



**WOODCOTE HOUSE SCHOOL**

**September 2023**

# **CHILD PROTECTION AND SAFEGUARDING POLICY**

**IN CHARGE OF POLICY: DANIELLE RAMAGE (DSL)**

**REVIEWED ANNUALLY BY: NICK PATERSON (PROPRIETOR)**

## CHILD PROTECTION AND SAFEGUARDING POLICY

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Disclosure and Barring Service	ADDRESS: PO Box 181, Darlington, DL1 9FA TEL: 01325 953795 EMAIL: <a href="mailto:dbsdispatch@dbs.gsi.gov.uk">dbsdispatch@dbs.gsi.gov.uk</a>
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## **1. Policy statement**

This policy applies to all staff and volunteers at Woodcote House School and will be supplied to parents and pupils on request and is available on the School's website.

- Our policy is set within the framework of: Keeping Children Safe in Education (KCSiE), September 2023
- Working Together to Safeguard Children 2018
- Relationships Education, Relationships and Sex Education (RSE) and Health Education 2019
- Locally agreed inter-agency procedures from Surrey Safeguarding Children Partnership (SSCP)
- Counter Terrorism and Security Act 2015, 'Prevent Duty'

Danielle Ramage (07728608514) is the Designated Safeguarding Lead, and the Deputy Safeguarding Lead Oliver Paterson (07796947235) is the Deputy, in her absence. These persons are responsible for ensuring that mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in KCSiE, September 2022.

All appointments to the staff or volunteers are checked in accordance with the Safer Recruitment Policy.

This policy is reviewed annually by the Proprietor, Nick Paterson.

## **2. Aims**

The School aims, in compliance with Section 10 of the Children Act 2004

- to improve the physical and mental health and the emotional well-being of the young people in its care; to protect them from harm and neglect and to keep them safe from maltreatment.
- To provide pupils with relevant information, skills and attitudes to help them resist abuse and prepare for the responsibilities of adult life including home and family;
- To allow staff to be familiar with, and confident of, the appropriate Child Protection procedures and issues. This policy is intended to give clear guidance to all staff, teaching and support staff and volunteers, on signs that may indicate the possibility of abuse and the procedure to follow if a young person discloses or a member of staff suspects abuse;
- To ensure that **all** school staff provide a safe environment in which children can learn.
- To support children who have been abused, in accordance with their agreed Child Protection plans.
- To always act in the best interests of the child.

The school rejects all forms of corporal punishment.

### **3. Objectives**

Skills and information will be delivered through the curriculum and through tutor groups.

We try to create an environment and ethos in which young people feel secure and their points of view valued. They are encouraged to talk and they are listened to.

We provide a range of appropriate adults whom they may approach if they are in difficulties.

Staff treat pupils with respect and pupils are expected to treat each other and staff with respect.

We try to impress upon pupils the importance of rejecting violence as a means of resolving conflict.

We give pupils opportunities to understand stress and strategies for coping with it.

We operate clear policies on drugs, alcohol and substance misuse.

We ensure that we prevent radicalisation and extremism developing within the school

We provide Child Protection training regularly to School staff. All staff undergo initial training during the induction programme for new teachers.

Each member of staff must sign a specific register to say that they have read and understood this policy and that they have read Part 1, Annexe A and Senior leaders and anyone who works directly with children must read Annex B of Keeping Children Safe in Education 2022, and accept their duty to cooperate with the School management in promoting Child Protection.

### **4. What school staff should know and do**

Schools, colleges and their staff form part of the wider safeguarding system for children. This system is described in statutory guidance 'Working together to safeguard children'.

Safeguarding and promoting the welfare of children is everyone's responsibility and a whole school approach to safeguarding is the only way to ensure the safety of the boys at the school. Safeguarding and child protection must be at the forefront and underpin all relevant aspects of process and policy development. Ultimately, all systems, processes and policies should operate with the best interests of the pupils at their heart.

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

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

Children include everyone under the age of 18.

Where there is a safeguarding concern, children's wishes, and feelings should be taken into account when determining what action to take and what services to provide. Children and young people should know that their concerns will be treated seriously, and they can safely express their views. Staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited or neglected and they may not recognise their experiences as harmful. Staff should have a professional curiosity and speak to the DSL if they are concerned.

#### **The role of staff at the school**

1. All staff have a responsibility to provide a safe environment in which children can learn. All staff, including the proprietor, receive appropriate training in safeguarding and child protection.

2. **Any staff member** who has a concern about a child's welfare should follow the referral processes set out later in this document.

## **What staff at the school need to know**

3. All staff members are aware of the systems within the school which support safeguarding. These include:

- the safeguarding policy;
- the behaviour policy;
- employee Handbook;
- the safeguarding response to children who go missing from education; and
- the role of the designated safeguarding lead (including the identity of the designated safeguarding lead and the deputy designated safeguarding lead).

4. All staff will receive regular safeguarding training and will receive updates as required but at least annually to provide them with the relevant skills and knowledge to safeguard children effectively. New staff will receive training as part of their induction. Staff meetings will be used to update staff on a regular basis on safeguarding matters. Staff training will be carried out at the start of every Michaelmas term and updated if guidance changes. Staff will also receive updates about their responsibilities in relation to filtering and monitoring and updated throughout the year.

5. All school staff are trained to identify children who may benefit from early help. All staff are aware of the early help process and understand their role in it. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years. This includes identifying emerging problems, liaising with the Designated Safeguarding Lead, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking an early help assessment. Any child may benefit from early help but all staff should be particularly alert to the potential need for early help for a child who:

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

6. All staff should also be aware of the process for making referrals to children's social care and for statutory assessment under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.

7. If staff are unsure, they should always speak to the designated safeguarding lead.

8. All staff must read Part 1 and Annex A of Keeping Children Safe in Education, 2023. Senior leaders and anyone who works directly with children must read Annex B.

9. All staff should be aware of the importance of e-safety and be aware of their duty to report online abuse in the same way as they would any other form of abuse.

10. All staff should complete appropriate Prevent training.

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

If staff members have any concerns about a child they should act on them immediately. Wherever possible, there should be a conversation with the Designated Safeguarding Lead.

If in exceptional circumstances, the designated safeguarding lead (or deputy) is not available, the Headmaster should be notified, this should not delay appropriate action being taken.

If anyone other than the Designated Safeguarding Lead makes the referral they should inform the Designated Safeguarding Lead, as soon as possible. Staff should follow up on a referral should that information not be forthcoming.

If after a referral the child's situation does not appear to be improving the Designated Safeguarding Lead (or the person that made the referral) should press for re-consideration to ensure their concerns have been addressed and, most importantly, that the child's situation improves.

### **Early Help**

If early help is appropriate the Designated Safeguarding Lead will support the staff member in liaising with other agencies and setting up an inter-agency assessment as appropriate.

If early help and or other support is appropriate the case should be kept under constant review and consideration given to a referral to children's social care if the child's situation doesn't appear to be improving.

### **Children in need**

A child in need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989.

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

**If a child is in immediate danger or is at risk of harm a referral should be made to children's social care and/or the police immediately.** Anyone can make a referral. Where referrals are not made by the designated safeguarding lead the designated safeguarding lead should be informed, as soon as possible, that a referral has been made.

### **Record Keeping**

**All concerns should be recorded on CPOMS.**

Further details on record keeping are set out in section 13 below.

