



Mary Hare Policy: SCH010  
Safeguarding & Child Protection Policy

Policy Owner: Emma Kennett

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*Securing the future of deaf children and young people*

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## Safeguarding Team Contact Details

Role	Name	Contact details
Designated Safeguarding Lead (DSL)	Emma Kennett	e.kennett@maryhare.org.uk 01635 244365
Deputy DSLs	Sarah Stefano - Director of Care Michelle Flannery –Head of Year 7-8 Rachel Sheen– Head of Primary	<a href="mailto:safeguarding@maryhare.org.uk">safeguarding@maryhare.org.uk</a> 01635 244200
Chair of Governors	Tim Polack	governors@maryhare.org.uk
Safeguarding Governor	Sarah Butcher	governors@maryhare.org.uk
Deputy Safeguarding Governor	Daniel Clements	governors@maryhare.org.uk

Wider Safeguarding Team		
Robin Askew	Principal/ CEO	Safeguarding@maryhare.org.uk
Georgina Collins	Team Leader, Care	
April McEniry	Head of Care Operations	
Nicky Mercer	Wellbeing Coordinator	
Helen Farthing	Wellbeing Coordinator	
Rachel Solly	Assistant Head Primary	

All staff and Governors listed form the Safeguarding and Child Protection Team for both the Primary and Secondary sites.

## Safeguarding Referrals: Key contacts within the local authority

- If a child is in immediate danger at any time, left alone or missing, you should contact the police directly using 999/101
- For other local authority information relating to safeguarding visit: <http://berks.proceduresonline.com/>

Role	Name	Contact details
Contact, Advice and Assessment Service (CAAS)	Duty Social Worker	Professionals only 01635 503190 Parents only 01635 503090 Emergency Duty Team (outside of office hours) 01344 786543 <a href="mailto:child@westberks.gov.uk">child@westberks.gov.uk</a>
Local Authority Designated Officer	Fiona Goussard	CAAS on 01635 503190 cpadmin@westberks.gov.uk or

(LADO) Contact can be made via CAAS	<a href="mailto:LADO@westberks.gov.uk">LADO@westberks.gov.uk</a>
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## Other Agencies

1. Agency	Contact Details
Ofsted	General enquiries: 0300 123 1231 Concerns: 0300 123 4666 <a href="mailto:enquiries@ofsted.gov.uk">enquiries@ofsted.gov.uk</a>
NSPCC	Tel: 0808 800 5000 (free service, line open 24 hours a day) Text: 88858 Reporting concerns online: <a href="http://www.nspcc.org.uk/what-you-can-do/report-abuse">www.nspcc.org.uk/what-you-can-do/report-abuse</a>  <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>
Childline	0800 1111 <a href="http://www.childline.org.uk">www.childline.org.uk</a>

## Terminology

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

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment whether that is within or outside the home, including online
- Preventing impairment of children’s mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes.

**Child protection** refers to the processes undertaken to protect children who have been identified as suffering or being at risk of suffering significant harm. This includes harm that occurs inside or outside the home, including online.

**Mary Hare School (MHS)** refers to both the Primary and Secondary schools.

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

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

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

**Parent** refers to those who have parental responsibility including birth parents as well as other adults who are in a parenting role, for example step-parents, foster carers and adoptive parents.

**Abuse** is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Appendix 3 explains the different types.

**Child on Child** abuse occurs when a young person is exploited, bullied /harmed, or sexually assaulted or sexually harassed by another child under the age of 18.

## Policy Aim

1. Mary Hare School (MHS) is committed to safeguarding and promoting the welfare of children and young people and expects all staff, governors, visitors, and volunteers to share this commitment. Our policy and procedures apply to the educational day, residential time, and off-site activities.
2. The policy aims are:
  - To provide all staff, governors, visitors and volunteers with the necessary information to enable them to meet their child protection responsibilities.
  - To ensure consistent good practice.
  - To demonstrate the school's commitment regarding child protection to pupils, parents, and other partners.
3. The policy is available on the school website and paper copies available in the staff room or on request.

## Legislation and statutory guidance

4. This policy is in line with guidance from the following legislation and statutory guidance.
  - The Children Act 1989 & Section 11 of the Children Act 2004
  - The Education Act 2002 (Section 175)
  - The Education (Pupil Information) (England) Regulations 2005
  - Dealing with Allegation of Abuse Against Teachers and Other Staff (2011)
  - Working Together to Safeguard Children (2023)
  - Keeping Children Safe in Education (Sept 2024)
  - Inspecting safeguarding in early years, education, and skills settings, 2016, Ofsted
  - Berkshire Child Protection Procedures [http://berks.proceduresonline.com/west\\_berk/index.html](http://berks.proceduresonline.com/west_berk/index.html)
  - What To Do If You're Worried a Child Is Being Abused
  - Prevent Within Schools, a toolkit for schools May 2015 · The Education Inspection Framework
  - Children's social care: Stable Homes Built on Love
  - Prevent Duty Guidance 2023
  - [The Non-Maintained Special Schools \(England\) Regulations 2015 \(legislation.gov.uk\)](#)
  - National Minimum Standards for Residential Special Schools
  - [Meeting digital and Technological Standards in Schools and Colleges](#)
  - [Missing Children and Adults](#)
  - [Working together to improve school attendance \(applies from 19 August 2024\) \(publishing.service.gov.uk\)](#)
  - [Early years foundation stage \(EYFS\) statutory framework - GOV.UK \(www.gov.uk\)](#)

Further information can be accessed from West Berkshire's Education Portal on the 'Safeguarding in Schools' page: [www.westberkseducation.co.uk](http://www.westberkseducation.co.uk).

## Commitment

5. The school is committed to ensuring that:
  - Safeguarding is everyone's responsibility. All staff are aware of their statutory responsibilities and that the pupils' welfare and safety is of paramount importance.
  - We have an effective safeguarding culture where we foster an honest, open, caring, and supportive environment. All concerns are taken seriously, and appropriate action is taken in a timely manner.
  - All staff maintain an attitude of '**it could happen here**' and are trained on recognising and reporting safeguarding issues professionally and sensitively. We encourage staff to be curious and challenge where they feel it is necessary.
6. We recognise that pupils with special educational needs (SEN) or disabilities or certain health conditions can face additional safeguarding challenges and are 3 times more likely to be abused than their peers. Additional barriers can exist when recognising abuse, neglect and exploitation in this group, including:
  - Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration.
  - Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils.
  - The potential for pupils with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
  - Communication barriers and difficulties in managing or reporting these challenges.
7. We will be alert to the extra vulnerabilities these pupils may face due to the residential nature of our setting.
8. MHS is committed to protecting children from maltreatment; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.
9. MHS promotes an ethos where children feel secure and are encouraged to communicate with staff, are listened to, taken seriously, and responded to appropriately.
10. It is MHS's commitment to ensure every Child Protection concern, complaint, or suspicion of abuse from within or outside the school is taken seriously and followed up appropriately. This includes allegations of historic abuse. This may result in referral to an external authority such as the Local Authority Designated Officer (LADO), the social services department of the local authority (SSD), the child protection unit of the police (CPU) or the NSPCC. In each case, the matter will be referred to West Berkshire Children's Services and where appropriate, Children's Services in the child's home area.
11. MHS contributes to inter-agency working in line with statutory guidance Working Together to Safeguard Children (WTSC). Allowing access to Children's Social Care to conduct or consider conducting a section 17, or a section 47 assessment. Safeguarding procedures take into account Berkshire West Safeguarding Children Partnership (BWSCP) arrangements, reflecting local protocols for assessment.
12. Recording and monitoring of child protection concerns are well maintained and complete. This will form part of the *Standard 20* visits.
13. Robust recruitment and selection procedure to ensure all appropriate checks are carried out on staff and volunteers who work with our pupils.
14. Checks are undertaken on any organisation or individual hiring/renting the school premises that ensures suitable arrangements are in place to safeguard children and young people.
15. Ensuring that all staff are trained in the relevant safeguarding courses and is kept up to date. Further under training.



