

**MAYFIELD GRAMMAR SCHOOL  
GRAVESEND**

**SAFEGUARDING AND  
CHILD PROTECTION POLICY**

**Approved by:**

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Mayfield Grammar School, Gravesend

# SAFEGUARDING AND CHILD PROTECTION POLICY

**Designated Safeguarding Lead(s):** Louise ABSOLON (Senior Assistant Headteacher)

**Named Safeguarding Governor:** Dawn FOULGER

**All staff should have access to this policy and sign to the effect that they have read and understood its content.**

## What to do if you have a welfare concern about a student at Mayfield Grammar School, Gravesend

### Why are you concerned?

- For example
  - Disclosure
  - Child's appearance
  - Behaviour change
  - Witnessed concerning behaviour

### Immediately record your concerns

- Follow the schools procedure
  - Clarify concerns if necessary (**TED**: **T**ell, **E**xplain, **D**escribe)
  - Use child's own words
  - Sign and date your records
  - Reassure the child

### Inform the Designated Safeguarding Lead Louise ABSOLON

(OR Assistant Headteacher, Lower School Julie FROST Assistant Headteacher Upper School, Janice MURFET, Lower School Theresa LEE, Sixth Form Ben SLIGHT, Assistant Headteacher Robert BOYCE, Deputy Headteacher Caroline KEMP, Headteacher Elaine WILSON)

Consider: is the child is at immediate risk of harm e.g. unsafe to go home?

If so, then the DSL must be informed immediately.

### Designated Safeguarding Lead

- Consider KSCMP Threshold document and procedures: [Home - Kent Safeguarding Children Multi-Agency Partnership \(kscmp.org.uk\)](https://www.kscmp.org.uk)
- Refer to other agencies as appropriate e.g. LADO, Early Help Notification Form or Inter-Agency Referral Form
- If unsure then consult with Area Education

### If you are unhappy with the response

#### Staff:

- Seek advice from the Education Safeguarding Team 03000 412445

#### Pupils and Parents:

- Follow school complaints procedures

### Record decision making and action taken in the child's child protection/safeguarding file on MyConcern

### Monitor

Be clear about:

- What you will monitor e.g. behaviour trends, appearance etc.
- How long you will monitor
- If/who to feedback to and how you will record

### Review and Re-refer (if necessary)

At all stages the child's circumstances will be kept under review  
The DSL/Staff will re-refer if required to ensure the **child's safety is paramount**

## INTRODUCTION AND ETHOS

- Safeguarding and promoting the welfare of children is defined as:
  1. Protecting children from maltreatment
  2. Preventing impairment of children's mental and physical health or development
  3. Ensuring that children grow up in circumstances consistent with the provision of safe and effective care, and
  4. Taking action to enable all children to have the best outcomes
- Mayfield Grammar School is a community and all those directly connected (staff, governors, parents, families and pupils) have an essential role to play in making it safe and secure. Mayfield Grammar School recognises our moral and statutory responsibility to safeguard and promote the welfare of all children.
- Mayfield Grammar School recognises the importance of providing an ethos and environment within school that will help children to feel safe, secure and respected; encourage them to talk openly; and enable them to feel confident that they will be listened to. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice.
- Our school core safeguarding principles are:
  - It is a whole school responsibility to safeguard and promote the welfare of children as its paramount concern.
  - All children (defined as those up to the age of 18) regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection.
  - All children have a right to be heard and to have their wishes and feelings taken into account.
  - All staff understand safe professional practice and adhere to our code of conduct and other associated policies.
  - All staff have a responsibility to recognise vulnerability in children and act on any concern in accordance with this guidance.
  - Appropriate action is taken in a timely manner to safeguard and promote children's welfare.
  - All staff are aware of their statutory responsibilities with respect to safeguarding.
  - All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments. All staff, but especially the DSLs should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra familial harms take a variety of different forms and children can be vulnerable to multiple harms including, but not limited to sexual exploitation, criminal exploitation and serious youth violence.
  - Staff are properly trained in recognising and reporting safeguarding issues.
- There are four main elements to our safeguarding policy:
  - Prevention (e.g. positive, supportive, safe school culture, curriculum and pastoral opportunities for children, safer recruitment procedures);
  - Protection (by following the agreed procedures, ensuring all staff are trained and supported to respond appropriately and sensitively to safeguarding concerns);

- Support (for all pupils, parents and staff, and where appropriate specific intervention for those who may be at risk of harm);
- Working with parents and other agencies (to ensure appropriate communications and actions are undertaken).
- The procedures contained in this policy apply to all staff and governors and are consistent with those of Kent Safeguarding Children Multi-Agency Partnership (KSCMP).

## 1. CONTEXT

- This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004 and related guidance. This includes:
  - DfE guidance Keeping Children Safe in Education 2022 (KCSIE)
  - Sexual Violence and sexual harassment between children in schools and colleges, advice for governing bodies, proprietors, headteachers, principles, senior leadership teams and designated safeguarding leads, September 2021
  - Working Together to Safeguard Children 2023 (WTSC)
  - Framework for the Assessment of Children in Need and their Families (2000)
  - Kent and Medway Safeguarding Children Procedures (Online, 2016)
- Section 175 of the Education Act 2002 requires school governing bodies, local education authorities and further education institutions to make arrangements to safeguard and promote the welfare of all children who are pupils at a school, or who are students under 18 years of age. Such arrangements will have to have regard to any guidance issued by the Secretary of State.
- Departmental advice Covid-19: Safeguarding in schools, colleges and other providers
- Departmental advice What to do if you are worried a Child is Being Abused-Advice for Practitioners

## 2. ROLES AND RESPONSIBILITIES

- “Safeguarding is not just about protecting children from deliberate harm. It includes a wide range of issues relating to pupil’s welfare, health and safety.” (Inspecting safeguarding in early years, education and skills, Ofsted, September 2016).
- All safeguarding policies are reviewed constantly but also on an annual (minimum) basis by the Governing Body which has responsibility for oversight of school safeguarding and child protection systems. The Designated Safeguarding Lead / Headteacher will ensure regular reporting on safeguarding activity and systems in school to the Governing Body. The Governing Body will not receive details of individual pupil situations or identifying features of families as part of their oversight responsibility.
- The school acknowledges that this policy will incorporate a range of safeguarding issues including (but not limited to):
  - Anti-bullying
  - Breast ironing
  - Child abduction and community safety incidents
  - Children and the court system
  - Children with family members in prison

- Children missing from education
- Children missing from home or care
- Children potentially at greater risk of harm
- Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)
- County lines
- Modern Slavery and the National Referral Mechanism
- Cyber crime
- Domestic abuse
- Drugs
- Fabricated or induced illness
- Faith abuse
- Female Genital Mutilation (FGM)
- Forced Marriage
- Gangs and youth violence
- Hate
- Harmful sexual behaviour
- Homelessness
- Honour based violence, including Female Genital Mutilation (FGM)
- Mental health and well-being
- Online Safety
- Child on child abuse
- Preventing radicalisation
- The Prevent Duty
- Channel
- Private fostering
- Relationship abuse and gender-based violence
- Sexting
- Sexual violence and sexual harassment
- Youth Produced Sexual Imagery or “Sexting”
- Trafficking
- Up-skirting

(Also see Annex A within ‘Keeping children safe in education’ 2023 and Appendix 3 – (Microsoft Teams))

- Every member of staff at Mayfield Grammar School recognises that children experiencing specific safeguarding issues identified above are no different to safeguarding against any other vulnerability or concern and will be approached and responded to in the same way as protecting children from any other risks.

### **3. RELATED SAFEGUARDING POLICIES**

- We are aware that safeguarding is fundamental to the welfare of all children in our care. This policy is therefore one of a series in the school’s integrated safeguarding portfolio and should be read in conjunction with the policies as listed below. (to be read and followed alongside this document)
  - Behaviour Management, linked to the Use of Physical Intervention
  - Searching, screening and confiscation
  - Online Safety
  - Acceptable Use

- Anti-Bullying
- Data Protection and Information Sharing
- Image Use
- Drugs
- RSE
- Health and Safety
- Attendance (Children Missing Education)
- Risk Assessments (e.g. school trips, use of technology)
- First Aid and Accidents
- Managing Allegations Against Staff
- Code of Conduct for Staff (including Acceptable Use of Technology/AUP)
- Safer Recruitment
- Whistle-Blowing

### **Supporting Guidance (to be read and followed alongside this document)**

This policy is based on the Department for Education's statutory guidance

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1161273/Keeping children safe in education 2023 - statutory guidance for schools and colleges.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1161273/Keeping_children_safe_in_education_2023_-_statutory_guidance_for_schools_and_colleges.pdf)

and [Working together to safeguard children 2023: statutory guidance \(publishing.service.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/1161273/Working_together_to_safeguard_children_2023_statutory_guidance_publishing.service.gov.uk), and the [Governance Handbook](#). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

- Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
- [Prevent duty guidance: England and Wales \(2023\) - GOV.UK \(www.gov.uk\)](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism

This policy also complies with our funding agreement and articles of association.

- Teachers Standards 2012
- "Safeguarding Disabled Children – Practice Guidance" - DOH, 2009

- “Guidance for Safer Working Practice for Adults who Work with Children and Young People in Education Settings” - Safer Recruitment Consortium, October 2015
- “What to do if you are worried a child is being abused” – DfE, March 2015
- KSCB document: “Safe Practice with Technology – Guidance for Adults who Work with Children and Young People” (September 2016)
- KCC Safeguarding Children and Child Protection – “Induction Leaflet Guidelines for School Staff” (September 2021)
- KCC Guidelines for “Safeguarding Record Keeping in Schools” (September 2018)
- KCC Advice notes - “Dealing with Disclosures in School” (June 2015)
- Framework for the Assessment of Children in Need and their Families (2000)
- Kent and Medway Safeguarding Children Procedures (Online, 2019)
- NPCC (National Police Chiefs’ Council) – When to call the police
- These documents can be found on Microsoft Teams (<https://teams.microsoft.com/v2/>) and in LA’s office.

#### 4. KEY RESPONSIBILITIES

- Everyone who comes into contact with children and their families has a role to play in safeguarding children. Schools and colleges form part of the wider safeguarding system for children.
- The governing body, proprietor and management committees (as appropriate) have read and will follow KCSIE 2023. Further information regarding the key strategic responsibilities of the governing body and Headteacher are identified in appendix 1.
- The school has a nominated governor for safeguarding (Mrs Dawn FOULGER). The nominated governor will take the lead role in ensuring that the school has an effective policy which interlinks with other related policies; that locally agreed procedures are in place and being followed; and that the policy and structures supporting safeguarding children are reviewed at least annually.
- The Governing Body, Headteacher and Leadership Team will ensure that the DSL(s) are properly supported in this role at a time and resource level.

##### 4.1 Designated Safeguarding Lead (DSL)

- The school has appointed a member of the leadership team (Louise ABSOLON, Senior Assistant Headteacher) as the Designated Safeguarding Lead (DSL). The DSL has the overall responsibility for the day-to-day oversight of safeguarding and child protection systems in school. The designated safeguarding lead will take **lead responsibility** for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place). This should be explicit in the role holder’s job description.
- The DSL/s will undergo appropriate and specific training to provide them with the knowledge and skills required to carry out their role. This training will be approved by and meet the standards as required by the Kent Safeguarding Children Board. The DSL’s training will be updated formally every two years but their knowledge and skills will be updated through a variety of methods (KCC eBulletin, KCC Safeguarding Newsletter, Optimus Safeguarding

Information, attendance at annual Protecting Children Conference, updates via professional organisation membership ASCL) at regular intervals, at least annually, to keep up with any developments relevant to their role.

- The school has appointed additional staff to deputise for the DSL, Julie FROST Lower School, Janice MURFET Upper School, Theresa LEE SENCO, Ben SLIGHT, Sixth Form, Elaine WILSON Headteacher, Caroline KEMP Deputy Headteacher, Robert BOYCE Assistant Headteacher. Deputy DSLs have attended appropriate training to the same level as the DSL which enables them to fulfil this role. Whilst the activities of the designated safeguarding lead may be delegated to the deputies, the ultimate lead responsibility for safeguarding and child protection remains with the designated safeguarding lead and this responsibility will not be delegated.
- It is the role of the DSL to:
  - Act as the central contact point for all staff to discuss any safeguarding concerns
  - Maintain a confidential recording system for safeguarding and child protection concerns
  - Coordinate safeguarding action for individual children
  - Liaise with other agencies and professionals in line with Working together to safeguard children
  - Ensure that locally established procedures are followed and making referrals to other agencies, including Early Help and Specialist Children's Services (SCS) as necessary
  - Represent, or ensure the school is appropriately represented at inter-agency safeguarding meetings (including Child Protection conferences)
  - Manage and monitor the school's part in Early Help / Child in Need / Child Protection plans
  - Be available during term time (during school hours) for staff in the school to discuss any safeguarding concerns
  - Ensure all staff access appropriate safeguarding training and relevant updates in line with the recommendations within KCSIE (2023)
- Further details about the role of the DSL can be found in 'Keeping Children Safe in Education' 2023, Annex C.

## **4.2 Members of staff**

- All members of staff have a responsibility to:
  - provide a safe environment in which children can learn
  - ensure all children are able to develop appropriate strategies to recognise and respond to risk and build resilience
  - identify and recognise children who may be in need of extra help, who are suffering, or are likely to suffer significant harm
  - provide help for children, where appropriate and reasonable
  - take appropriate action to prevent safeguarding concerns escalating and work with other services as needed
  - safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties
  - maintain an attitude of 'it could happen here' where safeguarding is concerned and to always act in the best interests of the child

- respond to and refer any concerns about children or other members of the community in accordance with this policy
- contribute towards, read and adhere to the school policies
- All members of staff in Mayfield Grammar School know what to do if a child tells them she/he is being abused or neglected. Members of staff know to maintain an appropriate level of confidentiality whilst at the same time liaising with relevant professionals such as the DSL and other agencies as appropriate. Members of staff know they must never promise a child that they will not tell anyone about a concern or allegation as this may ultimately not be in the best interests of the child. See appendix 4 for advice for staff on responding to safeguarding concerns. (Microsoft Teams)

The welfare and safety of children are the responsibility of all staff in school and ANY concern for a pupil's welfare MUST always be reported to the Designated Safeguarding Lead(s).

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

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan)
- has a mental health need
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from care or from home • is at risk of modern slavery, trafficking, sexual or criminal exploitation
- is at risk of being radicalised or exploited
- has a family member in prison, or is affected by parental offending
- 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 alcohol and other drugs themselves
- has returned home to their family from care
- is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child, and
- is persistently absent from education, including persistent absences for part of the school day.

### **4.3 Children and young people**

- Children and young people (pupils) have a responsibility to:
  - Contribute to the development of school safeguarding policies
  - Read and adhere to (at a level appropriate to their age and ability) the schools safeguarding policies and procedures
  - Seek help from a trusted adult if things go wrong, and support others that may be experiencing safeguarding concerns
  - Develop and take responsibility (at a level that is appropriate to their individual age, ability and vulnerabilities) for keeping themselves and others safe, including online.

### **4.4 Parents and Carers**

- Parents/carers have a responsibility to:
  - Read the relevant school/policies and procedures, encouraging their children to adhere to them, and adhering to them themselves where appropriate

- Discuss safeguarding issues with their children, support the school in their safeguarding approaches, and reinforce appropriate safe behaviours at home
- Identify changes in behaviour which could indicate that their child is at risk of harm online
- Seek help and support from the school, or other appropriate agencies, if they or their child encounters any safeguarding concern
- Contribute to the development of the school's safeguarding policies
- A statement in the school prospectus will inform parents and carers about our school's duties and responsibilities under child protection and safeguarding procedures.
- Parents can obtain a copy of the school Safeguarding and Child Protection Policy and other related policies on request and can view them via the school website [www.mgsq.kent.sch.uk](http://www.mgsq.kent.sch.uk).

## 5. LOCAL SUPPORT

- All members of staff in Mayfield Grammar School are made aware of local support available (see final page for KCC wide details)
  - **Contact details for Area Safeguarding Advisor (Education Safeguarding Team)**
    - Worrall House, 30 Kings Hill Avenue, West Malling, Kent, ME19 4AE  
03000 412445
  - **Contact details for Online Protection/e-Safety**
    - Sessions House, County Hall, Maidstone Kent ME14 1XQ  
03000 415797
  - **Contact details for the LADO**
    - Telephone: 03000 410888
    - Email: [kentchildrenslado@kent.gov.uk](mailto:kentchildrenslado@kent.gov.uk)
  - **Childrens Specialist Services**
    - Integrated Front Door: 03000 411111
    - Out of Hours Number: 03000 419191
  - **Early Help and Preventative Services**
    - [earlyhelp@kelsi.org.uk](mailto:earlyhelp@kelsi.org.uk)
    - 03000 413991
  - **Kent Police**
    - 101 (or 999 if there is an immediate risk of harm)
  - **Gravesham Police**
    - North Kent Police Station, Thames Way, Northfleet. 01622 690690
    - Gravesend Contact Point, Civic Centre, Windmill Street, Gravesend 01622 690690
  - **Early Help Gravesham**
    - 03000 413991
  - **Kent Safeguarding Children Multi-Agency Partnership (KSCMP)**
    - <https://www.kscmp.org.uk/>
    - [kscmp@kent.gov.uk](mailto:kscmp@kent.gov.uk)

## **6. RECOGNITION AND CATEGORIES OF ABUSE**

- All staff in school should be aware of the definitions and signs and symptoms of abuse. There are four categories of abuse:
  - Physical abuse
  - Sexual abuse
  - Emotional abuse
  - Neglect
- The most up to date definitions and possible indicators and signs of abuse are found in Appendix 2. Staff should also refer to Part 1 and Annex A within 'Keeping children safe in education' 2023 (see appendix 5) and 'What school and college staff should do if they have concerns about a child' page 137 KCSIE 2023.
- Members of staff are made aware that child welfare concerns may arise in many different contexts, and can vary greatly in terms of their nature and seriousness. Children may be abused in a family or in an institutional or community setting, by those known to them or by a stranger. They may be abused by an adult or adults, or another child or children. Children may be abused via the internet by their peers, family members or by unknown and in some cases unidentifiable individuals. In the case of honour-based violence, including forced marriage and female genital mutilation, children may be taken out of the country to be abused. An abused child will often experience more than one type of abuse, as well as other difficulties in their lives.
- Abuse and neglect can happen over a period of time, but can also be a one-off event. Child abuse and neglect can have major long-term impacts on all aspects of a child's health, development and well-being.
- The warning signs and symptoms of child abuse and neglect can vary from child to child. Children also develop and mature at different rates so what appears to be worrying for a younger child might be normal behaviour for an older child. Parental behaviours may also indicate child abuse or neglect, so staff should also be alert to parent-child interactions which are concerning and other parental behaviours. This could include parents who are under the influence of drugs or alcohol or if there is a sudden change in their mental health.
- By understanding the warning signs, we can respond to problems as early as possible and provide the right support and services for the child and their family. It is important to recognise that a warning sign doesn't automatically mean a child is being abused.

## **7. STAFF INDUCTION, AWARENESS AND TRAINING**

- All members of staff have been provided with a copy of part one of the "Keeping Children Safe in Education" (2023) which covers Safeguarding information. School leaders will read the entire document. School leaders and all members of staff who work directly with children will access Annex A within Keeping Children Safe in Education 2023 (Microsoft Teams). Members of staff have signed to confirm that they have read and understood Part One and Annex A (Held as part of the Single Central Register).
- The DSL will ensure that all new staff and volunteers are appropriately inducted as regards the school's internal safeguarding procedures and communication lines. A summary information sheet is available to be given to staff and volunteers to support this process. See Appendix 6.