### **Information Sharing**

Information sharing is vital in identifying and tackling all forms of abuse and neglect. All staff must make sure that they are proactive in the sharing of information as early as possible with the relevant bodies (DSL or DDSL) Failure to do so may increase the risk to the child. Schools and colleges have clear powers to share, hold and use information for these purposes.

## **Online Safety**

The school takes online safety very seriously. Pupils can only access the internet through their school accounts. The internet is filtered using high level filtering software, which is monitored by a third party IT company, Project 5.

Boys, staff and parents receive training about online safety delivered by an external specialist. Where there is a risk to the well-being of staff or pupils from incidents occurring outside the school, the school would take appropriate action.

The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

- content: being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
- contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes’.
- conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and
- commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>).

## **Filtering and monitoring**

Whilst considering their responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn. WHS is doing all that they reasonably can to limit children’s exposure to the above risks from the schools IT system. There is appropriate filtering and monitoring systems in place and the DSL along with the proprietor regularly review their effectiveness. WHS considers the number of and age range of their children, those who are potentially at greater risk of harm and how often they access the IT system along with the proportionality of costs versus safeguarding risks.

Additional guidance on “appropriate” filtering and monitoring can be found at: UK Safer Internet Centre: <https://www.saferinternet.org.uk/advice-centre/teachers-and-schoolstaff/appropriate-filtering-and-monitoring>.

The UK Safer Internet Centre produced a series of webinars for teachers on behalf of the Department. These webinars were designed to inform and support schools with their filtering and monitoring responsibilities and can be assessed at Filtering and monitoring webinars

available – UK Safer Internet Centre. South West Grid for Learning (swgfl.org.uk) has created a tool to check whether a school or college's filtering provider is signed up to relevant lists (CSA content, Sexual Content, Terrorist content, Your Internet Connection Blocks Child Abuse & Terrorist Content).

## **5. What is Child Abuse?**

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

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

### **Physical abuse**

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

### **Signs of Physical Abuse**

Physical abuse may result in the symptoms described below. Aside from direct physical contact, physical abuse can also be caused when a parent or caregiver feigns the symptoms of, or deliberately causes ill health to a child whom they are looking after. Signs of physical abuse include:

- Bruises on legs before a child is mobile
- Black eyes without bruising to the forehead
- Finger-tip bruising and bruises in various stages of healing
- Cigarette type burns anywhere, patterned burns (irons), rope burns. Contact burns in abnormal sites.
- Lacerations to the body or mouth
- Multiple fractures. Evidence of old fractures. Any fractures to children under two years old
- Fading injuries noticeable after an absence from school
- Seems frightened of parents, does not want to return home at the end of the day
- Shrinks markedly (backs away) at the approach of adults
- Suffers from frozen watchfulness
- Constantly asks in words/actions what will happen next

### **Emotional abuse**

The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations

being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

All staff will receive annual training and information sharing regarding WHS filtering and monitoring systems in place at school. Staff training will include understanding roles and responsibilities in relation to filtering and monitoring

### **Signs of Emotional Abuse**

Emotional abuse is the persistent emotional ill-treatment of a child such as to cause severe and persistent adverse effects on the child's development. It may involve conveying to children that they are worthless or unloved, inadequate or valued insofar as they meet the needs of another person. It may feature inappropriate expectations being imposed on children, relative to their actual development or age. Signs of emotional abuse displayed by children include:

- Excessive behaviour, such as extreme aggression, passivity or become overly demanding
- Children who self-harm, for instance by scratching or cutting themselves
- Is either inappropriately adult or infantile
- Children who persistently run away from home
- Children who show high levels of anxiety, unhappiness or withdrawal

### **Sexual abuse**

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

### **Signs of Sexual Abuse**

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative or non-penetrative acts. They may also include non-contact activities, such as involving the children in looking at, or in the production of, pornographic material or watching sexual activities or encouraging children to behave in sexually inappropriate ways. Signs of sexual abuse displayed by children include:

- Difficulty walking or sitting
- Pain/itching/bleeding/bruising/discharge to the genital area/anus
- Urinary infections/sexually transmitted diseases
- Persistent sore throats
- Eating disorders
- Self mutilation

- Refuses to change for gym or participate in physical activities
- Exhibits an inappropriate sexual knowledge for their age
- Exhibits sexualised behaviour in their play or with other children
- Lack of peer relationships, sleep disturbances, acute anxiety/fear
- School refusal, running away from home

## **Neglect**

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

## **Signs of Neglect**

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs. This is likely to result in the serious impairment of the child's health or development. Signs of neglect include:

- Frequent absenteeism from school
- Begs or steals money or food
- Lacks needed medical or dental care, immunizations or glasses
- Lacks appropriate clothing, e.g. for weather conditions, shoes are too small, ill-fitted clothes
- Clothes are consistently dirty
- Teeth are dirty, hair quality is poor and contains infestations
- Hands are cold, red and swollen
- The parent of adult caregiver has failed to protect a child from physical harm or danger

## **Safeguarding Issues**

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education and sexting (also known as youth produced sexual imagery) put children in danger.

## **Child on Child Abuse**

All staff should be aware that safeguarding issues can manifest themselves via child-on-child abuse. Woodcote House has a zero tolerance policy to abuse. It can happen at school or away from school or online. All staff should recognise that children are capable of abusing other children (including online). All staff must be clear about WHS'S policy and procedure with regard to child-on-child abuse. Child on child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence);

- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nude and semi-nude images and/or videos(also known as sexting or youth produced sexual imagery);
- upskirting, which typically involves taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

### **Steps to prevent child on child abuse**

At Woodcote House, we encourage boys to talk openly about any concerns they may have. The role of the tutor is very important in helping to identify child on child abuse. All staff have a responsibility to help pupils understand what child on child abuse is.

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

### **Managing and investigating child on child abuse**

If there is an allegation of child on child abuse, the Designated Safeguarding Lead should be informed. A discussion will then follow as to whether or not the case should be referred to children’s social care. The details of the allegation will be investigated but it is essential that this is done in a way that does not put the alleged victim at risk of further abuse.

### **Supporting victims and perpetrators**

Support will be offered to victims and perpetrators and any other child affected by child on child abuse. All parties will be offered counselling from the school counsellor. The school will also liaise with the families where appropriate. Child on child abuse is unacceptable and must never be passed off as ‘banter’, ‘just having a laugh’ or ‘part of growing up’. It is also not acceptable to pass it off as ‘boys will be boys’.

Woodcote House is committed to do all it can to prevent child on child abuse. We do this through our PHSEE programme, through the tutor system and by encouraging pupils to talk to someone if they have concerns.

### **Supporting LGBT pupils**

Children who are LGBT can be targeted by other children. A child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT. Pupils have the ability to self refer to the school counsellor to discuss issues that are causing them concern.

### **Sexual violence and sexual harassment between children**

There is concern nationally relating to a culture of misogyny and sexual harassment in many schools and the DfE and Ofsted have reviewed school procedures. Schools are now required to have clear mechanisms for pupils to report concerns within school that are signposted and prevalent.

Sexual violence and sexual harassment are not acceptable and Woodcote House takes a zero-tolerance approach to abuse.

The initial response to a report from a child is incredibly important. How the school responds to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward. Any school that failed to recognise, acknowledge or understand the scale of harassment and abuse, or downplayed some behaviours, might actually lead to a culture of unacceptable behaviour.

