The highlighted advice provides more details on what to do when viewing an image is unavoidable.
- if possible, manage reports with two members of staff present, (preferably one of them being the designated safeguarding lead or a deputy). However, this might not always be possible; and
- informing the designated safeguarding lead (or deputy), as soon as practically possible, if the designated safeguarding lead (or deputy) is not involved in the initial report.
- the DSL will contact the local authority children's social care team and follow its advice (in order to provide help and support to both the alleged victim and alleged perpetrator), as well as the police if the allegation involves a potential criminal offence;
- the DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed;
- the DSL will contact the children and adolescent mental health services (CAMHS), if appropriate;
- if a report is determined to be unsubstantiated, unfounded, false or malicious, the designated safeguarding lead should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate;
- if a report is shown to be deliberately invented or malicious, the school will consider whether any disciplinary action is appropriate against the individual who made it as per our behaviour policy.

In dealing with the allegation it is important to consider:

- the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is

reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered;

- the nature of the alleged incident(s), including: whether a crime may have been committed and consideration of harmful sexual behaviour;
- the ages of the children involved;
- the developmental stages of the children involved;
- any power imbalance between the children. For example, is the alleged perpetrator significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?;
- if the alleged incident is a one-off or a sustained pattern of abuse;
- are there ongoing risks to the victim, other children, adult students or school or college staff; and
- other related issues and wider context. (Contextual safeguarding)

As always when concerned about the welfare of a child, all staff should act in the best interests of the child.

**Immediate** consideration should be given as to how best to support and protect the victim and the alleged perpetrator (and any other children involved/impacted). Whilst the school establishes the facts of the case and starts the process of liaising with children's social care and the police, the alleged perpetrator should be removed from any classes they share with the victim. They will also be kept separate whilst on school premises and won't be permitted to travel on school transport together.

The school will consider every report on a case-by-case basis and the school will deal with it via one of the methods below, as prescribed in *Keeping Children Safe in Education (September 2021)*:

- manage it internally;
- seek the support of Early Help;
- make a referral to children's social care; or
- report it to the Police.

*Consequences may be issued in line with the School's behaviour policy.*

We will minimise the risk of peer-on-peer abuse by:

- recognising that peer on peer abuse is not acceptable and will never be tolerated or passed off as "banter", "part of growing up", "just having a laugh" or "boys being boys";
- challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images;
- being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys;
- ensuring our curriculum helps to educate pupils. Pupils/students are educated through our PSHEE and tutor programmes, where issues such as those listed below are explored:
  - healthy and respectful relationships;
  - what respectful behaviour looks like;
  - consent;28
  - gender roles, stereotyping, equality;
  - body confidence and self-esteem;
  - prejudiced behaviour;
  - that sexual violence and sexual harassment is always wrong; and
  - addressing cultures of sexual harassment.
- ensuring pupils know they can talk to staff confidentially by speaking to their form tutor, head of year, DSL team or independent listener;
- promoting our core value of '**Respect**' and taking a whole school approach to upholding and demonstrating this value through all aspects of school life.
- ensuring staff are trained to understand that a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy.

## **Safeguarding and Supporting the victim**

When supporting a victim, the school will consider the following:

- The needs and wishes of the victim should be paramount (along with protecting the child) in any response. It is important they feel in as much control of the process as is reasonably possible. Wherever possible, the victim, if they wish, should be able to continue in their normal routine. Overall, the priority should be to make the victim's daily experience as normal as possible, so that school is a safe space for them.
- Consider the age and the developmental stage of the victim, the nature of the allegations and the potential risk of further abuse. The school should be aware that, by the very nature of sexual violence and sexual harassment, a power imbalance is likely to have been created between the victim and alleged perpetrator(s).
- The victim should never be made to feel they are the problem for making a report or made to feel ashamed for making a report.
- Consider the proportionality of the response. Support should be tailored on a case-by-case basis. The support required regarding a one-off incident of sexualised name-calling is likely to be vastly different from that for a report of rape.
- Schools should be aware that sexual assault can result in a range of health needs, including physical, mental, and sexual health problems and unwanted pregnancy. Children and young people that have a health need arising from sexual assault or abuse can access specialist NHS support from a Sexual Assault Referral Centre (SARC). SARCs offer confidential and non-judgmental support to victims and survivors of sexual assault and abuse. They provide medical, practical, and emotional care and advice to all children and adults, regardless of when the incident occurred.
- Victims may not talk about the whole picture immediately. They may be more comfortable providing information on a piecemeal basis. It is essential that dialogue is kept open and encouraged. When it is clear that ongoing support will be required, we will ask the victim if they would find it helpful to have a designated trusted adult (for example, their form tutor or designated safeguarding lead) to talk to about their needs. The choice of any such adult should be the victim's (as far as reasonably possible).
- A victim of sexual violence is likely to be traumatised and, in some cases, may struggle in a normal classroom environment. Although the school will try to avoid any action that would have the effect of isolating the victim, in particular from supportive peer groups, there may be times when the victim finds it difficult to maintain a full-time timetable and may express a wish to withdraw from lessons and activities. This should be because the victim wants to, not because it makes it easier to manage the situation. If required, the school will try to provide a physical space for victims to withdraw.

## **7.8 Sharing of Nude and Semi-nude Images**

### **Your responsibilities when responding to an incident**

If you are made aware of an incident involving the sharing of nude or semi-nude images and/or videos you must report it to the DSL immediately. This is because it is a sign that a child may be at risk.

You must **not**:

- view, download or share the imagery yourself, or ask a pupil to share or download it. If you have already viewed the imagery by accident, you must report this to the DSL;
- delete the imagery or ask the pupil to delete it;
- ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility);
- share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers;
- say or do anything to blame or shame any young people involved.

You should explain that you need to report the incident and reassure the pupil(s) that they will receive support and help from the DSL.

### **Initial review meeting**

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff. This meeting will consider the initial evidence and aim to determine:

- whether there is an immediate risk to pupil(s);
- if a referral needs to be made to the police and/or children's social care;
- if it is necessary to view the imagery in order to safeguard the young person (in most cases, imagery should not be viewed);
- what further information is required to decide on the best response;
- whether the imagery has been shared widely and via what services and/or platforms (this may be unknown);
- whether immediate action should be taken to delete or remove images from devices or online services;
- any relevant facts about the pupils involved which would influence risk assessment;
- if there is a need to contact another school, college, setting or individual;
- whether to contact parents or carers of the pupils involved (in most cases parents should be involved).

The DSL will make an immediate referral to police and/or children's social care if:

- the incident involves an adult;
- there is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs);
- what the DSL knows about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent;
- the imagery involves sexual acts and any pupil in the imagery is under 13;
- the DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of the imagery (for example, the young person is presenting as suicidal or self-harming).

If none of the above apply then the DSL, in consultation with the Headmaster and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care.

### **Further review by the DSL**

If at the initial review stage, a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review.

They will hold interviews with the pupils involved (if appropriate) to establish the facts and assess the risks.

If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

### **Informing parents**

The DSL will inform parents at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm.

### **Referring to the police**

If it is necessary to refer an incident to the police, this will be done through dialling 101, or speaking to the local safer schools officer.