- All staff members will receive appropriate safeguarding and child protection training (organised by the DSL) which will enable them to:
  - **Recognise** potential safeguarding and child protection concerns involving pupils and adults (colleagues, other professionals and parents/carers)
  - **Respond** appropriately to safeguarding issues and take action in line with this policy
  - **Record** concerns in line with the school policies
  - **Refer** concerns to the DSL and be able to seek support external to the school if required
- Staff will receive appropriate training to ensure they are aware of a range of safeguarding issues (see definition of safeguarding) and are aware that behaviours linked to the likes of drug taking, alcohol abuse, truanting and peer on peer abuse such as bullying and sexting can put children in danger. The staff training will also include school responsibilities, the school child protection procedures, online safety, safe working practice and external reporting mechanisms.
- Staff will receive appropriate safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring at induction. All staff members will receive regular safeguarding and child protection updates (full training every second year, update given in interim every September; via email, staff meetings, bulletin, tutor team training as needed), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.
- All members of staff will be made aware of the school's expectations regarding safe and professional practice and IT Acceptable Use Policy *which adheres to the Teacher Standards and the school's Code of Conduct (in Essentials for Staff)* and which is provided and discussed as part of the induction process.
- The school recognises the expertise which members of staff build by undertaking safeguarding training and managing safeguarding concerns on a daily basis. Opportunity is therefore provided for all staff to contribute to and shape safeguarding arrangements and the safeguarding.
- The DSL and Head Teacher will provide an annual report to the Governing Body detailing safeguarding training undertaken by all staff and will maintain up to date registers of who has been trained.
- Although the school has a nominated lead for the governing body (Dawn FOULGER), all members of the governing body will access appropriate safeguarding training which covers their specific strategic responsibilities on a regular basis.
- Governors will ensure that, as part of the requirement for staff to undergo regular updated safeguarding training, including online safety and the requirement to ensure children are taught about safeguarding, including online safety, that safeguarding training for staff, including online safety training, is integrated, aligned and considered as part of the whole school or college safeguarding approach and wider staff training and curriculum planning.

## 8. SAFE WORKING PRACTICE

- All members of staff are required to work within clear guidelines on Safe Working Practice / the school's Code of Conduct.
- Children may make allegations against staff in situations where they feel vulnerable or where they perceive there to be a possible risk to their welfare. As such, all staff should take care not to place themselves in a vulnerable position regarding child protection or potential allegations. For example, it is always advisable for interviews or work with individual children or parents to be conducted in view of other adults.
- Physical intervention should only be used when the child is endangering him/herself or others and such events should be recorded and signed by a witness. Staff should be aware of the school's **Behaviour Policy**, and any physical interventions must be in line with agreed policy and procedure in which appropriate training should be provided.
- Full advice and guidance can be found in **Guidance for Safer Working Practice for Adults who Work with Children and Young People in Education Settings (2019)** which can be found in the staff area of the VLE (under Staff/Safeguarding).
- Staff should be particularly aware of the professional risks associated with the use of social media and electronic communication (email, mobile phones, texting, social network sites etc.) and should familiarise themselves with advice and professional expectations outlined in **Guidance for Safer Working Practice for Adults who Work with Children and Young People in Education Settings (2019)**, the school's **Online Safety Policy** and **IT Acceptable Use Policy** and **Safe Practice with Technology – Guidance for Adults who Work with Children and Young People (2016)**

## 9. STAFF SUPERVISION AND SUPPORT

- Any member of staff affected by issues arising from concerns for children's welfare or safety can seek support from a DSL.
- All new staff including ECTs (Early Career Teachers) and support staff will receive induction training and have a mentor or co-ordinator with whom they can discuss concerns including safeguarding concerns.
- The induction process will include familiarisation with child protection responsibilities and procedures to be followed if staff have any concerns about a child's safety or welfare.
- The school will provide appropriate supervision and support for all members of staff to ensure that:
  - All staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children
  - Staff are able to create an environment where members of staff feel able to raise concerns and feel supported in their safeguarding role
  - All staff have regular reviews of their own practice to ensure they improve over time.
- The DSL will also put staff in touch with outside agencies for professional support if they so wish. Staff can also approach organisations such as their Union, the Education Support Partnership or other similar organisations directly. Further information about a range of supporting organisations can be found in appendix 5. (Microsoft Teams)

## 10. SAFER RECRUITMENT

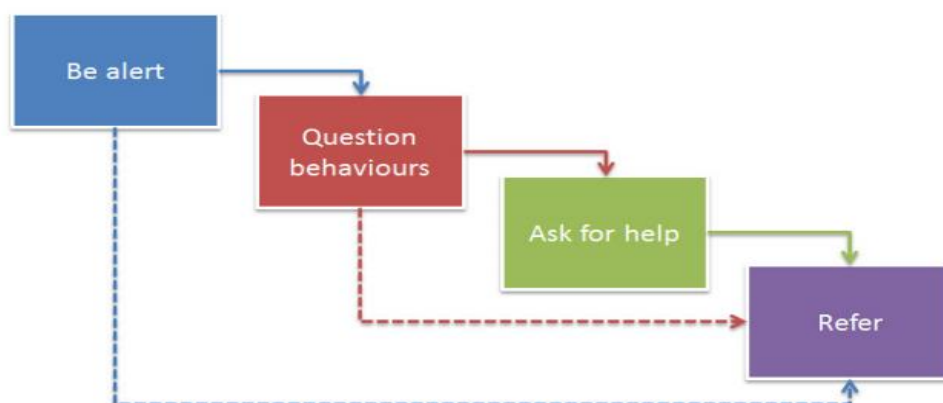
- Mayfield Grammar School is committed to ensure that all steps are taken to recruit staff and volunteers who are safe to work with our pupils/students and have their welfare and protection as the highest priority. The Governing Body and Leadership Team are responsible for ensuring that the school follows safe recruitment processes outlined within guidance, including accurate maintenance of the Single Central Record (SCR); and an application, vetting and recruitment process which places safeguarding at its centre, regardless of employee or voluntary role. We will inform shortlisted candidates that online searches will be carried out.
- The Governing Body will ensure that the Headteacher, other senior staff responsible for recruitment and one member of the Governing Body complete accredited Safer Recruitment Training in line with government requirements.
- Please see our Safer Recruitment Policy for further details.

## 11. SAFEGUARDING AND CHILD PROTECTION PROCEDURES

- Mayfield Grammar School adheres to the KSCB Safeguarding Children Procedures (Online, April 2019). The full KSCB procedures and additional guidance relating to specific safeguarding issues can be found on the KSCB website [www.kscb.org.uk](http://www.kscb.org.uk)
- Additional guidance for staff includes
  - **‘What to do if you are Worried About a Child Being Abused’ (DfE 2015)**
  - **Information Sharing advice for safeguarding practitioners (2015)**
  - **Kent and Medway Inter-Agency Threshold Criteria for Children in Need**
  - **The Framework for the Assessment of Children in Need and their Families (2020)**

These documents can be found in the staff area of the VLE.

- ‘What to do if you are worried about a child being abused’ (DfE 2015) p.12 identifies that there are four key steps for professionals to follow to help identify and respond appropriately to possible abuse and/or neglect.
- All members of staff are expected to be aware of and follow this approach:



- It may not always be appropriate to go through all four stages sequentially and if a child is in immediate danger or is at risk of harm, a referral should be made immediately to children’s social care and/or the police.

- **The role of the school in situations where there are child protection concerns is NOT to investigate but to recognise and refer.**
- It is the responsibility of the DSL to receive and collate information regarding individual children, to make immediate and on-going assessments of potential risk and to decide actions necessary (with parents / carers in most cases). This includes the need to make referrals to partner agencies and services.
  - To help with this decision s/he may choose to consult with the Area Education Safeguarding Adviser from the Education Safeguarding Team and/or the Education Safeguarding Adviser (Online Protection) for online safety concerns.
  - Advice may also be sought from the Early Help Team.
  - Issues discussed during consultations may include the urgency and gravity of the concerns for a child or young person and the extent to which parents/carers are made aware of these.
- All members of staff are made aware of the Early Help process and understand their role within it. This includes identifying emerging problems, liaising with the designated safeguarding lead, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking an early help assessment.
- If Early Help is assessed to be appropriate then the DSL will support staff members involved with the family in liaising with other agencies and submitting an Early Help Notification Form. The DSL will keep all early help cases under constant review and will give consideration to making a referral to SCS if the situation doesn't appear to be improving for the child.
- New referrals to services will be made using the agreed Kent process, using the appropriate referral forms. These will be made with reference to the Kent Interagency Threshold Criteria for Children in Need (KSCB). In situations where there are felt to be urgent or grave concerns, a telephone referral will be made prior to the form being completed and sent to the County Duty Team. Concerns for children who are already known to services will be passed to the allocated worker / Team.
- All members of staff are aware of the process for making referrals to SCS for statutory assessments under the Children Act 1985 that may follow a referral, along with the role they might be expected to play in such assessments.
- **In all but the most exceptional circumstances, parents /carers will be made aware of the concerns felt for a child or young person at the earliest possible stage. In the event of a referral to SCS being necessary, parents/carers will be informed and consent to this will be sought unless there is a valid reason not to do so.**
- In the absence of the availability of the DSL to discuss an immediate and urgent concern, staff can seek advice from the Education Safeguarding Team (Appendix 7) Microsoft Teams. If anyone other than the DSL makes a referral to external services, then they will inform the DSL as soon as possible.
- On occasion, staff may pass information about a child to the DSL, but remain anxious about action subsequently taken. Staff should feel able to clarify with the DSL further progress, so that they can reassure themselves the child is safe and their welfare is being considered.
- If following this process, the staff member remains concerned that appropriate action is not being taken then the member of staff should seek further direct consultation from a member

of the Education Safeguards Team who will be able to discuss the concern and provide further advice on appropriate action to be taken.

- If after a referral a child's situation does not appear to be improving then the DSL (or the person that made the referral) will press for reconsideration to ensure that the school's concerns have been addressed and, most importantly, that the child's situation improves. Professional disagreements (escalation) will be responded to in line with the KSCB procedures and DSLs may request support via the Education Safeguarding Team.

## 12. RECORD KEEPING

- Staff will record any welfare concern that they have about a child on the school's safeguarding site, MyConcern, and pass any written notes without delay to the DSL. Records will be completed as soon as possible after the incident/event, using the child's words and will be signed and dated and uploaded.
- All safeguarding concerns, discussions and decisions made and the reasons for those decisions will be recorded on MyConcern. If members of staff are in any doubt about recording requirements then they will discuss their concerns with a DSL.
- Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.
- Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school.
- If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main pupil file. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.
- Any written paperwork is held by Lead DSL (Louise Absolon) in locked Policy cabinet.
- Safeguarding records are kept for individual children and separate from all other records relating to the child in school. They are retained centrally and securely by the DSL and are shared with staff on a 'need to know' basis only.
- The Headteacher will be kept informed of any significant issues.
- All safeguarding records will be forwarded in accordance with data protection legislation to a child's subsequent school/setting, under confidential and separate cover to the new DSL or Headteacher and a receipt of delivery will be obtained.
- Detailed guidance on Record Keeping is found in a separate document "Guidelines for Safeguarding Record Keeping in Schools". All Staff **WILL** familiarise themselves with the responsibilities as outlined in this document. [www.kelsi.org.uk/support-for-children-and-young-people/child-protection-and-safeguarding/safeguarding-policies-and-guidance](http://www.kelsi.org.uk/support-for-children-and-young-people/child-protection-and-safeguarding/safeguarding-policies-and-guidance)  
This can be found on the staff area of the VLE.
- The School has transferred record keeping to **MyConcern**. DSL's have been trained and this has been rolled out to all staff.

### **13. WORKING WITH OTHER AGENCIES**

- Mayfield Grammar School recognises and is committed to its responsibility to work with other professionals and agencies both to ensure children's needs are met and to protect them from harm. We will endeavour to identify those children and families who may benefit from the intervention and support of external professionals and will seek to enable referrals, in discussion with parents/carers as appropriate.
- Schools are not the investigating agency when there are child protection concerns and the school will therefore pass all relevant cases to the statutory agencies. We will however contribute to the investigation and assessment processes as required, and recognise that a crucial part of this may be in supporting the child while these take place.
- Safeguarding partners and child death review partner arrangements are now in place. Locally, the three safeguarding partners (the local authority; a clinical commission group for an area within the local authority; and the chief officer of police for an area, any part of which falls within the local authority area) will make arrangements to work together with appropriate relevant agencies to safeguard and promote the welfare of local children, including identifying and responding to their needs.
- Mayfield Grammar School understands its role in the three safeguarding partner arrangements. Governing bodies, proprietors and our senior leadership team, especially the designated safeguarding lead, will make themselves aware of and follow local arrangements.
- Mayfield Grammar School understands that the Kent Safeguarding Children multi-agency partnership (KSCMP) have a shared and equal duty to work together to safeguard and promote the welfare of children. To fulfil this role they must set out how they will work together and with any relevant agencies. KSCMP has set out which organisations and agencies they will be working with and the expectations placed on any agencies and organisations by the arrangements. Find at: <https://www.kscmp.org.uk/>
- KSCMP will make arrangements to allow all schools in the local area to be fully engaged, involved and included in safeguarding arrangements. It is expected that locally KSCMP will name schools and colleges as relevant agencies and will reach their own conclusions on the best way to achieve the active engagement with individual institutions in a meaningful way.
- Mayfield Grammar School recognises the importance of multi-agency working and will ensure that staff are enabled to attend relevant safeguarding meetings, including Child Protection Conferences, Core Groups, Strategy Meetings, Child in Need meetings and Early Help Teams around the Child / Family.
- The School Leadership Team and DSL will work to establish strong and co-operative relationships with relevant professionals in other agencies.

### **14. CONFIDENTIALITY AND INFORMATION SHARING**

- Mayfield Grammar School recognises that all matters relating to child protection are confidential. The Headteacher or DSL will only disclose information about a pupil to other members of staff on a need-to-know basis, and in compliance with GDPR and Safeguarding regulations.

- Mayfield Grammar School will ensure that relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the GDPR. This includes:

Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including in relation to their educational outcomes.

The school and governing body recognises the importance of information sharing between practitioners and local agencies and arrangements are in place that set out clearly the processes and principles for sharing information within the school and with local authority children's social care, the safeguarding partners and other organisations, agencies, and practitioners as required.

School staff should be proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to the local authority children's social care.

The Governing body ensures relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the UK GDPR.

**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.**

Further details on information sharing can be found:

- in Chapter one of [Working Together to Safeguard Children](#), which includes a myth-busting guide to information sharing
- at [Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers](#). The seven golden rules for sharing information will be especially useful
- at [The Information Commissioner's Office \(ICO\)](#), which includes information about your obligations and how to comply, including protecting personal information, and providing access to official information
- in [Data protection: toolkit for schools](#) - Guidance to support schools with data protection activity, including compliance with the UK GDPR.

When children leave the school, the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term to allow the new school or college to have support in place for when the child arrives. The designated safeguarding lead should ensure secure transit, and confirmation of receipt should be obtained. For schools, this should be transferred separately from the main pupil file. Receiving schools and colleges should ensure key staff such as designated safeguarding leads and special educational needs co-ordinators (SENCO's) or the named persons with oversight for special educational needs and disability (SEND) in a college, are aware as required.

In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any information with the new school or college in advance of a child

leaving. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse, or those who are currently receiving support through the 'Channel' programme and can have that support in place for when the child arrives. More information on the child protection file is in Annex C. (KCSIE 2023)

## **15. OPPORTUNITIES TO TEACH SAFEGUARDING**

Mayfield Grammar School, ensures that children are taught about how to keep themselves and others safe, including online. Effective education will be tailored to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs or disabilities.

The school has zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment. There is a clear set of values and standards, upheld and demonstrated throughout all aspects of school life. These are underpinned by the school's behaviour policy and pastoral support system, as well as by a planned programme of evidence-based RSHE delivered in regularly timetabled lessons and reinforced throughout the whole curriculum. The programme is fully inclusive and developed to be age and stage of development appropriate (especially when considering the needs of children with SEND and other vulnerabilities). This program tackles at an age-appropriate stages issues such as:

- healthy and respectful relationships
- boundaries and consent
- stereotyping, prejudice and equality
- body confidence and self-esteem
- how to recognise an abusive relationship, including coercive and controlling behaviour
- the concepts of, and laws relating to- sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so called honour-based violence such as forced marriage and Female Genital Mutilation (FGM), and how to access support, and
- what constitutes sexual harassment and sexual violence and why these are always unacceptable.

The following resources, plus many more listed in Annex B (KCSIE 2022), may also help teach about safeguarding:

- DfE advice for schools: [teaching online safety in schools](#)
- UK Council for Internet Safety (UKCIS)<sup>1</sup> guidance: [Education for a connected world](#)
- UKCIS guidance: [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)
- The UKCIS [external visitors guidance](#) will help schools and colleges to ensure the maximum impact of any online safety sessions delivered by external visitors
- National Crime Agency's CEOP education programme: [Thinkuknow](#)
- Public Health England: [Every Mind Matters](#)

- [Harmful online challenges and online hoaxes](#) - this includes advice on preparing for any online challenges and hoaxes, sharing information with parents and carers and where to get help and support.

Mayfield Grammar School is aware that whilst appropriate filters and monitoring systems are in place, we are careful to ensure that 'over blocking' does not lead to unreasonable restrictions as to what children can be taught with regard to online teaching and safeguarding.

**The Data Protection Act 2018 and 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.**

Further details on information sharing can be found:

- in Chapter one of [Working Together to Safeguard Children](#), which includes a myth-busting guide to information sharing
- at [Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers](#). The seven golden rules for sharing information will be especially useful
- at [The Information Commissioner's Office \(ICO\)](#), which includes ICO GDPR FAQs and guidance from the department
- in [Data protection: toolkit for schools](#) - Guidance to support schools with data protection activity, including compliance with the GDPR.
- All members of staff must be aware that whilst they have duties to keep any information about children, families and colleagues which they have access to as a result of their role confidential, they also have a professional responsibility to share information with other agencies in order to safeguard children. All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing. Further advice on responding to disclosures can be found in appendix 4.
- All staff receive GDPR training on an annual basis, using DfE guidance on information sharing.
- If the school is made aware of any safeguarding concerns which they feel need to be shared with the wider community (including other local schools) then advice will be sought from the Education Safeguarding team to ensure that the integrity of any subsequent investigations are maintained and that all members of the community are safeguarded.

## 16. ONLINE SAFETY

It is essential that children are safeguarded from potentially harmful and inappropriate online material. The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk:

**content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.

**contact:** being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

**conduct:** online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and nonconsensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying, and

**commerce:** - risks such as online gambling, inappropriate advertising, phishing and or financial scams.

## **Online safety policy**

Online safety is a running and interrelated theme whilst devising and implementing our whole school approach to safeguarding and related policies and procedures. This will include how online safety is reflected in all relevant policies and how online safety is considered whilst planning the curriculum and any teacher training. This is the role and responsibility of the designated safeguarding lead, Mrs L Absolon, and the Deputy Designated Safeguarding Lead responsible for Online Safety, Mr R Boyce. Parental engagement will be sought when it is appropriate to do so.

Online safety is reflected in the child protection policy and the consideration of the 4Cs (above) will provide the basis of an effective online policy. Mayfield Grammar School has a clear policy on the use of mobile and smart technology. This reflects the fact many children have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G). This access means some children, whilst at school, sexually harass, bully, and control others via their mobile and smart technology, share indecent images consensually and non-consensually (often via large chat groups) and view and share pornography and other harmful content. This is carefully managed on our premises and reflected in our mobile and smart technology policy and child protection policy.

## **Remote education**

Mayfield Grammar School uses advice to help keep pupils, students and staff safe whilst learning remotely, [safeguarding in schools colleges and other providers](#) and [safeguarding and remote education](#). The NSPCC also provide helpful advice - [Undertaking remote teaching safely](#)

Communications are used to reinforce the importance of children being safe online. Parents and carers are aware of what their children are being asked to do online, including the sites they will be asked to access and are clear who from the school (if anyone) their child is going to be interacting with online.

## **Filters and monitoring**

Mayfield Grammar School will do all it can to limit children's exposure to the above risks from the school's IT system. As part of this process, we ensure that Mayfield Grammar School has appropriate filters and monitoring systems in place and regularly reviews their effectiveness. The leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified. Mayfield Grammar School considers the age range of their children, the number of children, how often they access the IT system and the proportionality of costs versus safeguarding risks.

To support school to meet this duty, the Department for Education has published [filtering and monitoring standards](#) which set out that the School will:

- identify and assign roles and responsibilities to manage filtering and monitoring systems.
- review filtering and monitoring provision at least annually.
- block harmful and inappropriate content without unreasonably impacting teaching and learning.

