



**CHURCHER'S  
COLLEGE**

**CHILD PROTECTION AND SAFEGUARDING POLICY AND  
PROCEDURES**

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**SENIOR SCHOOL, JUNIOR SCHOOL AND NURSERY (INCLUDING EYFS)**

December 2024

## CHILD PROTECTION AND SAFEGUARDING POLICY AND PROCEDURES

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Churcher's College, a charitable company limited by guarantee registered in England and Wales with company number 10813349 and registered charity number 1173833.

Registered office address: Ramshill, Petersfield, Hampshire GU31 4AS

## Key School Contacts

### Designated Safeguarding Lead (DSL):

**Deputy Head (Pastoral) - Mr Chris Jones** (Tel office: 01730 236808, Mobile: 07795 190947, E-mail: [cjones@churcherscollege.com](mailto:cjones@churcherscollege.com))

### Deputy Designated Safeguarding Leads (Deputy DSL(s)):

**Senior Teacher (Wellbeing, Inclusion and Safeguarding) – Mr Richard Hoe** (Tel office: 01730 236854, Mobile: 07825 458828, E-mail: [rhoe@churcherscollege.com](mailto:rhoe@churcherscollege.com))

**Senior Teacher (Pastoral) – Mrs Suzanne Herrington** (Tel office: 01730 236828, Mobile: 07824 445757, E-mail: [sherrington@churcherscollege.com](mailto:sherrington@churcherscollege.com))

**Head of Sixth Form – Mr William Baker** (Tel office: 01730 236843, Mobile: 07747 665270, E-mail: [wbaker@churcherscollege.com](mailto:wbaker@churcherscollege.com))

**Head of the Junior School - Mrs Ffion Robinson**, who also takes lead responsibility for safeguarding children in the EYFS setting (Tel office: 01730 236871, Mobile: 07702 564452, E-mail: [frobinson@churcherscollege.com](mailto:frobinson@churcherscollege.com))

**Deputy Head of the Junior School - Mrs Philpa Yugin-Power** (Tel office: 01730 236874, Mobile: 07384 540249, E-mail: [pyuginpower@churcherscollege.com](mailto:pyuginpower@churcherscollege.com))

### Chair of the Governors:

**Mr C Strick** - contact details can be obtained from the Bursar's PA, Mrs Alex Hind (Tel office: 01730 236802, E-mail: [ahind@churcherscollege.com](mailto:ahind@churcherscollege.com)).

### Designated Safeguarding Governor:

**Mrs Jo Bloomer** - contact details can be obtained from the Bursar's PA, Mrs Alex Hind (Tel office: 01730 236802, E-mail: [ahind@churcherscollege.com](mailto:ahind@churcherscollege.com)).

## Key External Contacts

### Hampshire Children's Services:

Tel: 01329 225379 (office hours – 8.30am - 5pm Monday-Thursday, 8.30am – 4.30pm Friday)

[childrens.services@hants.gov.uk](mailto:childrens.services@hants.gov.uk)

Out of hours tel: 0300 555 1373

Please note – in an emergency call the police on 999

### Local Authority Designated Officer:

Barbara Piddington / Shona McMinn / Fiona Armfield Tel: 01962 876364

### Multi-Agency Safeguarding Hub

East Hants Early Help Hub

Tel: 01730 235244

Email: [easthants.fss@hants.gov.uk](mailto:easthants.fss@hants.gov.uk).

### Support and Advice about Extremism

Hampshire Special Branch Prevent Team

Prevent Officer Ish Damani

Tel: 07831 615167

Email: [ishret.damani@hampshirepnn.police.uk](mailto:ishret.damani@hampshirepnn.police.uk)

Hampshire Constabulary can also be contacted on the non-emergency telephone number 101 or email [prevent.engagement@hampshire.pnn.police.uk](mailto:prevent.engagement@hampshire.pnn.police.uk)

DfE advice

Tel: 020 7340 7264

Email: [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk)

### NSPCC Whistleblowing Advice Line

Tel: 0800 028 0285 (8am to 8pm Monday to Friday, 9am to 6pm at weekends)

Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

### **Support and Advice Services**

NSPCC	<a href="https://www.nspcc.org.uk/">https://www.nspcc.org.uk/</a>
Childline	Tel: 0800 1111 <a href="https://www.childline.org.uk/">https://www.childline.org.uk/</a>
CEOP Education	<a href="https://www.ceopeducation.co.uk/">https://www.ceopeducation.co.uk/</a>
Anti-Bullying Alliance	<a href="http://www.anti-bullyingalliance.org.uk/">http://www.anti-bullyingalliance.org.uk/</a>

### **Reporting serious wrongdoing to the Charity Commission**

Further guidance see:	<a href="https://www.gov.uk/guidance/report-serious-wrongdoing-at-a-charity-as-a-worker-or-volunteer">https://www.gov.uk/guidance/report-serious-wrongdoing-at-a-charity-as-a-worker-or-volunteer</a>
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**1 What is Child Protection?**

- 1.1 A moral and legal responsibility for children and young people under the age of 18, under the Children Act 1989 and 2004.
- 1.2 Recognition that abuse might occur.
- 1.3 Recognition that non-action is not an option.
- 1.4 Understanding that all children are entitled to be protected from harm or abuse (UN Convention on the Rights of the Child Article 19).
- 1.5 A framework and procedure setting out the action that must be taken where there are any concerns relating to the protection of children from harm or abuse.