Part 5 of the statutory guidance in Keeping Children Safe in Education 2022 sets out how Woodcote House will manage reports of child-on-child sexual violence and harassment. Part 5 of KCSIE should be read in conjunction with a further Department for Education (DfE) guidance document, updated in September 2022:

[Sexual violence and sexual harassment between children in schools and colleges](#)

This document is read and understood by the DSL and DDSL and will be referred to as needed, particularly if a report of child-on-child sexual violence or sexual harassment is made. It contains detailed information on:

- what sexual violence and sexual harassment constitutes.
- important context to be aware of, including: what is consent, power imbalances, and developmental stages.
- Harmful sexual behaviour (HSB), including that a child displaying HSB may be an indication that they are a victim of abuse themselves.
- Related legal responsibilities for schools.
- Advice on a whole-school approach to preventing child-on-child sexual violence and sexual harassment.
- More detailed advice on responding to reports of sexual violence and sexual harassment, including safeguarding and supporting both the victim(s) and alleged perpetrator(s).

If a report is made, the designated safeguarding lead / Headmaster will take the lead in how the report is dealt with, given the high-profile nature of the report. Where the DSL is unavailable, the Deputy DSL will lead. On a case-by-case basis, there will be consideration made as to the gender of the DSL or Deputy, so that the victim feels comfortable with how the investigation is managed.

When it comes to action to manage the report, the needs and wishes of the victim will take centre stage. Considerations should include how the investigation proceeds and what support the victim requires. Support should also be provided to alleged perpetrators and any other pupils who may be involved.

Where a report of rape, assault by penetration or sexual assault is made, children's social care and the police will be informed. Before doing so, this will be discussed with the victim and their parents/carers, explaining why it is important for other agencies to know and how these agencies will be able to support the victim. Other allegations will be managed within the school and/or with support from children's social care providers.

KCSIE 2023 and the DfE guidance mentioned above set out the steps the school will take to manage the students involved, including the writing of risk assessments, separating the students in lessons, investigating the report and supporting the victim and alleged perpetrator.

Our school also has access to, and will utilise where necessary, the 'Stop Now' tool.

<https://www.stopitnow.org.uk/concerned-about-a-child-or-young-persons-sexual-behaviour/how-to-tell-if-a-childs-sexual-behaviour-is-age-appropriate/>

<https://www.stopitnow.org.uk/concerned-about-a-child-or-young-persons-sexual-behaviour/preventing-harmful-sexual-behaviour/>

The tool uses a traffic light system to categorise the sexual behaviours of young people and is designed to help professionals:

- Make decisions about safeguarding children and young people.
- Assess and respond appropriately to sexual behaviour in children and young people.
- Understand healthy sexual development and distinguish it from harmful behaviour.

### **Child abduction and community safety incidents**

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers. Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation. As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. At Woodcote House we engage with parents and try to build children's confidence, rather than simply warning them about all strangers. Further information is available at: [www.actionagainstabduction.org](http://www.actionagainstabduction.org)

### **Children and the court system**

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children, for 5-11-year olds and 12-17 year olds, which explain each step of the process, support and special measures that are available. Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children and Woodcote House is aware of its responsibilities when this situation arises in a family. The Ministry of Justice has launched an [online information tool](#) with clear and concise information on the dispute resolution service.

### **Children missing from education**

All staff should be aware that children going missing from school, particularly repeatedly, can act as a vital warning sign of a range of possible safeguarding issues. This may include abuse and neglect, which may involve sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Information regarding schools' duties regarding children missing education, including information schools must provide to the local authority when removing a child from the school roll at standard and non-standard transition points, can be found in the department's statutory guidance: Children Missing Education.

### **Definition of Children Missing Education**

For the purpose of the Statutory Guidance on Children Missing Education (2016), children missing education are defined as those who are not on a school roll or receiving suitable education otherwise

than at school. Those who are regularly absent or have missed 10 school days or more without permission may be at risk of becoming 'children missing education'.

More detail is provided in the **Children Missing Education Procedure** and this section should be read in conjunction with that Procedure.

### **Recognition and Response**

From the first day that a child does not attend school and there is no explanation or authorisation of the absence, the following steps should be taken:

- A trained staff member will make contact with the parents/guardian (person with parental responsibility for the child) to seek reassurance that the child is safe at home;
- The outcome of the contact should be assessed and if there are any concerns a consultation should take place to consider the child's vulnerability.

In the following circumstances a referral to children's social care and /or the police should always be made promptly:

- The child may be the victim of a crime;
- The child is subject of a Child Protection Plan;
- The child is subject of s47 enquiries;
- The child is looked after;
- There is a known person posing a risk to children in the household or in contact with the household;
- There is a history of the family moving frequently;
- There are serious issues with attendance.

The answers to further questions could assist a judgement whether or not to inform LA children's social care and the police:

- In which age range is the child?
- Is this very sudden and unexpected behaviour?
- Have there been any past concerns about the child associating with significantly older young people or adults?
- Was there any significant incident prior to the child's unexplained absence?
- Has the child been a victim of bullying?
- Are there health reasons to believe that the child is at risk? e.g.
- Does the child need essential medication or health care?
- Was the child noted to be depressed prior to the child's unexplained absence?
- Are there religious or cultural reasons to believe that the child is at risk? e.g.
- Rites of passage or forced marriage planned for the child?
- Has the child got a disability and/or special educational needs?
- Have there been past concerns about this child and family which together with the sudden disappearance are worrying? e.g.
  - Is there any known history of drug or alcohol dependency within the family?
  - Is there any known history of domestic violence?
  - Is there concern about the parent/carer's ability to protect the child from harm?

The length of time that a child remains out of school could, of itself, be an alerting factor of risk of harm to the child. Accordingly if a situation is not resolved within 3 days the Education Welfare Service should be contacted, then referrals should be made to the police and LA children's social care, as appropriate over the next two weeks.

Extended leave of absence can be authorised by the head teacher, at which point a return date is set. In these cases the time line for enquiries starts from when the child does not attend school on the expected return date, not from the day the extended leave started.

## **Notifications and Actions**

### **Day one**

If the answers to any of the points set out in the previous section indicates that there are concerns about the child's safety then a referral should be made to the police and children's social care on day one. The education welfare service should be informed and requested to assist in locating the child.

#### **Step one:**

- Contact the local police station (24 hour response);
- Any suspicion/evidence of crime must be clearly stated;
- The circumstances and all available information regarding the child and family will be required.

#### **Step two:**

- The missing person report will be risk assessed and the local police response team will carry out immediate actions;
- The investigation will be progressed by the police response team, in conjunction with either the local Missing Persons Unit and/or the CID.

#### **Step three:**

- The missing person report will generate a notification to the police;
- The police will work with, and refer information to, the LA children's social care;
- LA children's social care, who must be contacted as soon as possible in these circumstances, will also liaise with the Child Abuse Investigation Team (CAIT) in order to identify, and act upon, any suspicion of child abuse or child related crime.

#### **Step four:**

The school should work in collaboration with Children's social care and the police and a safeguarding education representative should participate in any strategy discussions, s47 enquiries and Child Protection Conferences, which may arise.

### **Reasonable enquiry:**

If the judgement reached on day one is that there is no reason to believe that the child is suffering, or likely to suffer, significant harm, then the school may delay making a referral. The process of 'reasonable enquiry' has not been identified in regulations, however this includes school staff checking with all members of staff whom the child may have had contact with, and with the pupil's friends and their parents, siblings and known relatives at this school and others.