- have effective monitoring strategies in place that meet their safeguarding needs

The Governing body will review the standards and discuss with IT staff and service providers what more needs to be done to support schools and colleges in meeting this standard.

The UK Safer Internet Centre has published guidance as to what “appropriate” filtering and monitoring might look like: [UK Safer Internet Centre: appropriate filtering and monitoring](#). South West Grid for Learning ([swgfl.org.uk](#)) have created a [tool](#) to check whether a school or college’s filtering provider is signed up to relevant lists (CSA content, Sexual Content, Terrorist content Your Internet Connection Blocks Child Abuse & Terrorist Content).

Mayfield Grammar School is committed to checking the active web filter regularly, and reviewing any practice which is identified for improvement.

### **Information security and access management**

Mayfield Grammar School is directly responsible for ensuring that there is the appropriate level of security protection procedures in place in order to safeguard our systems, staff and learners and will review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies. Guidance on e-security is available from the [National Education Network](#). Broader guidance on cyber security including considerations for governors can be found at [Cyber security training for school staff - NCSC.GOV.UK](#).

### **Reviewing online safety**

Technology, and risks and harms related to it, evolve, and change rapidly. Mayfield Grammar School carries out an annual review of its approach to online safety, supported by an annual risk assessment that considers and reflects the risks their children face. Mayfield Grammar School engages with the [360 safe](#) self-review tool.

UKCIS has published Online safety in schools and colleges: [Questions from the governing board](#). The questions can be used to gain a basic understanding of the current approach to keeping children safe online; learn how to improve this approach where appropriate; and find out about tools which can be used to improve the approach. It has also published an [Online Safety Audit Tool](#) which helps mentors of trainee teachers and newly qualified teachers induct mentees and provide ongoing support, development and monitoring.

When reviewing online safety provision, the UKCIS [external visitors guidance](#) highlights a range of resources which can support educational settings to develop a whole school approach towards online safety.

## **17. COMPLAINTS**

- The school has a **Complaints Procedure** available to parents, pupils/students and members of staff who wish to report concerns. This can be found on the School VLE and website.
- All reported concerns will be taken seriously and considered within the relevant and appropriate process. Anything that constitutes an allegation against a member of staff or volunteer will be dealt with under the specific **Procedures for Managing Allegations Against Staff policy**. This can be found on the school VLE.

## 18.THE MANAGEMENT OF SAFEGUARDING

### Legislation and the law

The governing body has a strategic leadership responsibility for safeguarding arrangements and **must** ensure that they comply with their duties under legislation. They **must** have regard to this guidance, ensuring policies, procedures and training is effective and complies with the law at all times. The Headteacher will ensure that the policies and procedures, adopted by their governing bodies (particularly those concerning referrals of cases of suspected abuse and neglect), are understood, and followed by all staff.

The Governing body ensures that **all** governors and trustees receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective and support the delivery of a robust whole school approach to safeguarding. Their training will be regularly updated.

Governing bodies and proprietors should be aware of their obligations under the Human Rights Act 1998 , the Equality Act 2010, (including the Public Sector Equality Duty<sup>2</sup>), and their local multi-agency safeguarding arrangements.

### Human Rights Act

The Human Rights Act 1998 (HRA) sets out the fundamental rights and freedoms that everyone in the UK is entitled to and contains the Articles and protocols of the European Convention on Human Rights (ECHR) (the Convention) that are deemed to apply in the UK. It compels public organisations to respect and protect an individual's human rights when they make individual decisions about them.

Under the HRA, it is unlawful for schools to act in a way that is incompatible with the Convention. The specific convention rights applying to schools are:

- Article 3: the right to freedom from inhuman and degrading treatment (an absolute right)
- Article 8: the right to respect for private and family life (a qualified right) includes a duty to protect individuals' physical and psychological integrity
- Article 14: requires that all of the rights and freedoms set out in the Act must be protected and applied without discrimination,<sup>3</sup> and
- Protocol 1, Article 2: protects the right to education.

Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach any or all of these rights, depending on the nature of the conduct and the circumstances. Further information (including on absolute and qualified rights) can be found at [Human Rights | Equality and Human Rights Commission \(equalityhumanrights.com\)](https://www.equalityhumanrights.com).

### Equality Act 2010

Mayfield Grammar School has obligations under the Equality Act 2010 (the Equality Act).

According to the Equality Act, a school **must** not unlawfully discriminate against pupils because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics).

We carefully consider how we are supporting our pupils and students with regard to particular protected characteristics - including disability, sex, sexual orientation, gender reassignment and race.

### **Public Sector Equality Duty**

The Public Sector Equality Duty (PSED) is found in the Equality Act. Compliance with the PSED is a legal requirement.

Mayfield Grammar School pays due regard to the need to eliminate unlawful discrimination, harassment and victimisation (and any other conduct prohibited under the Equality Act), to advance equality of opportunity and foster good relations between those who share a relevant protected characteristic and those who do not. Whenever significant decisions are being made or policies developed, specific consideration is given to the equality implications of these.

### **Whole school and college approach to safeguarding**

The governing body ensures there is a whole school approach to safeguarding. This means involving everyone in the school, and ensuring that safeguarding, and child protection are at the forefront and underpin all relevant aspects of process and policy development. Ultimately, all systems, processes and policies operate with the **best interests** of the child at their heart.

Where there is a safeguarding concern, Mayfield Grammar School ensures the child's wishes and feelings are taken into account when determining what action to take and what services to provide.

Safeguarding policies and procedures are transparent, clear, and easy to understand for staff, pupils, students, parents, and carers. Systems are in place, and are well promoted, easily understood and easily accessible for children to confidently report, any form of abuse or neglect, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

## **19. ALLEGATIONS AGAINST MEMBERS OF STAFF AND VOLUNTEERS**

Mayfield Grammar School recognises that it is possible for teaching staff, support staff and volunteers to behave in a way that might cause harm to children and takes seriously any allegation received. Such allegations should be referred immediately to the Headteacher who will first contact the Local Authority Designated Officer (LADO) to agree further action to be taken in respect of the child and staff member. In the event of allegations of abuse being made against the headteacher then staff are advised that allegations should be reported directly to the Chair of governors.

There are two sections covering the two levels of allegation/concern:

1. Allegations that may meet the harms threshold.
2. Allegation/concerns that do not meet the harms threshold – referred to for the purposes of this guidance as 'low level concerns'.

These procedures are consistent with local safeguarding procedures and practice guidance.

### **Section one: Allegations that may meet the harms threshold**

This part of the policy is about managing cases of allegations that might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in a school or college. This guidance will be followed where it is alleged that anyone working in

the school or a college that provides education for children under 18 years of age, including supply teachers, volunteers and contractors 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 he or she may pose a risk of harm to children; and/or**
- **behaved or may have behaved in a way that indicates they may not be suitable to work with children.**

The last bullet point above includes behaviour that may have happened outside of school or college, that might make an individual unsuitable to work with children, this is known as transferable risk.

Where appropriate an assessment of transferable risk to children with whom the person works should be undertaken. If in doubt we will seek advice from the Local Authority Designated Officer (LADO).

Allegations should be reported to the Headteacher and that this should be done without delay. A “case manager” will lead any investigation. This will be either the headteacher or, where the headteacher is the subject of an allegation, the chair of governors.

### **The initial response to an allegation**

Where the school identify a child has been harmed, that there may be an immediate risk of harm to a child or if the situation is an emergency, we will contact children’s social care and as appropriate the police immediately.

There are two aspects to consider when an allegation is made:

1. **Looking after the welfare of the child** - the designated safeguarding lead is responsible for ensuring that the child is not at risk and referring cases of suspected abuse to the local authority children’s social care as described in Part one of this guidance.
2. **Investigating and supporting the person subject to the allegation** - the case manager should discuss with the LADO, the nature, content and context of the allegation, and agree a course of action.

When dealing with allegations, schools and colleges should:

- apply common sense and judgement;
- deal with allegations quickly, fairly and consistently; and
- provide effective protection for the child and support the person subject to the allegation.

Mayfield Grammar School understands the local authority arrangements for managing allegations, including the contact details and what information the LADO will require when an allegation is made. Before contacting the LADO, we will conduct basic enquiries in line with local procedures to establish the facts to help them determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation. For example:

- was the individual in the school or college at the time of the allegations?
- did the individual, or could they have, come into contact with the child?

- are there any witnesses? and,
- was there any CCTV footage?
- The School is familiar with what initial information the LADO will require. This information can be found in local policy and procedural guidance provided by the LADO service.

When to inform the individual of the allegation will be considered carefully on a case by case basis, with guidance as required from the LADO, and if appropriate children's social care and the police.

If there is cause to suspect a child is suffering, or is likely to suffer significant harm, a strategy discussion involving the police and/or children's social care will be convened in accordance with the statutory guidance [Working Together to Safeguard Children](#). If the allegation is about physical contact, for example restraint, the strategy discussion or initial evaluation with the LADO should take into account that teachers and other school staff are entitled to use reasonable force to control or restrain children in certain circumstances, including dealing with disruptive behaviour. Further information about the use of reasonable force can be found in Part 2 of KCSIE 2022.

Where the case manager is concerned about the welfare of other children in the community or the member of staff's family, they should discuss these concerns with the designated safeguarding lead and make a risk assessment of the situation. It may be necessary for the designated safeguarding lead to make a referral to children's social care.

Where it is clear that an investigation by the police or children's social care is unnecessary, or the strategy discussion or initial assessment decides that is the case, the LADO should discuss the next steps with the case manager.

### **No further action**

Where the initial discussion leads to no further action, the case manager and the LADO should:

- record the decision and justification for it; and,
- agree on what information should be put in writing to the individual concerned and by whom.

### **Further enquiries**

- Where further enquiries are required to enable a decision about how to proceed, the LADO and case manager should discuss how and by whom the investigation will be undertaken. In straightforward cases, the investigation should normally be undertaken by a senior member of the school's staff.
- Where there is a lack of appropriate resources within the school, It is important that local authorities ensure that schools in that area have access to an affordable facility for independent investigation where that is appropriate. Academies and independent schools should also ensure they secure the services of a person who is independent of the school.
- The case manager should monitor the progress of cases to ensure that they are dealt with as quickly as possible in a thorough and fair process. Reviews should be conducted at fortnightly or monthly intervals, depending on the complexity of the case.
- Wherever possible, the first review should take place no later than four weeks after the initial assessment. Dates for subsequent reviews, ideally at fortnightly intervals, should be set at the review meeting if the investigation continues. The LADO will provide advice and guidance to schools and colleges when considering allegations against adults working with children. The LADO's role is not to investigate the allegation, but to ensure that an appropriate investigation

is carried out, whether that is by the police, children's social care, the school, or a combination of these.

### **Supply teachers and all contracted staff**

In some circumstances Mayfield Grammar School may have to consider an allegation against an individual not directly employed by them, where its disciplinary procedures do not fully apply because agencies will have their own policies and procedures; for example, supply teachers or contracted staff provided by an employment agency or business.

- Whilst Mayfield Grammar School is not the employer of supply teachers, we will ensure allegations are dealt with properly. In no circumstances will we decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome.
- Agencies should be fully involved and co-operate with any enquiries from the LADO, police and/or children's social care. Mayfield Grammar School will usually take the lead because agencies do not have direct access to children or other school or college staff, so they will not be able to collect the facts when an allegation is made, nor do they have all the relevant information required by the LADO as part of the referral process. Supply teachers, whilst not employed by the school or college, are under the supervision, direction and control of the school when working in the school. They should be advised to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting which is often arranged by the LADO should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency or agencies are taken into account by the school during the investigation.
- When using a supply agency, we will inform the agency of its process for managing allegations but also take account of the agency's policies and their duty to refer to the DBS as personnel suppliers. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

### **Governors**

If an allegation is made against a governor, the school will follow its own procedure. Where an allegation is substantiated, we will follow the procedures to consider removing them from office. The Headteacher will determine an appropriate route of investigation including external agencies and Chair of Governors/Governor responsible for Safeguarding.

### **Organisations or Individuals using school premises**

If Mayfield Grammar School receives an allegation relating to an incident that happened when an individual or organisation was using the school premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities), as with any safeguarding allegation, Mayfield Grammar School will follow our safeguarding policies and procedures, including informing the LADO.

### **Suspension**

- Suspension should not be an automatic response when an allegation is reported. All options to avoid suspension should be considered prior to taking that step. The case manager **must** consider carefully whether the circumstances warrant suspension from contact with children at the school or until the allegation is resolved. It should be considered only in cases where there is cause to suspect a child or other children at the school or college is/are at risk of

harm, or the case is so serious that it might be grounds for dismissal. If in doubt, the case manager should seek views from their personnel adviser and the LADO, as well as the police and children's social care where they have been involved.

- Where the school is made aware that the Secretary of State has made an interim prohibition order, in respect of an individual who works at a school or sixth form college, we will take immediate action to ensure the individual does not carry out work in contravention of the order. This means that pending the findings of the TRA investigation, the individual **must not** carry out teaching work. We have clear policies on pay arrangements whilst the person is suspended or where there is an interim prohibition order in place.
- In many cases, an inquiry can be resolved quickly and without the need for suspension. We will decide on whether the individual should continue to work at the school based on consultation with the LADO who will provide relevant information they have received from the police or children's social care on whether they have any objections to the member of staff continuing to work during the investigation of the case. The case manager should be as inventive as possible to avoid suspension.

Based on advice from the school's HR provider and/or a risk analysis drawn up with the LADO, the following alternatives should be considered by the case manager before suspending a member of staff:

- 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 to alternative work in the school so the individual does not have unsupervised access to children;
- moving the child or children to classes where they will not come into contact with the member of staff, but this decision should only be made if it is in the best interest of the child or children concerned and takes accounts of their views. It should be made making it clear that this is not a punishment and parents have been consulted; or
- temporarily redeploying the member of staff to another role in a different location, for example to an alternative school or college or where available, work for the local authority or academy trust.

These alternatives allow time for an informed decision regarding the suspension, this will, however, depend upon the nature of the allegation. The case manager should consider the potential permanent professional reputational damage to employees that can result from suspension where an allegation is later found to be unfounded, unsubstantiated, malicious, or false.

If immediate suspension is considered necessary, the case manager should record the rationale and justification for such a course of action. This should also include what alternatives to suspension have been considered and why they were rejected.

Where it has been deemed appropriate to suspend the person, written confirmation should be given within one working day, giving as much detail as appropriate for the reasons for the suspension. It is not acceptable for an employer to leave a person who has been suspended without any support. The person should be informed at the point of their suspension who their named contact is within the organisation and provided with their contact details.

Children's social care or the police may give their view to the LADO but they cannot require the case manager to suspend a member of staff or a volunteer, although the case manager should give appropriate weight to their views. The power to suspend is vested in the governing body or proprietor who are the employers. However, where a strategy discussion, or initial assessment, concludes that there should be enquiries by the children's social care, and/or an investigation by the police, the LADO should canvass police and children's social care for views about whether the accused member of staff should be suspended from contact with children. Police involvement does not make it mandatory to suspend a member of staff; this decision should be taken on a case-by-case basis having undertaken a risk assessment about whether the person poses a risk of harm to children.

## **Supporting those involved**

### **Duty of care**

- The welfare of a child is paramount (how children should be protected and supported is set out throughout this guidance) and this will be the prime concern in terms of investigating an allegation against a person in a position of trust. However, when an allegation or safeguarding concern is being investigated it is likely to be a very stressful experience for the adult subject of the investigation, and potentially for their family members. It is important that an employer offers appropriate welfare support at such a time and recognises the sensitivity of the situation. Information is confidential and should not ordinarily be shared with other staff or with children or parents who are not directly involved in the investigation.

Employers have a duty of care to their employees. They should:

- manage and minimise the stress caused by the allegation;
- inform the individual as soon as possible, explaining the likely course of action, guided by the LADO, and the police where necessary;
- advise the individual to contact their trade union representative, or a colleague for support;
- appoint a named representative to keep the person informed about progress of the case;
- provide access to counselling or medical advice where appropriate. For staff in schools maintained by the local authority this may include support via the local authority's occupational health arrangements; and
- not prevent social contact with work colleagues and friends, when staff are suspended, unless there is evidence to suggest this may prejudice the gathering of evidence.

Parents or carers of the child or children involved should be:

- formally told about the allegation as soon as possible. The case manager should consult the LADO and where involved children's social care and/or the police on what information can be disclosed;
- kept informed about the progress of the case, only in relation to their child no information can be shared regarding the staff member; and
- made aware of the requirement to maintain confidentiality and unwanted publicity about any allegations made against teachers in schools whilst investigations are in progress as set out in section 141F of the Education Act 2002 (see paragraphs 372-380).

## Confidentiality and Information sharing

- In an allegations management meeting or during the initial assessment of the case, the agencies involved should share all relevant information they have about the person who is the subject of the allegation, and about the alleged victim, see paragraphs 105-113 in Part two about information sharing
- Where the police are involved, wherever possible the school or college should ask the police to obtain consent from the individuals involved to share their statements and evidence for use in the employer's disciplinary process. This should be done as their investigation proceeds and will enable the police to share relevant information without delaying the conclusion of their investigation or any court case.
- Children's social care should adopt a similar procedure when making enquiries to determine whether the child or children named in the allegation are in need of protection or services, so that any information obtained in the course of those enquiries which is relevant to a disciplinary case can be passed to the employer without delay.
- The school **must** make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. The Education Act 2011 amended the Education Act 2002, to introduce reporting restrictions. These provisions made it an offence (except in the limited circumstance expressly permitted by the legislation), for any person to publish any material that may lead to the identification of a teacher in a school who has been accused by, or on behalf of, a child from the same school (where that identification would identify the teacher as the subject of the allegation).

The reporting restrictions apply until:

- the point that the accused person is charged with a relevant offence; or the Secretary of State or the General Teaching Council for Wales publishes information about an investigation or decision in a disciplinary case arising from the allegation.
- The reporting restrictions are disapplied if the individual to whom the restrictions apply effectively waives their right to anonymity by going public themselves or by giving their written consent for another to do so or if a court lifts the reporting restrictions in response to a request to do so.
- The legislation prevents the "publication" of material by any person that may lead to the identification of the teacher who is the subject of the allegation. "Publication" includes "any speech, writing, relevant programme or other communication in whatever form, which is addressed to the public at large or any section of the public." This means that a parent who, for example, published details of the allegation on a social networking site would be in breach of the reporting restrictions (if what was published could lead to the identification of the teacher by members of the public). In circumstances where schools need to make parents aware about an allegation, they should make parents and others aware that there are restrictions on publishing information.
- In accordance with the Authorised Professional Practice published by the College of Policing in May 2017, the police will not normally provide any information to the press or media that might identify an individual who is under investigation, unless and until the person is charged with a criminal offence. In exceptional cases where the police wish to depart from that rule, for example an appeal to trace a suspect, they **must** apply to a magistrates' court to request that reporting restrictions be lifted.

The case manager should take advice from the LADO, police and children's social care to agree the following:

- who needs to know and exactly what information can be shared;
- how to manage speculation, leaks and gossip;
- what, if any, information can be reasonably given to the wider community to reduce speculation; and
- how to manage press interest if, and when, it should arise.

### **Allegation outcomes**

The definitions that should be used when schools and colleges determine the outcome of an allegation are set out below:

- **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 cause harm to the person 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. The term, therefore, does not imply guilt or innocence; or,
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made.

Ultimately the options open to the school depend on the nature and circumstances of the allegations and the evidence and information available. This will range from taking no further action, to dismissal or a decision not to use the person's services in future. Suspension should not be the default position, an individual should be suspended only if there is no reasonable alternative.

If the allegation is substantiated and:

- the person is dismissed; resigns, or otherwise ceases to provide his or her services; or
- the employer ceases to use the person's services.

The employer has a legal duty to make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

In the case of a member of teaching staff at a school or sixth form college, the case manager **must** consider whether to refer the matter to the TRA to consider prohibiting the individual from teaching.

There is a legal requirement for employers to make a referral to the DBS where they consider an individual has engaged in conduct that harmed (or is likely to harm) a child; or if a person otherwise poses a risk of harm to a child.