**2 What does 'Safeguarding and promoting the welfare of children' mean?**

- 2.1 Providing help and support to meet the needs of children as soon as problems emerge.
- 2.2 Protecting children from maltreatment, whether that is within or outside the home, including online.
- 2.3 Preventing the impairment of children's mental and physical health or development.
- 2.4 Ensuring that children grow up in circumstances that are consistent with the provision of safe and effective care.
- 2.5 Undertaking that role so as to enable those children to have optimum life chances and to enter adulthood successfully.
- 2.6 Taking action to enable all children to have their best outcomes.

**3 A Policy Statement**

- 3.1 This policy relates to all children at Churcher's College and all sections of the school including the Nursery, the Junior School and the Senior School and has due regard for the specific requirements for the Early Years Foundation Stage (EYFS). Throughout this policy document, the terms 'the School' and 'Churcher's College' refer to all sections of Churcher's College, unless otherwise specified.
- 3.2 At Churcher's College we fully recognise our moral and statutory responsibility to safeguard and promote the welfare of all children. We make every effort to provide a safe and welcoming environment underpinned by a culture of openness where both children and adults feel secure, able to talk and know that they are being listened to.
- 3.3 All staff, volunteers and Governors must be aware of the signs of abuse, neglect and exploitation and maintain an attitude of "it could happen here" where safeguarding is concerned.



- 3.4 The purpose of this policy is to provide staff, volunteers and Governors with the framework they need in order to keep children safe and secure in our school and to inform parents and guardians how we will safeguard their children whilst they are in our care.
- 3.5 We recognise the expertise staff acquire by undertaking regular safeguarding training and managing safeguarding concerns on a daily basis. Consequently, staff contribute to and shape safeguarding arrangements and the content of this policy.
- 3.6 Specific guidance is given below on the action that needs to be taken with regard to cases of suspected or identified child abuse within Churcher's College. Further information is available from the Designated Safeguarding Lead – The Deputy Head (Pastoral) (CDJ); and other members of the School's Child Protection Team (the Deputy Designated Safeguarding Leads): the Senior Teacher (Wellbeing, Inclusion and Safeguarding) (RMH), the Senior Teacher (Pastoral) (SH), the Head of Sixth Form (WB) and the Head and Deputy Head of the Junior School (FR & PYP). The Head of the Junior School takes lead responsibility for safeguarding children in the EYFS setting.
- 3.7 In compliance with Keeping Children Safe in Education (September 2024) ("KCSIE"), Working Together to Safeguard Children 2023 (updated February 2024) and Prevent Duty Guidance: Guidance for specified authorities in England and Wales (December 2023) this policy:
- 3.7.1 names one or more 'designated person(s)' with 'status and authority' to take responsibility for Child Protection matters;
- 3.7.2 has due regard for specific requirements in the EYFS setting, which include a clearly defined policy on the use of mobile phones and cameras, specific identification of the practitioner designated to take lead responsibility and the requirement to notify OFSTED within 14 days of any allegations of serious harm or abuse by any person living, working or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere);
- 3.7.3 ensures that the Governing Body:
- (a) are updated on a regular basis on safeguarding guidance, regulation and compliance.
  - (b) at each termly Full Board meeting has safeguarding as a standing agenda item.
  - (c) undertakes an annual review of the School's Child Protection policies and procedures, and of the efficiency with which the related duties have been discharged.
- 3.7.4 appoints a Governor with specific responsibility for frequent liaison with the School's Child Protection Team, and who continually reviews implementation of policies and procedures. Presently this Governor is Mrs Jo Bloomer;
- 3.7.5 in line with advice from the local three safeguarding partners requires training (updated every two years) in Child Protection and inter-agency working for the

- designated person(s); requires appropriate training in Child Protection for the Headmaster, all staff, Governors and volunteers **(see CP Training Register)**;
- 3.7.6 is in accordance with locally agreed inter-agency procedures;
- 3.7.7 applies safer recruitment procedures, including DBS checks, in compliance with Independent School Standards Regulations **(see Recruitment, Selection and Disclosure Policy and Procedure)**;
- 3.7.8 ensures that written assurance is obtained that appropriate Child Protection checks and procedures apply to staff employed by another organisation and working with the School's pupils on another site **(see Educational/External Visits Policy)**;
- 3.7.9 includes arrangements that comply with locally agreed multi-agency procedures to deal with concerns in relation to/allegations of abuse against members of staff/Governors/volunteers/contractors/the Headmaster;
- 3.7.10 requires that any deficiencies or weaknesses in Child Protection arrangements are remedied without delay; and
- 3.7.11 is posted on the School's website, and is made available to parents on request.
- 3.8 This policy has regard to relevant guidance and advice including, but not limited to, the following:
- 3.8.1 Keeping Children Safe in Education (DfE, September 2024) (KCSIE)
- 3.8.2 Disqualification under the Childcare Act 2006 (DfE, August 2018)
- 3.8.3 What to do if you're worried a child is being abused: Advice for practitioners (HM Government, March 2015)
- 3.8.4 Working Together to Safeguard Children 2023 (HM Government, December 2023 updated February 2024)
- 3.8.5 Information Sharing: Advice for practitioners providing safeguarding services for children, young people, parents and carers (DfE, April 2024 updated May 2024)
- 3.8.6 Revised Prevent Duty Guidance: Guidance for specified authorities in England and Wales (HM Government, December 2023)
- 3.8.7 The Prevent duty: Safeguarding learners vulnerable to radicalisation (DfE, October 2022, updated September 2023)
- 3.8.8 The use of social media for online radicalisation (DfE, July 2015)
- 3.8.9 Channel Duty Guidance: Protecting people susceptible to radicalisation (HM Government, February 2021, updated December 2023)
- 3.8.10 Searching, screening and confiscation: advice for schools (DfE, July 2022)