## **Recording incidents**

All incidents of the sharing of nude and semi-nude images, and the decisions made in responding to them will be recorded.

## **Curriculum coverage**

Pupils are taught about the issues surrounding the sharing of nude or semi-nude images and/or videos as part of our PSHEE and computing programs.

Teaching covers the following:

- what it is;
- how it is most likely to be encountered;
- the consequences of requesting, forwarding or providing such images, including when it is and is not abusive;
- issues of legality;
- the risk of damage to people's feelings and reputation.

Pupils also learn the strategies and skills needed to manage:

- specific requests or pressure to provide (or forward) such images;
- the receipt of such images.

This policy on the sharing of nude and semi-nude images and/or videos is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

## **8. Notifying parents**

Where appropriate, we will discuss any concerns about a child with the child's parents. The DSL will normally do this in the event of a suspicion or disclosure.

Other staff will only talk to parents about any such concerns following consultation with the DSL.

If we believe that notifying the parents would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents of all the children involved.

## **9. Children potentially at greater risk of harm**

All staff should be aware that there are some children who are at greater risk of harm.

### **9.1 Children who need a social worker (Child in Need and Child Protection Plans)**

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health. Local authorities should share the fact a child has a social worker, and the designated safeguarding lead should hold and use this information so that decisions can be made in

the best interests of the child's safety, welfare and educational outcomes. The DSL will make staff aware of these children, as appropriate.

## **9.2 Looked after and previously looked after children**

The most common reason for children becoming looked after is as a result of abuse and/or neglect. The DSL (and deputies) will ensure that staff have the information they need in relation to a child's looked after legal status and the child's contact arrangements with birth parents or those with parental responsibility. This also includes information about the child's care arrangements. It is important to be aware that looked after children and previously looked after children are particularly vulnerable and prompt action must be taken when necessary to safeguard these children.

## **9.3 Pupils with special educational needs and disabilities**

We recognise that pupils with special educational needs (SEN) and disabilities can face additional safeguarding challenges and that they may be more vulnerable (including to peer on peer abuse). Additional barriers can exist when recognising abuse and neglect in this group, including:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- pupils being more prone to peer group isolation than other pupils;
- the potential for pupils with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.

## **10. Mental health**

All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. The School has a Mental Health Policy which all staff should refer to.

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

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

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by raising the issue with the DSL, who will in turn speak with the medical team, who may in turn contact an appropriate external agency.

## **11. Mobile phones and cameras**

Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present. Staff members' personal phones will remain in their bags or cupboards during contact time with pupils. Staff will never use their mobile phones in front of pupils unless in the case of an emergency, or for educational reasons (Senior School). Mobile phones used on school trips should be school mobile phones unless express permission has been sought by the Headmaster, EVC or DSL.

Staff will not take pictures or recordings of pupils on their personal phones or cameras.

We will follow the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in the school.

## **EYFS (Prep School)**

Personal mobile phones and cameras should only be used outside of working hours and not whilst children are present. Visiting adults should be informed of this policy on arrival and by their accompanying member of staff. Personal mobile phones and cameras should be stored safely with staff possessions. In very unusual circumstances, such as a family emergency, staff and volunteers should seek permission from the Head of Pre-Prep to use their mobile phone during the school day. If a staff member or volunteer must use their mobile phone (see above) this should be away from the children and ensuring that staff supervision levels are not compromised. Staff or volunteers who ignore this policy and use a mobile on the setting premises without permission may face disciplinary action.

## **Pupil use of Mobile Technology and BYOD**

### ***EYFS, Pre-Prep and Prep School***

Mobile and Bring your own Device is currently not permitted at Langley Prep School at Taverham Hall.

### ***Senior School***

Pupils may not use their own mobile device on the School site. The only exception to this is that students in the Sixth Form may use their devices whilst in the Alston Centre. All pupils may use their device in lessons if given specific permission by the class teacher. This must be for educational purposes only. For further information please refer to the Senior School's Mobile Device Policy.

For further information about Mobile Technology, BYOD and Online Safety parameters, please see the Online Safety Policy

## **12. Complaints and concerns about school safeguarding policies**

### **12.1 Complaints against staff**

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 2).

### **12.2 Other complaints**

The school has a complaints policy and concerns and complaints from parents and/or carers, will be kept as a written record with action and outcome recorded. Parents and/ or carers will receive an outcome of the investigation within 28 days of having received the complaint. The record of complaints must be made available to ISI, Ofsted for EYFS or the relevant agency on request.

### **12.3 Whistle-blowing**

**Please note – in the case of serious harm to a child, the Police must be informed immediately.**

If an allegation is made against an adult in a position of trust (member of staff/supply staff/volunteers), this should be brought to the immediate attention of the Headmaster (Deputy DSL) who will then contact the Local Area Designated Officer (also referred to as the Designated Officer) for advice (there are no thresholds, all allegations must be reported to the LADO).

The LADO can be contacted at the Education Intervention Service Duty Desk on 01603 307797

If the allegation is against the Headmaster then the DSL will advise the Chair of Governors or the member of staff should go directly to the Chair of Governors (or directly to the LADO); it should not be discussed with the Headmaster in any way if the allegation is against him.

The Headmaster/ Chair of Governors must discuss with the Local Authority Designated Officer (LADO) the nature of the allegations in order for appropriate action to be taken; this should be done immediately (no longer than 24 hours after the allegation has been made). Information on how to make a LADO referral can be found in appendix 2.

Where a staff member feels unable to raise an issue with anyone in the School, or feels that their genuine concerns are not being addressed, the NSPCC's dedicated helpline is available as an alternative route for staff. Via this helpline, staff can raise concerns regarding internal child protection failures or if they have concerns about the way a concern is being handled by the School. Staff can call 0800 028 0285, or via their email, [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

### 13. Record-keeping

We will hold records in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL.

Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main pupil file. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

**Prep School** - All records are paper based. They are kept in a locked filing cabinet in the DSL's office and files are sent confidentially to the pupils' next educational establishment.

**Senior School** – Historical records (prior to September 2019) are paper based. Records after this date are kept securely using the safeguarding software package CPOMS.

Files and information on the files are only shared with the DSL and Deputies and ongoing school DSLs.

- Appendix 2 sets out our policy on record-keeping with respect to allegations of abuse made against staff.
- Appendix 4 outlines the procedure for the transfer of files.

All records should include:

- a clear comprehensive summary of the concern;
- details of how the concern was followed up and resolved;
- a note of any action taken, decisions reached and the outcome.

### 14. Training

#### 14.1 All staff

All new staff, including temporary staff and volunteers, will receive safeguarding training in accordance with Norfolk County Council guidance through the DSL or Assistant DSL. They will receive safeguarding training as part of their induction (this is in addition to the Safeguarding training that all staff receive at least every year). During this induction training all new staff and volunteers will:

- a) complete an online Safeguarding course and assessment;

- b) receive and read the School's Safeguarding Policy (including the procedures for dealing with peer-on-peer abuse);
- c) receive and read the School's Employment Handbook (Staff Code of Conduct);
- d) receive information about the identity and role of the Designated Person(s);
- e) receive and read a copy of Part 1 and Annex A of *Keeping Children Safe in Education* (Sept 2021);
- f) receive and read the School's Whistleblowing Policy;
- g) receive and read the School's Behaviour policy;
- h) receive information on the school's response to children who go missing from education;
- i) receive training on how to manage a report of child on child sexual violence and sexual harassment; and
- j) receive information regarding online safety.