### **Following a criminal investigation or a prosecution**

**The police should inform the LADO and the employer immediately when:**

- a criminal investigation and any subsequent trial is complete,
- it is decided to close an investigation without charge, or
- it is decided not to continue to prosecute after the person has been charged.

In those circumstances, during the joint assessment meeting the LADO should discuss with the case manager whether any further action, including disciplinary action, is appropriate and, if so, how to proceed. The information provided by the police and/or children's social care should also inform that decision. The options will depend on the circumstances of the case and the consideration should take into account the result of the police investigation or the trial, as well as the different standard of proof required in disciplinary and criminal proceedings.

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

If an allegation is determined to be unsubstantiated, unfounded, false or malicious, the LADO and the case manager should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate.

If a report is determined to be unsubstantiated, unfounded, false or malicious, the designated safeguarding lead should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the school should consider whether any disciplinary action is appropriate against the individual who made it as per the behaviour policy (<https://msgsg.fireflycloud.net/policies>).

### **Returning to work**

Where it is decided on the conclusion of a case that a person who has been suspended can return to work, the case manager should consider how best to facilitate that. Guidance and advice are usually provided via HR or the LADO. Most people will benefit from some help and support to return to work after a stressful experience. Depending on the individual's circumstances, a phased return and/or the provision of a mentor to provide assistance and support in the short term may be appropriate. The case manager should also consider how the person's contact with the child or children who made the allegation can best be managed if they are still attending the school or college.

### **Managing the situation and exit arrangements**

#### **Resignations and 'settlement agreements'**

- 'Settlement agreements' (sometimes referred to as compromise agreements), by which a person agrees to resign if the employer agrees not to pursue disciplinary action and both parties agree a form of words to be used in any future reference, should **not** be used, where there are allegations that indicate the person is a risk or poses a risk of harm to children or deemed not suitable to work with children. Such an agreement will not prevent a thorough police and/or school investigation where that is appropriate.
- The school will not cease their investigations if the person leaves, resigns or ceases to provide their services. It is important that every effort is made to reach a conclusion in all cases of allegations bearing on the safety or welfare of children, including any in which the person concerned refuses to cooperate.
- Wherever possible, the accused should be given full opportunity to answer the allegation and make representations about it. The process of recording the allegation and any supporting evidence and reaching a judgement about whether it can be substantiated or otherwise on the basis of all the information available, should continue even if the accused does not

cooperate. It may be difficult to reach a conclusion in those circumstances, and it may not be possible to apply any disciplinary sanctions if a person's period of notice expires before the process is complete, but it is important to reach and record an outcome wherever possible. The person concerned should be notified of the conclusion of the allegations and sanctions that might be posed.

- Other than where allegations are false, malicious, unsubstantiated, or unfounded, the outcome should be made clear when providing references to prospective employers. This is particularly important where the person moves into another position involving working with children.
- It is not appropriate to reach a settlement/compromise agreement if the person subject to the allegation resigns or their services cease to be used. However, in limited circumstances schools and colleges sometimes use settlement agreements to end the employment relationship on agreed terms, but not where there is an allegation that the individual poses a risk to children.
- Where a settlement/compromise agreement is used, we will not let it prevent the employer from:
  - fulfilling their legal duty to refer cases to the DBS where the referral criteria are met. Non-compliance of this duty is a criminal offence; or
  - providing a reference to potential employers when requested; or
  - considering whether to make a referral to the Teaching Regulations Agency where the criteria are met.

## **Record keeping**

Details of allegations following an investigation that are found to have been malicious or false should be removed from personnel records, unless the individual gives their consent for retention of the information. However, for all other allegations, it is important that the following information is kept on the file of the person accused:

- a clear and comprehensive summary of the allegation;
- details of how the allegation was followed up and resolved;
- a note of any action taken, and decisions reached and the outcome as categorised above;
- a copy provided to the person concerned, where agreed by children's social care or the police; and,
- a declaration on whether the information will be referred to in any future reference.
- The purpose of the record is to enable accurate information to be given in response to any future request for a reference. It will provide clarification in cases where future DBS checks reveal information from the police about an allegation that did not result in a criminal conviction and it will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation re-surfaces after a period of time.
- The School will preserve records which contain information about allegations of sexual abuse for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry (further information can be found on the [IICSA website](#)). All other records should be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer.

- The Information Commissioner has published guidance on employment records in its Employment Practices Code and supplementary guidance, which provides some practical advice on record retention. This can be found on the ICO website: [here](#).

## References

Cases in which an allegation was found to be false, unfounded, unsubstantiated or malicious should not be included in employer references. Any repeated concerns or allegations which have all been found to be false, unfounded, unsubstantiated or malicious should also not be included in any reference. Substantiated allegations should be included in references, provided that the information is factual and does not include opinions.

## Learning lessons

Throughout the process in handling allegations and at conclusion of a case in which an allegation is substantiated, the LADO should review the circumstances of the case with the case manager to determine whether there are any improvements to be made to the school's or college's procedures to help prevent similar events in the future. This should include issues arising from any decision to suspend the member of staff, the duration of the suspension and whether or not suspension was justified. Lessons should also be learnt from the use of suspension when the individual is subsequently reinstated. The LADO and case manager should consider how future investigations of a similar nature could be carried out without suspending the individual.

For all other cases the case manager should consider the facts and determine whether any improvements can be made.

## Non-recent allegations

Where an adult makes an allegation to the school that they were abused as a child, the individual should be advised to report the allegation to the police. Non recent allegations made by a child, should be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations. The LADO will coordinate with children social care and the police. Abuse can be reported no matter how long ago it happened.

## Section two: Concerns that do not meet the harm threshold

Governing bodies and proprietors should have policies and processes to deal with concerns (including allegations) which do not meet the harm threshold set out above. Concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken. It is important that schools and colleges have appropriate policies and processes in place to manage and record any such concerns and take appropriate action to safeguard children.

## Low level concerns

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

Creating a culture in which **all** concerns about adults are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. This should encourage an open and

transparent culture; enable the school to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the school or college are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of our institution.

### **What is a low level concern?**

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold set out. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that:

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

Examples of such behaviour could include, but are not limited to:

- being over 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; or,
- using inappropriate sexualised, intimidating or offensive language.

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

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

### **Staff code of conduct and safeguarding policies**

We will set out our low-level concerns policy within our staff code of conduct and safeguarding policies. The purpose of the policy is to create and embed a culture of openness, trust and transparency in which our values and expected behaviour which are set out in the staff code of conduct are constantly lived, monitored and reinforced by all staff.

We will achieve the purpose of our low-level concerns policy 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 safeguarding concerns with the designated safeguarding lead (or a deputy);
- 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; and,
- helping identify any weakness in the school or colleges safeguarding system.

### **Sharing low-level concerns**

- Low-level concerns about a member of staff should be reported to the designated safeguarding lead (or deputy). Where a low-level concern is raised about the designated safeguarding lead, it should be shared with the headteacher or principal.
- Staff are encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.
- Where a low-level concern relates to a person employed by a supply agency or a contractor to work in a school or college, that concern should be shared with the designated safeguarding lead (or deputy), and/or headteacher, and recorded in accordance with the school's low-level concern/staff code of conduct policy and their employer notified about the concern, so that any potential patterns of inappropriate behaviour can be identified.

### **Recording low-level concerns**

- All low-level concerns will be recorded in writing by the designated safeguarding lead (or deputy). The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.
- Records will be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR)
- Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the school or college should decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it should be referred to the LADO. Consideration should also be given to whether there are wider cultural issues within the school or college that enabled the behaviour to occur and where appropriate policies could be revised or extra training delivered to minimise the risk of it happening again.
- We will retain information at least until the individual leaves our employment.

### **References**

We will only provide substantiated safeguarding allegations in references. Low level concerns will not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) should not be referred to in a reference. However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it should be referred to in a reference.

## Responding to low-level concerns

Concerns about safeguarding should be reported to the designated safeguarding lead or their deputy. If the concern has been raised via a third party, the designated safeguarding lead should collect as much evidence as possible by speaking:

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

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

A good low level concerns policy will simply be a reflection and extension of the school's or college's wider staff behaviour policy/code of conduct.

More detailed guidance and case studies on low-level concerns can be found in [Developing and implementing a low-level concerns policy \(farrer.co.uk\)](http://farrer.co.uk).

## 20. ALLEGATIONS AGAINST PUPILS – Child-on-child abuse

1. **All** staff should recognise that children are capable of abusing other children (including online). **All** staff should be clear about their school's or college's policy and procedures with regard to child-on-child abuse.
2. Mayfield Grammar School ensures that our child protection policy includes:
  - procedures to minimise the risk of child-on-child abuse
  - the systems in place (and they should be well promoted, easily understood and easily accessible) for children to confidently report abuse, knowing their concerns will be treated seriously
  - how allegations of child-on-child abuse will be recorded, investigated, and dealt with
  - clear processes as to how victims, perpetrators and any other children affected by child-on-child abuse will be supported
  - a recognition that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and is simply not being reported
  - a statement which makes clear there should be a zero-tolerance approach to abuse, and it should never be passed off as “banter”, “just having a laugh”, “part of growing up” or “boys being boys” as this can lead to a culture of unacceptable behaviours and an unsafe environment for children
  - recognition that it is more likely that girls will be victims and boys' perpetrators, but that all child-on-child abuse is unacceptable and will be taken seriously, and
  - the different forms child-on-child abuse can take, such as:
    - bullying (including cyberbullying, prejudice-based and discriminatory bullying)
    - abuse in intimate personal relationships between children (also known as teenage relationship abuse)

- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- sexual violence and sexual harassment. The Department provides [Searching Screening and Confiscation Advice](#) for schools. The UKCIS Education Group has published [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) which outlines how to respond to an incident of nude and/or semi-nude being shared ○ causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- upskirting (which is a criminal offence), which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and
- initiation/hazing type violence and rituals.
- Mayfield Grammar School recognises that children are capable of abusing their peers. Child-on-child abuse can take many forms, including (but not limited to) bullying, cyberbullying, hazing (initiation type violence), sexualised bullying and violence, sexting. The school is mindful that some potential issues may be affected by the gender, age, ability, race, ethnicity, culture, religion and sexual identity of those involved.
- Mayfield Grammar School believes that abuse is abuse and it will never be tolerated, dismissed or minimised. The school will ensure that appropriate curriculum time is dedicated to enable children to develop an awareness and understanding of abusive behaviour and to ensure that children recognise warning signs and levels of support both within the school and externally (such as Kent Police, ChildLine etc.). Further information can be found, but not exclusively, in relevant policies such as Online Use Policy, Behaviour Policy.
- Pupils who have been experienced child-on-child abuse will be supported by:
  - Offering them an immediate opportunity to discuss the experience with a member of staff of their choice
  - Being advised to keep a record of concerns as evidence and discussions regarding how to respond to concerns and build resilience, if appropriate.
  - Providing reassurance and continuous support
  - Working with the wider community and local/national organisations to provide further or specialist advice and guidance
- Pupils who are alleged to have abused other pupils will be helped by:
  - Discussing what happened, establishing the specific concern and the need for behaviour to change
  - Informing parents/carers to help change the attitude and behaviour of the child
  - Providing appropriate education and support
  - Sanctioning them in line with school behaviour/discipline policy. This may include official warnings, detentions, removal of privileges (including denial of online access), fixed-term and permanent exclusions.
  - Speaking with police or other local services (such as early help or children's specialist services) as appropriate

- Further information about the school's response to allegations of abuse against pupils can be located, but not exclusively, in relevant policies such as *the IT Acceptable Use Policy*, Behaviour Policy
- Mayfield Grammar School is aware of and will follow the KSCB procedures ([www.kscb.org.uk](http://www.kscb.org.uk)) for supporting children who are at risk of harm as a result of their own behaviour.

## **21. THE USE OF 'REASONABLE FORCE'**

There are circumstances when it is appropriate for staff to use reasonable force to safeguard children. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a child needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of the classroom.

The decision on whether or not to use reasonable force to control or restrain a child is down to the professional judgement of the staff concerned within the context of the law and should always depend on individual circumstances.

When using reasonable force in response to risks presented by incidents involving children with SEND, mental health problems or with medical conditions, staff should in considering the risks carefully recognise the additional vulnerability of these groups. They should also consider their duties under the Equality Act 2010 in relation to making reasonable adjustments and their Public Sector Equality Duty. By planning positive and proactive behaviour support, for instance through drawing up individual behaviour plans for more vulnerable children, and agreeing them with parents and carers, we can reduce the occurrence of challenging behaviour and the need to use reasonable force.

- Departmental advice for schools is available at [Use of Reasonable Force in Schools](#)
- HM Government guidance [Reducing the need for restraint and restrictive intervention](#) sets out how to support children and young people with learning disabilities, autistic spectrum conditions and mental health difficulties who are at risk of restrictive intervention in special education settings, however all schools and colleges may find the information helpful.

## **22. SAFEGUARDING CHILDREN WITH SPECIAL EDUCATIONAL NEEDS AND DISABILITIES**

- Mayfield Grammar School acknowledges that children with special educational needs and disabilities (SEND) can face additional safeguarding challenges as they may have an impaired capacity to resist or avoid abuse. They may have speech, language and communication needs which may make it difficult to tell others what is happening.
- Mayfield Grammar School will ensure that children with SEND and disabilities, specifically those with communication difficulties will be supported to ensure that their voice is heard and acted upon.

- Members of staff are encouraged to be aware that children with SEND and disabilities can be disproportionately impacted by safeguarding concerns such as bullying. All members of staff will be encouraged to appropriately explore possible indicators of abuse such as behaviour/mood change or injuries and not to assume that they are related to the child's disability and be aware that children with SEN and disabilities may not always outwardly display indicators of abuse.

## **23. CHILDREN POTENTIALLY AT GREATER RISK OF HARM**

Whilst **all** children should be protected, it is important to note that some groups of children, are potentially at greater risk of harm than others. The list below, is not exhaustive, but highlights some of those groups.

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

1. Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse and/or neglect and/or complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour, and mental health.
2. Local authorities should share the fact a child has a social worker, and the designated safeguarding lead should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This should be considered as a matter of routine. There are clear powers to share this information under existing duties on both local authorities and schools and colleges to safeguard and promote the welfare of children.
3. Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or to a child missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).
4. Findings from the Children in Need review, '[Improving the educational outcomes of Children in Need of help and protection](#)' contains further information; the conclusion of the review, '[Help, protection, education](#)' provides detail about the action the government is taking to support this.

### **Children who are absent from education**

Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. It is important the school's response to persistently absent pupils and children missing education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community. Further information and support, includes:

- 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.
- Information regarding school's duties regarding children missing education, including information schools **must** provide to the local authority when removing a child from the school roll at standard and non-standard transition points, can be found in the department's statutory guidance: [Children Missing Education](#).
- further information for colleges providing education for a child of compulsory school age can be found in: [Full-time-Enrolment of 14 to 16 year olds in Further Education and Sixth Form Colleges](#).
- general information and advice for schools and colleges can be found in the Government's [Missing Children and Adults Strategy](#).

### **Elective Home Education (EHE)**

1. Many home educated children have an overwhelmingly positive learning experience. We would expect the parents' decision to home educate to be made with their child's best education at the heart of the decision. However, this is not the case for all, and home education can mean some children are less visible to the services that are there to keep them safe and supported in line with their needs.
2. From September 2016 [the Education \(Pupil Registration\) \(England\) Regulations 2006 were amended](#) so that all schools must inform their LA of all deletions from their admission register when a child is taken off roll.
3. Where a parent/carers has expressed their intention to remove a child from school with a view to educating at home, we will work with LAs and other key professionals to coordinate a meeting with parents/carers where possible 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.
4. If the parent/carers of a child with an education, health and care (EHC) plan has expressed their intention to educate their child at home, local authorities will need to review the plan and work closely with parents/carers
5. DfE guidance for local authorities on [Elective home education](#) sets out the role and responsibilities of LAs and their powers to engage with parents in relation to EHE.

### **Children requiring mental health support**

1. We have an important role to play in supporting the mental health and wellbeing of our pupils.
2. 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. We have clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems.
3. There is a senior mental health lead at Mayfield Grammar School (Janice Murfet).
4. Public Health England has produced a range of resources to support secondary schools to promote positive health, wellbeing and resilience among children including its guidance

[Promoting children and young people's emotional health and wellbeing](#). Its resources include social media, forming positive relationships, smoking and alcohol. See [Rise Above: Resources for School from Public Health England #esafety | The Education People](#) for links to all materials and lesson plans. The Department has also published, '[Every interaction matters](#)' a pre-recorded webinar which provides staff with a simple framework for promoting wellbeing, resilience, and mental health. This sits alongside our [Wellbeing for education recovery](#) program content, which covers issues such as bereavement, loss, anxiety, stress and trauma.

5. The Department has published advice and guidance on [Preventing and Tackling Bullying](#) (which may also be useful for colleges). The [Promoting and supporting mental health and wellbeing in schools and colleges](#) guidance sets out how schools and colleges can help prevent mental health problems by promoting resilience as part of an integrated, whole school/college approach to social and emotional wellbeing, which is tailored to the needs of their pupils and students.

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

1. The most common reason for children becoming looked after is as a result of abuse and/or neglect. Staff have the skills, knowledge and understanding to keep looked after children safe.
2. Appropriate staff have access to the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order) and the child's contact arrangements with birth parents or those with parental responsibility. Staff have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. The designated safeguarding lead has details of the child's social worker and the name of the virtual school head in the authority that looks after the child.
3. A previously looked after child potentially remains vulnerable and all staff have the skills, knowledge and understanding to keep previously looked after children safe.

### **The designated teacher**

There is a designated teacher who works with local authorities to promote the educational achievement of registered pupils who are looked after (Theresa Lee). Statutory guidance: [Designated teacher for looked-after and previously looked after children](#) contains further information on the role and responsibilities of the Designated Teacher.

### **Virtual school heads**

1. Virtual school heads manage pupil premium plus for looked after children; they receive this funding based on the latest published number of children looked after by the local authority. The designated teacher works with the virtual school head to discuss how funding can be best used to support the progress of looked after children in the school and meet the needs identified in the child's personal education plan. The designated teacher also works with the virtual school head to promote the educational achievement of previously looked after children.
2. As with designated teachers, following the commencement of sections 4 to 6 of the Children and Social Work Act 2017, virtual school heads have responsibilities towards children who have left care through adoption, special guardianship, or child arrangement orders or who were adopted from state care outside England or Wales. Their primary role for this group will be the provision of information and advice to relevant parties.

3. Statutory guidance on [Promoting the education of looked-after and previously looked-after children](#) contains further information on the roles and responsibilities of virtual school heads.
4. In addition to their statutory duties, the role of virtual school heads was extended in June 2021, to include a non-statutory responsibility for the strategic oversight of the educational attendance, attainment, and progress of children with a social worker.
5. Non-statutory guidance on [promoting the education of children with a social worker](#) contains further information on the roles and responsibilities of virtual school heads.

### **Children with special educational needs and disabilities or health issues**

1. Children with special educational needs or disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges both online and offline. The child protection policy reflects the fact that additional barriers can exist when recognising abuse and neglect in this group of children. These can include:
  - assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
  - these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
  - the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs, and
  - communication barriers and difficulties in managing or reporting these challenges.
  - cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.
2. Any reports of abuse involving children with SEND will therefore require close liaison with the designated safeguarding lead (or deputy) and the SENCO or the named person with oversight for SEND in a college.
3. Extra pastoral support and attention for these children will be available, along with ensuring any appropriate support for communication is in place.
4. Further information can be found in the Department's:
  - [SEND Code of Practice 0 to 25 years](#), and
  - [Supporting Pupils at School with Medical Conditions](#).

And from specialist organisations:

- [Mencap](#) - Represents people with learning disabilities, with specific advice and information for people who work with children and young people
- [Council for disabled children](#) - Every Local area has an information, advice and support service, providing information, advice and support to disabled children and young people, and those with SEND, and their parents.

### **Children who are lesbian, gay, bi, or trans (LGBT)**

1. The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a

child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

2. Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of staff.