- 3.8.11 *Sharing nudes and semi-nudes: advice for education settings working with children and young people* (Department for Science, Innovation and Technology and UK Council for Internet Safety (UKCIS), updated March 2024)
- 3.8.12 When to call the police (non-statutory guidance from the National Police Chief's Council – npcc.police.uk)
- 3.8.13 Teaching online safety in school (DfE, June 2019 updated January 2023)
- 3.8.14 Mental health and behaviour in schools (DfE, November 2018)
- 3.8.15 Preventing and tackling bullying (DfE, July 2017)
- 3.8.16 Safeguarding and protecting people for charities and trustees (Charity Commission, December 2017 updated June 2022)
- 3.8.17 Relationships Education, Relationships and Sex Education (RSE) and Health Education (DfE, July 2019)
- 3.8.18 Harmful online challenges and online hoaxes (DfE, February 2021)
- 3.8.19 Children Missing Education (DfE, August 2024)
- 3.8.20 Working together to improve school attendance (DfE, August 2024)
- 3.8.21 Meeting digital and technology standards in schools and colleges (DfE, March 2022)
- 3.9 This policy has been designed to address the School's charity law safeguarding duty to:
  - 3.9.1 provide a safe and trusted environment which safeguards anyone who comes into contact with it, including beneficiaries, staff and volunteers;
  - 3.9.2 set an organisational culture that prioritises safeguarding, so that it is safe for those affected to report incidents and concerns with the assurance they will be handled sensitively and properly;
  - 3.9.3 have adequate safeguarding policies, procedures and measures to protect people;
  - 3.9.4 provide clarity as to how incidents and allegations will be handled should they arise, including reporting to the relevant authorities, such as the police, local authority and Charity Commission.
- 3.10 **Related policies**

The following policies, procedures and resource materials are also relevant to the School's safeguarding practices:

  - (a) Staff Code of Conduct
  - (b) Recruitment, selection and disclosure policy and procedure
  - (c) Educational/External Visits Policy
  - (d) Anti-Bullying Policy

- (e) Whistleblowing Policy
- (f) Behaviour, Rewards and Sanctions Policy (Senior School)
- (g) Culture and Ethos Policy (Junior School and Nursery)
- (h) Data Protection Policy
- (i) IT Acceptable Use Policy for Pupils
- (j) IT Acceptable Use Policy for Staff
- (k) Online Safety Policy
- (l) Risk Assessment for the Prevention of Radicalisation and Extremist Ideology
- (m) Junior School Touch Policy
- (n) Risk Assessment Policy for Pupil Welfare
- (o) Youth Produced Sexual Imagery Policy
- (p) Attendance Policy

These policies, procedures and resource materials are available to staff on the School's intranet and hard copies are available on request.

#### **4 Principles and Values**

- 4.1 Children have a right to feel secure and cannot learn effectively unless they do so.
- 4.2 All children regardless of age, gender, race, ability, sexuality, religion, culture or language have a right to be protected from harm.
- 4.3 The School will ensure that the welfare of children is given paramount consideration when developing and delivering all school activities.
- 4.4 All staff have a key role in prevention of harm and an equal responsibility to act on any suspicion or disclosure that may indicate a child is at risk of harm in accordance with the guidance. Everyone who comes into contact with children and their families and carers has a role to play in safeguarding children. All professionals should make sure that their approach is child-centred. This means that they must consider, at all times, what is in the best interests of the child. It is important to note that no single professional can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.
- 4.5 We acknowledge that working in partnership with other agencies protects children and reduces risk and so we will engage in partnership working throughout the Child Protection process to safeguard children. This includes working with agencies to support children who may benefit from Early Help.
- 4.6 Whilst the School will work openly with parents as far as possible, the School reserves the right to contact local authority children's social care or the police, without notifying parents if this is in the child's best interests.

#### **5 The Designated Safeguarding Lead – key responsibilities**

- 5.1 The Designated Safeguarding Lead ("DSL"), Mr Chris Jones, takes the lead responsibility for safeguarding and Child Protection (including online safety and understanding the filtering and

monitoring systems and processes in place) in the School. This responsibility is explicit in the role holder's job description (**see Appendix 2**). The Deputy DSL(s) fulfil the role of the DSL in his absence (in accordance with the role and responsibilities set out in Appendix 2).

- 5.2 In line with KCSIE the DSL is in a position of senior responsibility and sits on the Senior Management Team in the School. The DSL has undertaken all relevant training and will be granted sufficient time, support and resources, to fulfil the role. The responsibilities include acting as a source of support and expertise to staff on all matters of safety and safeguarding; ensuring that the School's relevant policies are known and used appropriately; raising awareness and discussion of safeguarding issues and concerns amongst staff and pupils; co-ordinating referrals and maintaining written records.

## **6 The Governing Body – key responsibilities**

- 6.1 It is the Governing Body's responsibility to ensure compliance with Child Protection statutory requirements. The Governing Body takes its responsibility seriously to uphold the aims of the charity and its duty of care in promoting the welfare of children, ensuring their security and protecting them from harm. The reporting of safeguarding practice at the School enables the Governing Body to ensure compliance with current legislation and to identify areas for improvement. The Governing Body recognises that close liaison with the local authority is also vital in order that appropriate support and training can be given.
- 6.2 The Governing Body will ensure that the policies, procedures and training relating to Child Protection are effective and comply with the law.
- 6.3 The Governing Body will appoint a Designated Safeguarding Governor to take leadership responsibility for the school's safeguarding arrangements, and liaise with the School's DSL on safeguarding issues.
- 6.4 The Designated Safeguarding Governor is Mrs Jo Bloomer. Mrs Bloomer's contact details can be obtained from the Bursar's PA, Mrs Alex Hind (Tel office: 01730 236802, E-mail: [ahind@churcherscollege.com](mailto:ahind@churcherscollege.com)).
- 6.5 Further details of the Governing Body's responsibilities can be found in **Appendix 3**.