School staff should also make telephone calls to any numbers held on record or identified, sending a letter to the last known address, home visits by some school based staff and consultation with local authority staff.

### **Days two to twenty-eight**

If the above response was unsuccessful, the school should contact their local authority CME Officer. The local authority should make enquiries by visiting the child's home and asking for information from the family's neighbours and their local community - as appropriate.

The LA CME team should also check databases within the local authority, use agreed protocols to check local databases, e.g. LA housing, health and the police; check with agencies known to be involved with the family, with the local authority the child moved from originally, and with any local authority to which the child may have moved.

The child's circumstances and vulnerability should be reviewed and reassessed regularly jointly by the school's nominated safeguarding advisor and the CME Officer in consultation with children's social care and the police as appropriate.

### **Child missing from school for more than four weeks**

Where a pupil is absent from school without authorisation for twenty consecutive school days, the pupil can be removed from the admission register when the school and the local authority have failed, after jointly making reasonable enquiries, to establish the whereabouts of the child. This only applies if the school does not have reasonable grounds to believe that the pupil is unable to attend because of sickness or unavoidable cause.

### **Transfer of information when a pupil changes school**

**The Education (Pupil Information) (England) Regulations 2000 (SI 2000/297)** (as amended by SI 2001/1212 and SI 2002/1680) governs the transfer of information between schools.

- Regulation 10(3) states that 'The head teacher of the pupil's old school shall send the information within fifteen school days of the pupil's ceasing to be registered at the school'.

*However:*

- Regulation 10 (4) states that 'This regulation does not apply where it is not reasonably practicable for the head teacher of the old school to ascertain the pupil's new school or where the pupil was registered at his old school for less than four weeks'.

If the CME team or any other agency becomes aware the child has moved to another school the service should ensure all relevant agencies are informed so that arrangements can be made to forward records from the previous school.

### **Children with family members in prison**

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders, NICCO, provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

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

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic

or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

Although Woodcote House is a school for boys, 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 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. CSE is a form of child sexual abuse and 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.

### **Further information on child sexual exploitation**

Child sexual exploitation is a form of sexual abuse where children are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation does not always involve physical contact and can happen online. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point. Some of the following signs may be indicators of sexual exploitation:

- Children who appear with unexplained gifts or new possessions;
- Children who associate with other young people involved in exploitation
- Children who have older boyfriends or girlfriends;
- Children who suffer from sexually transmitted infections or become pregnant;
- 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.

### **Further information on so-called 'honour based' violence**

So-called 'honour-based' violence (HBV) encompasses crimes, which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so-called HBV are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt, staff should speak to the designated safeguarding lead. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV.

### **Further information on Female Genital Mutilation**

FGM is a form of child abuse that can lead to extreme and lifelong physical and psychological suffering to women and girls. The term FGM comprises all procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs for non- medical reasons. In

general, girls undergo female genital cutting from around the age of 3, though this may vary depending on the type of ritual / custom of the local village or region.

There are factors that may indicate a child may be at risk of FGM. As with all other aspects of safeguarding, they may form part of a collective picture of concern such as:

- The family originates from a community known to practice FGM and / or information is shared of intention to travel to their country of origin;
- A parent requests permission for a child to travel overseas for an extended period during the academic year;
- A parent seeks to withdraw their child from learning about FGM in the school / academy;
- A child expresses anxiety about a special ceremony or traditional custom;
- Another family member is known to have previously undergone FGM; The immediate health consequences of FGM may include:
  - Fatality as a result of shock, haemorrhage or septicaemia;
  - Infection due to insanitary conditions;
  - Transmission of the HIV virus which can cause AIDS;
  - Extreme levels of pain, fear, anxiety and discomfort. FGM has many long-term physiological, sexual and psychological effects some of which include:
    - Kidney and or recurrent urinary retention / infection;
    - Genital malformation, cysts, keloid scar formation;
    - Delayed menarche (first menstrual cycle);
    - Chronic pelvic complications;
    - Sexual frigidity, pain during sex, lack of pleasurable sensation;
    - Obstetric complications;
    - Mental health difficulties, Post-Traumatic Stress Disorder (PTSD).

Because of the nature and extent of both the initial and repeated cutting and suturing, the physical effects of Type III infibulation are greater and longer-lasting than for the other types of FGM.

The origins of FGM are unclear but there is historical evidence of the practice in ancient Egypt, Tsarist Russia and by pre-Islamic Arabs and African tribes. It is predominantly practiced in the African continent however, following migration, is also practised amongst immigrant communities in Europe, North and South America, Canada, Australia and New Zealand. FGM is not an Islamic practice. It is a cross-cultural and cross-religious ritual.

Communities supporting FGM justify the practice for a variety of reasons. These may be:

- Sexual control of men over women;
- Preservation of virginity;
- Custom and tradition;
- Family honour;
- Hygiene or cleanliness;
- Mistaken belief that FGM is a religious requirement.

From October 2015, education professionals in England and Wales have a mandatory duty to report to the police if they know a girl aged under 18 years has undergone FGM. The duty requires the individual who becomes aware of the case to make the report. Unlike other safeguarding or child welfare concerns, the reporting duty cannot be transferred.

### **Further information on breast ironing**

Breast ironing is a form of physical abuse. Also known as breast flattening, it is the pounding and massaging of a pubescent girl's breasts, using hard or heated objects, to try to make them stop developing or disappear. Usually carried out by elder female family members on girls aged between 9

to 15, the practice is performed to make them appear child-like for longer with the rationale that this will protect them from sexual harassment, rape, pregnancy and forced marriage. The practice does not stop the breasts from growing and often leads to significant health difficulties such as infection, abscesses, chest pain, breast malformation and breastfeeding difficulties. Breast ironing is practised in African countries, particularly prevalent in Cameroon, with an estimated 3.8 million girls and women affected. The addition of breast ironing as a safeguarding topic in Keeping Children Safe in Education (2016) highlights the concern that this practice may be carried out by African communities resident in the UK. Indicators include:

- Chest pain or discomfort;
- Changes in behaviour;
- Withdrawal;
- Reluctance to undress in front of others.

### **Further information on Child Criminal Exploitation**

Recent evidence shows an increase in children being targeted to act as money mules by fraudsters who wish to hide money from the authorities. Targeted through adverts on social media, video sharing sites and in some cases outside schools, children are offered money in exchange for moving the fraudsters money through their bank accounts. The fraud prevention service Cifas reported an upward trend of 4,222 cases as at July 2017 compared to 2,143 in the previous year. Most children are unaware that allowing their bank account to be used in this way is unlawful and carries a maximum sentence of 14 years in prison. It is important for DSLs to be aware of this practice, ensure staff are also made aware and that children understand this practice is a form of exploitation.

County lines is another form of CCE. This is where gangs and organized criminal networks use intimidation, violence and weapons, including knives, corrosives and firearms to exploit children to transport and sell drugs. The children are also targeted to replenish stocks from borough to borough and transport money.

### **Further Information on Forced Marriage**

Forced Marriage is when one or both parties do not consent to marriage but are subjected to physical and or emotional pressure to marry. This may be in the form of threats, violence or psychological pressure. Whatever form used, pressure which forces someone into a marriage is an abuse of their human rights. Forced marriage also applies to a marriage involving a person without the capacity to consent to the marriage, as defined in the Mental Capacity Act 2005, whether or not coercion or the above measures are used. This includes persons with physical or learning disabilities.