## 24. CURRICULUM AND STAYING SAFE

- The Governing body ensures that children are taught about safeguarding, including online safety, and recognise that a one size fits all approach may not be appropriate for all children, and a more personalised or contextualised approach for more vulnerable children, victims of abuse and some SEND children might be needed.
- Mayfield Grammar School provides a broad and balanced curriculum and includes covering relevant issues through Relationships and Sex Education. The statutory guidance can be found here: [Statutory guidance: relationships education relationships and sex education \(RSE\) and health education](#).
- There is access to a one-stop page for teachers on GOV.UK, which can be accessed here: [Teaching about relationships sex and health](#). This includes teacher training modules on the RSHE topics and non-statutory implementation guidance. The following resources may also help staff teach about safeguarding:
  - DfE advice for schools: [teaching online safety in schools](#);
  - UK Council for Internet Safety (UKCIS) guidance: [Education for a connected world](#);
  - UKCIS guidance: [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#);
  - The UKCIS [external visitors guidance](#) will help schools and colleges to ensure the maximum impact of any online safety sessions delivered by external visitors;
  - National Crime Agency's CEOP education programme: [Thinkuknow](#);
  - Public Health England: [Rise Above](#)
- We recognise that schools play an essential role in helping children to understand and identify the parameters of what is appropriate child and adult behaviour; what is 'safe'; to recognise when they and others close to them are not safe; and how to seek advice and support when they are concerned.
- Mayfield Grammar School will use the curriculum to provide opportunities for increasing self-awareness, self-esteem, social and emotional understanding, assertiveness and decision making so that students have a range of contacts and strategies to ensure their own protection and understand the importance of protecting others, including online.
- Pupils will be educated at a level appropriate to their age and ability about a range of safeguarding concerns through personal, social, health and economic education (PSHE), tutorials (if appropriate) and through relationship and sex education (RSE). This will include, but is not limited, to bullying (including cyber bullying), radicalisation, child sexual exploitation (CSE), stranger danger, road safety, sexual abuse, neglect, gender-based violence/sexual assaults and sexting. (See PSHE overviews, assembly planner, Tutor Time Planning).

- Systems have been established to support the empowerment of children to talk to a range of staff. Children at Mayfield Grammar School will be listened to and heard; their concerns will be taken seriously and acted upon as appropriate.
- Whilst it is essential that appropriate filters and monitoring systems are in place, we are careful that “over blocking” does not lead to unreasonable restrictions as to what children can be taught with regard to online teaching and safeguarding
- Specific systems outside of expected day to day classroom interaction and support will include:
  - **Academic Tutoring**
  - **School Council**
  - **Sixth Form Prefect**
  - **Buddy and peer-mentoring systems**
  - **Peer mediation**
  - **PSHE events**
  - **Regular feedback questionnaires with groups of children**
  - **Anti-Bullying Policy**
  - **Think U Know, Childnet, NSPCC, Internet Matters, National Online Safety**
  - **Assembly**
  - **Code of Conduct**
  - **Mayfield’s Expectations**

## **25. THE USE OF SCHOOL PREMISES BY OTHER ORGANISATIONS**

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

When services or activities are provided by the governing body, under the direct supervision or management of their school staff, their arrangements for child protection will apply. However, where services or activities are provided separately by another body this is not necessarily the case. The governing body will therefore seek assurance that the provider concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place for the provider to liaise with the school on these matters where appropriate. This applies regardless of whether or not the children who attend any of these services or activities are children on the school roll. The governing body will also ensure safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement. The guidance on [Keeping children safe in out-of-school settings](#) details the safeguarding arrangements that schools and colleges should expect these providers to have in place.

## **26. SECURITY**

All members of staff have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may come to light. We operate within a whole-school community ethos and welcome comments from pupils/students, parents and others about areas that may need improvement as well as what we are doing well.

Appropriate checks will be undertaken in respect of visitors and volunteers coming into school as outlined within guidance. Visitors will be expected to sign in and out via the office visitors log and to display a visitor's badge whilst on school site. Any individual who is not known or identifiable should be challenged for clarification and reassurance.

The school will not accept the behaviour of any individual (parent or other) that threatens school security or leads others (child or adult) to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse access for that individual to the school site.

Date agreed: November 2016

Updated: June 2018, December 2019, April 2020, September 2020  
September 2021, September 2022 September 2023

## Appendix 1: Responsibilities of the Governing Body and the Headteacher

### Legislation and the law

Governors have a strategic leadership responsibility for the school's safeguarding arrangements and **must** ensure that they comply with their duties under legislation. They **must** have regard to KCSIE 2023, ensuring policies, procedures and training in this school are effective and comply with the law at all times.

The Governing body has a senior board level (or equivalent) lead to take **leadership** responsibility for their school's or college's safeguarding arrangements. This is Dawn Foulger.

The Headteacher will ensure that the policies and procedures, adopted by the governing body (particularly those concerning referrals of cases of suspected abuse and neglect), are understood, and followed by all staff.

### Whole school and college approach to safeguarding

The Governing Body will facilitate a whole school approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. Ultimately, all systems, processes and policies should operate with the best interests of the child at their heart.

Where there is a safeguarding concern, the governing body will ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems are in place, and they should be well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

### Safeguarding policies and procedures

The Governing body will ensure there are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare.

These policies should include individual schools and colleges having:

- an **effective child protection policy** which:
  - reflects the whole school/college approach to child-on-child abuse
  - reflects reporting systems as set out at paragraph
  - describe procedures which are in accordance with government guidance;
  - refers to locally agreed multi-agency safeguarding arrangements put in place by the safeguarding partners;
  - includes policies as reflected elsewhere in Part two of KCSIE and is reviewed annually and updated if needed, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt; and o is available publicly either via the school or college website or by other means.
- a **behaviour policy**, which includes measures to prevent bullying (including cyberbullying, prejudice-based and discriminatory bullying)

- a **Staff Code of Conduct** which includes low-level concerns, allegations against staff and whistleblowing, plus acceptable use of technologies (including the use of mobile devices), staff/pupil relationships and communications including the use of social media.
- **appropriate safeguarding arrangements** in place to respond to children who go missing from education, particularly on repeat occasions.

The above is not intended to be an exhaustive list. These policies and procedures, along with Part one (or Annex A if appropriate) of this guidance and information regarding the role and identity of the designated safeguarding lead (and deputies), should be provided to all staff on induction.

Governing bodies and proprietors should take a proportionate risk-based approach to the level of information that is provided to temporary staff, volunteers and contractors.

In addition, governing bodies and proprietors should ensure:

- **child protection files** are maintained as set out in Annex C
- **appropriate safer recruitment policies** in accordance with Part three of this guidance are in place, embedded and effective and,
- where reasonably possible, schools and colleges hold **more than one emergency contact number** for each pupil or student. This goes beyond the legal minimum.<sup>4</sup> It is good practice to give the school or college additional options to make contact with a responsible adult when a child missing education is also identified as a welfare and/or safeguarding concern. Further information for schools can be found in the department's [School Attendance Guidance](#).

#### **The Headteacher has the responsibility to ensure:**

- That the child protection policy and procedures are implemented and followed by all staff
- That sufficient time and resources are allocated to enable the DSL (and any appropriately trained deputies) to carry out their roles effectively, including the assessment of pupils and the attendance at strategy discussions and other necessary meetings
- That all members of staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the school's whistle blowing procedures
- That child's safety and welfare is addressed through the curriculum.

## Appendix 2: Categories of Abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.

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

Emotional abuse may involve:

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

**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.

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

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

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

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

## **Appendix 3: Specific Safeguarding Issues**

### **(See Annex B of Keeping Children Safe in Education 2023)**

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

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers.

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff.

It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: [www.actionagainstabduction.org](http://www.actionagainstabduction.org) and [www.clevernevergoes.org](http://www.clevernevergoes.org).

#### **B) Children and the court system**

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children [5-11-year olds](#) and [12-17 year olds](#).

The guides explain each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online [child arrangements information tool](#) with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

#### **C) Children absent/missing from education**

All staff should be aware that children being absent from, particularly repeatedly and/or for prolonged periods, and children missing education can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect such as sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, so-called 'honour'-based abuse or risk of forced marriage. Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. It is important that staff are aware of their school's or college's unauthorised absence procedures and children missing education procedures.

Mayfield Grammar School recognises that 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. Mayfield Grammar School is aware that a child going missing from education is a potential indicator of abuse or neglect.

Mayfield Grammar School has a procedure in place for responding to unauthorised absence and for dealing with children that go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of their going missing in future. For further information, please access the school's policy and procedures regarding **attendance** and **inclusion**.

- Local authorities have a duty to identify children of compulsory school age who are missing education
- LA must be informed of pupils who fail to attend school regularly, or who have been absent without the school's permission for a continuous period of 10 school days

KCC policy states the first ten days of unauthorised absence should be investigated by the school in line with the school's attendance policy. After 10 days of continuous non-attendance where:

- The child is not attending a new school and/or
- The child has emigrated and/or
- The child's whereabouts are unknown

The school should notify KCC.

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

We know that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation.

In some cases the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator.

Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim.

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

Some of the following can be indicators of both child criminal and sexual exploitation where children:

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

Children who have been exploited will need additional support to help keep them in education.

Child Sexual Exploitation (CSE) can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

Some additional specific indicators that may be present in CSE are children who:

- have older boyfriends or girlfriends; and
- suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

Further information on signs of a child's involvement in sexual exploitation is available in Home Office guidance: [Child sexual exploitation: guide for practitioners](#)

## **Operation Willow**

### **SAY SOMETHING IF YOU SEE SOMETHING**

[cse.team.kent.and.medway@kent.pnn.police.uk](mailto:cse.team.kent.and.medway@kent.pnn.police.uk)

[www.kscb.org.uk/guidance/sexual-abuse-and-exploitation](http://www.kscb.org.uk/guidance/sexual-abuse-and-exploitation)

## **E) Child-on-child abuse**

**All** staff should be aware that children can abuse other children (often referred to as child-on-child abuse), and that it can happen both inside and outside of school or college and online. **All** staff should be clear as to the school's or college's policy and procedures with regard to child-on-child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

**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).

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

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

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

## **G) Children potentially at greater risk of harm**

Children who need a social worker (Child in Need and Child Protection Plans).

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity

and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.

Local authorities should share the fact a child has a social worker, and the designated safeguarding lead should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This should be considered as a matter of routine. There are clear powers to share this information under existing duties on both local authorities and schools and colleges to safeguard and promote the welfare of children.

Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

Findings from the Children in Need review, ['Improving the educational outcomes of Children in Need of help and protection'](#) contains further information; the conclusion of the review, ['Help, protection, education'](#) sets out action Government is taking to support this.

## **H) County lines**

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line". This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children's homes and care homes.

Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing and are subsequently found in areas away from their home;
- have been the victim or perpetrator of serious violence (e.g. knife crime);
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection;
- are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity;
- owe a 'debt bond' to their exploiters;
- have their bank accounts used to facilitate drug dealing.

Further information on the signs of a child's involvement in county lines is available in guidance published by the [Home Office](#).

### **Linked to County Lines: Gangs – serious violent crimes**

A gang is usually considered to be a group of people who spend time in public places that

- see themselves (and are seen by others) as a noticeable group.
- engage in a range of criminal activity and violence.

They may also have any or all of the following features

- identify with or lay a claim over territory,
- are in conflict with other, similar gangs

People often assume gangs are a city or urban problem. The truth is that gangs are present everywhere from major urban areas to suburbs and rural communities.

A worrying trend has emerged over the past few years, which has seen sophisticated street gangs from London using Kent as a base to expand their dealing empire.

### **Reasons for getting involved in a gang can include:**

- Building a sense of identity/family
- Need for food/money
- Personal safety/desire for protection
- Peer pressure
- Family history/tradition
- It is “cool”
- Excitement

### **What might concern me?**

- Shows interest in talking to or hanging out with known gang members.
- Acquires anew nickname or moniker
- Drastic change in appearance – hair style, clothing, accessories with distinctive designs and colour combinations.
- Shows a change in attitude towards friends, family and authority figures.
- Obtains large amounts of cash and possessions with no explanation.
- Develops obsession with the gangster lifestyle such as music and films
- Carrying weapons.
- Involvement in criminal activity (shoplifting, fights, graffiti etc).

Further information on the signs of a child's involvement in county lines is available in guidance published by the [Home Office](#).

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

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

Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern

## J) Cybercrime

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

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

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

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

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

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

## K) Domestic abuse

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

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

will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

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

Young people can also experience domestic abuse within their own intimate relationships. This form of peer on peer abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support. The Act's provisions, including the new definition, will be commenced over the coming months.

### ***Operation Encompass***

[Operation Encompass](#) operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs. Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or schools should make a referral to children's social care if they are concerned about a child's welfare. More information about the scheme and how schools can become involved is available on the Operation Encompass website.

### ***National Domestic Abuse Helpline***

Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked.

Additional advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

- [NSPCC- UK domestic-abuse Signs Symptoms Effects](#)
- [Refuge what is domestic violence/effects of domestic violence on children](#)
- [Safelives: young people and domestic abuse.](#)
- [Domestic abuse: specialist sources of support - GOV.UK \(www.gov.uk\)](#) (includes information for adult victims, young people facing abuse in their own relationships and parents experiencing child to parent violence/abuse)
- [Home : Operation Encompass](#) (includes information for schools on the impact of domestic abuse on children)

## **L) So-called ‘honour’-based abuse (including Female Genital Mutilation and Forced Marriage)**

So-called ‘honour’-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving ‘honour’ often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

### ***Actions***

If staff have a concern regarding a child who might be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding lead (or deputy). As appropriate, the designated safeguarding lead (or deputy) will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children’s social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on **teachers** that requires a different approach (see following section).

## **M) FGM**

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

### ***FGM mandatory reporting duty for teachers***

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon **teachers**, along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases may face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should **not** be examining pupils or students, but the same definition of what is meant by “to discover that an act of FGM appears to have been carried out” is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at: [Mandatory reporting of female genital mutilation procedural information](#).

Teachers **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has good reason not to, they should still consider and discuss any such case with the school’s or college’s designated safeguarding lead (or deputy) and involve children’s social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures. The following is a useful summary of the FGM mandatory reporting duty: [FGM Fact Sheet](#).

Further information can be found in the [Multi-agency statutory guidance on female genital mutilation](#) and the [FGM resource pack](#) particularly section 13.

## **N) Forced marriage**

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

The Forced Marriage Unit (FMU) has created: Multi-agency practice guidelines: handling cases of forced marriage (pages 75-80 of which focus on the role of schools and colleges) and, Multi-agency statutory guidance for dealing with forced marriage, which can both be found at [The right to choose: government guidance on forced marriage - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/guidance/the-right-to-choose-government-guidance-on-forced-marriage) School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email [fm@fcdo.gov.uk](mailto:fm@fcdo.gov.uk).

In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

## **O) Homelessness**

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

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the new duties: [Homeless Reduction Act Factsheets](#). The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

In most cases school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's social care will be the lead agency for these children and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. The Department and the Ministry of Housing, Communities and Local Government have published joint statutory guidance on the provision of accommodation for 16 and 17 year olds who may be homeless and/or require accommodation: [here](#).

## P) Mental Health

- All staff should be aware that mental health problems can, in some cases be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well-placed to observe children day-to-day and identify those whose behaviour suggests they may be experiencing a mental health problem or be at risk of developing one.
- Where children have suffered abuse or neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood adolescence and into adulthood. It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour and education.
- If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following our safeguarding and child protection policy and speaking to a DSL.
- Staff can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies. More information can be found in the [mental health and behaviour in schools guidance](#). Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among young people. See [Rise Above](#) for links to all materials and lesson plans.
- The [Link Programme](#) training for senior mental health leads, will be available to all state funded schools and colleges by 2025, to help introduce or develop their whole school or college approach to mental health.
- The Department has published advice and guidance on [Preventing and Tackling Bullying, Mental Health and Behaviour in Schools](#)). The [Mental Health and Behaviour in Schools guidance](#) sets out how schools and colleges can help prevent mental health problems by promoting resilience as part of an integrated, whole school approach to social and emotional wellbeing, which is tailored to the needs of their pupils.
- The senior mental health lead in the school will be a member of, or be supported by the senior leadership team.
- We have access to senior mental health leads training and Janice MURFET is our Senior Mental Health Lead.
- The school supports the Public Health England range of resources to support secondary schools to promote positive health, wellbeing and resilience among children including its guidance Promoting children and young people's emotional health and wellbeing. Its resources include social media, forming positive relationships, smoking and alcohol. See [Rise Above](#) for links to all materials and lesson plans. The Department has also published, '[Every interaction matters](#)', a pre-recorded webinar which provides staff with a simple framework for promoting wellbeing, resilience, and mental health. This sits alongside the [Wellbeing for education recovery](#) program content, which covers issues such as bereavement, loss, anxiety, stress and trauma.

## Q) Modern Slavery and the National Referral Mechanism

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

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

## R) Preventing radicalisation

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools' or colleges' safeguarding approach.

- **Extremism** is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- **Terrorism** is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat **must** be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. 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 the designated safeguarding lead (or deputy) making a Prevent referral.

The school's or college's designated safeguarding lead (and any deputies) should be aware of local procedures for making a Prevent referral.

## The Prevent duty

All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty.

The Prevent duty should be seen as part of schools' and colleges' wider safeguarding obligations. Designated safeguarding leads and other senior leaders in schools should familiarise themselves with the revised [Prevent duty guidance: for England and Wales](#), especially paragraphs 57-76, which are specifically concerned with schools (and also covers childcare). Designated safeguarding leads and other senior leaders in colleges should familiar themselves with the [Prevent duty guidance: for further education institutions in England and Wales](#). The guidance is

set out in terms of four general themes: risk assessment, working in partnership, staff training, and IT policies.

## **Channel**

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages.

The designated safeguarding lead should consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse or those who are currently receiving support through the 'Channel' programme, and have that support in place for when the child arrives.

Statutory guidance on Channel is available at: [Channel guidance](#).

### **Additional support**

The Department has published further advice for schools on the [Prevent duty](#). The advice is intended to complement the Prevent guidance and signposts to other sources of advice and support.

The Home Office has developed three e-learning modules:

- [Prevent awareness e-learning](#) offers an introduction to the Prevent duty.
- [Prevent referrals e-learning](#) supports staff to make Prevent referrals that are **robust, informed** and with **good intention**.
- [Channel awareness e-learning](#) is aimed at staff who may be asked to contribute to or sit on a multi-agency Channel panel.

[Educate Against Hate](#), is a government website designed to support school teachers and leaders to help them safeguard their students from radicalisation and extremism. The platform provides free information and resources to help school staff identify and address the risks, as well as build resilience to radicalisation.

For advice specific to further education, the Education and Training Foundation (ETF) hosts the [Prevent for FE and Training](#). This hosts a range of free, sector specific resources to support further education settings comply with the Prevent duty. This includes the Prevent Awareness e-learning, which offers an introduction to the duty, and the Prevent Referral e-learning, which is designed to support staff to make robust, informed and proportionate referrals.

The ETF Online Learning environment provides online training modules for practitioners, leaders and managers, support staff and governors/Board members outlining their roles and responsibilities under the duty.

## **Spot the Signs**

As teachers we are required to be aware of and spot the signs of radicalisation in our students. There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology.

- Susceptibility to indoctrination
- Social networks involvement in extremism
- Being at a transitional time of life
- Need for identity meaning and belonging
- Being influenced or controlled by a group
- Opportunistic involvement
- Feelings of grievance and injustice
- Feeling under threat
- Relevant mental health issues
- A desire for status
- A desire for excitement and adventure
- A need to dominate and control others

## **Serious Violence**

There are a number of indicators, which may signal children are at risk from, or are involved with, serious violent crime. These may include:

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

The likelihood of involvement in serious violence may be increased by factors such as:

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

A fuller list of risk factors can be found in the Home Office's [Serious Violence Strategy](#).

Professionals should also be aware that violence can often peak in the hours just before or just after school, when pupils are travelling to and from school. These times can be particularly risky for young people involved in serious violence.

Advice for schools and colleges is provided in the Home Office's [Criminal exploitation of children and vulnerable adults: county lines](#) guidance. The [Youth Endowment Fund \(YEF\) Toolkit](#) sets out the evidence for what works in preventing young people from becoming involved in violence.