## Roles and responsibilities

### All staff will:

16. Read and understand at least part 1 and Annexe B of the Department of Education's statutory safeguarding guidance [Keeping children safe in education 2024 \(publishing.service.gov.uk\)](https://publishing.service.gov.uk) Review this guidance at least annually and sign a declaration to say that they have reviewed the guidance.
17. Sign the school Code of Conduct at the start of each academic year.
18. Promote the safeguarding and welfare of the children and maintain the attitude of 'it could happen here'.
19. Provide a safe space for pupils to speak out share any concerns, including pupils who are LGBTQ+.
20. Ensure they are wearing their Blue Lanyard which identifies them as a member of staff, visibly and at all times.

### All staff will be aware of:

21. MHS is a residential school for deaf children and young people. All pupils have an EHCP. When managing a safeguarding concern staff will be considerate to the needs of the individual pupil. While staff must be mindful of the importance of not leading or suggesting, they will need to ensure that the pupils understand and are understood.
22. Our systems which support safeguarding, including the safeguarding and child protection policy, the role and identity of the DSL and deputies, and other policies including (found on the Mary Hare website):
  - Behaviour Policy
  - Positive Mental Health and Self-Harm Policy
  - Anti-bullying Policy
  - Data Protection Policy
23. How to report any pupil concerns (including mental health), conversation or event, through MyConcern, or through speaking directly with the DSL team.
24. The Early Help assessment process and their role in it, including identifying emerging problems, liaising with the DSL and sharing information with other professionals to support early identification and assessment.
25. If an act of FGM appears to have been carried out on a girl under the age of 18; they are legally required to report this to the police. For further guidance see [Mandatory Reporting of Female Genital Mutilation – procedural information.](#)
26. How to report allegations brought against a colleague, through Confide or through reporting directly to the Principal, or DSL, or if the concern is about the Principal to the chair of Governors. (Please see the section below on Staff Allegations).
27. All staff have a responsibility to undertake appropriate training and keep it up to date, (including online safety, which amongst other things includes an understanding of the expectations, applicable roles, and responsibilities in relation to filtering and monitoring)
28. The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as, child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved in serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines). See Appendix 3
29. How to encourage and promote positive and safe behaviour among children through our behaviour policy and ensure staff are vigilant to changes in pupil behaviour which may be an indicator of child-on-child abuse.

### Designated Safeguarding Lead (DSL)

30. The DSL is a member of the senior leadership team. Our DSL is Emma Kennett. The DSL takes lead responsibility for child protection and wider safeguarding in the school.
31. During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns. When absent the deputies and wider safeguarding team are available. If staff have a concern about the DSL, they should report it to the Principal.
32. During residential hours, including weekends, one of the deputy DSLs is available and there is a senior leadership team rota.
33. During the holidays the DSL and Safeguarding Team will continue to monitor MyConcern/ Confide. Pupils, Parents and Staff can contact safeguarding staff by emailing [safeguarding@maryhare.org.uk](mailto:safeguarding@maryhare.org.uk) or using published telephone contacts. Concerns can be recorded by staff using MyConcern/ Confide.
34. During periods of school closure such as periods of national lockdown the safeguarding procedure will continue to operate as detailed above.
35. The DSL will ensure that the performance of the safeguarding and child protection regime is reported to regular meetings of the Governing Body and its Care & Education Committee at least three times a year. Exceptional incidents will be reported to the Chair and to the designated Governor as soon as practicable.
36. The DSL will take lead responsibility for safeguarding and child protection including online safety and understanding the filtering and monitoring systems in place.
37. If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main pupil file.
38. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child

### Principal

39. The Principal will ensure that:
  - All policies that support the safeguarding and child protection of the child and young people at MHS are followed by all staff.
  - Sufficient time is allocated and resourced to enable the DSL and Safeguarding Team to complete their statutory responsibilities, including record keeping, monitoring safeguarding practice, talking part in strategy meetings, and the reporting and contributing to the assessment of children.
  - Children's safety and welfare are addressed through the curriculum.
  - Responsibility is taken to case manage and respond to staff allegations.
  - Each child in the Early Years Foundation Stage is assigned a Key Person.
  - The mobile phone policy is adhered to so that there is safe use of technology, mobile phones and cameras.
  - Relevant staffing ratios are met, where applicable.

### Governing Body

40. The Governing Body has the responsibility to ensure that MHS complies with safeguarding duties under legislation and guidance. Safeguarding and child protection is a standing item at all governing body meetings and forms the bases of the *Standard 20* monitoring visits which is carried out six times a year.

41. The Governing Body ensures that:

- At least one of its members is a named person responsible for Safeguarding and Child Protection.
- There are appropriate policies and procedures in place that promote the safety and well-being of the pupils.
- The Safeguarding and Child Protection Policy, Staffing Policy, Code of Conduct are available to all staff during induction. Part one of [Keeping children safe in education 2024 \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/100241/keeping-children-safe-in-education-2024.pdf) and information about the role of the DSL should also be made available to staff, volunteers and temporary staff on induction.
- Governors must read all parts of Keeping Children Safe in Education 2024.
- A senior member of staff is appointed as a DSL and that they take lead responsibility for safeguarding and child protection. The governing body should also ensure that MHS has appointed at least one deputy safeguarding lead and during term time one should be always available for staff to discuss safeguarding concerns.
- They are committed to a child centred approach and will ensure that the child's wishes and feelings are taken into account when determining any action required. They will ensure that systems are in place for children to express their views and are given feedback.
- They are fully and properly informed of matters relating to Child Protection and Safeguarding. They have full access to all the facts surrounding child protection concerns and the school's response. They have overall responsibility for the response made and to those in their care when events take place.
- There is an online safety policy that includes appropriate filtering and monitoring on school devices and networks, and that includes the use of mobile and smart technology which will reflect that many children and unlimited and unrestricted access to the internet via mobile phone networks.
- Appropriate safeguarding responses are in place for children who are deliberately and/ or persistently absent or go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect including sexual abuse or exploitation and to help prevent the risks of them missing education in future. The [Government Missing children and adult strategy](#) the [Children Missing Education Statutory Guidance for local authorities, and working together to improve school attendance](#) guidance provides information that governing boards and proprietors might find useful when considering children who are often absent or go missing from education. guidance provides information that governing boards and proprietors might find useful when considering children who are often absent or go missing from education.
- The practice of Safer Recruitment processes is in line with national legislation.
- They are aware that among other obligations, the Data Protection Act 2018, and the UK General Data Protection Regulation (UK GDPR) place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.