A signed copy of evidence of receipt, reading and understanding of the documentation is kept on individual personnel files.

This training helps to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect. This training will be regularly updated and will be in line with advice from the 3 safeguarding partners from Norfolk County Council.

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

Staff will also receive regular safeguarding (including online safety) and child protection updates (for example, through emails, e-bulletins and staff meetings) as required, but at least twice annually.

Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.

#### **14.2 The DSL and Deputies**

The DSL and the Deputies will attend the Local Authority's induction course and refresher training at least every two years, which includes child protection and inter-agency working as detailed in *Keeping Children Safe in Education* (Sept 2021) (Annex B), as well as training in the Local Authority's approach to *Prevent* duties.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

In addition, the Designated Safeguarding Lead (DSL) also meets termly with the Independent Schools' Safeguarding Forum to discuss current issues/legislation and best practice.

#### **14.3 Governors**

All governors receive training about safeguarding, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities.

As the chair of governors may be required to act as the 'case manager' in the event that an allegation of abuse is made against the Headmaster, they receive training in managing allegations for this purpose. In addition, the School Governor for Safeguarding has received named Governor training provided by Norfolk Safeguarding Children's Board.

#### **14.4 Recruitment – interview panels**

The School follows the Government's recommendations for the safer recruitment and employment of staff who work with children. At least one person conducting any interview for a post at the school will have

undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education's statutory guidance, *Keeping Children Safe in Education* (Sept 2021), and will be in line with local safeguarding procedures.

All staff are subject to the statutory Child Protection checks with the Disclosure and Barring Service (DBS) before starting work. The School makes a commitment to confirm that Child Protection checks and procedures have been carried out on any staff employed by another organisation working with the School's pupils on another site. All governors, volunteer helpers, contractors working regularly during term-time, and adult members of the families of members of staff who live on site, are also vetted. We refer to *Keeping Children Safe in Education* (Sept 2021) part 3. The School's *Safer Recruitment Policy* and *Employment Handbook (Staff Code of Conduct)*, which are also available on the School's website, should be referred to when reading this *Safeguarding Policy*.

#### **14.5 Staff who have contact with pupils and families**

All staff who have contact with children and families will have supervisions which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

#### **14.6 Opportunities to teach safeguarding**

The School ensures that pupils are taught about safeguarding, including online safety. This is taught through our curriculum including covering relevant issues through Relationships Education and Relationships and Sex Education, delivered via our PSHE programme.

### **15. Monitoring arrangements**

This policy will be reviewed **annually** by the DSLs at both schools. At every review, it will be approved by the full governing board.

### **16. Links with other policies**

This policy links to the following policies and procedures:

- Behaviour
- Staff code of conduct
- Complaints
- Safer recruitment policy
- Health and safety
- E safety
- Anti-Bullying
- Equality
- Sex and relationship education
- First aid
- Curriculum
- Privacy notices
- Intimate Care (Prep School)

## Appendix 1: types of abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap. Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. 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. Child abuse can take various forms, all of which can cause long term damage to a child – the main 4 categories of abuse are: **neglect, physical, emotional and sexual abuse.**

**Physical abuse** may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child whom they are looking after (fabricated or induced illness). Signs may include bruises, repeated minor injuries, the mark of a hand, lacerations, bite marks, and burns, which may be apparent particularly when children change their clothes for PE, swimming and other sports activities.

Harm may be caused to children both by the abuse itself, and by the abuse taking place in a wider family or institutional context of conflict and aggression. Physical abuse has been linked to aggressive behaviour in children, emotional and behavioural problems and educational difficulties. Possible signs are:

- seems afraid of parents or carers;
- is severely bruised or injured;
- behavioural extremes;
- wanting arms/legs covered in very hot weather.

**Emotional abuse** is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse may involve:

- conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person;
- not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate;
- age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction;
- seeing or hearing the ill-treatment of another;
- serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, depressed, or to be excessively dependent, attention seeking, or to self-harm;
- the exploitation or corruption of children.

There is clear evidence of the adverse long-term consequences for children's development where they have been subjected to sustained emotional abuse. Emotional abuse has an important impact on the developing child's mental health, behaviour and self-esteem. It can be especially damaging in infancy. Underlying emotional abuse may be as important, if not more so, than other more visible forms of abuse in terms of the impact on the child. Domestic violence, adult mental health and parental substance misuse may be features in families where children are exposed to emotional harm.

Possible signs are:

- low self-esteem;
- attention seeking;
- failure to thrive;
- apathy.

**Sexual abuse** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve:

- Physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- 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.

Disturbed behaviour including self-harm, inappropriate sexualised behaviour, substantial behavioural change, precocity, withdrawal, pregnancy, depression and loss of self-esteem have all been linked with sexual abuse; its adverse effects may endure into adulthood. The severity of the impact is likely to increase the longer the abuse continues. A number of features which may increase the severity of impact include the relationship with the abuser, the extent of premeditation, the degree of threat or coercion, and the risks posed through electronic communications and their potential for grooming. Possible signs are:

- displays sexual behaviour which does not seem appropriate for their age;
- wary of adults/running away from home;
- stomach pains when walking or sitting;
- unexplained gifts/money.

**Neglect** is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- protect a child from physical and emotional harm or danger;
- ensure adequate supervision (including the use of inadequate care-givers);
- ensure access to appropriate medical care or treatment.

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

Severe neglect of young children has adverse effects on children's ability to form attachments and is associated with major impairment of growth and intellectual development, and long-term difficulties with social functioning, relationships and educational progress. Neglected children may also experience feelings of being unloved and isolated. Neglect can also result in extreme cases, in death. The impact of the neglect depends on how long the child has been neglected, the child's age and the type of neglect. Possible signs are:

- is frequently dirty, hungry or inadequately dressed;
- is left in unsafe situations or without medical attention;
- is constantly "put down", insulted, sworn at or humiliated;
- poor/late attendance at school.

**The above terminologies reflect the needs of our current pupil body.** However, there are further forms of abuse of which all staff should be aware. These are described in Appendix 3.

## Appendix 2: allegations of abuse made against staff

This section of this policy applies to all cases in which it is alleged that a current member of staff (including supply staff, volunteers and governors) has:

- 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;
- behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

It applies regardless of whether the alleged abuse took place in the school. Allegations against a teacher who is no longer teaching and historical allegations of abuse will be referred to the police.

We will deal with any allegation of abuse against a member of staff or volunteer very quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

Our procedures for dealing with allegations will be applied with common sense and judgement.

### Suspension

Suspension will not be the default position, and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- redeployment within the school so that the individual does not have direct contact with the child or children concerned;
- providing an assistant to be present when the individual has contact with children;
- redeploying the individual to alternative work in the school so that they do not have unsupervised access to children;
- moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents have been consulted;
- temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for Langley Schools.