## **7 The Headmaster – key responsibilities**

- 7.1 The Headmaster is responsible for the implementation of the Child Protection policy and ensuring that the outcomes are monitored. The Headmaster will report termly and annually to the Governors on the working of the policy.
- 7.2 The Headmaster 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.
- 7.3 The Headmaster will ensure that sufficient time, funding, training, resources and support are allocated to enable the DSL, Deputy DSL(s) and other staff to discharge their responsibilities, including taking part in strategy discussions and other inter-agency meetings, and contributing to the assessment of children.

7.4 He will inform the LADO(s) of all cases of suspected or alleged abuse in relation to allegations against staff and governors (**see paragraph 22 and Appendix 5**).

## **8 Training and Induction**

8.1 The DSL and Deputy DSL(s) undertake appropriate training at least every two years in accordance with the requirements set out in KCSIE and Working Together to Safeguard Children. This will include local inter-agency working protocols and training in the local safeguarding partners' approach to Prevent duties.

8.2 In addition to the formal training set out above, the knowledge and skills of the DSL and Deputy DSL(s) should be refreshed at regular intervals, as required, but at least annually, to allow them to understand and keep up with any developments relevant to their role.

8.3 Any member of staff (including temporary staff and volunteers) who joins Churcher's College is given appropriate safeguarding and Child Protection induction training by the DSL or a Deputy DSL(s) all of whom have up-to-date inter-agency training.

8.4 This induction training process includes:

- the School's Child Protection and Safeguarding Policy and Procedures (including the policy and procedures to deal with child on child abuse);
- the safeguarding response to children who are absent from education, particularly on repeat occasions and/or for prolonged periods;
- online safety training, including an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring
- the School's Whistleblowing Policy;
- the School's pupil Behaviour Policy (including measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying);
- the School's expectations regarding Staff Behaviour and Code of Conduct;
- the identity and function of the DSL and Deputy DSL(s); and
- School leaders and staff who work directly with children will also be required to read Annex B of KCSIE.

All staff are trained to manage a report of child on child sexual violence and sexual harassment. All staff are provided with a copy of Part 1 (or Annex A, if appropriate) of KCSIE during induction, together with copies of the above policies.

8.5 Each time KCSIE is updated by the DfE, existing staff must read and formally acknowledge that they have read the revised document (**see CP Training Register**). The DSL and the Deputy DSL(s) will ensure that mechanisms are in place to assist staff to understand Part 1 (or Annex A, if appropriate) of KCSIE.

8.6 In addition, all staff members, in line with advice from the Hampshire Safeguarding Children Partnership, receive regular safeguarding and Child Protection updates (including online safety), as required, and at least annually. Additionally, the School will make an assessment of the appropriate level and focus for staff training in relation to specific safeguarding

concerns such as, radicalisation, child sexual exploitation, female genital mutilation, cyberbullying and mental health.

- 8.7 All staff undertake Prevent Awareness Training by completing a Home Office Prevent eLearning module and receive on-line safety training.
- 8.8 All Governors undertake training on the School's Safeguarding and Child Protection Policy, in accordance with local safeguarding children partnership requirements. Governors also complete an online training exercise in relation to Part 2 of Keeping Children Safe in Education.
- 8.9 The Deputy Head (Pastoral), the Senior Teacher (Wellbeing, Inclusion and Safeguarding), Senior Teacher (Pastoral), the Heads of House, School Nurses, School Counsellor and the Deputy Head of the Junior School have the Mental Health First Aid (MHFA) England qualification.
- 8.10 Records of all Child Protection training sessions, courses and attendees are kept by the Human Resources department **(see CP Training Register)**.
- 8.11 All members of staff are issued with a Child Protection cue card that, in addition to key points of advice, provides the name and contact details of the DSL and the Deputy DSL(s).

## **9 Transparency: Whistleblowing and Complaints**

- 9.1 Churcher's College actively promotes a culture of safety and of raising concerns. We hope that pupils, staff, parents and carers will always feel able to take up any issues or worries that they may have with the School.
- 9.2 Parents should be informed about any concerns regarding their children, as the adults with primary legal responsibility for their welfare. It is important that we are honest and open in our dealings with parents. However, safeguarding concerns must be referred to the DSL who will decide on the appropriate response. In a very few cases, it may not be right to inform parents of our concerns immediately as that action could prejudice any investigation or place the child at further risk. In such cases advice will be sought and followed from Hampshire Children's Services.
- 9.3 Churcher's College is a community that promotes respect and mutual tolerance. Every pupil should feel able to raise concerns with any member of staff whom they feel they can trust. Pupils are made aware of this through relevant documentation in the Calendar and on-going briefings. Pupils, parents and staff must feel that they can raise any concern, no matter how small, and the School recognises that listening is an important part of safeguarding children against abuse, neglect and exploitation. Any expression of dissatisfaction or disquiet in relation to a pupil will be listened to and acted upon in order to safeguard his/her welfare. A copy of the School's Complaints Policy is available on the School's website and can be sent to any parent on request.
- 9.4 Churcher's College encourages a culture of valuing staff and of reflective practice. Staff should feel able to raise concerns about poor or unsafe practice and potential failures in the School's safeguarding regime. The Whistleblowing Policy is in place to encourage staff to report suspected wrongdoing as soon as possible in the knowledge that their concerns will be taken

seriously and investigated as appropriate, and that their confidentiality will be respected; to provide staff with guidance as to how to raise those concerns; and to reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken. In the first instance, staff should raise their concerns with their Head of Department or Line Manager. Further details of the procedure are set out in the Whistleblowing Policy. All staff are made aware of this policy and are given training.