## Recognising abuse and taking action

42. All staff are expected to be able to identify and recognise all forms of abuse, neglect and exploitation and shall be alert to the potential need for early help for a child who:

- Is disabled
- Has special educational needs (whether or not they have a statutory education health and care (EHC) plan)
- Is a young carer
- Is bereaved
- Is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime
- Is frequently missing/goes missing from education, care or home
- Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation

- Is at risk of being radicalised or exploited
- Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing drugs or alcohol
- Is suffering from mental ill health
- Has returned home to their family from care
- Is at risk of so-called 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage
- Is a privately fostered child
- Has a parent or carer in custody or is affected by parental offending
- Is missing education, or persistently absent from school, or not in receipt of full-time education
- Has experienced multiple suspensions and is at risk of, or has been permanently excluded
- Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue.

### **What to do if a child makes a disclosure**

43. Staff, volunteers, and governors must follow the procedures set out below in the event of a safeguarding issue.
44. MyConcern is the reporting system for pupil concerns, Confide is for staff concerns or allegations.
45. If a child discloses a safeguarding issue to you, you should:
  - Listen to show that you believe them. Allow them time to talk freely and do not ask leading questions.
  - Stay calm and do not show that you are shocked or upset.
  - Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner.
  - Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret.
  - Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it.
46. Complete MyConcern/ Confide which will ask for details such as time, date, location, details of concern and actions taken. If urgent, please also inform the DSL by phone or in person. Aside from these people, do not disclose the information to anyone else. MyConcern is the reporting system for pupil concerns, Confide is for staff concerns or allegations.
47. When recording a MyConcern/ Confide record the actual words spoken by the child wherever possible and describe observations on their behaviour eg. Was crying, shaking, however do not interpret these behaviours.
48. Bear in mind that some children may:
  - Not feel ready or know how to tell someone that they are being abused, exploited, or neglected.
  - Not recognise their experiences as harmful
  - Feel embarrassed, humiliated, or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers.

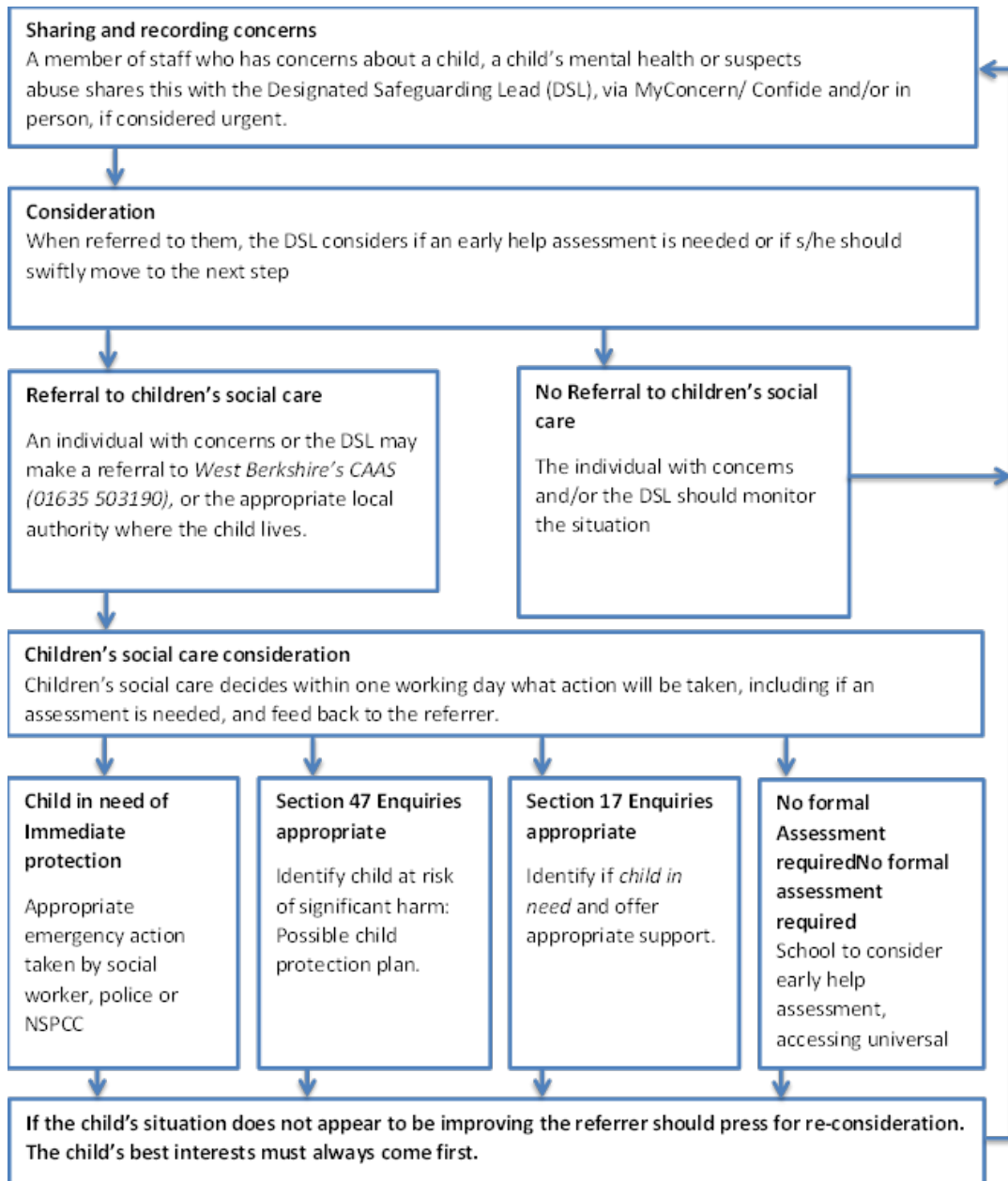
None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

**If you have concerns about a child, no disclosure made**

- 49. Where possible, speak to the DSL first to agree a course of action.
- 50. If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the safeguarding team and/or take advice from local authority children’s social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible and record on MyConcern/ Confide.

**Action when a child has suffered or is likely to suffer harm, or in immediate danger**

- 51. The following diagram explains what action should be taken and who should take it when there is a concern about a child. If, at any point, there is a risk of immediate serious harm to a child a referral should be made to children’s social care immediately. Anybody can make a referral.



## Referral

52. If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so. The DSL will immediately refer cases of suspected or actual abuse or allegations to West Berks' CAAS, or the appropriate child's local authority. In cases where a student may be vulnerable to or exhibiting ~~extremist~~ views the Designated Safeguarding Lead or their Deputy will also refer cases to the Prevent Officer at Thames Valley Police.
53. Threshold advice can be found at [Threshold Criteria for BWSCP](#) and is a document which provides a framework, but is not a rigid list of stages of support and intervention. This does not remove the need for workers to make a professional judgement when identifying the needs of a child.
54. If you make a referral directly, you must tell the DSL as soon as possible.
55. The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.
56. If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

## Early Help Assessment

57. If an Early Help assessment is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.
58. The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

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

59. Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".
60. FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.
61. Possible indicators that a pupil has already been subjected to FGM are laid out in appendix 3.
62. Any teacher who either:
  - Is informed by a girl under 18 that an act of FGM has been carried out on her; or
  - Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth.
 Must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.
63. Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children's social care as appropriate.
64. Any other member of staff who discovers that an act of FGM appears to have been carried out on a pupil under 18 must speak to the DSL and follow our local safeguarding procedures.