### Definitions for outcomes of allegation investigations

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

## Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the Headmaster (or Chair of Governors where the Headmaster is the subject of the allegation) – the ‘case manager’ – will take the following steps:

- Immediately discuss the allegation with the designated officer at the local authority, within one working day of it being reported. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children’s social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police).
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children’s social care services, where necessary). Where the police and/or children’s social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies.
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children’s social care services, as appropriate.
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details.
- In the event of a member of boarding staff being suspended, pending an investigation of a child protection nature, arrangements for alternative accommodation for the member of staff must be made. As a Boarding School we are aware of the greater opportunities for contact between staff and pupils and the possibility of greater risks resulting from this.
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation.
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children’s social care services as appropriate.
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. Staff can access the Staff support service, details of which can be obtained from HR.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children’s social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice.

- Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence).
- Any member of staff/person who is considered unsuitable to work with children (whether employed, contracted, a volunteer, or pupil/student), where they have caused harm or posed a risk of harm to a child, whose services are no longer used by the School(s) (including where the cessation of that person's services results from dismissal; non-renewal of a fixed-term contract; no longer engaging/refusing to engage a supply teacher provided by an employment agency; terminating the placement of a student teacher or other trainee; no longer using staff employed by contractors; no longer using volunteers; resignation, and voluntary withdrawal from supply teaching, contract working, a course of initial teacher training, or volunteering because he/she is considered unsuitable to work with children) will be reported to the DBS upon conclusion of the investigation. The School recognise that failure to report constitutes a criminal offence and may result in the DfE removing the School from the register of Independent Schools. Compromise or Settlement agreements by which a person agrees to resign, an employer agrees not to pursue disciplinary action, and both parties agree a form of words to be used in any future reference, **will not** be used in these circumstances.
- The School will also make a referral to the Teacher Regulation Agency (TRA) where a teacher has been dismissed (or would have been dismissed if he/she had not resigned) and a prohibition order may be appropriate. The reasons such an order would be considered are: "unacceptable professional conduct", "conduct that may bring the profession into disrepute" or a "conviction, at any time, for a relevant offence". Further guidance is published on the TRA website. Where a dismissal does not reach the threshold for DBS referral, separate consideration should be given to a TRA referral. If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.
- If the School (or agency) dismisses or ceases to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left first, we will consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency).

Where the police are involved, wherever possible the governing body will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

### Timescales

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious will be resolved within 1 week.
- If the nature of an allegation does not require formal disciplinary action, we will institute appropriate action within 3 working days.
- If a disciplinary hearing is required and can be held without further investigation, we will hold this within 15 working days.
- Where appropriate, the school will inform ISI and Ofsted (for EYFS) of the allegation and actions taken, as soon as practicably possible and within 14 days.

### Specific actions

#### Action following a criminal investigation or prosecution

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

### **Conclusion of a case where the allegation is substantiated**

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the case manager and the school's personnel adviser will discuss with the designated officer whether to make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the case manager and personnel adviser will discuss with the designated officer whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

The School will make a referral to the Teacher Regulation Agency (TRA) where a teacher has been dismissed (or would have been dismissed if he/she had not resigned) and a prohibition order may be appropriate. The reasons such an order would be considered are: "unacceptable professional conduct", "conduct that may bring the profession into disrepute" or a "conviction, at any time, for a relevant offence". Further guidance is published on the TRA website. Where a dismissal does not reach the threshold for DBS referral, separate consideration should be given to a TRA referral.

### **Individuals returning to work after suspension**

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

### **Unsubstantiated or malicious allegations**

If an allegation is shown to be deliberately invented, or malicious, the Headmaster, or other appropriate person in the case of an allegation against the Headmaster, will consider whether any disciplinary action is appropriate against the pupil(s) who made it, or whether the police should be asked to consider whether action against those who made the allegation might be appropriate, even if they are not a pupil. The DSL will refer the matter to children's social care services to determine whether the child concerned is in need of services, or may have been abused by someone else.

### **Concerns that do not meet the harm threshold ('low-level concerns')**

There is a requirement for governors and the school to have policies and processes in place to deal with concerns (including allegations) that do not meet the harm threshold for Dealing with Allegations. These may arise from a variety of sources, including suspicion, complaint, a disclosure (by child or adult) or during vetting checks.

### **Purpose of the policy**

The purpose of the policy is to create and embed a culture of openness, trust and transparency in which the school's values and expected behaviour as set out in the staff code of conduct are constantly lived, monitored and reinforced by all staff.

It is critical that there is a culture in which all concerns about adults are shared responsibly and with the right person, recorded and dealt with appropriately. This should enable an open and transparent culture, enable the early identification of concerning, problematic or inappropriate behaviour, minimise the risk of abuse,

ensure that adults working in the school are clear about and act within professional boundaries in accordance with the values and ethos of the institution, and protect those working in or on behalf of schools from potential false allegations or misunderstandings.

### **Definition**

A low-level concern is 'any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult working in or on behalf of the school or college may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate contact outside of work, and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.'

These behaviours can exist on a wide spectrum, from inadvertent to that which is ultimately intended to enable abuse. They include, for example:

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with children on a one-to-one basis in a secluded area or behind a closed door;
- using inappropriate sexualised, intimidating or offensive language.

### **Procedure**

Low-level concerns about a member of staff should be reported to the Headmaster. Staff should feel confident to self-refer. Low-level concerns about someone employed by a supply agency or contractor should be shared with the headmaster, the concern recorded, and their employer notified so that potential patterns of inappropriate behaviour can be identified.

Where a third party has raised the concern, the headmaster should collect as much evidence as possible by speaking:

- directly to the person who raised the concern (if known);
- to the individual involved and any witnesses.

The headteacher should record all low-level concerns in writing. This should include:

- details of the concern;
- the context in which it arose;
- evidence collected by the DSL where the concern has been raised via a third party;
- the decision categorising the type of behaviour;
- action taken;
- the rationale for decisions and action taken;
- the name of the individual sharing the concerns (respecting any wish to remain anonymous as far as possible).

### **Record keeping**

The records must be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK GDPR.

They should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where such a pattern is identified, the school should either take action through its disciplinary procedures or, if it meets the harms threshold, refer to the LADO. KCSIE specifies that, 'Consideration should also be given to whether there are wider cultural issues within the school that enabled the behaviour to occur and where appropriate policies could be revised or extra training delivered to minimise the risk of it happening again.' It is recommended that the school retains this information at least until the individual leaves their employment.

The low-level concerns policy is set out within both the safeguarding policy and the staff code of conduct.

## Confidentiality

The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the local authority's designated officer, police and children's social care services, as appropriate, to agree:

- who needs to know about the allegation and what information can be shared;
- how to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality;
- what, if any, information can be reasonably given to the wider community to reduce speculation;
- how to manage press interest if, and when, it arises.

## Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case. Such records will include:

- a clear and comprehensive summary of the allegation;
- details of how the allegation was followed up and resolved;
- notes of any action taken and decisions reached (and justification for these, as stated above).

If an allegation or concern is not found to have been malicious, the school will retain the records of the case on the individual's confidential personnel file, and provide a copy to the individual.

Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

The records of any allegation that is found to be malicious will be deleted from the individual's personnel file.

## References

When providing employer references, we will not refer to any allegation that has been proven to be false, unsubstantiated or malicious, or any history of allegations where all such allegations have been proven to be false, unsubstantiated or malicious.

## Learning lessons

After any cases where the allegations are *substantiated*, we will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- issues arising from the decision to suspend the member of staff;
- the duration of the suspension;
- whether or not the suspension was justified;
- the use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual.

## **Supply teachers**

It is recognised that the School may have to consider an allegation against an individual not directly employed by the School, for example supply teachers provided by an employment agency or business.

The School will ensure allegations are dealt with properly. Prior to ceasing using a supply teacher due to safeguarding concerns, the facts will be found out and the LADO liaised with to determine a suitable outcome. The School may discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them, whilst the investigation is carried out.

The School may take the lead in the investigation as required in full co-operation with the LADO, police and/or children's social services. The supply teacher will be advised to contact their trade union for representation. If there is an allegation meeting it will address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the School. The agency's HR manager (or equivalent) will be invited to any such meetings.

## Appendix 3: Specific safeguarding issues

### Children missing from education

Children missing education are children of compulsory school age who are not registered pupils at a school and are not receiving suitable education otherwise than at a school. A child going missing from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may become missing from education, but some children are particularly at risk. These include children who:

- are at risk of harm or neglect;
- are at risk of forced marriage or FGM;
- come from Gypsy, Roma, or Traveller families;
- come from the families of service personnel;
- go missing or run away from home or care;
- are supervised by the youth justice system;
- cease to attend a school;
- come from new migrant families.

We will follow our procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future.

The School will adhere to the following procedures and processes to ensure there is an appropriate safeguarding response to children who go missing:

- an attendance register will be taken at the start of the first session of each school day and once during the second session;
- the School will make every effort to contact parents and carers and follow up with the emergency contacts held;
- the School will hold at least two emergency contact numbers for each of the pupils on our roll wherever possible;
- staff will alert the DSL to any concerns raised regarding children who are absent from school by completing a **'Reporting Form for Safeguarding Concerns' (or raise a concern via CPOMS – Senior School)**;
- the DSL will meet regularly with the Attendance Officer and Pastoral Committee to ensure that each response is thorough and takes into account all the relevant information about individual children;
- we will intervene early in cases of poor attendance and/or unexplained absence.
- when removing a child from roll at the standard and non-standard transition points, we will inform the Local Authority in accordance with statutory requirements and pass on all safeguarding files. This includes informing the local authority if a child leaves the school without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures as outlined earlier in this document, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

## Child sexual exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse that occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator.

This can involve violent, humiliating and degrading sexual assaults, but does not always involve physical contact and can happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam.

CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17-year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

Like all forms of child sex abuse, sex abuse of children by children and child sexual exploitation:

- can affect any child or young person under the age of 18, including 16- and 17-year olds who can legally consent to have sex;
- can still be abuse even if the sexual activity appears to be consensual;
- can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity;
- can take place in person or via technology, or a combination of both;
- can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence;
- may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media);
- can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to organised abuse;
- is typified by some sort of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious, this power imbalance can also be due to gender, sexual identity, cognitive ability, physical strength, status and access to economic or other resources.

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Indicators of sexual exploitation can include a child:

- appearing with unexplained gifts or new possessions;
- associating with other young people involved in exploitation;
- having older boyfriends or girlfriends;
- suffering from sexually transmitted infections or becoming pregnant;
- displaying inappropriate sexualised behaviour;
- suffering from changes in emotional wellbeing;
- Misusing drugs and/or alcohol;
- going missing for periods of time, or regularly coming home late;
- regularly missing school or education, or not taking part in education;



## Child Criminal Exploitation (CCE)

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

- (a) in exchange for something the victim needs or wants, and/or
- (b) for the financial or other advantage of the perpetrator or facilitator and/or
- (c) through violence or the threat of violence.

CCE can affect children, both male and female, and can include children who have been moved for the purpose of exploitation. Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim.

The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology. CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, forced into vehicle crime, or to threaten/commit serious violence to others.

Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources.

Some of the following can be indicators of CCE:

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

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however all staff should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

## County Lines

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

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

debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs. If a member of staff suspects a child is at risk of or involved in county lines, a safeguarding referral should be made, alongside the availability of local services who offer support to victims of county lines exploitation, which will be organized by the DSL and deputies.

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;
- is typified by some sort of power imbalance in favour of those perpetrating the exploitation.

A young person's involvement in county lines activity often leaves signs. A person might exhibit some of these signs, either as a member or as an associate of a gang dealing drugs. Any sudden changes in a person's lifestyle should be discussed with them.

Some potential indicators of county lines involvement and exploitation are listed below, with those at the top of particular concern:

- persistently going missing from school or home and / or being found out-of-area;
- unexplained acquisition of money, clothes, or mobile phones;
- excessive receipt of texts / phone calls and/or having multiple handsets;
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;
- relationships with controlling / older individuals or groups;
- leaving home / care without explanation;
- suspicion of physical assault / unexplained injuries;
- have been the victim or perpetrator of serious violence;
- parental concerns;
- carrying weapons;
- significant decline in school results / performance;
- gang association or isolation from peers or social networks;
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection;
- are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity;
- owe a 'debt bond' to their exploiters;
- have their bank accounts used to facilitate drug dealing;
- self-harm or significant changes in emotional well-being.

## **Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. Staff should be alert to indicators that a family may be at risk of homelessness, which include household debt, rent arrears, domestic abuse and anti-social behaviour.

The DSL and deputies will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

### **So-called 'honour-based' abuse (including FGM and forced marriage)**

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

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse (regardless of motivation) and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

### **Upskirting**

Upskirting is a highly intrusive practice, which typically involves someone taking a picture under another person's clothing without their knowledge, with the intention of viewing their genitals or buttocks (with or without underwear). It is illegal; anyone, and any gender, can be a victim and this behaviour is completely unacceptable. Staff should be aware of this practice and if they are aware that upskirting has taken place, they must report it to the DSL, who will inform CADS, where a minor is concerned or the police where an adult is concerned.

### **Serious violence**

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

### **FGM**

FGM is illegal in England and Wales. 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 and should intervene to safeguard girls who may be at risk of or have been affected by it.

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

- a pupil confiding in a professional that FGM has taken place;
- a mother/family member disclosing that FGM has been carried out;

- a family/pupil already being known to social services in relation to other safeguarding issues;
- a girl:
  - having difficulty walking, sitting or standing, or looking uncomfortable;
  - finding it hard to sit still for long periods of time (where this was not a problem previously);
  - spending longer than normal in the bathroom or toilet due to difficulties urinating;
  - having frequent urinary, menstrual or stomach problems;
  - avoiding physical exercise or missing PE;
  - being repeatedly absent from school, or absent for a prolonged period;
  - demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour;
  - being reluctant to undergo any medical examinations;
  - asking for help, but not being explicit about the problem;
  - talking about pain or discomfort between her legs.