Home Office funded Violence Reduction Units (VRU) operate in the 18 police force areas across England and Wales that have the highest volumes of serious violence, as measured by hospital admissions for injury with a sharp object. A list of these locations can be found [here](#). As the strategic co-ordinators for local violence prevention, each VRU is mandated to include at least one local education representative within their Core Membership group, which is responsible for setting the direction for VRU activity. Schools and educational partners within these areas are encouraged to reach out to their local VRU, either directly or via their education Core Member, to better ingrain

partnership working to tackle serious violence across local areas and ensure a joined up approach to young people across the risk spectrum.

## **S) Sexting**

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

If you are made aware of an incident involving sexting (also known as 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must **not**:

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

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

### **Initial review meeting**

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

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

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

- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- What the DSL knows about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent

- The imagery involves sexual acts and any pupil in the imagery is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of the imagery (for example, the young person is presenting as suicidal or self-harming)

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

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

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

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

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

### **Informing parents**

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

### **Referring to the police**

If it is necessary to refer an incident to the police, this will be done through

### **Recording incidents**

All sexting incidents and the decisions made in responding to them will be recorded on My Concern

### **Curriculum coverage**

Pupils are taught about the issues surrounding sexting as part of our PSHE education and computing programmes. Teaching covers the following in relation to sexting:

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive
- Issues of legality
- The risk of damage to people's feelings and reputation

Pupils also learn the strategies and skills needed to manage:

- Specific requests or pressure to provide (or forward) such images
- The receipt of such images

This policy on sexting is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

## Child-on-child sexual violence and sexual harassment (Part 5 of KCSIE)

### Context

1. Sexual violence and sexual harassment can occur between two or more children of any age and sex, from primary through to secondary stage and into college. It can occur also through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face-to-face (both physically and verbally) and are never acceptable. Mayfield Grammar School is aware of the importance of:
  - making clear that there is a **zero-tolerance** approach to sexual violence and sexual harassment, that it is never acceptable, and it will not be tolerated. It should **never** be passed off as “banter”, “just having a laugh”, “a part of growing up” or “boys being boys”. Failure to do so can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it.
  - recognising, acknowledging, and understanding the scale of harassment and abuse and that even if there are no reports it does not mean it is not happening, it may be the case that it is just not being reported.
  - challenging physical behaviour (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.
2. Children who are victims of sexual violence and sexual harassment wherever it happens, may 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 or college.
3. Whilst **any** report of sexual violence or sexual harassment should be taken seriously, staff should be aware it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys. Children with special educational needs and disabilities (SEND) are also three times more likely to be abused than their peers.
4. Ultimately, it is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe.

### Sexual violence

Mayfield Grammar School is aware of sexual violence and the fact children can, and sometimes do, abuse other children in this way and that it **can happen both inside and outside of school**. When referring to sexual violence in this policy, we do so in the context of child-on-child sexual violence.

When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

**Rape:** A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

**Assault by Penetration:** A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

**Sexual Assault:** A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. (NOTE- Schools and colleges should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent, or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.)

**Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (NOTE – this could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

**What is consent?** Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

- a child under the age of 13 can never consent to any sexual activity
- the age of consent is 16
- sexual intercourse without consent is rape.

Further information about consent can be found here: [Rape Crisis England & Wales - Sexual consent](#)

## **Sexual harassment**

1. When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.
2. Whilst not intended to be an exhaustive list, sexual harassment can include:
  - sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names
  - sexual "jokes" or taunting
  - physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes. Schools and colleges should be considering when any of this crosses a line into sexual violence – it is important to talk to and consider the experience of the victim.
  - displaying pictures, photos or drawings of a sexual nature
  - upskirting (this is a criminal offence), and

- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
  - consensual and non-consensual sharing of nude and semi-nude images and/or videos. Taking and sharing nude photographs of U18s is a criminal offence. [UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) provides detailed advice for schools and colleges.
  - sharing of unwanted explicit content
  - sexualised online bullying
  - unwanted sexual comments and messages, including, on social media
  - sexual exploitation; coercion and threats, and
  - coercing others into sharing images of themselves or performing acts they're not comfortable with online.

3. Sexual harassment (as set out above) creates a culture that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence.

### **Harmful sexual behaviour**

Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent.

Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is "harmful sexual behaviour" (HSB). The term has been widely adopted in child protection and is used in this advice.

**HSB can occur online and/or face-to-face and can also occur simultaneously between the two.** HSB is considered in a child protection context.

When considering HSB, both ages and the stages of development of the children are critical factors. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' difference or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature.

It is effective safeguarding practice for the designated safeguarding lead (and their deputies) to have a good understanding of HSB. This aids in planning preventative education, implementing preventative measures, drafting and implementing an effective child protection policy and incorporating the approach to sexual violence and sexual harassment into the whole school.

HSB **can**, in some cases, progress on a continuum. Addressing inappropriate behaviour **can** be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Children displaying HSB have often experienced their own abuse and trauma. It is important that they are offered appropriate support.

### **Preventing abuse**

- if required, the designated safeguarding lead (or a deputy) will discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues in order to prepare the school's policies (especially the child protection policy) and responses, and

- the designated safeguarding lead (and their deputies) are confident as to what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment and are confident as to how to access this support when required. Responding to reports of sexual violence and sexual harassment

Mayfield Grammar School, Gravesend will ensure that it contributes to multi-agency working in line with statutory guidance [Working Together to Safeguard Children](#)

Ultimately, any decisions will be made on a case-by-case basis, with the designated safeguarding lead (or a deputy) taking a leading role and using their professional judgement, supported by other agencies, such as local authority children's social care and the police as required.

## Support for schools and colleges

**Local authority children's social care** and **the police** are important partners where a crime might have been committed. Referrals to the police will often be a natural progression of making a referral to local authority children's social care. The designated safeguarding lead (or a deputy) will lead the school response and will be aware of the local process for referrals to children's social care and making referrals to the police, the following resources may also be helpful:

- **National Crime Agency's CEOP Safety Centre:** The CEOP Safety Centre aims to keep children and young people safe from online sexual abuse. Online sexual abuse can be reported on their website and a report made to one of its Child Protection Advisors.
- **The NSPCC** provides a helpline for professionals at 0808 800 5000 and [help@nspcc.org.uk](mailto:help@nspcc.org.uk). The helpline provides expert advice and support for school and college staff and will be especially useful for the designated safeguarding lead (and their deputies)
- Support from **specialist sexual violence sector organisations** such as [Rape Crisis](#) or [The Survivors Trust](#)
- **The Anti-Bullying Alliance** has developed guidance for schools about [Sexual and sexist bullying](#).

**Online:** Sexual violence and sexual harassment occurring online (either in isolation or in connection with face-to-face incidents) can introduce a number of complex factors. Amongst other things, this can include widespread abuse or harm across a number of social media platforms that leads to repeat victimisation. Online concerns can be especially complicated and support is available from:

- **The UK Safer Internet Centre** provides an online safety helpline for professionals at 0344 381 4772 and [helpline@saferinternet.org.uk](mailto:helpline@saferinternet.org.uk). The helpline provides expert advice and support for school and college staff with regard to online safety issues
- **Internet Watch Foundation:** If the incident/report involves sexual images or videos that have been made and circulated online, the victim can be supported to get the images removed by the [Internet Watch Foundation](#) (IWF)
- **Childline/IWF Report Remove** is a free tool that allows children to report nude or sexual images and/or videos of themselves that they think might have been shared online
- **UKCIS Sharing nudes and semi-nudes advice:** [Advice for education settings working with children and young people](#) on responding to reports of children sharing non-consensual nude and semi-nude images and/or videos (also known as sexting and youth produced sexual imagery). Please see footnote 8 for further information

- National Crime Agency's [CEOP Education Programme](#) provides information for the children's workforce and parents and carers on protecting children and young people from online child sexual abuse.
- LGFL '[Undressed](#)' provided schools advice about how to teach young children about being tricked into getting undressed online in a fun way without scaring them or explaining the motives of sex offenders.

## The immediate response to a report

### Responding to the report

It is important to understand that children may not find it easy to tell staff about their abuse verbally. Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report, or a member of staff may overhear a conversation that suggests a child has been harmed or a child's own behaviour might indicate that something is wrong. If staff have **any** concerns about a child's welfare, they should act on them immediately rather than wait to be told.

The initial response to a report from a child is incredibly important. The response to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward.

It is essential that **all** victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of school should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

All staff are to be trained to manage a report.

Effective safeguarding practice includes:

- if possible, managing reports with two members of staff present, (preferably one of them being the designated safeguarding lead or a deputy)
- careful management and handling of reports that include an online element. Including being aware of [searching screening and confiscation](#) advice (for schools) and [UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people](#). **The key consideration is for staff not to view or forward illegal images of a child.** The highlighted advice provides more details on what to do when viewing an image is unavoidable. In some cases, it may be more appropriate to confiscate any devices to preserve any evidence and hand them to the police for inspection
- not promising confidentiality at this initial stage as it is very likely a concern will have to be shared further (for example, with the designated safeguarding lead (or a deputy) or local authority children's social care) to discuss next steps. Staff should only share the report with those people who are necessary in order to progress it. It is important that the victim understands what the next steps will be and who the report will be passed to
- recognising that a child is likely to disclose to someone they trust: this could be **anyone** on the school staff. It is important that the person to whom the child discloses recognises that

the child has placed them in a position of trust. They should be supportive and respectful of the child

- recognising that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory and so children may not be able to recall all details or timeline of abuse
- keeping in mind that certain children may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity, and/or sexual orientation
- listening carefully to the child, reflecting back, using the child's language, being non-judgemental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions – where, when, what, etc. It is important to note that whilst leading questions should be avoided, staff can ask children if they have been harmed and what the nature of that harm was
- considering the best way to make a record of the report. Best practice is to wait until the end of the report and immediately write up a thorough summary. This allows the staff member to devote their full attention to the child and to listen to what they are saying. It may be appropriate to make notes during the report (especially if a second member of staff is present). However, if making notes, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking. Either way, **it is essential a written record is made on MyConcern.**
- only recording the facts as the child presents them. The notes should not reflect the personal opinion of the note taker. Notes of such reports could become part of a statutory assessment by local authority children's social care and/or part of a criminal investigation, and
- informing the designated safeguarding lead (or a deputy), as soon as practically possible, if the designated safeguarding lead (or a deputy) is not involved in the initial report.

## **Considering confidentiality and anonymity**

### **Confidentiality**

Staff taking a report should never promise confidentiality as it is very likely that it will be in the best interests of the victim to seek advice and guidance from others in order to provide support and engage appropriate agencies.

Mayfield Grammar School, Gravesend will only engage staff and agencies who are required to support the children involved and/or be involved in any investigation.

The victim may ask the school not to tell anyone about the sexual violence or sexual harassment. There are no easy or definitive answers when a victim makes this request. If the victim does not give consent to share information, staff may still lawfully share it, if there is another legal basis under the UK GDPR that applies. For example, the public task basis may apply, where the overall purpose is to perform a public interest task or exercise official authority, and the task or authority has a clear basis in law. Advice should be sought from the designated safeguarding lead (or a deputy), who should consider the following:

- parents or carers should normally be informed (unless this would put the victim at greater risk)

- the basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care, and
- rape, assault by penetration and sexual assaults are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of referring to the police remains. The police will take a welfare, rather than a criminal justice approach, in these cases.

Ultimately, the designated safeguarding lead (or a deputy) will have to balance the victim's wishes against their duty to protect the victim and other children.

If the designated safeguarding lead (or a deputy) decide to go ahead and make a referral to local authority children's social care and/or a report to the police against the victim's wishes, this should be handled extremely carefully, the reasons will be explained to the victim and appropriate specialist support will be offered.

Additional information on confidentiality and information sharing is available at [Safeguarding Practitioners Information Sharing Advice](#) and [NSPCC: Information sharing and confidentiality for practitioners](#).

### **Anonymity**

Where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system, Mayfield Grammar School, Gravesend will be aware of anonymity, witness support, and the criminal process in general so that support can be offered and appropriate actions followed. Relevant information can be found in: [CPS: Safeguarding Children as Victims and Witnesses](#).

As a matter of effective safeguarding practice, Mayfield Grammar School, Gravesend will do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment. Amongst other things, this will mean carefully considering, based on the nature of the report, which staff should know about the report and any support that will be put in place for the children involved.

Mayfield Grammar School, Gravesend will also consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities.

### **Risk assessment**

When there has been a report of sexual violence, the designated safeguarding lead (or a deputy) will make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment will be considered on a case-by-case basis. The risk and needs assessment for a report of sexual violence will consider:

- the victim, especially their protection and support
- whether there may have been other victims
- the alleged perpetrator(s)
- all the other children, (and, if appropriate, adult students and staff) at the school, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms, and
- The time and location of the incident, and any action required to make the location safer.

Risk assessments will be recorded (paper or electronic) and will be kept under review. At all times, the risks posed to all pupils and students will be considered and adequate measures will be put in place to protect pupils and keep them safe.

The designated safeguarding lead (or a deputy) will ensure they are engaging with local authority children's social care and specialist services as required. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required. The risk assessment is not intended to replace the detailed assessments of expert professionals. Any such professional assessments should be used to inform the approach to supporting and protecting pupils and students and updating the school risk assessment.

## **Action following a report of sexual violence and/or sexual harassment**

### **What to consider**

As set out above, sexual violence and sexual abuse can happen anywhere, and all staff working with children are advised to maintain an attitude of '**it could happen here**'. Mayfield Grammar School, Gravesend should be aware of and respond appropriately to **all** reports and concerns about sexual violence and/or sexual harassment both online and offline, including those that have happened outside of school. The designated safeguarding lead (or a deputy) is likely to have a complete safeguarding picture and be the most appropriate person to advise on the initial response. Important considerations will include:

- the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however need to be balanced with the school's duty and responsibilities to protect other children
- the nature of the alleged incident(s), including whether a crime may have been committed and/or whether HSB has been displayed
- the ages of the children involved
- the developmental stages of the children involved
- any power imbalance between the children. For example, is/are the alleged perpetrator(s) significantly older, more mature, confident and well known social standing? Does the victim have a disability or learning difficulty?
- if the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature)
- that sexual violence and sexual harassment can take place within intimate personal relationships between children
- importance of understanding intra familial harms and any necessary support for siblings following incidents
- are there ongoing risks to the victim, other children, adult students or staff, and
- other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

As always when concerned about the welfare of a child, all staff should act in the best interests of the child. In all cases, the school will follow general safeguarding principles. **Immediate** consideration will be given as to how best to support and protect the victim and the alleged perpetrator(s) (and any other children involved/impacted).

### Children sharing a classroom: Initial considerations when the report is made

Any report of sexual violence is likely to be traumatic for the victim. It is essential that all victims 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 sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

However, reports of rape and assault by penetration are likely to be especially difficult for the victim, and close proximity to the alleged perpetrator(s) is likely to be especially distressing. Whilst the school establishes the facts of the case and starts the process of liaising with local authority children's social care and the police, the alleged perpetrator(s) **should** be removed from any classes they share with the victim. The school should also **carefully** consider how best to keep the victim and alleged perpetrator(s) a reasonable distance apart on school premises (including during any before or after school-based activities) and on transport to and from the school, where appropriate. These actions are in the best interests of all children involved and should not be perceived to be a judgement on the guilt of the alleged perpetrator(s).

For other reports of sexual violence and sexual harassment, the proximity of the victim and alleged perpetrator(s) and considerations regarding shared classes, sharing school premises and school transport, should be considered immediately.

In all cases, the initial report should be carefully evaluated. The wishes of the victim, the nature of the allegations and the protection of all children in the school will be especially important when considering any immediate actions.

### Options to manage the report

It is important to consider every report on a case-by-case basis. When to inform the alleged perpetrator(s) will be a decision that should be carefully considered. Where a report is going to be made to local authority children's social care and/or the police, then, as a general rule, the designated safeguarding lead should speak to the local authority children's social care and the police and discuss next steps and how the alleged perpetrator(s) will be informed of the allegations. However, as per general safeguarding principles, this does not and should not stop the school taking immediate action to safeguard its children, where required.

There are four likely scenarios for schools and colleges to consider when managing any reports of sexual violence and/or sexual harassment. The four scenarios are:

#### 1. Manage internally

In some cases of **sexual harassment**, for example, one-off incidents, the school may take the view that the children concerned are not in need of early help or that referrals to statutory services are not required, and that it would be appropriate to handle the incident internally, perhaps through utilising their behaviour policy and by providing pastoral support.

Whatever the response, it will be underpinned by the principle that there is a **zero-tolerance** approach to sexual violence and sexual harassment, and it is never acceptable and will not be tolerated.

**All** concerns, discussions, decisions and reasons for decisions will be recorded (written or electronic).

#### Case study

A 12-year-old girl reported to the head of year that five boys in her friendship group were playing a game, which involved daring each other to use increasingly graphic sexually explicit language, describing what they would like to do to her. She was very upset but did not want to get anyone into trouble or everyone to know about it. She just wanted them to stop. She explained this to her head of year. The head of year explained to her that what she had experienced was extremely serious and reassured her that her reaction was completely understandable. He also explained that he would pass the report to the designated safeguarding lead to ensure records were updated. He explained he would be following the school's behaviour policy and would speak to the boys involved and their parents, making it clear that what they were doing was sexual bullying and harassment and taken extremely seriously. The girl's parents were contacted and given the opportunity to discuss the action the school planned to take.

Result: the boys were removed from the classroom and reprimanded with their parents present. It was made clear that the behaviour was unacceptable, and they received a punishment in line with the school's behaviour policy. They were also warned about the more severe consequences that would arise if the harassment continued.

## 2. Early help

In line with managing internally, Mayfield Grammar School, Gravesend may decide that the children involved do not require referral to statutory services but may benefit from early help.

Early help means providing support as soon as a problem emerges, at any point in a child's life. Providing early help is more effective in promoting the welfare of children than reacting later. Early help can be particularly useful to address non-violent HSB and may prevent escalation of sexual violence.

Mayfield Grammar School, Gravesend, as a relevant agency, should be part of discussions with statutory safeguarding partners to agree the levels for the different types of assessment and services to be commissioned and delivered, as part of the local arrangements. Safeguarding partners should publish a local threshold document which includes the process for the local early help assessment and the type and level of early help services to be provided, and designated safeguarding leads (and their deputies) will need to familiarise themselves with this document.

Early help and the option to manage a report internally do not need to be mutually exclusive: the school could manage internally and seek early help for both the victim and alleged perpetrator(s).

Whatever the response, it will be under-pinned by the principle that there is **zero-tolerance** approach to sexual violence and sexual harassment and it is never acceptable and will not be tolerated.

**All** concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).

## 3. Referrals to local authority children's social care

Where a child has been harmed, is at risk of harm, or is in immediate danger, Mayfield Grammar School, Gravesend, will make a referral to local authority children's social care.

At the point of referral to local authority children's social care, the school will generally inform parents or carers, unless there are compelling reasons not to (if informing a parent or carer is going to put the child at additional risk). Any such decision should be made with the support of local authority children's social care.

If a referral is made, local authority children's social care will then make enquiries to determine whether any of the children involved are in need of protection or other services.

Where statutory assessments are appropriate, the designated safeguarding lead (or a deputy)) will work alongside, and cooperate with, the relevant lead social worker. Collaborative working will help ensure the best possible package of coordinated support is implemented for the victim and, where appropriate, the alleged perpetrator(s) and any other children that require support.

Schools and colleges should not wait for the outcome (or even the start) of a local authority children's social care investigation before protecting the victim and other children in the school or college. It will be important for the designated safeguarding lead (or a deputy) to work closely with local authority children's social care (and other agencies as required) to ensure any actions the school or college takes do not jeopardise a statutory investigation. The risk assessment as per paragraph 480-482 will help inform any decision. Consideration of safeguarding the victim, alleged perpetrator(s), any other children directly involved in the safeguarding report, and all children at the school or college should be **immediate**.