65. The duty for teachers mentioned above does not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.
66. Any member of staff who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out or discovers that a pupil aged 18 or over appears to have been a victim of FGM, should speak to the DSL and follow our local safeguarding procedures.

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

67. If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.
68. If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.
69. Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include [Channel](#), the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.
70. The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk). Note that this is not for use in emergency situations.
71. In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:
  - Think someone is in immediate danger.
  - Think someone may be planning to travel to join an extremist group.
  - See or hear something that may be terrorist related.

### **If you have a mental health concern about a child**

72. 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. Further information and guidance can be found in the Positive Mental Health and Self Harm Policy.

Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

73. If your concern is urgent you may need to seek immediate medical assistance or ring 111/999. If it is non-urgent, please complete a MyConcern and update the Wellbeing Team.

### **Allegations of abuse made against other pupils**

74. We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up", as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils.
75. We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.
76. Most cases of pupils hurting other pupils will be dealt with under our school's behaviour policy and the anti-bullying policy. However, this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:
  - Is serious, and potentially a criminal offence.
  - Could put pupils in the school at risk.
  - Is violent.
  - Involves pupils being forced to use drugs or alcohol.

- Involves sexual exploitation, sexual abuse, or sexual harassment, such as indecent exposure, sexual assault, up skirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)
77. If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

### **Creating a supportive environment in school and minimising the risk of child-on-child abuse**

78. We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, all staff will:

- a) Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images.
- b) Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys.
- c) Ensure our curriculum helps to educate pupils about appropriate behaviour and consent.
- d) Ensure pupils are able to easily and confidently report abuse using our reporting systems.
- e) Ensure staff reassure victims that they are being taken seriously.
- f) Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes, and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners.
- g) Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed.
- h) Consider intra familial harms and any necessary support for siblings following a report of sexual violence and/or harassment.
- i) Ensure staff are trained to understand:
  - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
  - That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here.”
  - That if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
    - I. Children can show signs or act in ways they hope adults will notice and react to
    - II. A friend may make a report.
    - III. A member of staff may overhear a conversation.
    - IV. A child’s behaviour might indicate that something is wrong.
  - That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation.
  - That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy.
  - The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it.



- That they should speak to the DSL if they have any concerns
  - That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side.
79. The DSL will take the lead role in any consequences for the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.
80. Consequences can be given while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:
- Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or LA children's social care to determine this.
  - There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing.

### **Sharing nudes and semi-nudes ('sexting')**

81. Sharing photos and videos online is part of daily life for many people, enabling them to share their experiences, connect with friends and record their lives. Photos and videos can be shared as text messages, email, posted on social media or increasingly via mobile messaging apps, such as Snapchat, WhatsApp, or Facebook Messenger.
82. For our deaf children and young people this technology is a significant form of communication. This increase in the speed and ease of sharing imagery has brought concerns about young people producing and sharing sexual imagery of themselves. This can expose them to risks, particularly if the imagery is shared further, including embarrassment, bullying and increased vulnerability to sexual exploitation. Producing and sharing sexual images of under 18s is also illegal.

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

83. If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos including pseudo images which are computer generated images that otherwise appear to be a photograph or video (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.
84. You must **not**:
- View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
  - Delete the imagery or ask the pupil to delete it (this is the DSL's responsibility)
  - Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
  - Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers.
  - Say or do anything to blame or shame any young people involved.
85. You should explain that you need to report the incident and reassure the pupil(s) that they will receive support and help from the DSL.

## Initial review

86. Following a report of an incident, the DSL will consider the initial evidence and aim to determine:

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

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

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

88. If none of the above apply then the DSL, in consultation with the Principal and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded on MyConcern in line with the procedures set out in this policy.

## Further review by the DSL

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

They will hold interviews with the pupils involved (if appropriate).

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

## Informing parents/carers

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

## Referring to the police

91. If it is necessary to refer an incident to the police, this will be done following guidance from the pupil's Local Authority.

## Record Keeping

92. All incidents of sharing nudes and semi-nudes and the decisions made in responding to them will be recorded.

## Safeguarding within the Curriculum

93. Safeguarding including sex education, relationships and online safety is part of the Primary and Secondary curriculum in PSHE, Science and ICT. In addition to this all staff are actively encouraged to ensure opportunities to promote safeguarding knowledge and awareness both on and offline, including the issues around the sharing of nudes and semi-nudes.
94. Staff are to be aware of non-statutory guidance [\*Teaching online safety in school \(June 2019\)\*](#) and [\*Education for a Connected World \(Jun 2020\)\*](#), using these to support embedding online safety education within the curriculum and residential care provision.
95. The PSHE coordinators and DSL ensure all pupils receive appropriate and regular information delivered in an age-appropriate manner. Updates and key themes are covered through assemblies, residential house meetings and individual keyworker sessions.
96. Outside agencies are commissioned to provide additional safeguarding and child protection awareness. For example, The Edge (drug and alcohol abuse service), Sign Health (Healthy Relationships) Outside agencies are commissioned to provide additional safeguarding and child protection awareness. These include the safer schools partnership liaison officer, The Edge (drug and alcohol abuse service), Sign Health (Healthy Relationships), and NSPCC/Childline.

## Reporting Systems for our pupils

97. Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.
98. We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we:

- Display posters around school with pictures of the safeguarding team.
- Independent listener visits the school and can be emailed: [independentlistener@maryhare.org.uk](mailto:independentlistener@maryhare.org.uk)
- Safeguarding email address [safeguarding@maryhare.org.uk](mailto:safeguarding@maryhare.org.uk)
- Safeguarding post box for anonymous concerns
- Culture where all staff are available to listen and signpost.

## Notifying parents or carers

99. Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL will normally do this in the event of a suspicion or disclosure.
100. Other staff will only talk to parents or carers about any such concerns following consultation with the DSL.
101. If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.
102. In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

103. The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

- Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them and understand their wishes in terms of what support they may need and how the report will be progressed.
- Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s)

### Information sharing

104. Information sharing is vital in identifying and tackling all forms of abuse, neglect, and exploitation, and in promoting children's welfare, including in relation to their educational outcomes. Schools and colleges have clear powers to share, hold and use information for these purposes.
105. The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children

### Online Safety and the use of mobile technology

106. Mary Hare School believes that the use of information and communication technologies bring great benefits. We recognise that there are online safety issues that need to be planned for that will help to ensure appropriate, effective and safer use of electronic communications. We will ensure appropriate filtering and monitoring systems are in place and regularly review their effectiveness in line with guidance in [Meeting digital and technology standards in schools and colleges - Filtering and monitoring standards for schools and colleges - Guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges-filtering-and-monitoring-standards-for-schools-and-colleges)
107. Mary Hare School implements a whole school approach to online safety, to protect and educate our community on the safe use of technology, promoting systems to identify, intervene in and escalate any incident where appropriate. Developing methods of incorporating online safety education into all areas of the curriculum and welfare planning.
108. To address online safety issues, we aim to:
- Have robust processes in place to ensure the online safety of pupils, staff, volunteers and governors.
  - Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
  - Set clear guidelines for the use of mobile phones for the whole school community.
  - Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate
  - All members of staff are trained in/receive regular updates in online safety and recognising and reporting concerns and are aware of their role in the filtering and monitoring process. We train staff as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year.
  - Children and young people may expose themselves to danger, whether knowingly or unknowingly, when using the internet and other technologies. Additionally, some young people may find themselves involved in activities which are inappropriate or possibly illegal. The school, therefore, recognises its responsibility to educate pupils, teaching them the appropriate behaviours and critical thinking skills to enable them to remain both safe and legal when using the internet and related technologies.