- 9.5 Where a staff member feels unable to raise an issue with the School, and they feel it is necessary to seek advice outside the School, advice can be sought from Protect on 020 3117 2520 or [whistle@protect-advice.org.uk](mailto:whistle@protect-advice.org.uk). If staff have concerns over how Child Protection issues are being handled, then they can talk to the NSPCC whistleblowing advice line: [help@nspcc.org.uk](mailto:help@nspcc.org.uk) or 0800 028 0285.
- 9.6 For both pupils and staff there will be immunity from retribution or disciplinary action for whistleblowing in good faith.

## **10 Early Help**

**(see Appendices 6 and 7)**

- 10.1 Intervening to support a child before they experience problems lies at the heart of Early Help.
- 10.2 'Early Help means providing support as soon as a problem emerges, at any point in a child's life, from the foundation years through to the teenage years.' (Keeping Children Safe in Education).
- 10.3 Churchar's College understands the importance of children receiving the right help at the right time to address risks and prevent issues escalating, the importance of acting on and referring the early signs of abuse, neglect, exploitation and radicalisation, keeping clear records and listening to the views of the child.
- 10.4 Central to this is reassessing concerns when situations do not improve, sharing information quickly and challenging inaction.
- 10.5 All staff should be aware of their local Early Help process, and understand their role in it. All staff should be prepared to identify children who may benefit from early help.
- 10.6 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 into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines and/or serious violence, including knife crime;
  - is frequently missing/goes missing from education, home or care;



- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit;
  - is at risk of modern slavery, trafficking, sexual and/or criminal exploitation;
  - is at risk of being radicalised or exploited;
  - has a parent or carer in custody, 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 or other drugs themselves;
  - is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage;
  - is a privately fostered child;
  - is persistently absent from education, including persistent absences for part of the school day;
  - has returned home to their family from care;
  - is bereaved; and
  - is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online.
- 10.7 Staff who have a concern that a pupil may be in need, no matter what the level of concern, should report their concerns to the pupil's Form Tutor, Personal Tutor or Head of House or the Head of the Junior School. These concerns will be recorded and tracked internally and discussed with the DSL who will refer to the Hampshire and Isle of Wight Safeguarding Children Partnership and Children's Trust Thresholds Chart to decide the next action (**see Appendix 7**).
- 10.8 Pupils deemed to require additional support (but not meeting the threshold for referral to Hampshire Children's Services) will be assessed using an Early Help Assessment which will identify the most appropriate way to meet the needs of the pupil.
- 10.9 Churcher's College will monitor such cases using the Hampshire and Isle of Wight Safeguarding Children Partnership and Children's Trust Thresholds Chart, and in borderline cases will contact Hampshire Children's Services 'front door' Central Referral Team at HantsDirect for advice. If Early Help is appropriate, the DSL (or a Deputy DSL) will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate.
- 10.10 All staff may be asked to contribute to an Early Help Assessment meeting and/or be a member of Team Around the Child (TAC) or Team Around the Family (TAF).
- 10.11 Any such cases should be kept under constant review and consideration given to a referral to children's social care for assessment for statutory services, if the child's situation does not appear to be improving or is getting worse.
- 11 Action to be taken – general guidance**
- 11.1 Members of staff should be aware that pupils may suffer neglect, physical, sexual or emotional abuse, radicalisation or exploitation either whilst at home or away from School or within the School itself, by staff, other adults (including parents), and other children.

- 11.2 Members of staff should be aware of behaviour and physical indications that may draw attention to the possibility of abuse, radicalisation or exploitation. The attention of staff is drawn to the alerting 'Signs and Symptoms' information and 'Specific Safeguarding Issues' (see Appendix 4).
- 11.3 Members of staff should maintain an attitude of 'it could happen here' where safeguarding is concerned. Don't think 'What if I am wrong?' Think 'What if I am right?'
- 11.4 The policy of the School is to work in partnership with parents in order to promote the welfare of children. The School also aims to build up relationships of trust with children. Children and parents should feel able to raise with the School concerns about safety and welfare in the knowledge that these will be dealt with sensitively.
- 11.5 Children must feel able to share concerns with staff. A possible difficulty could arise if a child consults a member of staff about a problem and does not want that information to be shared with parents.
- 11.6 Whilst staff should try to encourage children to share the information with parents where that is appropriate, there may be circumstances in which any pressure to pass information on could result in the child keeping the problem to him or herself or not sharing concerns in the future.
- 11.7 Some children may seek to tell members of staff in confidence that they have been abused. Members of staff must understand that it is not possible to give absolute guarantees of confidentiality because that could place the member of staff in the untenable position of being in possession of information that a crime has been committed without the necessary freedom to report it, and it may be impossible for a child to be protected from further abuse.
- 11.8 All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experience as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.
- 11.9 Staff are required to disclose to the School's DSL any information which may be prejudicial to the safety or wellbeing of a child at Churcher's College.
- 11.10 Information related to a Child Protection or Safeguarding concern will be disseminated to the appropriate people on a 'need to know' basis, keeping the privacy, wellbeing and safety of the pupil in question at the centre of any decision made.
- 11.11 All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting **any** form of abuse and/or neglect. Nor should a victim ever be made to feel ashamed for making a report.