Potential signs that a pupil may be at risk of FGM include:

- the girl's family having a history of practising FGM (this is the biggest risk factor to consider);
- FGM being known to be practised in the girl's community or country of origin;
- a parent or family member expressing concern that FGM may be carried out;
- a family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues;
- a girl:
  - having a mother, older sibling or cousin who has undergone FGM;
  - having limited level of integration within UK society;
  - confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman";
  - talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents stating that they or a relative will take the girl out of the country for a prolonged period;
  - requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM;
  - talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion);
  - being unexpectedly absent from school;
  - having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication.

The above indicators and risk factors are not intended to be exhaustive.

### **Forced marriage**

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. Some communities use religion and culture as a way to coerce a person into marriage.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the 'one chance' rule, i.e. we may only have one chance to speak to the potential victim and only one chance to save them.

If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- speak to the pupil about the concerns in a secure and private place;

- activate the local safeguarding procedures and refer the case to the local authority's designated officer;
- seek advice from the Forced Marriage Unit on 020 7008 0151 or [fmf@fco.gov.uk](mailto:fmf@fco.gov.uk);
- refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate.

## Preventing radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place, and equip our pupils to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period. Staff must be conscious of the fact that it can occur through many different methods (such as social media) and settings (such as the internet).

Staff will be alert to changes in pupils' behavior which could indicate that they might 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.

The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a pupil is being radicalised can include:

- refusal to engage with, or becoming abusive to, peers who are different from themselves;
- becoming susceptible to conspiracy theories and feelings of persecution;
- changes in friendship groups and appearance;
- rejecting activities they used to enjoy;
- converting to a new religion;
- isolating themselves from family and friends;
- talking as if from a scripted speech;
- an unwillingness or inability to discuss their views;
- a sudden disrespectful attitude towards others;
- increased levels of anger;
- increased secretiveness, especially around internet use;
- expressions of sympathy for extremist ideologies and groups, or justification of their actions;
- accessing extremist material online, including on Facebook or Twitter;
- possessing extremist literature;
- being in contact with extremist recruiters and joining, or seeking to join, extremist organisations.

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

Staff should **always** take action if they are worried.

Further information on the school's measures to prevent radicalisation are set out in other school policies and procedures, including the E Safety and Anti-bullying Policy.

## **Domestic Violence**

Domestic violence and abuse is defined as any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:

- psychological;
- physical;
- sexual;
- financial; and
- emotional.

Controlling behaviour is a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.

Coercive behaviour is an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio- economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

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

At Langley School we are working in partnership with Norfolk Constabulary and Norfolk Children's Services to identify and provide appropriate support to pupils who have experienced domestic violence in their household; this scheme is called Operation Encompass. In order to achieve this, Norfolk Multi-agency Safeguarding Hub will share police information of all domestic incidents where one of our pupils has been present with the Designated Safeguarding Lead(s). On receipt of any information, the Designated Safeguarding Lead will decide on the appropriate support the child requires, this could be silent or overt. All information sharing and resulting actions will be undertaken in accordance with the '*Norfolk Joint Agency Protocol for Domestic Abuse – Notifications to Schools*'. We will record this information and store this information in accordance with the record keeping procedures outlined in this policy.

## **Gangs and Youth Violence**

The vast majority of young people and education establishments will not be affected by serious violence or gangs. However, where these problems do occur there will almost certainly be a significant impact.

While pupils and students generally see the school as a safe place, even low levels of youth violence can have a disproportionate impact. Interventions, through teachings, can take place to prevent negative behaviour, such as young people carrying a knife. The school will ensure that all groups of pupils:

- feel safe at school all the time;
- understand very clearly what unsafe situations are; and
- are highly aware of how to keep themselves and others safe.

## Signs of abuse

***Signs such as those listed below can do no more than give rise to concern - they are not in themselves proof that abuse has occurred, but trusted adults should be aware of the possible implications of, and be alert to, all such signs.***

It is always preferable to prevent or reduce the risk of abuse through effective early intervention and help. Because of their day-to-day contact with individual children, school staff are particularly well placed to observe outward symptoms or abnormality or changes in appearance, behaviour, learning pattern or development. Such symptoms may of course be due to a variety of other causes, including bereavement or other disruption in the family, peer group or social circumstances. However, staff should be particularly mindful of a child who:

- is frequently dirty, hungry or inadequately dressed;
- is left in unsafe situations or without medical attention;
- is constantly "put down", insulted, sworn at or humiliated;
- seems afraid of parents or carers;
- is severely bruised or injured;
- displays sexual behaviour which does not seem appropriate for their age;
- is growing up in a home where there is domestic violence;
- is living with parents or carers involved in drug or alcohol abuse;
- has self-inflicted wounds;
- has significant changes in their behaviour;
- goes missing from an education setting, particularly on repeat occasions.

Further signs of abuse could result from observing inappropriate behaviour displayed by other members of staff, or any other person working with the children. For example, inappropriate sexual comments; excessive one-to-one attention beyond the requirements of their usual role and responsibilities; or inappropriate sharing of images.

## Homestays

When a homestay is arranged the school will assess the suitability of the adults in those families who will be responsible for the visiting child during the stay. A DBS enhanced certificate with barred list information will be obtained for each adult. This check will not only establish whether the adults are barred from engaging in regulated activity relating to children, but where criminal record information is disclosed it will also allow the school to consider, alongside all other intelligence that it has obtained, whether the adults would be a suitable host for a child.

It is not possible for schools and colleges to obtain criminality information from the DBS about adults who provide homestays abroad. Staff arranging such trips should liaise with partner schools abroad, to establish a shared understanding of, and agreement to the arrangements in place for the visit. They should use their professional judgement to satisfy themselves that the arrangements are appropriate and sufficient to safeguard effectively every child who will take part in the exchange. Parents should be aware of agreed arrangement. The staff member may decide whether they consider it necessary to contact the relevant foreign embassy or High Commission of the country in question to discuss what checks may be possible in respect of those providing homestay outside of the UK.

During the visit all pupils should understand who to contact during a homestay should an emergency occur, or a situation arise which makes them feel uncomfortable.

### **Checking the identity and suitability of visitors**

All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign the visitors' book and wear a visitor's badge.

Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:

- will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- the organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an enhanced DBS check with barred list information has been carried out.

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

### **Non-collection of children**

If a child is not collected at the end of the session/day:

Duty Staff

- For the Prep School: Any children left at 18:00 are looked after by the duty member of staff, this normally happens in the Outer Hall. If the pupil has not been picked up by 18:30, then child's parents should be contacted, details can be found in the contact list kept in the locked box by the front door.
- For the Senior School: Any child not collected by 17:30 should report to the Boarding Office where they can be monitored and parents can be called.
- In the unlikely scenario where neither the child's parents nor any other of the contacts on the School's contact list can be raised then the member of staff on duty must contact a member LLT who will take the decision about what is best for the child.

LLT

- Will inform the DSL of the situation
- Will retry the contact numbers for all contacts supplied to the school
- Will contact CADS 0344 800 8021 to advise them of the situation (**See Appendix 6**)
- Will contact the out of hours Emergency Children's Advice and Duty Service if after 8pm on 0344 800 8020
- Will supply the child with appropriate nourishment and shelter until the appropriate agency collects the child (Police, temporary foster carer or Children's services)

### **Missing pupils**

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will:

- Prep School: Follow the Whole School Supervision of Pupils and Missing Pupils Procedure Policy;
- Senior School: Follow the Missing Pupil/Student Procedure.