109. To do this we will educate pupils about online safety as part of our curriculum. For example:
- The safe use of social media, the internet and technology
  - Keeping personal information private
  - How to recognise unacceptable behaviour online
  - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim.
110. Mary Hare School educates parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them, so they know how to raise concerns about online safety.
111. All pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology.
112. We explain the consequences we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones throughout behaviour policy.
113. Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the [DfE's guidance on searching, screening and confiscation](#).
114. Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community.

## Staff use of mobile telephones, tablets, and cameras

115. Communication between pupils and adults should be within clear and explicit professional boundaries. This includes the use of technology including mobile phones, emails, video calls etc.
116. Staff must not give their personal contact details. Personal phones should only be used within staff offices, meeting rooms or staff communal spaces, such as the staff room, during non-contact time when pupils are not present.
117. Staff must ensure communication with children avoid any possible misinterpretation of their motives or any behaviour which could be construed as grooming.
118. Staff use school technology to take photos or videos of the pupils, not their own devices. Images should not be shared on personal social media.
119. Consent should be obtained from parents and the child prior to any images being captured, recorded, or shared externally.
120. When a recording is made (for example PE or performing arts), pupils should be clear about the purpose and that it is school equipment. Any images or recording should be stored within the school network and must not be placed on any personal devices.
121. Failing to work within the agreed protocols may lead to disciplinary and/or criminal investigations.

## Sharing of images by pupils, parents, and carers

122. Parent or carers capturing images during school events may **not** be shared on social media unless solely depicting their own child.
- Pupils should not capture, record, or share images of others without prior consent.

A young person is breaking the law if they:

- Take an explicit photo or video of themselves or a friend.
- Share an explicit imagery of a child, even if it's shared between children of the same age.
- Possess, download or store explicit imagery of a child, even if the child gave their permission for it to be created.

## Pupils with a social worker

123. Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour, and mental health. The DSL and all members of staff will work with and support social workers to help protect vulnerable children.
124. Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare, and educational outcomes. For example, it will inform decisions about:
  - Responding to unauthorised absence or missing education where there are known safeguarding risks.
  - The provision of pastoral and/or academic support
  - If it is appropriate to suspend a pupil, or if another consequence is safer.

## Looked-after and previously looked-after children

125. We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:
126. Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
127. The DSL has details of children's social workers and relevant virtual school heads.
128. We have appointed a designated teacher, Emma Kennett, who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with [statutory guidance](#).
129. The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.
130. As part of their role, the designated teacher will:
  - ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
  - Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans.

## Pupils who are lesbian, gay, bisexual or gender questioning

131. We recognise that pupils who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children. See our anti bullying policy for more detail on how we prevent bullying based on gender or sexuality.

132. We also recognise that LGBTQ+ children are more likely to experience poor mental health. Any concerns should be reported to the DSL.
133. When families/carers are making decisions about support for gender questioning pupils, they should be encouraged to seek clinical help and advice. This should be done as early as possible when supporting pre-pubertal children.
134. When supporting a gender questioning pupil, we will take a cautious approach as there are still unknowns around the impact of social transition, and a pupil may have wider vulnerability, such as complex mental health and psychosocial needs, and in some cases, autism spectrum disorder (ASD) and/or attention deficit hyperactivity disorder (ADHD).
135. We will also consider the broad range of their individual needs, in partnership with their parents/carers (other than in rare circumstances where involving parents/carers would constitute a significant risk of harm to the pupil). We will also include any clinical advice that is available and consider how to address wider vulnerabilities such as the risk of bullying.
136. Risks can be compounded where children lack trusted adults with whom they can be open. We therefore aim to reduce the additional barriers faced and create a culture where pupils can speak out or share their concerns with members of staff.

## Children Missing and Absent from Education

137. All children, regardless of their circumstances, are entitled to a full-time education which is suitable to their age, ability, aptitude, and any special educational needs they may have. A child going missing from education is a potential indicator of abuse or neglect. It is essential that staff are alert to the signs to look out for and to help identify the risk of abuse and neglect, including CSE and the risk of potential travel to conflict zones, FGM and forced marriages.
138. Mary Hare will inform the relevant local authority of any pupil who fails to attend school regularly or has been absent without school's permission for a continuous period of 6 school days or more.
139. The school uses a range of strategies when a pupil is absent from school which starts with a first day contact. Other actions include further contact with home including emails and letters, meetings, and referrals to the authority's Education Welfare Officer.
140. Due to the nature of boarding at Mary Hare School, absence without permission is very low. This policy should be read alongside the *Absence without Authority Policy*. Further guidance is available from the DoE: [Children missing education; Statutory guidance for local authorities – Sept 2016](#)
  - Guidance on school attendance [Working together to improve school attendance](#) including information on how schools should work with local authority children's services where school absence indicates safeguarding concerns.
141. Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, the Local authority, schools, and other key professionals should work together to coordinate a meeting with parents/carers where possible. Ideally, this would be before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child. This is particularly important where a child has special educational needs or a disability, and/or has a social worker, and/or is otherwise vulnerable.
142. Where a child has an Education, Health and Care plan local authorities will need to review the plan, working closely with parents and carers.
143. The local authority must be notified when a school is to remove a pupil from its register. This should be done as soon as these grounds for removal from the register are met, and in any event no later than



removing the pupil’s name from the register. It is essential that schools comply with this duty, so that local authorities can, as part of their duty to identify children of compulsory school age who are missing education and follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse or neglect.

## Training

- 144. All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures and online safety, to ensure they understand the school’s safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect.
- 145. This training will be regularly updated, every two years for residential staff, all other staff every three years, and will be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning.

This training is based on the most up-to-date training material provided by West Berkshire Safeguarding Children's board.

Training	Who	Provider	Frequency
Child Sexual Exploitation (CSE)	1. Teachers TAs Care	<a href="http://paceuk.info/training/keep-them-safe/">http://paceuk.info/training/keep-them-safe/</a>	3 years
Domestic Violence and Abuse	Teachers TAs Care	<a href="https://courses.idas.org.uk/online-courses/">https://courses.idas.org.uk/online-courses/</a>	3 years
Sexual Violence Basic Awareness	Teachers TAs Care	TES (Child-on-Child Sexual Violence and Harassment)	3 years
PREVENT and Channel	All Staff	<a href="https://www.elearning.prevent.homeoffice.gov.uk/">https://www.elearning.prevent.homeoffice.gov.uk/</a>	3 years
Female Genital Mutilation (FGM)	Teachers TAs Care	<a href="https://www.gov.uk/government/publications/female-genital-mutilation-resource-pack">https://www.gov.uk/government/publications/female-genital-mutilation-resource-pack</a>	3 years

- 146. Staff will also receive regular safeguarding and child protection updates, including on online safety, and filtering and monitoring as required but at least annually (for example, through emails, e-bulletins and staff meetings).
- 147. Volunteers will receive appropriate training, if applicable.

## The DSL and Deputies

- 148. The DSL and deputies will undertake child protection and safeguarding training at least every 2 years. In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).



## Governors

149. All governors receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:
  - Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge.
  - Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding.
150. As the Chair of Governors may be required to act as the ‘case manager’ in the event that an allegation of abuse is made against the Principal, they receive training in managing allegations for this purpose.