In some cases, local authority children's social care will review the evidence and decide that a statutory intervention is not appropriate. Mayfield Grammar School, Gravesend, is prepared to refer again if it is believed that the child remains in immediate danger or at risk of harm or if circumstances change. If a statutory assessment is not appropriate, the designated safeguarding lead (or a deputy) will consider other support mechanisms such as early help, specialist support and pastoral support.

Whatever the response, it will be under-pinned by the principle that there is a **zero- tolerance** approach to sexual violence and sexual harassment and it is never acceptable and will not be tolerated.

**All** concerns, discussions, decisions and reasons for decisions will be recorded on MyConcern.

#### 4. Reporting to the Police

**Any report** to the police will generally be in parallel with a referral to local authority children's social care.

It is important that the designated safeguarding lead (and their deputies) are clear about the local process for referrals and follow that process.

Where a report of rape, assault by penetration or sexual assault is made, the starting point is that this should be passed on to the police. The police will take a welfare, rather than a criminal justice, approach. The following advice may help the decision of when to engage the Police and what to expect of them when they do:

##### When to call the police.

Where a report has been made to the police, the school will consult the police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator(s) and their parents or carers. The best way to protect the victim and their anonymity will also be discussed.

At this stage, Mayfield Grammar School, Gravesend will generally inform parents or carers unless there are compelling reasons not to, for example, if informing a parent or carer is likely to put a child at additional risk. In circumstances where parents or carers have not been informed, it will be

especially important to support the child in any decision they take. This should be with the support of local authority children's social care and any appropriate specialist agencies.

All police forces in England have specialist units that investigate child abuse. The names and structures of these units are matters for local forces. It is important that the designated safeguarding lead (and their deputies) are aware of their local arrangements.

In some cases, it may become clear very quickly that the police (for whatever reason) will not take further action. In such circumstances, it is important to continue to engage with specialist support for the victim and alleged perpetrator(s) as required.

Whilst protecting children and/or taking any disciplinary measures against the alleged perpetrator(s), it will be important for the designated safeguarding lead (or a deputy) to work closely with the police (and other agencies as required), to ensure any actions taken do not jeopardise the police investigation.

If there are questions about the investigation, the school will ask the police. The police will help and support the school as much as they can (within the constraints of any legal restrictions).

Whatever the response, it should be underpinned by the principle that there is a **zero-tolerance** approach to sexual violence and sexual harassment and it is never acceptable and will not be tolerated.

**All** concerns, discussions, decisions and reasons for decisions should be recorded on MyConcern.

### **Considering bail conditions**

The police will consider what action to take to manage the assessed risk of harm. This could involve the use of police bail with conditions, prior to a suspect appearing in court, or court bail with or without conditions after the first appearance.

Alternatively, the person suspected of an offence could be 'released under investigation' (RUI). People released under RUI can have no conditions attached to their release from custody and it is possible for a person on bail also to have no conditions.

Whatever arrangements are in place, the school will consider what additional measures may be necessary to manage any assessed risk of harm that may arise within their institution.

Particular regard will be given to: the additional stress and trauma that might be caused to a victim within the institution; the potential for the suspected person to intimidate the victim or a witness; the need to ensure that any risk management measures strike a balance between management of risk and the rights of an unconvicted person (e.g. rights to privacy, family life, etc).

Careful liaison with the police investigators should help to develop a balanced set of arrangements.

### **Managing any delays in the criminal process**

There may be delays in any case that is being progressed through the criminal justice system. Mayfield Grammar School, Gravesend will not wait for the outcome (or even the start) of a police investigation before protecting the victim, alleged perpetrator(s) and other children in the school. The risk assessment will help inform any decision.

Considering any disciplinary action against the alleged perpetrator(s) whilst an investigation is ongoing is discussed below.

Whilst protecting children and/or taking any disciplinary measures against the alleged perpetrator(s), the designated safeguarding lead (or a deputy) will work closely with the police (and other agencies as required), to ensure any actions taken, do not jeopardise the police investigation.

If there are questions about the investigation, the police will be contacted and asked. The police will provide support as much as they can (within the constraints of any legal restrictions).

### **The end of the criminal process**

If a child is convicted or receives a caution for a sexual offence, the risk assessment will be updated to ensure relevant protections are in place for all the children. This process will include a review of the necessary actions to keep all parties safe and meet their needs. If the perpetrator(s) remains at the school, we will be very clear as to our expectations regarding the perpetrator(s) now they have been convicted or cautioned. This could include expectations regarding their behaviour and any reasonable restrictions that are proportionate with regard to the perpetrator(s)' timetable.

Any conviction (even with legal anonymity reporting restrictions) is potentially going to generate interest among other pupils. It will be important to ensure both the victim and perpetrator(s) remain protected, especially from any bullying or harassment (including online).

Where cases are classified as "no further action" by the police or Crown Prosecution Service, or where there is a not guilty verdict, Mayfield Grammar School, Gravesend will continue to offer support to the victim and the alleged perpetrator(s) for as long as is necessary. A not guilty verdict or a decision not to progress with their case will likely be traumatic for the victim. The fact that an allegation cannot be substantiated or was withdrawn does not necessarily mean that it was unfounded. Any decisions will be discussed with the victim in this light and continued support offered. The alleged perpetrator(s) is/are also likely to require ongoing support for what will have likely been a difficult experience.

### Case study

A 15-year-old girl disclosed to a pastoral lead that she had been sexually touched by a 15-year-old boy, on public transport on the way to school. The school made a referral to local authority children's social care on the same day, submitting a MARF (Multi Agency Referral Form) for both children. The MARF led to immediate police involvement. The school arranged for the boy to have an amended timetable so that he was not in any class with the girl. Specific teaching staff were briefed on the need to ensure the children were not together. The girl was given a trusted adult she could go to at any time: this staff member agreed she would meet with the girl every day and she supported her with break and lunchtime arrangements. The girl was able to suggest how she would feel safest at lunchtime.

At the end of the second day, another girl went to the designated safeguarding lead (DSL) and made a report about the same boy. She reported that he had sexually assaulted her in school three weeks before. The school submitted a MARF for the girl and a second MARF for the boy. The school knew the police were involved and that a MERLIN had been submitted (a crime report involving a child), but they knew the police would not have the ongoing and detailed information about the boy held by the school. The school did not want either girl further distressed by possibly seeing the boy around school; the option choices and group sizes for the three children meant it was very difficult to educate separately. The school contacted another secondary school. The school links had been established as part of the In Year Fair Access Process (IYFAP) and made immediate arrangements for the boy to move to the other school so that his education was not disrupted. The boy remained at the new school for the duration of the investigation. The DSLs from both schools worked together with police and the children and ensured appropriate child protection information was shared so the receiving school was fully aware of the allegations. The boy received a caution, and the decision was made for him to remain at his new school where he engaged with a personalised RSHE plan. Parents were involved throughout; the children were at the centre of decision-making, often suggesting how they could be supported.

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

All concerns, discussions and decisions made, and the reasons for those decisions, will be recorded in writing. Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified, and addressed.

If a report is determined to be unsubstantiated, unfounded, false or malicious, the designated safeguarding lead will consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to local authority children's social care may be appropriate.

If a report is shown to be deliberately invented or malicious, the school will consider whether any disciplinary action is appropriate against the individual who made it.

## Ongoing response

### Safeguarding and supporting the victim

The following principles are based on effective safeguarding practice and should help shape any decisions regarding safeguarding and supporting the victim.

- The needs and wishes of the victim should be paramount (along with protecting the child) in any response. It is important they feel in as much control of the process as is reasonably possible. Wherever possible, the victim, if they wish, should be able to continue in their normal routine. Overall, the priority should be to make the victim's daily experience as normal as possible, so that school is a safe space for them.
- The age and the developmental stage of the victim, the nature of the allegation(s) and the potential risk of further abuse will be considered. By the very nature of sexual violence and sexual harassment, a power imbalance is likely to have been created between the victim and alleged perpetrator(s).
- The victim should never be made to feel they are the problem for making a report or made to feel ashamed for making a report.
- Support should be tailored on a case-by-case basis. The support required regarding a one-off incident of sexualised name-calling is likely to be vastly different from that for a report of rape.
- Sexual assault can result in a range of health needs, including physical, mental, and sexual health problems and unwanted pregnancy. Children and young people that have a health need arising from sexual assault or abuse can access specialist NHS support from a Sexual Assault Referral Centre (SARC). SARCs offer confidential and non-judgemental support to victims and survivors of sexual assault and abuse. They provide medical, practical, and emotional care and advice to all children and adults, regardless of when the incident occurred.
- Decisions and actions will be regularly reviewed and relevant policies updated to reflect lessons learnt. It is particularly important to look out for potential patterns of concerning, problematic or inappropriate behaviour. Where a pattern is identified, Mayfield Grammar School, Gravesend will decide on a course of action. Consideration will be given as to whether there are wider cultural issues within the school that enabled the inappropriate behaviour to occur and where appropriate extra teaching time and/or staff training could be delivered to minimise the risk of it happening again.

Support can include:

- Early help and local authority children's social care.
- Children and Young People's Independent Sexual Violence Advisors (ChISVAs) provide emotional and practical support for victims of sexual violence. They are based within the specialist sexual violence sector and will help the victim understand what their options are and how the criminal justice process works if they have reported or are considering reporting to the police.
- Police and social care agencies can signpost to ChISVA services (where available) or referrals can be made directly to the ChISVA service by the young person or school. .

- Child and young people's mental health services ([CYPMHS](#)) is used as a term for all services that work with children who have difficulties with their emotional or behavioural wellbeing. Services vary depending on local authority. Most CYPMHS have their own website, which will have information about access, referrals and contact numbers.
- The specialist sexual violence sector can provide therapeutic support for children who have experienced sexual violence. Contact [Rape Crisis](#) (England & Wales) or [The Survivors Trust](#) for details of local specialist organisations. The [Male Survivors Partnership](#) can provide details of services which specialise in supporting men and boys.
- NHS - [Help after rape and sexual assault - NHS \(www.nhs.uk\)](#) provides a range of advice, help and support including advice about the risk of pregnancy, sexually transmitted infections (STI), reporting to the police and forensics.
- Rape and sexual assault referral centres services can be found at: Find [Rape and sexual assault referral centres](#). Sexual assault referral centres (SARCs) offer medical, practical and emotional support. They have specially trained doctors, nurses and support workers. If children, young people, or their families are unsure which service to access, they should contact their GP or call the NHS on 111.
- [Childline](#) provides free and confidential advice for children and young people.
- [Internet Watch Foundation](#) works internationally to remove child sexual abuse online images and videos and offers a place for the public to report them anonymously.
- [Childline / IWF: Remove a nude image shared online](#) Report Remove is a free tool that allows children to report nude or sexual images and videos of themselves that they think might have been shared online, to see if they can be removed from the internet.

#### Case study

A 15-year-old boy and girl who go to the same school had sex at a party and, without them knowing, other people at the party filmed it. The video was then uploaded to a site and shared around their school and other schools in the area.

Following this, the girl was sexually harassed at school being called a 'slag and a slut' during lessons. Other boys in the school began propositioning her in school and trying to touch her aggressively and inappropriately. A teacher who saw the sexual harassment in his class talked to the girl about how she was feeling and suggested she spoke to the designated safeguarding lead (DSL). The DSL spoke to the girl and recorded the report, discussed her options about trying to get the video deleted from people's devices and the website it was on, and how to talk to her parents about what happened. The teachers and parents did not view the video, and this was communicated to the girl and boy.

Whilst in this case the boy was not harassed in the same way as the girl, the school recognised he was also a victim and spoke to him about his feelings and what could be done to support him.

The teacher arranged a workshop as part of the RSHE curriculum for all year 10s about respect, shame, consent, and their collective responsibility to challenge inappropriate sexual behaviour.

The parents of the girl and boy worked with the school and the police to get the content removed via the IWF and identify who recorded and distributed the video. Both the girl and boy were supported through the investigation with counselling.

Those responsible for harassing the girl and sharing the video received sanctions in line with the school behaviour policy.

Victims may not disclose the whole picture immediately. They may be more comfortable providing information on a piecemeal basis. It is essential that dialogue is kept open and encouraged. When it is clear that ongoing support will be required, the victim will be asked if they would find it helpful to have a designated trusted adult (for example, their form tutor or designated safeguarding lead) to talk to about their needs. The choice of any such adult should be the victim's (as far as is reasonably possible).

Children who have experienced sexual violence display a very wide range of responses to their experience, including in some cases clear signs of trauma, physical and emotional responses, or no overt signs at all. Mayfield Grammar School, Gravesend will remain alert to the possible challenges of detecting those signs and show sensitivity to the needs of the child (e.g. about attendance in lessons) irrespective of how overt the child's distress is.

Mayfield Grammar School, Gravesend will avoid any action that would have the effect of isolating the victim, in particular from supportive peer groups, there may be times when the victim finds it difficult to maintain a full-time timetable and may express a wish to withdraw from lessons and activities. This should be because the victim wants to, not because it makes it easier to manage the situation. If required, a physical space for victims to withdraw to will be provided.

It may be necessary for to maintain arrangements to protect and support the victim for a long time and to work with local authority children's social care and other agencies as required.

It is important to do everything possible to protect the victim from bullying and harassment as a result of any report they have made.

Whilst they should be given all the necessary support to remain in their school or college, if the trauma results in the victim being unable to do this, alternative provision or a move to another school or college will be considered to enable them to continue to receive suitable education. This should only be at the request of the victim (and following discussion with their parents or carers).

It is important that if the victim does move to another educational institution (for any reason), that the new educational institution is made aware of any ongoing support needs. The designated safeguarding lead will take responsibility to ensure this happens (and will discuss with the victim and, where appropriate their parents or carers as to the most suitable way of doing this) as well as transferring the child protection file.

### **Ongoing Considerations: Victim and alleged perpetrator(s) sharing classes**

Page 111 considered the immediate response to a report. Once the designated safeguarding lead (or a deputy) has decided what the next steps will be in terms of progressing the report, they should **carefully consider** again the question of the victim and alleged perpetrator(s) sharing classes and sharing space at school or college. This will inevitably involve complex and difficult professional decisions, including considering their duty to safeguard children and their duty to educate them.

It is important each report is considered on a case-by-case basis and risk assessments are updated as appropriate. As always when concerned about the welfare of a child, the best interests of the child should come first. In all cases, schools and colleges should follow general safeguarding principles as per this guidance.

Where there is a criminal investigation into a rape, assault by penetration or sexual assault, the alleged perpetrator(s) should be removed from any classes they share with the victim. The school or college should also consider how best to keep the victim and alleged perpetrator(s) a reasonable distance apart on school or college premises (including during before and after school-based activities) and on transport to and from school or college where appropriate. This is in the best interests of both children and should not be perceived to be a judgement on the guilt of the alleged perpetrator(s). As per paragraph 505, close liaison with the police is essential.

Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, the school or college should take suitable action, if they have not already done so. In all but the most exceptional of circumstances, the rape or assault is likely to constitute a serious breach of discipline and lead to the view that allowing the perpetrator(s) to remain in the same school or college would seriously harm the education or welfare of the victim (and potentially other pupils or students).

Where a criminal investigation into sexual assault leads to a conviction or caution, the school or college should, if it has not already, consider any suitable sanctions in light of their behaviour policy, including consideration of permanent exclusion.<sup>143</sup> Where the perpetrator(s) is going to remain at the school or college, the principle would be to continue keeping the victim and perpetrator(s) in separate classes and continue to consider the most appropriate way to manage potential contact on school and college premises and transport. The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases.

In all cases, schools and colleges should record and be able to justify their decisionmaking.

Reports of sexual assault and sexual harassment will, in some cases, not lead to a report to the police (for a variety of reasons). In some cases, rape, assault by penetration, sexual assault or sexual harassment are reported to the police and the case is not progressed or are reported to the police and ultimately result in a not guilty verdict. None of this means the offence did not happen or that the victim lied. The process will have affected both victim and alleged perpetrator(s). Appropriate support should be provided to both as required and consideration given to sharing classes and potential contact as required on a case-by-case basis. In all cases, schools and colleges should record and be able to justify their decision-making.

All of the above should be considered with the needs and wishes of the victim at the heart of the process (supported by parents and carers as required). Any arrangements should be kept under review.

Safeguarding and supporting the alleged perpetrator(s) and children and young people who have displayed harmful sexual behaviour

The following principles are based on effective safeguarding practice and should help shape any decisions regarding safeguarding and supporting the alleged perpetrator(s):

- There is a difficult balancing act to consider. On one hand, the victim needs to be safeguarded (and the wider pupil/student body) and on the other hand the alleged perpetrator(s) needs to be provided with an education, safeguarding support as appropriate and implement any disciplinary sanctions. Taking disciplinary action and still providing appropriate support are not mutually exclusive actions. They can, and should, occur at the same time if necessary.
- Consider the age and the developmental stage of the alleged perpetrator(s), the nature of the allegations and frequency of allegations. Any child will likely experience stress as a result of being the subject of allegations and/or negative reactions by their peers to the allegations against them.
- Consider the proportionality of the response. Support (and sanctions) should be considered on a case-by-case basis. The alleged perpetrator(s) may potentially have unmet needs (in some cases these may be considerable) as well as potentially posing a risk of harm to other children. HSB in young children may be  
(and often are) a symptom of either their own abuse or exposure to abusive practices and or materials.
- The Lucy Faithfull Foundation has developed a [HSB toolkit](#), which amongst other things, provides support, advice and information on how to prevent it, links to organisations and helplines, resources about HSB by children, internet safety, sexual development and preventing child sexual abuse.
- The NSPCC provides free and independent advice about HSB: [NSPCC Learning: Protecting children from harmful sexual behaviour](#) and [NSPCC - Harmful sexual behaviour framework](#).
- [Contextual Safeguarding Network – Beyond Referrals \(Schools\)](#) provides a school self-assessment toolkit and guidance for addressing HSB in schools.

- StopItNow – [Preventing harmful sexual behaviour in children - Stop It Now](#) provides a guide for parents, carers and professionals to help everyone do their part in keeping children safe, they also run a free confidential helpline.

It is important that the perpetrator(s) is/are also given the correct support to try to stop them re-offending and to address any underlying trauma that may be causing this behaviour. Addressing inappropriate behaviour **can** be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Advice on [behaviour in schools](#) is clear that teachers can sanction pupils whose conduct falls below the standard which could be reasonably expected of them. If the perpetrator(s) is to be excluded the decision must be lawful, reasonable and fair. Further information about exclusions can be found in statutory guidance for schools: [Suspension and Permanent Exclusion from maintained schools, academies and pupil referral units in England](#).

School can be a significant protective factor for children who have displayed HSB, and continued access to school, with a comprehensive safeguarding management plan in place, is an important factor to consider before final decisions are made. It is important that if an alleged perpetrator does move to another educational institution (for any reason), that the new educational institution is made aware of any ongoing support needs and where appropriate, potential risks to other children and staff. The designated safeguarding lead will take responsibility to ensure this happens as well as transferring the child protection file. Information sharing advice referenced at paragraphs 115-123 will help support this process.

## **Sanctions and the alleged perpetrator(s)**

### **Schools**

Teachers can sanction pupils whose conduct falls below the standard which could be reasonably expected of them. Exclusions statutory guidance for maintained schools, academies and PRUs is [here](#). Disciplinary action can be taken whilst other investigations by the police and/or local authority children's social care are ongoing. The fact that another body is investigating or has investigated an incident does not in itself prevent a Mayfield Grammar School, Gravesend, from coming to its own conclusion, on the balance of probabilities, about what happened, and imposing a penalty accordingly. This is a matter for the school and will be carefully considered on a case-by-case basis. The designated safeguarding lead (or a deputy) should take a leading role. The school will consider if, by taking any action, it would prejudice an investigation and/or any subsequent prosecution. Careful liaison with the police and/or local authority children's social care will help the school make a determination. It will also be important to consider whether there are circumstances that make it unreasonable or irrational to reach a view about what happened while an independent investigation is considering the same facts.

### **Discipline and support**

Taking disciplinary action and still providing appropriate support are not mutually exclusive actions. They can, and should, occur at the same time if necessary. On the one hand there is preventative or forward-looking action to safeguard the victim and/or the perpetrator(s), especially where there are concerns that a perpetrator themselves may have been a victim of abuse; and, on the other, there is disciplinary action to punish a perpetrator for their past conduct. It should be very clear as to which category any action taken falls or whether it is really both and should ensure that the action complies with the law relating to each relevant category.