## **Modern Slavery**

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

## **Cybercrime**

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include:

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded;
- denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and,
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

Note that Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

#### **Appendix 4: transfer of records**

When a child whose name is on the Safeguarding Register leaves the School, the DSL will inform the relevant social worker/school DSL and send the child protection records to the receiving school immediately. If the name of the receiving school is not known, the DSL will notify the child's social worker as a matter of urgency as soon as the child leaves or appears to be missing. In these circumstances, the safeguarding records will remain at the School until the child is known to have registered elsewhere.

Once a child joins Langley School, the previous school is contacted in writing to ascertain whether there are any on-going safeguarding issues.

When a child joins the School and records from the previous school indicate his/her name is on the Child Protection Register, the Headmaster or DSL will notify Children's social care **immediately**.

When a child whose name is known to be on the Child Protection Register joins the School and no child protection records have been received from the previous school, the DSL will contact that school to request the records be sent **immediately**. This request will be confirmed in writing and repeated if necessary.

Data protection and GDPR must never prevent the communication of information for Child Protection cases, to necessary parties. The KCSIE (Sept 2021) Special Category Personal Data guidelines should be used when sharing information, including without consent.

## Appendix 5: Peer on peer abuse: Sexual Violence and Sexual Harassment

Sexual violence and sexual harassment can occur between two children of **any age and sex**. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. The school takes a zero tolerance approach to sexual violence and sexual harassment.

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

All staff should be aware of the importance of:

- challenging inappropriate behaviours between peers;
- making it clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys";
- challenging behaviour (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia and flicking bras and lifting up skirts. Dismissing or tolerating such behavior's risks normalising them; and
- understanding that all of the above can be driven by wider societal factors beyond the school and college, such as everyday sexist stereotypes and everyday sexist language.

### **Sexual Violence**

All staff must be aware of sexual violence and the fact that children can, and sometimes do, abuse their peers in this way. When referring to sexual violence the offences are (as described in the Sexual Offences Act 2003):

- Rape
- Assault by Penetration
- Sexual Assault

### **Sexual Harassment**

Sexual harassment refers to 'unwanted conduct of a sexual nature'. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

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

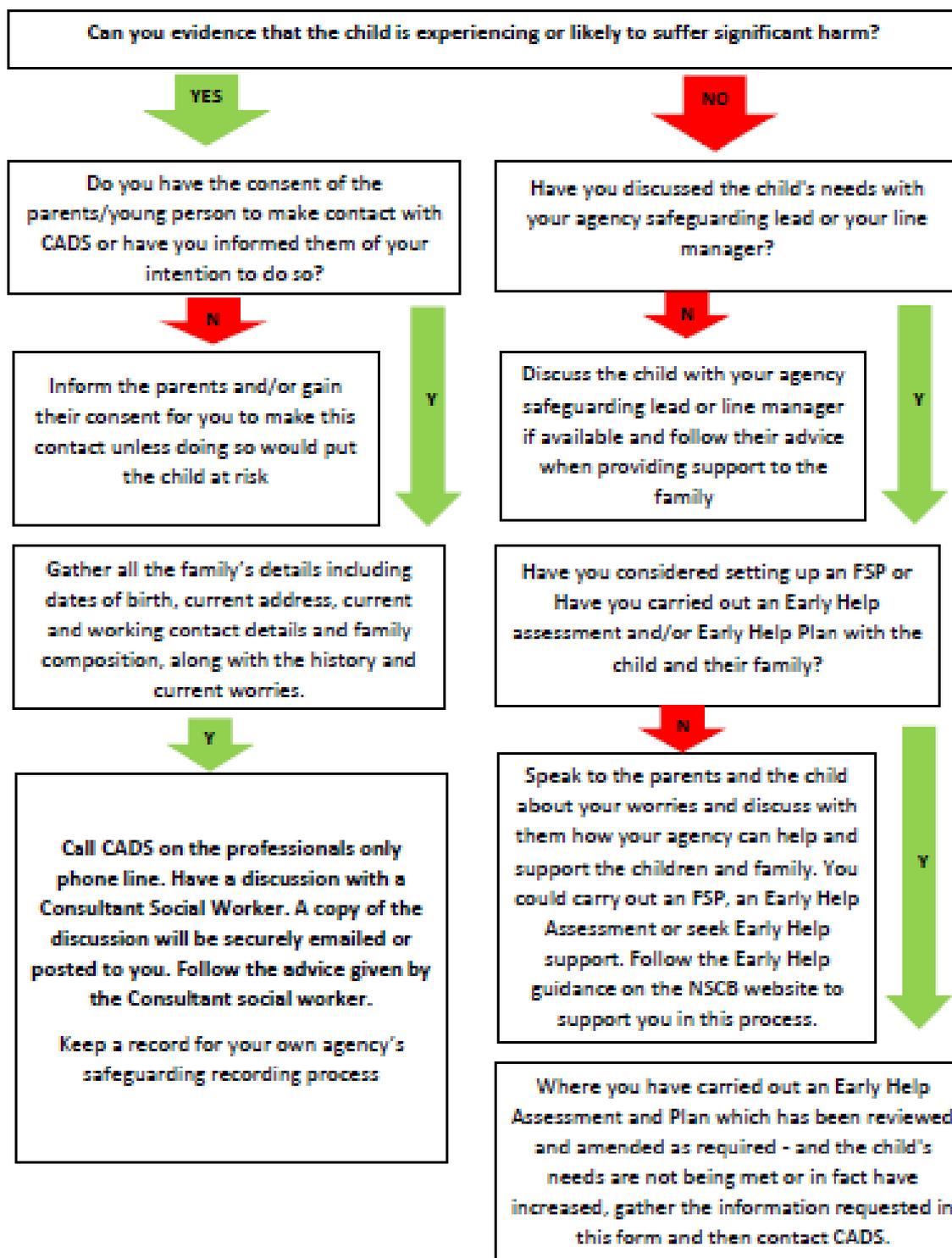
- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual "jokes" or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools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

**If a child alleges that they have been a victim of sexual violence or sexual harassment; staff should follow the procedures laid out earlier in this document (point 7.7).**

**The NSPCC's dedicated helpline (0800 136 663) for those who have suffered sexual abuse in school is clearly made known to pupils and students.**

Appendix 6 CADS referral process

Before contacting CADS, please answer the following questions and follow the advice provided:



**PROFESSIONAL USE ONLY – CALL CADS ON 0344 800 8021**

## Appendix 7: Online Safety

The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm. The school protects and educates the whole school community in their use of technology. Appropriate mechanisms, as described in this policy (and in the school's Online Safety policy), have been established which help identify, intervene in, and escalate any incident where appropriate.