## Use of school premises by other organisations

151. Where services or activities are provided separately by another body, using the school premises, working with our pupils, the School, Governing Body will seek assurance that the body concerned has appropriate policies and procedures in place in regard to safeguarding children and child protection.
152. When an incident occurs while outside organisations (such as community groups, sports clubs, or after-school activity providers) are using school premises, including Arlington Arts. MHS will follow its safeguarding policies and procedures, as if the incident had occurred during normal school hours, including informing the local authority designated officer (LADO).

## Former pupils

153. The Board of Governors will ensure that the desire to exonerate the school will not be allowed to take precedence over concerns for the current physical and emotional health of former pupils.

## Whistleblowing

154. Governing boards, proprietors and school leaders will ensure that all staff know how to make a complaint and understand policies on whistleblowing (set out in Part 4 of [Keeping children safe in education 2024 \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/115222/keeping-children-safe-in-education-2024.pdf))
155. All staff are aware of their duty to raise concerns about the attitude or actions of colleagues and are regularly reminded of this. Staff are aware how to raise concerns and who to share these with. This is detailed in Appendix 2.
156. Whistleblowing concerns about the Principal should be raised with the Chair of Governors.
157. Where a staff member feels unable to raise an issue with their employer or feel their genuine concerns are not being addressed, other whistleblowing channels may be open to them. The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. **Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk).**
158. **Please refer to the Whistleblowing Policy for further information**

## Appendices

### Appendix 1:

159. [Keeping children safe in education 2024 \(publishing.service.gov.uk\)](https://publishing.service.gov.uk) (Part three), sets out clear guidance which is adhered to at this school. The recruitment process is robust in seeking to establish the commitment of candidates to support the school's measures to safeguard and promote the welfare of children and to identify, deter or reject people who might pose a risk of harm to children or are otherwise unsuited to work with them.
160. All staff working within the school, including staff employed by another organization, who have substantial access to children have been checked as to their suitability to work with children, including verification of their identity and qualifications, satisfactory references, a satisfactory barred list check, an enhanced DBS check, a right to work in the UK check and additional overseas checks for those who have lived or worked abroad is also completed. For teachers an additional check has been carried out to ensure they are not prohibited from teaching.

**For further information please refer to the Safer Recruitment Policy**

### Checking the identity and suitability of visitors

161. All visitors will be required to verify their identity to the satisfaction of staff.
162. If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.
163. Visitors are expected to sign in and wear a visitor's badge. They will be given a coloured lanyard according to their purpose for visiting. The ID and lanyard must be visible throughout the visit.
  - **Yellow** – General Visitors (including, educational professionals, LEA representatives, inspectors, contractors etc). Visitors on Yellow Lanyards are to be escorted at all times, including any interactions with pupils.
  - **Orange** – Trusted contractors and other visitors who have a current DBS check that has been seen and recorded by the school; these will typically be regular visitors who need to be able to work independently, e.g. fire alarm or plant servicing. Such visitors do not need to be escorted around the site but are not to have any direct interaction with pupils unless accompanied by a member of staff.
  - **Red** – Training department students and lecturers. Whilst they do not need to be escorted around the site, they should be limited to those areas directly relevant to their training and are to have no interaction with our pupils unless accompanied by a member of staff.
  - **Green** – Mary Hare Trustees/Governors, the Schedule 3 Inspector, and the School Visitor. These individuals are all named, have a current DBS check and are registered on our central record. They do not need to be escorted, and may directly interact with our pupils, although Trustees would normally be accompanied by a member of staff when doing so.
164. Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID
165. and will be asked to show their DBS certificate, which will be checked alongside their photo ID;

166. or the organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate)
167. All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist views and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.
168. It is the responsibility of ALL employees to verbally and respectfully challenge any individual on the school campus who is not wearing a staff or visitors' ID Badge and lanyard. Any visitor to Mary Hare who is not clearly wearing an appropriate identity badge and lanyard should be politely but clearly challenged to enquire who they are and their business on the school site, eg "Can I help you?", "Can I direct you to the main reception?", "who are you here to visit?".

**For further information please refer to the Visitors Policy**

## Appendix 2: allegations of abuse made against staff

### Allegations against staff (including low-level concerns)

#### Code of Conduct

169. All staff must behave responsibly and professionally in all dealings with children and specifically with students for whom they have a duty of care. All staff must follow the procedures set out in our staff Code of Conduct policy. Staff should always avoid behaviour which might be misunderstood or misinterpreted by others. As a result of their knowledge, position and/or the authority invested in their role, all adults working with children are in positions of trust in relation to the children in their care. A relationship between a member of staff and a student cannot be a relationship between equals. There is potential for exploitation and harm of vulnerable children and young people and all members of staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.
170. Each new member of staff and volunteer will be provided with a full induction on Safeguarding, in addition to the training requirements set out in this policy. A copy of 'Working Together to Safeguard Children' will be available for all staff and volunteers to read on the SharePoint. All staff are required to read at least Part One of Keeping Children Safe in Education, Sept 2024 if working directly with children, or Appendix A if assessed as appropriate.
171. Staff members and volunteers are required to sign up to and follow the school's Code of Conduct. This is a separate document and should be considered alongside this policy.
172. The Code of Conduct for staff and volunteers is made freely available to staff, visitors, contractors, pupils, parents, and carers on the school website and in hard copy, at request. This allows everyone to understand our expectations of our staff and to be able to identify any behaviour that may be inappropriate.

### Allegations that may meet the harms threshold

173. This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer, or contractor, has:

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
  - Possibly committed a criminal offence against or related to a child, and/or
  - Behaved towards a child or children in a way that indicates they may pose a risk of harm to children, and/or
  - Behaved or may have behaved in a way that indicates they may not be suitable to work with children. This includes behaviour taking place both inside and outside of school.
174. If we're in any doubt as to whether a concern meets the harm threshold, we will consult our local authority designated officer (LADO).
175. We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.
176. A 'case manager' will lead any investigation. This will be the Principal, or the Chair of Governors where the Principal is the subject of the allegation.
177. Our procedures for dealing with allegations will be applied with common sense and judgement.
178. If we receive an allegation of an incident happening while an individual or organisation was using the school premises to run activities for children, we will follow our safeguarding policies and procedures and inform the LADO.

### Suspension of an individual until the case is resolved

179. Suspension will not be the default position and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.
180. Based on an assessment of risk, we will consider alternatives such as:
- Redeployment within the school so that the individual does not have direct contact with the child or children concerned.
  - Providing an assistant to be present when the individual has contact with children.
  - Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children.
  - Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment, and parents/carers have been consulted.
  - Temporarily redeploying the individual to another role in a different location,
181. If in doubt, the case manager will seek views from the school's personnel adviser and the designated officer at the local authority, as well as the police and children's social care where they have been involved.

### Definitions for outcomes of allegation investigations

182. Definitions
- **Substantiated:** there is sufficient evidence to prove the allegation
  - **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation
  - **False:** there is sufficient evidence to disprove the allegation

- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

### Procedure for dealing with allegations

183. In the event of an allegation that meets the criteria above, the case manager will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below.
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies.
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate.
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care.
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details.
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation.
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate.
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice.

- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
  - Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child.
184. With respect to Early Years, we will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.
185. If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.
186. Where the police are involved, wherever possible the school will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

#### Additional considerations for supply teachers and all contracted staff

187. If there are concerns or an allegation is made against someone not directly employed by the school, such as a supply teacher or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures.
- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome.
  - The governing board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation.
  - We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required.
  - We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)
188. When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

#### Specific actions

##### Action following a criminal investigation or prosecution

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

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

190. If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.
191. If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

### Individuals returning to work after suspension

192. If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.
193. The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

### Unsubstantiated, unfounded, false, or malicious reports

194. If a report is:
  - Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate.
  - Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it.

### Unsubstantiated, unfounded, false, or malicious allegations

195. If an allegation is:
  - Determined to be unsubstantiated, unfounded, false, or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate.
  - Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it.

### Confidentiality and information sharing

196. The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.
197. The case manager will take advice from the LADO, police, and children's social care services, as appropriate, to agree:
  - Who needs to know about the allegation and what information can be shared.
  - How to manage speculation, leaks, and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality.
  - What, if any, information can be reasonably given to the wider community to reduce speculation.
  - How to manage press interest if, and when, it arises.



198. The Government's 'Information sharing advice for safeguarding practitioners will support staff who have to make decisions about information sharing. [DfE non statutory information sharing advice for practitioners providing safeguarding services for children, young people, parents and carers \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/612222/dfe-non-statutory-information-sharing-advice-for-practitioners-providing-safeguarding-services-for-children-young-people-parents-and-carers.pdf)

### Record-keeping

199. The case manager will maintain clear records on Confide about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.
200. The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).
201. For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:
- A clear and comprehensive summary of the allegation.
  - Details of how the allegation was followed up and resolved.
  - Notes of any action taken, decisions reached and the outcome.
  - A declaration on whether the information will be referred to in any future reference.
202. In these cases, the school will provide a copy to the individual, in agreement with children's social care or the police as appropriate.
203. Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

### References

204. When providing employer references, we will:
- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious.
  - Include substantiated allegations, provided that the information is factual and does not include opinions.

### Learning lessons

205. After any cases where the allegations are *substantiated*, the case manager will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.
206. This will include consideration of (as applicable):
- Issues arising from the decision to suspend the member of staff.
  - The duration of the suspension.
  - Whether or not the suspension was justified.



- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual.
207. For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

### Non-recent allegations

208. Abuse can be reported, no matter how long ago it happened.
209. We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.
210. Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

## Section 2: Allegations that do not meet the harms threshold

211. This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.
212. Concerns may arise through, for example:
- Suspicion
  - Complaint
  - Safeguarding concern or allegation from another member of staff.
  - Disclosure made by a child, parent, or other adult within or outside the school.
  - Pre-employment vetting checks.
213. We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

### Definition of low-level concerns.

214. The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the school may have acted in a way that:
- Is inconsistent with the staff code of conduct, 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 designated officer at the local authority.
215. Examples of such behaviour could include, but are not limited to:
- Being overly friendly with children
  - Having favourites
  - Taking photographs of children on their mobile phone
  - Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
  - Humiliating pupils

### Sharing low-level concerns

216. We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially share low-level concerns so that they can be addressed appropriately.

217. We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others.
- Empowering staff to share any low-level concerns.
- Empowering staff to self-refer.
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage.
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised.

### Responding to low-level concerns

218. If the concern is raised via a third party, the Principal will collect evidence where necessary by speaking:

- Directly to the person who raised the concern unless it has been raised anonymously.
- To the individual involved and any witnesses.

219. The Principal will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's code of conduct. The Principal will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

### Record-keeping

220. All low-level concerns will be recorded on Confide. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

221. Records will be:

- Kept confidential, held securely, and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority.
- Retained at least until the individual leaves employment at the school

222. Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

### References

223. We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance.

### Appendix 3: types of abuse

224. **Abuse** including neglect, and safeguarding issues are rarely standalone events that can be covered by 1 definition or label. In most cases, multiple issues will overlap. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children

#### *Physical abuse*

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

#### *Emotional abuse*

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

Emotional abuse may involve:

- Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.
- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction.
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

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

- Physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

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

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

- Provide adequate food, clothing, and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger.
- Ensure adequate supervision (including the use of inadequate caregivers)
- Ensure access to appropriate medical care or treatment.

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

*Other types of abuse include:*

229.

- Domestic Abuse
- Bullying & Cyber bullying
- Child Trafficking
- Criminal Exploitation
- Female Genital Mutilation
- Online Abuse
- Financial
- Grooming

*Possible signs of abuse include (but are not limited to):*

230.

- the pupil says s/he has been abused or asks a question which gives rise to that inference.
- there is no reasonable or consistent explanation for a pupil's injury; the injury is unusual in kind or location; there have been a number of injuries; there is a pattern to the injuries.
- the pupil's behaviour stands out from the group as either exhibiting extreme model behaviour or extremely challenging behaviour; or there is a sudden change in the pupil's behaviour.
- the pupil asks to drop subjects with a particular teacher and seems reluctant to discuss the reasons.
- the pupil's development is delayed.
- the pupil loses or gains weight.
- the pupil appears neglected, e.g., dirty, hungry, inadequately clothed.
- the pupil is reluctant to go home or has been openly rejected by his/her parents or carers.
- the pupil is reluctant to go to school.
- The pupil is showing signs of being drawn into anti-social behaviour or criminal behaviour including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime.
- The pupil is frequently missing/goes missing from education, care or home

## Specific Safeguarding Issues

### Children missing from education

231. A child with unexplainable and or/persistent absences - from education, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.
232. There are many circumstances where a child may become absent from education, but some children are particularly at risk. These include children who:
- Are at risk of harm or neglect.
  - Are at risk of forced marriage or FGM.
  - Come from Gypsy, Roma, or Traveller families.
  - Come from the families of service personnel.
  - Go missing or run away from home or care.
  - Are supervised by the youth justice system.
  - Cease to attend a school.
  - Come from new migrant families.
233. We will follow our procedures for unauthorised absence and for dealing with children who are unexplainably absent or persistently absent from education to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.
234. Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage.
235. If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

### Child criminal exploitation

236. Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
237. The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.
238. The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.
239. **Indicators of CCE can include a child:**
- Appearing with unexplained gifts or new possessions.
  - Associating with other young people involved in exploitation.

- Suffering from changes in emotional wellbeing.
- Misusing drugs and alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly missing school or education.
- Not taking part in education.