The term marriage applies to any religious or civil ceremony whether or not legally binding. It is important to distinguish between forced marriage and arranged marriage. In an arranged marriage, families may play an active role in selecting a partner for a family member however, both spouses fully consent to the marriage.

Forced marriage is not specific to one country or culture. Victims include people thought to be at potential risk of future forced marriage, those currently going through a forced marriage and those who have already been forced to marry. Women, men and children are at risk of forced marriage regardless of age or background. Research shows there is no predisposed group at risk of forced marriage, however often lesbian, gay, transsexual or transgender people may be forced into marriage as a means seen to protect family honour. Also persons with a physical or learning disability are at risk by being forced into a marriage in order to provide them with a carer. Some of the key motives for facilitating a forced marriage are:

- Controlling unwanted sexuality, including perceived promiscuity and sexual behaviour of women;

- Controlling unwanted behaviour e.g. alcohol / drug use, wearing make-up, behaving in what is perceived as a *westernised* manner;
- Preventing unsuitable relationships e.g. outside the ethnic, cultural or caste group;
- Protecting family honour (also known as *izzat*);
- Responding to peer group or family pressure;
- Attempting to strengthen family links;
- Achieving financial gain;
- Ensuring land, property and wealth remain within the family;
- Protecting perceived cultural ideals;
- Protecting religious ideals which are misguided;
- Ensuring care for a child or adult with SEND where parents / carers are unable to fulfill that role;
- Assisting claims for UK residence and citizenship
- Long standing family commitments.

Similar to domestic violence, those at risk of or trapped in a forced marriage commonly experience isolation and feel they have no one they can speak to or trust. They may be taken abroad without access to their passport, isolating them further from social contact or support. As such disclosure is rare. Victims within forced marriage relationships often suffer physical, emotional and sexual abuse including rape and forced pregnancy.

Forced marriage also has a negative effect on children within the marriage. Children are vulnerable as:

- They may experience direct harm as a consequence of the abusive setting;
- They may struggle to feel emotionally and or socially secure in settings outside the home;
- They may, from witnessing incidents within the home, think that physical violence or emotional abuse is justified when they are angry;
- They may suffer depression;
- They may develop low self-esteem in adulthood;

### **Modern Slavery and the National Referral Mechanism**

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. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the guidance [Modern slavery: how to identify and support victims.](#)

### **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.

- 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 cyberdependent 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. Additional advice can be found at: Cyber Choices, '[NSPCC-when to call the police](#)' and National Cyber Security Centre - [NCSC.GOV.UK](#).

### **Domestic abuse**

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse, and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be 'personally connected' (as defined in section 2 of the 2021 Act). Further information can be found in Annex B of KCSIE 2022.

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

### **Homelessness**

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

### **Female Genital Mutilation**

All staff who have any concerns about female genital mutilation should speak to the DSL or DDSL. If any teacher, in the course of their work, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, they MUST report this to the police.

Although boys at Woodcote House will not be directly affected by this, they may have sisters or other acquaintances who are at risk.

### **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,
- 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.

Risk factors which increase the likelihood of involvement in serious violence could include:

- being male,
- having been frequently absent or permanently excluded from school,
- having experienced child maltreatment
- having been involved in offending, such as theft or robbery

### **Preventing radicalisation – the Prevent duty**

Section 26 of the Counter-Terrorism and Security Act 2015 requires all schools to 'have due regard, in the exercise of their functions, to prevent people from being drawn into terrorism.' This is known as the 'Prevent Duty' and guidance can be found here: [Revised Prevent duty guidance for England and Wales](#). DfE advice for schools, of June 2015, states that: 'School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately'.

Radicalisation refers to the process by which a person comes to support terrorism or forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology.

Woodcote House is fully committed to safeguarding and promoting the welfare of all its pupils. As a school we recognise that safeguarding against radicalisation is no different from safeguarding against any other vulnerability. Staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. All staff are expected to uphold and promote the fundamental principles of British values, including democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs. The Deputy Headmaster is the school's Prevent Duty lead.

All of our staff undergo online Prevent Awareness training to support them in identifying radicalisation and in understanding what steps they need to take to protect the children and families in our school.

### **Prevent referrals**

Members of staff who have concerns about a boy will make these concerns known to the DSL at the earliest opportunity. The DSL will then make a judgement as to whether or not it is appropriate to make a referral.

### **Channel Awareness**

Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. This training package is for anyone who may be asked to contribute to, sit on, or even run a Channel Panel. It is aimed at all levels, from a professional asked to input and attend for the first time, to a member of staff new to their role and organising a panel meeting. <https://www.elearning.prevent.homeoffice.gov.uk/channelawareness>.

### **Additional support**

The DfE has published further advice for schools on the Prevent duty, complement the Prevent guidance. There are two learning modules, in addition to the Channel Awareness link immediately above.

- The training link below offers an introduction to the Prevent duty and explains how it aims to safeguard vulnerable people from being radicalised, supporting terrorism or becoming terrorists themselves. All staff are required to undergo this training.

<http://www.elearning.prevent.homeoffice.gov.uk>

- The package below builds on the Prevent awareness eLearning training. It is designed to make sure that when we share a concern that a vulnerable individual may be being radicalised, that the referral is robust, informed and with good intention, and that the response to that concern is considered, and proportionate

<https://www.elearning.prevent.homeoffice.gov.uk/preventreferrals>

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

### **Warning Signs of Radicalisation or Extremism**

- Parental reports of change in behaviour, friendships or actions and requests for support.
- Voicing opinions drawn from extremist ideology or narrative
- Use of extremist or hate terms to exclude others or incite violence
- Racist language and targeting certain groups or individuals
- Recent conversion and following a conservative strand of the faith. It must be understood that this may also be reasonable behaviour.

### **Mental Health**

If a member of staff has a mental health concern about a child that is also a safeguarding concern, immediate action should be taken. That member of staff must report their concern to the DSL or DDSL.

All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff,

however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Schools and colleges can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, speaking to the designated safeguarding lead or a deputy.

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. Public Health England has produced a range of resources to support school teachers to promote positive health, wellbeing and resilience among children. See <https://www.nhs.uk/every-mind-matters/> for useful links.

Through a strongly tiered Pastoral system, including tutors, Heads of Boarding and Pastoral, matrons and the school counsellor, a culture of awareness of potential Mental Health issues is promoted, and early intervention is possible, where necessary. Our PHSEE Policy and Scheme of Work has more information on the education the boys are given to support their own mental health.

### **Upskirting**

'Upskirting' typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence and the perpetrator can face a sentence of up to two years in prison. Anyone of any gender can be a victim.

## **6. Definition of harm and significant harm from Adoption & Children Act 2002 Section 10**

Ill treatment or the impairment of health or development (impairment suffered from seeing or hearing the ill treatment of another).

'**Development**' means physical, intellectual, emotional, social or behavioural development;

'**Health**' means physical or mental health;

'**Ill treatment**' includes sexual abuse and forms of ill treatment which are not physical

NB: The Adoption & Children Act 2002 s120 amended the definition of **HARM** to include those instances where a child may witness **domestic violence**.

### **Recognition of Significant Harm**

Any allegation of a sexual nature, or parents whose behaviour may present risk because of: Domestic violence, drug & alcohol abuse and mental health problems; any physical injury caused by assault or neglect which requires medical attention. Repeated incidents of physical harm. Any contact with a person assessed as presenting a risk to children, or children who live in low warmth, high criticism environments, and children who suffer from persistent neglect; children who may be involved in prostitution. Other circumstances where professional judgement and/or evidence suggest a child's health, development or welfare may be significantly harmed.