### The Designated Safeguarding Lead

- Takes day to day responsibility for online safety issues and has a leading role in establishing and reviewing the school online safety policies / documents;
- Ensures that all staff are aware of the procedures that need to be followed in the event of an online safety incident taking place;
- Provides training and advice for staff;
- Liaises with the Local Authority, where necessary;
- Liaises with school technical staff;
- Receives reports of online safety incidents and creates a log of incidents to inform future online safety developments;
- Meets regularly with Safeguarding Governor to discuss current issues, review incident logs and filtering / change control logs;
- Attends relevant meetings with the Governors;
- Reports regularly to Leadership Team.

The Designated Safeguarding Lead will be trained in Online Safety issues and be aware of the potential for serious child protection / safeguarding issues to arise from:

- sharing of personal data;
- access to illegal / inappropriate materials;
- inappropriate on-line contact with adults / strangers;
- potential or actual incidents of grooming;
- online-bullying.

Online safety issues can be categorised into four areas or risk, which all staff should be aware of:

- **content:** being exposed to illegal, inappropriate or harmful material; for example, pornography, fake news, racist and extremist views;
- **contact:** being subjected to harmful online interaction with other users; for example, commercial advertising as well as adults posing as children or young adults;
- **conduct:** personal online behavior that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, or online bullying;
- **commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams.

The School's Mobile Device Policy details the rules regarding pupils' use of mobile devices. The School recognises that children have the potential to sexually harass their peers via their mobile and smart technology, share indecent images: consensually and non-consensually (often via large chat groups), and view and share pornography and other harmful content because of 3G, 4G and 5G. This is why mobile device use is restricted so that pupils can be better safeguarded.

The School ensures that it has sufficient filters and monitoring systems in place (currently done through SENSO). The safeguarding team are alerted to any activity on school systems that are a cause for concern. The School also ensures that there are appropriate security protection procedures in place, to safeguard the systems, pupils and staff.

## Safeguarding and remote education

It is important that all staff who interact with children, including online, continue to look out for signs a child may be at risk. Any such concerns should be dealt with as per the Safeguarding Policy and where appropriate referrals should still be made to children's social care and as required, the police. Online teaching should follow the same principles as set out in the Langley Staff Code of Conduct. Langley School will ensure any use of online learning tools and systems is in line with privacy and data protection/GDPR requirements. Below are some things to consider when delivering virtual lessons, especially where webcams are involved:

- try to avoid 1:1 remote lessons, where this is unavoidable make sure the meeting is recorded a third party member of staff is present;
- staff and children must wear suitable clothing, as should anyone else in the household;
- any computers used should be in appropriate areas, for example, not in bedrooms; and the background should be blurred or plain;
- the live class should be recorded so that if any issues were to arise, the video can be reviewed;
- live classes should be kept to a reasonable length of time, or the streaming may prevent the family 'getting on' with their day;
- language must be professional and appropriate, including any family members in the background;
- staff must only use platforms suggested by Langley School, to communicate with pupils;
- staff should record the length, time, date and attendance of any sessions held on the Duty log at the Preparatory School under the "Live Session Record" tab.

## Supporting children not in school

Langley School is committed to ensuring the safety and wellbeing of all its Children and Young people. Where the DSL has identified a child to be on the edge of social care support, or who would normally receive pastoral-type support in school, they should ensure that a robust communication plan is in place for that child or young person. Details of contact will be kept centrally with the DSL team but may involve email contact from the tutor or key person, working with that child. The communication plans can include remote contact, phone contact or door-step visits (if permitted). Other individualised contact methods should be considered and recorded.

Langley School and its DSL will work closely with all stakeholders to maximise the effectiveness of any communication plan. This plan must be reviewed regularly (at least once a fortnight) and where concerns arise, the DSL will consider any referrals as appropriate.

The school will share safeguarding messages on its website, wellbeing channels and social media pages. Langley School recognises that school is a protective factor for children and young people, and the current circumstances, can affect the mental health of pupils and their parents/carers. Teachers at Langley School need to be aware of this in setting expectations of pupils' work whilst they are at home.

## **Appendix 8: use of school or college premises for non-school/college activities**

When the School hires or rents out facilities/premises to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) we will ensure that appropriate arrangements are in place to keep children safe.

When services or activities are provided, under the direct supervision or management of school staff, our arrangements for child protection will apply. However, where services or activities are provided separately by another body this is not necessarily the case. The school should therefore seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place to liaise with the school on these matters where appropriate. The school should also ensure safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.

## Appendix 9 Additional Safeguarding information for a registered setting.

Providers must have regard to the Government's statutory guidance *Working Together to Safeguard Children* and to the *Prevent duty guidance for England and Wales*. All schools are required to have regard to the government's *Keeping Children Safe in Education* statutory guidance. If providers have concerns about children's safety or welfare, they must notify agencies with statutory responsibilities without delay. This means the local children's social care services and, in emergencies, the police.

Registered providers must inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere). Registered providers must also notify Ofsted of the action taken in respect of the allegations. These notifications must be made as soon as is reasonably practicable, but at the latest within 14 days of the allegations being made. A registered provider who, without reasonable excuse, fails to comply with this requirement, commits an offence.

Registered providers other than childminders must obtain an enhanced DBS disclosure and barred list check in respect of every person aged 16 and over (including unsupervised volunteers and supervised volunteers who provide personal care) who<sup>1(1)</sup>:

- works directly with children;
- lives on the premises on which the childcare is provided; and/or
- works on the premises on which the childcare is provided (unless they do not work on the part of the premises where the childcare takes place, or do not work there at times when children are present).

Additional criminal records checks should be made for individuals who have lived or worked abroad

Providers must also meet their responsibilities under the Safeguarding Vulnerable Groups Act 2006 which includes a duty to make a referral to the DBS where a member of staff is dismissed (or would have been, had the person not left the setting first) because they have harmed a child or put a child at risk of harm.

A registered provider must notify Ofsted of any significant event which is likely to effect the suitability of any person who is in regular contact with children on the premises where childcare is provided. Disqualification, of an employee could be an instance of a significant event.

The registered provider must give Ofsted the following information about themselves or an employee when relevant:

- details of any order, determination, conviction, or other ground for disqualification from registration under regulations made under section 75 of the Childcare Act 2006;
- the date of the order, determination or conviction, or the date when the other ground for disqualification arose;
- the body or court which made the order, determination or conviction, and the sentence (if any) imposed; and
- a certified copy of the relevant order (in relation to an order or conviction).

The information must be provided to Ofsted soon as reasonably practicable, but at the latest within 14 days of the date the provider became aware of the information or ought reasonably to have become aware of it if they had made reasonable enquiries.

Registered providers must notify Ofsted of any food poisoning affecting two or more children cared for on the premises. Notification must be made as soon as is reasonably practicable, but in any event within 14 days of the incident. A registered provider, who, without reasonable excuse, fails to comply with this requirement, commits an offence.

Registered providers must notify Ofsted of any serious accident, illness or injury to, or death of, any child while in their care, and of the action taken. Notification must be made as soon as is reasonably practicable, but in any event within 14 days of the incident occurring. A registered provider, who, without reasonable excuse, fails to comply with this requirement, commits an offence.

Providers must notify local child protection agencies of any serious accident or injury to, or the death of, any child while in their care, and must act on any advice from those agencies.