11.12 Child protection records will be kept confidential, allowing disclosure only to those who need the information in order to safeguard and promote the welfare of children.

**12 Action to be taken – What to do if you are worried a child is being abused, exploited or neglected**

12.1 It is important that all parties act swiftly and avoid delay. If staff have **any concerns** about a child's welfare, they should act on them **immediately**.

12.2 The matter, no matter how small, should be reported immediately to the DSL or, in his/her absence, a Deputy DSL, and followed up by a written report giving full details of the circumstances (**see paragraph 13**). The matter should not be discussed with anyone except the DSL, or in his/her absence the Deputy DSL(s).

12.3 Options will then include:

- Managing any support for the child internally via the School's own pastoral support processes;
- Undertaking an early help assessment (see paragraph 10); or
- Making a referral to statutory services, for example as the child might be in need, is in need, or suffering, or is likely to suffer, harm.

12.4 The DSL (or a Deputy DSL) should always be available to discuss safeguarding concerns. However, if, in exceptional circumstances, the DSL (or a Deputy DSL) is not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the Senior Management Team and/or take advice from the Children's Services Department in Hampshire. In these circumstances, any action taken should be shared with the DSL (or a Deputy DSL) as soon as practically possible.

12.5 Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for the effective identification, assessment and allocation of appropriate service provision, whether this is when problems first emerge or where a child is already known to local authority children's social care (such as a child in need or a child with a protection plan). The Data Protection Act 2018 and the UK General Data Protection Regulation do not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare. Fears about sharing information **must not** be allowed to stand in the way of the need to safeguard and promote the welfare of children.

12.6 Where there are concerns that a child may be in need of help, the DSL is responsible for and will liaise as appropriate with the Children's Services Department in Hampshire. This will be done promptly including, if necessary, written referral (by submission of an Inter Agency Referral Form). The inter-agency Child Protection procedures will be followed.

12.7 If, at any time, a child is in immediate danger, is suffering harm or is at risk of suffering harm a referral should be made by the DSL to the Children's Services Department in Hampshire and/or Police immediately.

- 12.8 It is important to note that, if deemed necessary (for example, if a child is in immediate danger, is suffering, or is likely to suffer from, harm); any staff member can make an immediate referral to local authority children's social care (and if appropriate the police) directly, using the contact details in **Appendix 1**. When a referral is not made by the DSL, the DSL should be informed, as soon as possible, that a referral has been made.
- 12.9 Referrals must in practice be in line with published local referral thresholds (**see Appendix 7**).
- 12.10 The School is not required to obtain parental consent prior to making a referral but parents will be kept informed where it is appropriate to do so. If parental consent has not been sought prior to making the referral, the DSL should clarify with the statutory agencies, how best, when and by whom, the parents should be told about the referral.
- 12.11 Within one working day of a referral being made, a local authority social worker should acknowledge its receipt to the referrer and make a decision about the next steps and the type of response that is required. This will include determining whether:
- the child requires immediate protection and urgent action is required;
  - the child is in need, and should be assessed under section 17 of the Children Act 1989;
  - there is reasonable cause to suspect the child is suffering, or likely to suffer, significant harm, and whether enquiries must be made and the child assessed under section 47 of the Children Act 1989;
  - any services are required by the child and family and what type of services; and
  - further specialist assessments are required to help the local authority to decide what further action to take.

The referrer should follow up if this information is not forthcoming.

- 12.12 If social workers decide to carry out a statutory assessment, staff should do everything they can to support that assessment (supported by the DSL (or a Deputy DSL) as required).
- 12.13 If after a referral the child's situation does not appear to be improving the DSL (or the staff member that made the referral) should consider following local escalation procedures to ensure their concerns have been addressed and, most importantly, that the child's situation improves.
- 12.14 No attempt should be made to question a pupil beyond what the pupil is volunteering (for example, do not ask leading questions); such questioning could seriously jeopardise any possible legal action.
- 12.15 **Dos and Don'ts**
- (a) The child's welfare and interests must be paramount, taking precedence over all other considerations.
  - (b) If a child discloses abuse to you always acknowledge how difficult and painful it must have been for them to do so.

- (c) Tell and show a child that you are taking them seriously and that they will be supported and kept safe.
- (d) Don't make any promises to the child that you cannot keep.
- (e) Do not take sole responsibility. If you are at all concerned, consult with the DSL or Deputy DSL(s).
- (f) Always think before you act, keep an open mind and take an objective view of the situation.
- (g) Consider the long term future of the child and not necessarily the option which is least painful for you.
- (h) Make sure you are familiar with the School's Child Protection procedures.
- (i) Taking inappropriate action could put a child at further risk.
- (j) Whilst all staff should speak to the DSL (or a Deputy DSL) with any concerns about Female Genital Mutilation (FGM), there is a specific legal duty on teachers. If a teacher discovers that an act of FGM appears to have been carried out on a girl under the age of 18 the teacher must report this to the Police. Unless the teacher has good reason not to, they should still consider and discuss such a case with the School's DSL and involve children's social care as appropriate.