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

**240. In addition to the CCE indicators above, indicators of CSE can include a child:**

- Having an older boyfriend or girlfriend
- Suffering from sexually transmitted infections or becoming pregnant

### Child-on-child abuse

241. As a residential special school MHS is aware of the risks of inappropriate relationships and the potential for child-on-child abuse. In [Keeping children safe in education 2024 \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/100000/keeping-children-safe-in-education-2024.pdf) it makes reference to additional factors to consider with regards to safeguarding, these are laid out in the *National Minimum Standards – RSS April 2015*.
242. Child on Child abuse occurs when a young person is exploited, bullied and / or harmed by their peers who are the same or similar age; everyone directly involved in child-on-child abuse is under the age of 18. 'Child on child' abuse can relate to various forms of abuse and includes but is not 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; (Part 5 of [Keeping children safe in education 2024 \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/100000/keeping-children-safe-in-education-2024.pdf) 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.
  - 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).
  - Staff should be aware of a dedicated NSPCC helpline a helpline to support victims of sexual harassment and abuse in education settings. **0800136663**
243. Staff should regard a young person's behaviour as abusive if:
- There is a large difference in power (for example, age, size, ability, development) between the young people concerned' or
  - There it is of a serious nature, possibly including a criminal offence, or
  - It raises risk factors for other pupils in the school.
  - Indicates that other pupils may have been affected by this student; repeatedly tried to harm one or more other pupils, or

- There are concerns about the intention of the alleged perpetrator, or
  - Indicates that young people outside the school may be affected by this student.
244. Abuse is abuse and staff are aware that this is not to be tolerated or passed off as ‘banter’, ‘part of growing up’ or ‘boys being boys’.
245. All reports of child-on-child abuse will be taken seriously and acted upon in line with the behaviour policy. Support will be given to all parties including those pupils accused of abusing another child.
246. A pupil against whom an allegation of abuse has been made may be suspended from the School and the School's policy on behaviour, discipline and sanctions will apply. The school will take advice from the Local Authority Children’s Social Care on such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved, including the pupil or pupils accused of abuse.
247. If it is necessary for a pupil to be interviewed by the police in relation to allegations of abuse, the school will ensure that, subject to the advice of the Local Authority Children’s social care, parents are informed as soon as possible, and that the pupil is supported during the interview by an appropriate adult. In the case of pupils whose parents are abroad, the pupil's Guardian will be requested to provide support to the pupil and to accommodate him/her if it is necessary to suspend him/her.
248. If a pupil is suspended from school as a result of an allegation of abuse, the Chair of Governors and at least one Designated Governor will be informed as soon as practicable.
249. All staff should understand, that even if there are no reports in their schools or colleges it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding child-on-child abuse they should speak to their designated safeguarding lead (or deputy).

## Domestic abuse

250. Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.
251. Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological, or emotional. It can also include ill treatment that isn’t physical, as well as witnessing the ill treatment of others – for example, the impact of all forms of domestic abuse on children.
252. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.
253. Older children may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.
254. Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development, and ability to learn.
255. If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day. This is the procedure where police forces are part of [Operation Encompass](#)
256. The DSL will provide support according to the child’s needs and update records about their circumstances.



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

257. So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.
258. Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.
259. All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

### Forced marriage

260. Forcing a person into marriage is a crime. A child marriage is one entered into without the full and free consent of 1 or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.
261. Staff will receive training around forced marriage and the presenting symptoms. We are aware of the '1 chance' rule, i.e. we may only have 1 chance to speak to the potential victim and only 1 chance to save them.
262. If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.
263. The DSL will:
  - Speak to the pupil about the concerns in a secure and private place.
  - Activate the local safeguarding procedures and refer the case to the local authority's designated officer.
  - Seek advice from the Forced Marriage Unit on 020 7008 0151 or [fm@fco.gov.uk](mailto:fm@fco.gov.uk)
  - Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate.

### Preventing radicalisation

264. Protecting children from the risk of radicalisation should be seen as part of schools' wider safeguarding duties and is similar in nature to protecting children from other forms of harm and abuse. As with other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include making a referral to the Channel programme.
  - **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
  - **Extremism** is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
  - **Terrorism** is an action that:
    - Endangers or causes serious violence to a person/people.
    - Causes serious damage to property; or
    - Seriously interferes or disrupts an electronic system.
265. The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious, or ideological cause.
266. Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.



267. We will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.
268. We will ensure that suitable internet filtering is in place and equip our pupils to stay safe online at school and at home.
269. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.
270. Staff will be alert to changes in pupils' behaviour.
271. The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a pupil is being radicalised can include:
- Refusal to engage with, or becoming abusive to, peers who are different from themselves.
  - Becoming susceptible to conspiracy theories and feelings of persecution
  - Changes in friendship groups and appearance.
  - Rejecting activities they used to enjoy.
  - Converting to a new religion.
  - Isolating themselves from family and friends.
  - Talking as if from a scripted speech.
  - An unwillingness or inability to discuss their views.
  - A sudden disrespectful attitude towards others.
  - Increased levels of anger.
  - Increased secretiveness, especially around internet use.
  - Expressions of sympathy for extremist ideologies and groups, or justification of their actions.
  - Accessing extremist material online, including on Facebook or Twitter.
  - Possessing extremist literature.
  - Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations.
272. Children who are at risk of radicalisation may have low self-esteem or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.
273. If staff are concerned about a pupil, they will follow our procedures set out in this policy, including discussing their concerns with the DSL.
274. Staff should always take action if they are worried.

## Channel

275. School and college staff should understand when it is appropriate to make a referral to the Channel programme. Channel guidance is available at [Channel guidance](#) and an e-learning channel awareness programme for staff is available at: [Channel General Awareness](#).

## Sexual violence and sexual harassment between children in schools

276. Sexual violence and sexual harassment can occur:

- Between 2 children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally)

277. Sexual violence and sexual harassment exist on a continuum and may overlap.

278. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.
279. If a victim reports an incident, it is essential that staff make sure they are reassured 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 any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.
280. When supporting victims, staff will:
- Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them.
  - Regularly review decisions and actions, and update policies with lessons learnt.
  - Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns.
  - Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again.
  - Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence and show sensitivity to their needs.
281. Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual, and transgender (LGBT) children are at greater risk.
282. Staff should be aware of the importance of:
- Challenging inappropriate behaviours
  - Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up.
  - Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts, and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.
283. If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in this policy, as appropriate.

## **Serious violence**

284. Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:
- Increased absence from school
  - Change in friendships or relationships with older individuals or groups.
  - 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 (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))
285. Risk factors which increase the likelihood of involvement in serious violence 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.

286. Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL.

### Indicators of FGM

287. A pupil confiding in a professional that FGM has taken place.

288. A mother/family member disclosing that FGM has been carried out.

289. A family/pupil already being known to social services in relation to other safeguarding issues.

290. A girl:

- Having difficulty walking, sitting, or standing, or looking uncomfortable
- Finding it hard to sit still for long periods of time (where this was not a problem previously)
- Spending longer than normal in the bathroom or toilet due to difficulties urinating
- Having frequent urinary, menstrual or stomach problems
- Avoiding physical exercise or missing PE
- Being repeatedly absent from school or absent for a prolonged period.
- Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
- Being reluctant to undergo any medical examinations.
- Asking for help, but not being explicit about the problem
- Talking about pain or discomfort between her legs

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

- The girl's family having a history of practicing FGM (this is the biggest risk factor to consider)
- FGM being known to be practiced in the girl's community or country of origin.
- A parent or family member expressing concern that FGM may be carried out.
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues.

292. A girl:

- Having a mother, older sibling or cousin who has undergone FGM.
- Having limited level of integration within UK society
- Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman".
- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period.
- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM.
- Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
- Being unexpectedly absent from school
- Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

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

## Contextual Safeguarding

294. Contextual Safeguarding is an approach to understanding, and responding to, young people's experiences of significant harm beyond their families.
295. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships. Therefore, children's social care practitioners need to engage with individuals and sectors who do have influence over/within extra-familial contexts, and recognise that assessment of, and intervention with, these spaces are a critical part of safeguarding practices.
296. We use a multi-agency approach to working with young people where traditional safeguarding approaches are not appropriate, but where significant harm to that young person exists.
297. A member of staff who suspects that a pupil is suffering harm from outside the school should refer the matter to the Designated Safeguarding Lead.