### **Working with parents and carers**

Mayfield Grammar School, Gravesend, will, in most instances, engage with both the victim's and the alleged perpetrator's parents or carers when there has been a report of sexual violence (this **might** not be necessary or proportionate in the case of sexual harassment and should be

considered on a case-by-case basis). The exception to this rule is if there is a reason to believe informing a parent or carer will put a child at additional risk. carefully consider what information they provide to the respective parents or carers about the other child involved and when they do so. In some cases, local authority children's social care and/or the police will have a very clear view and it will be important to work with relevant agencies to ensure a consistent approach is taken to information sharing.

It is good practice to meet the victim's parents or carers with the victim present to discuss what arrangements are being put in place to safeguard the victim and understand their wishes in terms of support they may need and how the report will be progressed.

It is also good practice to meet with alleged perpetrator's parents or carers to discuss any arrangements that are being put into place that impact an alleged perpetrator, such as, for example, moving them out of classes with the victim and what this means for their education. The reason behind any decisions should be explained. Support for the alleged perpetrator should be discussed.

The designated safeguarding lead (or a deputy) will generally attend any such meetings. Consideration to the attendance of other agencies will be considered on a case-by-case basis.

Parents and carers may well struggle to cope with a report that their child has been the victim of a sexual assault or is alleged to have sexually assaulted another child. The school will signpost parents and carers to support.

### **Safeguarding other children**

Consideration will be given to supporting children who have witnessed sexual violence, especially rape and assault by penetration. Witnessing such an event is likely to be traumatic and support may be required.

Following any report of sexual violence or sexual harassment, it is likely that some children will take "sides". Mayfield Grammar School, Gravesend, will do all it can to ensure both the victim and alleged perpetrator(s), and any witnesses, are not being bullied or harassed.

Social media is very likely to play a central role in the fall out from any incident or alleged incident. There is the potential for contact between victim and alleged perpetrator(s) and a very high likelihood that friends from either side could harass the victim or alleged perpetrator(s) online and/or become victims of harassment themselves.

School transport is a potentially vulnerable place for a victim or alleged perpetrator(s) following any incident or alleged incident. As part of the risk assessment, staff will consider any additional potential support needs to keep all of the children safe.

A whole school approach to safeguarding, a culture that makes clear that there is a **zero-tolerance** approach to sexual violence and sexual harassment and that it is never acceptable, and it will not be tolerated, and a strong preventative education programme will help create an environment in which all children are supportive and respectful of their peers when reports of sexual violence or sexual harassment are made.

It is important to keep policies, processes, and curriculum under constant review to protect all children. Reports of sexual violence and/or harassment (especially where there is evidence of patterns of behaviour) may point to environmental and or systemic problems that could and should be addressed by updating relevant policies, processes, or relevant parts of the curriculum. Alongside this, patterns identified may also be reflective of the wider issues within a local area and it is good practice to share emerging trends with safeguarding partners.

## Appendix 4: Keeping yourself safe when responding to disclosures (the 4 R's – what to do if...)

### 1. Recognise

- Keep calm
- Listen to what is being said without displaying shock or disbelief
- Take what is being said to you seriously
- Note down what has been said

### 2. Respond

- Reassure the pupil that they have done the right thing in talking to you
- Be honest and do not make promises you cannot keep e.g. "It will be alright now"
- **Do not promise confidentiality**; you have a duty to refer
- Reassure and alleviate guilt, if the pupil refers to it e.g. "you're not to blame"
- Reassure the child that information will only be shared with those who need to know

### 3. React

- React to the pupil only as far as is necessary for you to establish whether or not you need to refer the matter, but do not interrogate for full details
- **Do not** ask leading questions; "Did he/she....?" Such questions can invalidate evidence.
- **Do** ask open "TED" questions; Tell, explain, describe
- Do not criticise the perpetrator; the pupil may have affection for him/her
- Do not ask the pupil to repeat it all for another member of staff
- Explain what you have to do next and who you have to talk to

### 4. Record

- Make some brief notes at the time on any paper which comes to hand and write them up as soon as possible
- Do not destroy your original notes
- Record the date, time, place, any non-verbal behaviour and the words used by the child. Always ensure that as far as possible you have recorded the actual words used by the child.
- Record statements and observable things rather than your interpretations or assumptions

## **Appendix 5: National Support Organisations**

### **Support for staff**

- Education Support Partnership: [www.educationsupportpartnership.org.uk](http://www.educationsupportpartnership.org.uk)
- Professional Online Safety Helpline: [www.saferinternet.org.uk/helpline](http://www.saferinternet.org.uk/helpline)

### **Support for Pupils**

- NSPCC: [www.nspcc.org.uk](http://www.nspcc.org.uk)
- ChildLine: [www.childline.org.uk](http://www.childline.org.uk)
- Papyrus: [www.papyrus-uk.org](http://www.papyrus-uk.org)
- Young Minds: [www.youngminds.org.uk](http://www.youngminds.org.uk)
- The Mix: [www.themix.org.uk](http://www.themix.org.uk)

### **Support for adults**

- Family Lives: [www.familylives.org.uk](http://www.familylives.org.uk)
- Crime Stoppers: [www.crimestoppers-uk.org](http://www.crimestoppers-uk.org)
- Victim Support: [www.victimsupport.org.uk](http://www.victimsupport.org.uk)
- Kidscape: [www.kidscape.org.uk](http://www.kidscape.org.uk)
- The Samaritans: [www.samaritans.org](http://www.samaritans.org)
- Mind: [www.mind.org.uk](http://www.mind.org.uk)
- NAPAC (National Association for People Abused in Childhood): [www.napac.org.uk](http://www.napac.org.uk)
- MOSAC: [www.mosac.org.uk](http://www.mosac.org.uk)
- Action Fraud: [www.actionfraud.police.uk](http://www.actionfraud.police.uk)

### **Support for Learning Disabilities**

- Respond: [www.respond.org.uk](http://www.respond.org.uk)
- Mencap: [www.mencap.org.uk](http://www.mencap.org.uk)

### **Domestic Abuse**

- Refuge: [www.refuge.org.uk](http://www.refuge.org.uk)
- Women's Aid: [www.womensaid.org.uk](http://www.womensaid.org.uk)
- Men's Advice Line: [www.mensadviceline.org.uk](http://www.mensadviceline.org.uk)
- Mankind: [www.mankindcounselling.org.uk](http://www.mankindcounselling.org.uk)

### **Honour based Violence**

- Forced Marriage Unit: <https://www.gov.uk/guidance/forced-marriage>

### **Sexual Abuse and CSE**

- Lucy Faithfull Foundation: [www.lucyfaithfull.org.uk](http://www.lucyfaithfull.org.uk)
- Stop it Now!: [www.stopitnow.org.uk](http://www.stopitnow.org.uk)
- Parents Protect: [www.parentsprotect.co.uk](http://www.parentsprotect.co.uk)
- CEOP: [www.ceop.police.uk](http://www.ceop.police.uk)
- Marie Collins Foundation: [www.mariecollinsfoundation.org.uk](http://www.mariecollinsfoundation.org.uk)
- Internet Watch Foundation (IWF): [www.iwf.org.uk](http://www.iwf.org.uk)

### **Online Safety**

- [Childnet](http://www.childnet.co.uk) provide guidance for schools on cyberbullying

- [Educateagainsthate](#) provides practical advice and support on protecting children from extremism and radicalisation
- [London Grid for Learning](#) provides advice on all aspects of a school or college's online safety arrangements
- [NSPCC](#) provides advice on all aspects of a school or college's online safety arrangements
- [Safer recruitment consortium](#) "guidance for safe working practice", which may help ensure staff behaviour policies are robust and effective
- [Searching screening and confiscation](#) is departmental advice for schools on searching children and confiscating items such as mobile phones
- [South West Grid for Learning](#) provides advice on all aspects of a school or college's online safety arrangements
- [Use of social media for online radicalisation](#) - A briefing note for schools on how social media is used to encourage travel to Syria and Iraq
- UK Council for Internet Safety have provided advice on, and an [Online Safety Audit Tool](#) to help mentors of trainee teachers and newly qualified teachers induct mentees and provide ongoing support, development and monitoring
- Department for Digital, Culture, Media & Sport (DCMS) [Online safety guidance if you own or manage an online platform](#) provides practical steps on how companies can embed safety into the design of their online platforms. It offers information on common platform features and functions (such as private messaging) and their risks, as well as steps that can be taken to manage that risk.
- Department for Digital, Culture, Media & Sport (DCMS) [A business guide for protecting children on your online platform](#) provides guidance to businesses on how to protect children on their online platform. It outlines existing regulatory requirements and provides best practice advice on how to protect children's personal data, ensure content is appropriate for the age of users, ensure positive user-to-user interactions and address child sexual exploitation and abuse.

### **Remote education, virtual lessons and live streaming**

- [Case studies](#) on remote education practice are available for schools to learn from each other
- [Departmental guidance on safeguarding and remote education](#) including planning remote education strategies and teaching remotely
- [London Grid for Learning](#) guidance, including platform specific advice
- [National cyber security centre](#) guidance on choosing, configuring and deploying video conferencing
- [National cyber security centre](#) guidance on how to set up and use video conferencing
- [UK Safer Internet Centre](#) guidance on safe remote learning

### **Support for children**

- [Childline](#) for free and confidential advice
- [UK Safer Internet Centre](#) to report and remove harmful online content

- [CEOP](#) for advice on making a report about online abuse

## Parental support

- [Childnet](#) offers a toolkit to support parents and carers of children of any age to start discussions about their online life, to set boundaries around online behaviour and technology use, and to find out where to get more help and support
- [Commonsensemedia](#) provide independent reviews, age ratings, & other information about all types of media for children and their parents
- [Government advice](#) about protecting children from specific online harms such as child sexual abuse, sexting, and cyberbullying
- [Government advice](#) about security and privacy settings, blocking unsuitable content, and parental controls
- [Internet Matters](#) provide age-specific online safety checklists, guides on how to set parental controls on a range of devices, and a host of practical tips to help children get the most out of their digital world
- [Let's Talk About It](#) provides advice for parents and carers to keep children safe from online radicalisation
- [London Grid for Learning](#) provides support for parents and carers to keep their children safe online, including tips to keep primary aged children safe online
- [Stopitnow](#) resource from [The Lucy Faithfull Foundation](#) can be used by parents and carers who are concerned about someone's behaviour, including children who may be displaying concerning sexual behaviour (not just about online)
- [National Crime Agency/CEOP Thinkuknow](#) provides support for parents and carers to keep their children safe online
- [Net-aware](#) provides support for parents and carers from the NSPCC and O2, including a guide to social networks, apps and games
- [Parentzone](#) provides help for parents and carers on how to keep their children safe online
- [Parent info](#) from Parentzone and the National Crime Agency provides support and guidance for parents from leading experts and organisations
- [UK Safer Internet Centre](#) provide tips, advice, guides and other resources to help keep children safe online

## Radicalisation and hate

- Educate against Hate: [www.educateagainsthate.com](http://www.educateagainsthate.com)
- Counter Terrorism Internet Referral Unit: [www.gov.uk/report-terrorism](http://www.gov.uk/report-terrorism)
- True Vision: [www.report-it.org.uk](http://www.report-it.org.uk) :

## Appendix 6

### Safeguarding Children and Child Protection Induction Leaflet Guidelines for School Staff September 2023



This leaflet contains important and sensitive information for adults.

#### Introduction

These guidelines for staff in schools have been produced by the Education Safeguarding Service to provide information about child protection and the procedures that must be observed. All staff will read, understand and have a copy of Part 1 of Keeping Children Safe in Education (KCSIE) 2022 and Annex A.

The protection of children in Kent is overseen by the Kent Safeguarding Children Multi-agency Partnership (KSCMP). You should be aware of and have reference to the Kent and Medway Safeguarding Children Procedures. This guidance is consistent with the DfE guidance 'Working Together to Safeguard Children' (2018). The online procedures manual can be found on the KSCMP website: [www.kscmp.org.uk](http://www.kscmp.org.uk).

The full extent of child abuse is not easily quantified. Research indicates that children are reluctant to report abuse, particularly if it is happening within their family. Abusers come from all walks of life; they may be parents, a trusted adult, a professional or another child.

Everybody who works with children has a duty to help protect them from abuse. All staff must know how to recognise possible abuse both within the setting and externally. You should be familiar with the processes of recording information in your setting and making requests for support from the Front Door and referrals to the Police.

Every school is required by the KCSIE 2019 to have a Designated Safeguarding Lead (DSL) and deputy(s) to ensure there is always someone available to discuss child protection concerns.

**The Designated Safeguarding Lead in our setting is:**  
Louise Absolon

#### Types of Abuse

##### Physical abuse:

Can range from: over-chastisement, slapping with the hand, a belt, a stick or other object, to shaking, punching or throwing a child across the room. It can lead directly to neurological damage, physical injuries, disability or – at the extreme – death. Harm may be caused by the abuse itself and by abuse taking place in a wider family or institutional context of conflict and aggression. It also includes a parent/carer fabricating symptoms of or inducing illness in a child. Some physical abuse is reactive; some may be clearly premeditated with intent to cause harm.

##### Neglect:

Can range from: ignoring a child's developmental needs to not feeding or clothing her/him adequately and not properly supervising her/him. Persistent neglect can lead to serious impairment of health and development, and long-term difficulties with social functioning, relationships and educational progress. Neglect may occur by omission or commission – it is important that problems for a child's parent do not obscure neglect of a child in the family. Unborn babies may now be regarded as suffering neglect due to maternal substance misuse.

##### Sexual Abuse:

Is the involvement of a child or adolescent in sexual activities that s/he does not understand, cannot give consent to and which are not acceptable by in our society. This includes: inappropriate touching, taking of obscene photographs, producing/trading in indecent images of children (including via the Internet), as well as attempted or actual sexual intercourse; adverse effects may endure into adulthood. Sexual abuse can be carried out by women and other children as well as men.

##### Emotional Abuse:

Ranges from rejection, refusing to show a child love or affection, making a child unhappy by continually belittling her/him or verbally abusing her/him. It has an important impact on a developing child's mental health, behaviour and self-esteem. It may also include

developmentally inappropriate expectations including overly high expectations which the child cannot fulfil. Domestic abuse, adult mental health problems and parental substance misuse may be features in families where children are exposed to such abuse. Emotional abuse may occur by omission or commission and it is important the problems of or a child's parents do not obscure professional views of their child's emotional development. Serious bullying, causing a child to feel frightened or in danger may be regarded as emotional abuse.

#### Other Safeguarding Risks

Our staff are aware of a range of other safeguarding concerns, including: Child Sexual exploitation (CSE), Radicalisation and extremism (The Prevent Agenda) and Honour based violence (including Female Genital Mutilation). More information can be found at: [www.kelsi.org.uk/child-protection-and-safeguarding](http://www.kelsi.org.uk/child-protection-and-safeguarding)

#### Online Safety:

The internet and related technologies provides wonderful opportunities for creativity, learning and communication; however, our setting recognises that there are also risks associated with this, including: sexual grooming, abuse and exploitation, cyberbullying and exposure to inappropriate material.

Online Safety is viewed as part of our schools safeguarding role and responsibility. Members of staff are made aware of the schools online safety policy and procedures, including our acceptable use of technology expectations regarding communication and use of social media.

Further advice regarding online safety can be found at: [www.e-safety.org.uk](http://www.e-safety.org.uk).

#### Indicators of Abuse

Child Abuse can present in many different ways; there may be physical evidence, such as: marks, bruises or weight loss. Or there may be behavioural evidence, such as: reluctance to change for P.E, becoming aggressive or withdrawn, or a change in normal behaviour.

You may also notice changes in a child’s presentation, friendships or ability to concentrate etc. A child may choose to disclose abuse; this may be directly, by telling you what happened or indirectly, by telling friends or by asking for advice about a situation involving another person.

Staff may also notice concerns and behaviour changes in adults within the setting, including, staff or parents/carers. We ask that you be curious, record and report anything which may worry you to the DSL.

### What to do if you are concerned for a child:

Sometimes we may have unconfirmed worries about a child, but have little concrete evidence that abuse is taking place; this can leave us feeling unsure about how to proceed. There have been many cases where unconfirmed worries have turned out to be the tip of the iceberg. It is vital therefore, that even vague “worries” are recorded and passed on to the DSL at the earliest opportunity. The DSL will then be in a position to collate all known information, involve other agencies, and decide whether a further referral is required.

Staff should record incidents or concerns in accordance with our policy. These records should be signed, dated and kept securely by the DSL.

### Immediately inform the Designated Safeguarding Lead in the school

The DSL will decide on what action is most appropriate and whether the child should request support from the Integrated Front Door. To help him/her decide this, they may consult with the Education Safeguarding Service or the Front Door team.

Although we would encourage staff to follow their normal child protection procedures, in certain cases, it may be appropriate for a member of staff to contact the Education Safeguarding Service or Children Social Work Service directly, regarding a safeguarding concern. Or to the LADO if concern was about a named member of staff.

### Disclosures

### What to do if a child starts to make an allegation of abuse

- **Reassure** the child that s/he is right to tell and is not to blame
- **DO NOT** promise not to tell anyone else; explain that you have to make sure the child is safe and may need to ask other adults to help you to do this
- **DO NOT** question the child; let her/him tell you what s/he wants to tell you and no more; s/he may need to have to disclose to a specialist later, and too much detail now may interfere with later investigations.
- When the child is finished, make sure they feel secure and explain what you are going to do next.
- **Write down notes**, including the date and time of the disclosure and sign them; record as much as you can remember, using the child’s own words.

### Requesting support from the Integrated Front Door

If a child or family needs support/intervention from Early Help or Children Social Care, the DSL will ensure that a Request for Support Form is completed as appropriate. These can be downloaded from the Child Protection and Safeguarding web page: [www.kelsi.org.uk](http://www.kelsi.org.uk) or [www.kscmp.org.uk](http://www.kscmp.org.uk)

### Allegations of abuse made against a member of Staff

When an allegation is made against a member of staff, the Headteacher/Chair of Governors must consult with the Local Authority Designated Officer (LADO) who will help to determine how the matter is to be investigated. The LADO is responsible for ensuring that allegations are managed in a proper way. The LADO can be contacted on 03000 410 888

### Preventative work in the classroom

Our pupils need to learn how to keep themselves safe and how to report concerns.

There are many training and resource packs available to help teachers design a curriculum which empowers children who may be being abused. Various elements can be incorporated into everyday teaching, including issues around safe use of the internet, touch, secrets,

positive and healthy relationships, British Values, self-esteem, assertiveness and feelings and emotions.

**Details of our Child Protection and other policies are available view at:**

### Useful names and contacts:

**Our Deputy Designated Safeguarding Lead(s) are:**  
Elaine Wilson, Caroline Kemp, Robert Boyce, Julie Frost, Theresa Lee, Ben Slight, Kerrie Booth

**Integrated Front Door:**  
**Tel no: 03000 41 11 11**  
**Out of hours:**  
**03000 419191**

**Area Safeguarding Advisor (Education)**  
**Name:**  
**Tel No: 03000 41 24 45**

<b>Education Safeguarding Service HQ</b>	<b>03000 415788</b>
<b>Gravesham, Dartford, Sevenoaks/Swanley Education Safeguarding Advisor</b>	<b>03000 412445</b>
<b>Maidstone, Tonbridge &amp; Malling, Tunbridge Wells Education Safeguarding Advisor</b>	<b>03000 412284</b>
<b>Thanet, Canterbury, Swale Education Safeguarding Advisor</b>	<b>03000 418503</b>
<b>Ashford, Dover, Folkestone &amp; Hythe Education Safeguarding Advisor</b>	<b>03000 415648</b>
<b>Education Safeguarding Advisor (Online Protection)</b>	<b>03000 415797</b>

Local safeguarding contacts information can be found here: <https://www.kelsi.org.uk/child-protection-and-safeguarding/safeguarding-contacts#:~:text=Contact%20the%20Education%20Safeguarding%20Service&text=To%20contact%20the%20LADO%20Team,%40kent.gov.uk>.