### **13 Written reports**

- 13.1 Written reports must be kept about any suspicion or allegation of abuse.
- 13.2 Best practice is to wait until the pupil has finished talking and immediately write up a thorough summary. This allows the member of staff to devote their full attention to the child and to listen to what they are saying. It may be appropriate to make notes at the time the pupil is talking (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. These notes must be handed immediately to the DSL. Copies should not be retained by the member of staff who received the allegation.
- 13.3 A written report should include:
  - (a) The member of staff's name and position in the School/relationship to the child (i.e. Form Tutor, Head of House etc.);
  - (b) The time and date;
  - (c) The nature of the concern;
  - (d) The party or parties involved;
  - (e) Any steps requested;
  - (f) Any steps taken, including, if appropriate, any steps taken to protect the victim;

- (g) If physical abuse has occurred, a body map (**Appendix 8**) can assist in the clear recording and reporting. The body map should only be used to record observed injuries and no child should be asked to remove clothing by a member of staff of the School;
- (h) Questions that the pupil was asked and their response, verbatim if possible;
- (i) How the pupil appeared – did they appear anxious, tearful, calm etc.

#### **14 Allegations of abuse made against other children – child on child abuse**

- 14.1 Children can abuse other children; this is often referred to as 'child on child abuse' (or peer on peer abuse) and can take many forms. It can happen both inside and outside of school and online. It is important that **all** staff are clear as to the school's policy and procedures with regard to child on child abuse and the important role they have in preventing it and responding where they believe a child may be at risk from it.
- 14.2 All staff should understand that, even if there are no reports of child on child abuse at Churcher's, this does not mean that it is not happening. It may be the case that abuse is not being reported. As such, it is important that if staff have **any** concerns regarding child on child abuse, they should speak to the DSL (or a Deputy DSL).
- 14.3 In most instances, the conduct of pupils towards each other will be covered by the School's Behaviour, Rewards and Sanctions Policy (the Culture and Ethos Policy in the Junior School) and Anti-Bullying policies.
- 14.4 Some allegations may be of such a serious nature that they may raise safeguarding concerns. It is essential that **all** staff understand the importance of challenging inappropriate behaviours between children, examples 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. Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

Child on child abuse is most likely to include, but may not be limited to:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- Abuse in intimate personal relationships between children (sometimes known as teenage relationship abuse);
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);

- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- Consensual and non-consensual sharing of nude and semi nude images and/or videos (also known as sexting or youth produced sexual imagery);
- Upskirting (which 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 (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

It is also likely that incidents dealt with under this policy will involve older pupils and their behaviour towards younger pupils or those who are vulnerable.

- 14.5 The intervention of child protection agencies in situations involving sexual activity between children can require difficult professional judgments. Some situations are statutorily clear – for example, a child under the age of 13 cannot consent to sexual activity. But it will not necessarily be appropriate to initiate safeguarding procedures where sexual activity involving children and young people below the age of legal consent (16 years) comes to notice. In our society generally the age at which children become sexually active has steadily dropped. It is important to distinguish between consensual sexual activity between children of a similar age (where at least one is below the age of consent), and sexual activity involving a power imbalance, or some form of coercion or exploitation. It may also be difficult to be sure that what has or has been alleged to have taken place definitely does have a sexual component.
- 14.6 As usual, important decisions should be made on a case by case basis, on the basis of an assessment of the children's best interests. Referral under safeguarding arrangements may be necessary, guided by an assessment of the extent to which a child is suffering, or is likely to suffer, significant harm. All staff, but especially the DSL (and Deputy DSLs), should consider the context within which safeguarding incidents and/or behaviours occur. Key specific considerations will include:
- (a) The age, maturity and understanding of the children;
  - (b) Any disability or special needs of the children;
  - (c) Their social and family circumstance;

- (d) Any evidence in the behaviour or presentation of the children that might suggest they have been harmed;
  - (e) Any evidence of pressure to engage in sexual activity;
  - (f) Any indication of sexual exploitation;
  - (g) There are also contextual factors. Gender, sexuality, race and levels of sexual knowledge can all be used to exert power.
- 14.7 At Churcher's College we believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm by adults in the school and other pupils. Churcher's College has a zero tolerance approach to all forms of abuse, including child on child abuse.
- 14.8 We recognise that some pupils will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the School's Behaviour and Anti-Bullying policies.
- 14.9 As a school we will minimise the risk of child on child abuse by:
- (a) Providing a developmentally appropriate PSHE syllabus which develops pupils' understanding of acceptable behaviour and keeping themselves safe.
  - (b) Having systems in place (which are well promoted, easily understood and easily accessible) for any pupils to raise concerns with staff, knowing that they will be listened to, believed and valued.
  - (c) Delivering targeted work on assertiveness and keeping safe those pupils identified as being at risk.
  - (d) Developing robust risk assessments and implementing development plans for pupils identified as being a potential risk to other pupils.
- 14.10 Occasionally, allegations may be made against pupils by others in the School, which are of a safeguarding nature. Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse and sexual exploitation (see also specific examples at paragraph 14.4). It is likely that, to be considered a safeguarding allegation against a pupil, some of the following features will be found. If the allegation:-
- (a) Is made against an older pupil and refers to their behaviour towards a younger pupil or a more vulnerable pupil.
  - (b) Is of a serious nature, possibly including a criminal offence.
  - (c) Raises risk factors for other pupils in the School.
  - (d) Indicates that other pupils may have been affected by this pupil.
  - (e) Indicates that young people outside the School may be affected by this pupil.