## **Indicators of Abuse**

### **The Parent or Other Adult Caregiver:**

- Denies existence of or blames the child for the child's problems at home or at school
- Sees and describes the child as entirely worthless, burdensome or in another negative light
- Unrealistic expectations of the child i.e. demands a level of academic or physical performance of which they are not
- Offers conflicting or unconvincing explanation of any injuries to the child
- Appears indifferent to or overtly rejects the child
- Refuses offers of help for the child's problems
- Isolated physically/emotionally

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It is important to recognise that the different types of abuse often occur simultaneously. For instance where a child is physically abused, they often suffer emotional abuse as well. If you perceive a combination or repetition of any of the signs of child abuse then please contact the relevant social services office immediately.

### **Recognition of Abuse**

Be open to possibilities; be aware – if you don't believe it is possible you will never see it, don't jump to conclusions and look for credible non-abusive explanations, but recognise you may need to seek advice to evaluate the facts. BUT don't let your preconceptions of the family skew your judgement. The symptoms of stress and distress an abused child will usually show signs of stress and distress. Possible signs of abuse include, but are not limited to, those listed below. Many of these may of course have nothing to do with abuse, but are worth consideration in trying to understand the child's behaviour.

- A fall off in school performance.
- Aggressive or hostile behaviour.
- Difficulties in relationships with peers.
- Excessively affectionate or sexual behaviour towards adults or other children.
- Regression to more immature forms of behaviour.
- Self harming or suicidal behaviour.
- No reasonable or consistent explanation for a pupil's injuries, or a pattern of injuries.
- Disturbed sleep.

## **7. The Role of Teachers, support staff and volunteers**

The person responsible for safeguarding, known as the Designated Safeguarding Lead, at Woodcote House is the Head of Pastoral Care, Danielle Ramage.

### **Areas of responsibility for the Designated Safeguarding Lead**

#### **Managing referrals**

- Refer all cases of suspected abuse to the local authority children's social care and:
  - The designated officer(s) for child protection concerns (all cases which concern a staff member),

- Disclosure and Barring Service (cases where a person is dismissed or left due to risk/harm to a child); and/or
- Police (cases where a crime may have been committed).  
NPCC - When to call the police provides useful advice about when the police should be called and what to expect when this happens.
- Act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.

## Training

- The Designated Safeguarding Lead receives appropriate training carried out every two years in order to:
  - Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments.
  - Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.
  - Ensure each member of staff has access to and understands the school's safeguarding policy and procedures, especially new and part time staff
  - Be alert to the specific needs of children in need, those with special educational needs and young carers.<sup>71</sup>
  - Be able to keep detailed, accurate, secure written records of concerns and referrals.
  - Obtain access to resources and attend any relevant or refresher training courses.
  - Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.
  - Be aware of the importance of online safety
  - Be aware of potential local threats.

## Raising Awareness

The Designated Safeguarding Lead ensures the school's policies are known and used appropriately:

- Ensure the school's safeguarding policy is reviewed annually , and in accordance with current guidance issued by the Secretary of State, and the procedures and implementation are updated and reviewed regularly, and work with proprietors regarding this.
- Ensure the safeguarding policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school or college in this.
- Link with the local Safeguarding Partnership (SSCP) to make sure staff are aware of training opportunities and the latest local policies on safeguarding. This is Surrey Safeguarding Children Partnership.
- Where children leave the school, ensure their child protection file is transferred to the new school or college as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt should be obtained.

## On-line safety

- The DSL is the On-line safety lead.
- In this context, the role of the DSL is to ensure that the school has systems in place to protect the pupils when they are on-line.
- Raise awareness of the importance of staying safe online amongst pupils, staff and parents through assemblies, PHSEE lessons (see SOW), outside speakers and recognising Internet Safety week.

Teachers have a statutory duty to pass on any Child Protection concerns and to follow these School (and local safeguarding partnership) procedures (Education Act 2002 & Children Act 2004):

- Be alert to signs of abuse and Prevent concerns.
- Take immediate action in the child's best interest by reporting any evidence of abuse or non-accidental injury to the Designated Safeguarding Lead.
- Know the role of the Designated Safeguarding Lead and School procedures.
- Enquire about the progress of individual cases in which they are/have been involved.
- Thereafter accept their restricted role as the case becomes the province of other agencies.
- Record accurately in writing information that may be required in safeguarding procedures. This note should record the time, date, place and people who were present as well as what was said. All evidence, for example scribbled notes, mobile phones with text messages, clothing, and computers, must be safeguarded and preserved. Also make a note of what happened next.

The Designated Safeguarding Lead and Deputy Designated Safeguarding Lead must receive training every two years. All staff require training in child protection (updated annually) and temporary and voluntary staff who work with children must be made aware of the arrangements for safeguarding children. This will be provided by the Designated Safeguarding Lead who will receive training from the local social services partnership or an external welfare agency acceptable to the local safeguarding children board.

All staff receive induction training and sign a declaration form once completed.

**Safeguarding is everyone's responsibility and anyone can make a referral to children's social care.**

Departmental advice: 'What to do if you are worried a child is being abused- Advice for practitioners' provides more information on understanding and identifying abuse and neglect. Examples of potential signs of abuse and neglect are highlighted throughout the advice and will be particularly helpful for school and college staff. The NSPCC website also provides useful additional information on types of abuse and what to look out for.

## **8. All Staff: Helping a child who wants to tell you about his abuse**

Referring to KCSIE paragraph 97, staff must remember that the priority is to protect the child. The matter must be taken seriously. React calmly, listen carefully, observe but do not judge. Don't stop the child who is freely recalling significant events. Reassure the child that s/he has done the right thing in telling you. Indicate the action you will take and make it clear that you will have to tell the designated member of staff (no secrets). If the child comes back to talk at a later stage he should be told that you cannot comment or advise as that might affect his/his security, but you can listen. Bear in mind these 'must nots':

- Do not drag the child to the designated person

- Do not yourself contact the parents
- Do not interrogate the child or ask leading questions
- Do not speak to anyone about whom allegations are made, including colleagues
- Do not promise confidentiality
- Do not ask a child outright if he or others have suffered abuse
- Avoid criticising the alleged perpetrator

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

### **Important:**

Bullying can develop into physical or sexual abuse – as can idiosyncratic punishments introduced by individuals.

Be vigilant for early warning signs – such as favouritism, development of excessive one – to –one contact, increased involvement with changing or showering.

Openly discuss within the staff group issues such as acceptable and unacceptable touching.

Openly discuss with pupils issues such as times of day or week, and locations in school, that are high risk for bullying or illicit activities.

### **Reporting Procedure**

A member of staff needs only reasonable cause for concern in order to act. One sentence from the child indicating abuse or non-accidental injury provides you with reasonable grounds and is sufficient for you to act. This may also apply if clear information comes from a sibling or another adult. Any suspicions will be reported to the LADO. If there are concerns under Prevent guidance, the Channel Police Practitioner, DI Prevent, Pete Oliphant will be informed.

We do not require parental consent to refer any case to social care or the police.

**In the case of a criminal act, it must be reported directly to the police.**

## **9. Allegations against School staff**

### **Concerns that meet the harm threshold - as laid out in KCSIE paragraph 256**

These relate to:

- a member of staff or volunteer who 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 may pose a risk of harm to children;
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Teachers and all School staff must protect themselves, and staff should bear in mind that even perfectly innocent actions can sometimes be misconstrued. Children may find being touched uncomfortable or distressing for a variety of reasons. It is also important not to touch pupils, however casually, in ways or on parts of the body that might be considered indecent.

Occasionally false allegations of abuse are made. To avoid as far as possible such an allegation, and situations, which may give rise to misinterpretation, Staff should be guided by the following advice:

- Avoid whenever possible unobserved situations of one to one contact with a child. If they are unavoidable, always keep a door open and try to ensure you are within the hearing of others.
- Do not offer to transport children alone in your car without seeking advice and telling another colleague that this is what you propose to do.
- Do not engage in or allow any sexually provocative games whether based on talking or touching or engage in 'horseplay' involving children.
- Never make suggestive remarks or discriminatory comments to a child.
- When supervising children changing their clothes for sport or for any other reason or when on duty in the boarding houses be aware that children may be uncomfortable with you seeing them when they are not fully dressed. Give children as much privacy as is possible and practical in these situations.
- Avoid 'favouritism' and singling out 'troublemakers'.
- Never communicate via social media sites with a pupil or allow them to be 'friends'.
- Never trivialise child abuse.
- Report any situation, which might be misconstrued as quickly as possible to the Designated Safeguarding Lead.

The Sexual Offences Act (Amended) 2004 states that it is a criminal offence for a person aged 18 or over in a position of trust in a school to engage in any sexual activity with a person under the age of 18 (in that school) irrespective of the age of consent, even if the basis of their relationship is consensual.

In circumstances which involve an allegation against a member of staff, the responsibility for dealing with the matter lies with the Headmaster.

Staff who hear an allegation of abuse against another member of staff should report the matter immediately to the Headmaster, unless the Headmaster is the person against whom the allegation is made. In that case the allegation must be reported directly to the LADO.

Immediate suspension of the member of staff is only one of a number of options, which will be considered. Others include leave of absence, or providing a classroom assistant or colleague to be present in contact time. A member of staff in such circumstances will be advised of appropriate support, for example from his/his trade union, or a colleague contact.

In the event of an allegation being made against a teacher, the Designated Safeguarding Lead or the Headmaster will immediately and at least with one working day refer the matter to the Local Authority Designated Officer (LADO) 01372 833325. Allegations against staff do not need to be referred to Children's Services: where the allegation relates to the use of reasonable force; where the allegation is demonstrably false. If there is any uncertainty as to whether a referral should be made, the school will seek advice from the LADO.

In the event of allegations of abuse being made against the Headmaster, allegations should be made directly to the designated officer at the local authority.

If the allegation is substantiated and the person is dismissed or the person resigns the Designated Safeguarding Lead will need to inform the DBS and if the member of staff is a teacher will need to refer the matter to the Teaching Regulation Agency (TRA).

**All staff must be aware of and comply with the Staff Handbook.**

### **Concerns that do not meet the harm threshold**

As stated in KCSIE, paragraph 423, if the Headmaster is wholly satisfied that the child or children is/are not at risk of significant harm and that a reportable criminal offence has not been committed they will consider the separate need for disciplinary action. In that case an investigation at School level would be necessary.

A low-level concern is a concern that does not meet the threshold outlined above but it is still significant. A low-level concern is **any** concern that an adult working at the School may have acted in a way that:

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

Examples of low-level concerns could include:

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

**Any member of staff who has concerns of this nature must discuss them the Headmaster.**

## **10. Whistleblowing**

Staff should familiarise themselves with the School's Whistleblowing Policy. It is particularly important in the context of Child Protection. Staff have a statutory duty to report concerns that a child is at risk of abuse, is being, or has been abused, to the Designated Safeguarding Lead. This is because the interests of the child are paramount. However, fear of reprisal is a real issue for staff in reporting abuse by colleagues. The Public Interest Disclosure Act 1998 provides protection against victimisation for persons who, acting in good faith, raise concerns about a wide variety of malpractices in the public interest.

When establishing the validity of any cause for concern care will be taken

- to protect the whistleblower;
- to avoid alerting anyone about whom a concern has been raised;
- to avoid alerting other colleagues who may warn the subject of the concern;
- to record the information;
- to keep all records secure and confidential.

## **11. Allegation of abuse by a child on another child**

This relates to a pupil who has behaved in a way that has harmed another child, or may have harmed another child; possibly committed a criminal offence against or related to another child.

If there is any suspicion that this may have happened, the LADO must be consulted and appropriate advice must be followed.

The school should not contact the parents of either child before speaking to the LADO.

## **12. Consultation/Referrals**

If the Designated Safeguarding Lead receives allegations or has any suspicions of abuse, or needs advice, she will inform the Local Children's Social Services, Surrey Safeguarding Children Partnership, MASH, LADO and/or police as appropriate department, within 24 hours, of their concerns. If the consultation/referral is by telephone a written confirmation will be made. If the case meets the criteria for eligibility, the Children's Services department will make background enquiries, including with the police. If the concerns appear well founded, a strategy discussion will follow, normally within two working days. At this point a decision will be taken either to proceed with an S47 enquiry/criminal investigation or not. If the concerns are substantiated and the child is deemed at continuing risk of significant harm, a Child Protection Conference will be convened.

**If there is a risk of immediate significant harm to a child, a referral should be made to the children's social care immediately.**

Once a referral has been made to the LADO, they will take over any investigation. It is not the role of the school to investigate any incidents of suspected child abuse.

If social workers decide to carry out a statutory assessment, staff should do everything they can to support that assessment (supported by the designated safeguarding lead (or deputy) as required). If a crime may have been committed, the matter should be reported to the police.

## **13. The DSL**

The proprietors should ensure an appropriate senior member of staff, from school is appointed to the role of designated safeguarding lead. The designated safeguarding lead takes lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place). This is explicit in the DSL's job description.

## **14. Record keeping and storage**

The designated safeguarding lead is responsible for monitoring each child's file on CPOMS.

Information is kept confidential and stored securely on CPOMS, which keeps concerns and referrals in a separate child protection file for each child.

Records should include:

- a clear and 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.

Each child's file is only accessed by those who need to see it and where the file or content within it is shared, this happens in line with information sharing advice as set out in Part one and Part two of this guidance.

Where children leave the school or college (including in year transfers) the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools and colleges should ensure key staff

such as designated safeguarding leads and special educational needs co-ordinators (SENCO's) or the named person with oversight for SEND in colleges, are aware as required.

Lack of information about their circumstances can impact on the child's safety, welfare and educational outcomes. In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any additional information with the new school or college in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school or college. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse and have that support in place for when the child arrives.

### **Raising awareness**

The designated safeguarding lead should:

- ensure each member of staff has access to, and understands, the school's or college's child protection policy and procedures, especially new and part-time staff;
- ensure the school's or college's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this;
- ensure the child protection policy is available publicly and parents know that referrals about suspected abuse or neglect may be made and the role of the school or college in this;
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements; and
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and school and college leadership staff.

## **15. Teaching the boys how to stay safe**

Boys at Woodcote House are taught how to stay safe. This is done through the curriculum and with specific PSHEE weekly lessons. We include advice on how to avoid radicalisation.

We also pay specific attention to e-safety. The boys are taught how to avoid risks online in the ICT curriculum and we also invite an outside speaker, Karl Hopwood, to deliver workshops to the boys and parents about e-safety. See PHSEE and RSE Schemes of Work.

## **16. Looked after children**

In cases where a boy is looked after by a local authority, the DSL will have overall responsibility for his welfare and will communicate with the local authority. It is essential that the DSL keeps up to date with contact arrangements and makes sure that staff are informed as to who is allowed or not allowed access. Consideration must also be made with regard to communication via telephone, email and post. The Head will be the designated LAC, in the event of looked after children starting at Woodcote.

If staff have any concerns, they must inform the DSL.

## **17. Contextual Safeguarding**

Safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside the school or college. All staff, but especially the designated safeguarding lead (and deputies) should be considering the context within which such incidents and/or behaviours occur.

- Never assume that abuse is impossible in the school or that an accusation against someone you know well is bound to be wrong.

The Surrey Safeguarding Children Partnership website has lots of useful information. Link <https://www.surreyscp.org.uk/professionals/sscp-procedures/>

## **18. Use of school or college premises for non-school/college activities**

Where the proprietor hires or rent out school or college facilities/premises to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) they should ensure that appropriate arrangements are in place to keep children safe. The proprietor will seek assurance that the provider 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 for the provider to liaise with the school or college on these matters where appropriate.

## **Annex A: SAFEGUARDING – GUIDELINES FOR MEMBERS OF STAFF**

All members of staff must be aware of the School's Child Protection Policy and of the professional obligations laid upon them by the 1989 Children's Act.

All members of staff should be aware of the following steps to be taken should information come to light of the possibility of physical, sexual or other forms of abuse of any boy or concerns under Prevent legislation.

- Always stop and listen immediately to anyone who seems to wish to tell you about incidents or suspicions of abuse.
- Write brief notes of what you are told on the spot (these may help later if you have to remember exactly what was said) and keep your original notes, however rough and ready they may have been – and even if you write them up more fully later. If you are unable to write at the time, make notes of what was said as soon as possible afterwards. You should also record your own responses to what the boy has said, as exactly as possible, being careful to avoid making interpretations or assumptions about the meaning.
- Do not give a guarantee that you will keep what was said confidential. If you are told about abuse you have a responsibility to tell the appropriate people to get something done about it. If asked, explain that if you are about to be told something that needs to be sorted out you will have to tell those who can do so, but that you will tell only those who absolutely 'need to

know'. Reassure your informant that what he has said will be taken very seriously and that he has done the right thing by 'telling' and that he is not in trouble himself.

- Do not ask leading questions – just ask 'what do you want to tell me?' or 'is there anything else you want to say?'
- If the boy says he has physical injuries do not attempt to examine these yourself.
- Immediately tell the DSL what you have been told. Do not tell other adults or boys what you have been told.
- Discuss with the DSL whether any steps need to be taken to protect the victim and the informant.
- Never attempt to carry out your own investigation of suspected alleged abuse by questioning the boy yourself or interviewing others. This is the responsibility of trained Social Services and Police staff. You could cause more damage and undermine possible criminal proceedings.
- As soon as possible (and certainly within 24 hours) the DSL should refer the matter to the SSCP Safeguarding Partnership. Their requests must then be followed – they have a statutory duty to set up any necessary investigations.
- Remember that you have a duty to safeguard the welfare of the pupils. If you report an allegation or suspicion of abuse in accordance with this procedure and honestly believe that your report has not been acted on appropriately, you may inform the DSL or inform the Social Care Agency under the terms of the Public Interest Disclosure Act 1998.
- Prevent concerns will be referred to the Channel Police Practitioner, DI Pete Oliphant. The Anti-Terrorism Hotline is 0800 789 321.
- It is important to understand 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.

## **Annex B - Low Level Concerns**

### **Introduction**

Concerns may arise in several different ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

Woodcote House adopts a whole-school approach to safeguarding and actively promotes, and seeks to ensure, an open, transparent and trusting culture in which the school's values and behavioural expectations are constantly lived, monitored and reinforced by all staff. All concerns about any adult working in any capacity (employed or voluntary) on behalf of the school will be dealt with promptly and appropriately.

Creating a culture in which all concerns about adults (including those concerns which do not meet the 'harms threshold' or 'harms test', as laid out in Keeping Children Safe in Education 2022, Part 4, Section 1) are shared responsibly with the correct person, recorded and dealt with appropriately, is critical.

This should encourage an open and transparent culture and enable the school to identify concerning, problematic or inappropriate behaviour early, thus minimising the risk of abuse and ensuring that adults working in or on behalf of the school are clear about professional boundaries and the ethos and values of the school. It should also protect those working in or on behalf of the school from potential false allegations or misunderstandings.

## **What is a Low Level Concern?**

The term 'low level concern' does not mean that it is insignificant, rather that the behaviour towards a child does not meet the 'harms threshold' or 'harms test' as set out in KCSIE 2022, Part 4, Section 1. 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 may have acted in a way that:

- is inconsistent with the Staff Behaviour Policy, including inappropriate conduct outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Examples of low level concerns could include, but are not limited to:

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

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse. Any such concern (including those that do not meet the 'harm threshold' in KCSIE , Part 4, Section 1) should be shared with the Headmaster (see below).

Woodcote House aims to:

- ensure that all staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, both in themselves and in others;
- empower staff to share any low level safeguarding concerns with the Headmaster;
- address unprofessional behaviour and support the individual to correct it at an early stage;
- provide a responsive, sensitive and proportionate handling of such concerns when they are raised; and
- help identify any weakness in the school's safeguarding procedures.

## **Sharing Low Level Concerns**

Low level concerns about any member of staff should be reported to the Headmaster.

Woodcote House seeks to create an environment in which staff are encouraged and feel confident to self-refer where, for example, they may have found themselves in a situation which could be misinterpreted, might appear compromising to others, or in which their own behaviour might have fallen below expected professional standards.

Where a low level concern relates to a person employed by an agency or contractor, that concern should still be shared with the Head and recorded in accordance with the school's low level concerns policy. The Head should also inform the employer about the concern, so that any potential patterns of inappropriate behaviour can be identified.

## **Responding to Low Level Concerns**

Concerns about safeguarding should be reported to the Headmaster. If the concern has been raised by a third party, the Headmaster should collect as much evidence as possible by speaking:

- directly to the person who raised the concern, unless it has been raised anonymously; and
- to the individual involved and any witnesses

The information collected will help the Headmaster to categorise the type of behaviour and determine what further action may need to be taken. All of this will be recorded along with the rationale for any decisions and action taken.

### **Recording Low Level Concerns**

All low level concerns should be recorded in writing by the Headmaster. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted; if the individual wishes to remain anonymous, then that should be respected as far as reasonably possible.

The school must keep these records confidential and held securely in compliance with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR). Records should be reviewed periodically so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.

Where a pattern of such behaviour is identified, the school will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the 'harms threshold', in which case it will be referred to the LADO.

Consideration will 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. The school will retain information on low level concerns at least until the individual leaves its employment.

### **References**

Only substantiated safeguarding allegations will be included in staff references. Low level concerns will not be included unless they relate to issues which would normally be included in a reference, such as misconduct or poor performance. Low level concerns relating exclusively to safeguarding (and not to misconduct or poor performance) will therefore not be referred to in a reference.

**If any deficiencies or weaknesses are identified in this safeguarding policy, it is essential that this should be remedied without delay.**

**The proprietor undertakes an annual review of the school's child protection policies and procedure and of the efficiency with which the related duties have been discharged.**