14.11 Examples of safeguarding issues against a pupil could include:

- (a) **Physical Abuse** - Violence, particularly pre-planned; forcing others to use drugs or alcohol.
- (b) **Emotional Abuse** - Blackmail or extortion; threats and intimidation.
- (c) **Sexual Abuse** - Indecent exposure, indecent touching or serious sexual assaults; forcing others to watch pornography or take part in sexting.
- (d) **Sexual Exploitation** - Encouraging other children to engage in inappropriate sexual behaviour; photographing or videoing other children performing indecent acts.

14.12 The School recognises that it is more likely that girls will be victims of child on child abuse and boys perpetrators, but all child on child abuse is unacceptable and will be taken seriously. There may also be different gender issues that can be prevalent when dealing with child on child abuse. This could, for example, include girls being sexually touched/assaulted or boys being subject to initiation/hazing type violence and rituals.

14.13 At Churcher's College allegations of child on child abuse will be recorded, investigated and dealt with as follows:

- (1) When an allegation is made by a pupil against another pupil, members of staff should consider whether the complaint raises a safeguarding concern. If there is a safeguarding concern, the DSL should be informed.
- (2) All children involved, whether perpetrator, alleged perpetrator or victim<sup>1</sup>, are treated as being 'at risk'.
- (3) A factual record should be made of the allegation, but no attempt at this stage should be made to investigate the circumstances.
- (4) The DSL should contact the Children's Services Department in Hampshire to discuss the case.
- (5) The DSL will follow through the outcomes of the discussion and make a referral where appropriate.
- (6) If the allegation indicates that a potential criminal offence has taken place, the Children's Services Department in Hampshire will refer the case to the multi-agency safeguarding hub where the Police will become involved.
- (7) Parents, of both the pupil being complained about and the alleged victim, should be informed and kept updated on the progress of the referral.

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<sup>1</sup> The School recognises that not everyone who has been subjected to abuse considers themselves a victim or would want to be described in this way. When managing any incident, the School will be conscious of this and will be prepared to use any term with which the child is most comfortable. The School will also give careful consideration to use of the terms 'alleged perpetrator' or 'perpetrator(s)', especially when speaking in front of children, not least because the abusive behaviour may have been harmful to the perpetrator(s) as well.

- (8) The DSL will make a record of the concern, the discussion and any outcome and keep a copy in both pupils' files.
- (9) It may be appropriate to suspend the pupil being complained about for a period of time according to the School's behaviour policies and procedures.
- (10) Where neither the Children's Services Department in Hampshire or the Police accept the complaint, a thorough School investigation should take place into the matter using the School's usual disciplinary procedures.
- (11) In situations where the School considers a safeguarding risk is present, a risk assessment should be prepared along with a preventative, supervision plan.
- (12) The plan should be monitored and a date set for a follow-up evaluation with everyone concerned.

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

15.1 CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants and/or for the financial advantage (or increased status) of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female, and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

15.2 **Child Criminal Exploitation (CCE):** Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

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

15.3 **Child Sexual Exploitation (CSE):** CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images,

forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse, including via the internet.

CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media.

CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

- 15.4 Further information about CSE and CCE, including definitions and indicators, is included in **Appendix 4.**

## **16 Serious violence**

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

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

16.3 Staff 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.

## **17 Child on child sexual violence and sexual harassment**

17.1 At Churcher's College we are clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up. All staff should maintain an attitude of 'it could happen here' and this is especially important when considering child on child abuse. Further information about sexual violence and sexual harassment can be found in **Part Five of KCSIE.**

### **17.2 Context**

Sexual violence and sexual harassment can occur between two or more children of **any** age and sex from primary to secondary stage and into colleges. It can also occur online. It can also occur 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 (physically and verbally) and are never acceptable.

Staff should be 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”, “part of growing up”, “just having a laugh” 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 behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

Children who are victims of sexual violence and sexual harassment 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.

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.

Staff should be aware that some groups are potentially more at risk. Evidence shows girls and children with disabilities are at greater risk.

### 17.3 What is sexual violence and sexual harassment?

**Sexual violence:** It is important that all staff are aware of sexual violence and the fact that 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 we do so in the context of child on child sexual violence and with reference to sexual offences under the Sexual Offences Act 2003 (rape, assault by penetration, sexual assault and causing someone to engage in sexual activity without consent – for further details see Part Five of KCSIE).

**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. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Note that:

- 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.

**Sexual harassment:** 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/college. 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.

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 (school 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 under 18s is a criminal offence (see the **Youth Produced Sexual Imagery Policy**)
  - 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.

#### 17.4 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. The term 'harmful sexual behaviour' (HSB) is a useful umbrella term and has been widely adopted in child protection. **HSB can occur online and/or face-to-face and can also occur simultaneously between the two.**

When considering HSB, both the 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 2 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 eg. if the older child has a disability or is smaller in stature.

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, and it is important that they are offered appropriate support.

Details of organisations who can provide specialist support and advice can be found in Annex B of KCSIE.

## 18 **The response to a report of sexual violence or sexual harassment**

18.1 The School has systems in place (which are well promoted, easily understood and easily accessible) for children to confidently report abuse, knowing their concerns will be treated seriously.

18.2 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.

18.3 If a child makes a report of sexual violence and/or sexual harassment, the procedures set out in paragraph 14.13 should be followed.

18.4 If possible, reports should be managed with two members of staff present (preferably one of them being the DSL or a Deputy DSL).

18.5 If the report includes an online element, staff must be mindful of the DfE *Advice Searching, Screening and Confiscation (July 2022)* and the non-statutory guidance *Sharing nudes and semi-nudes: advice for education settings working with children and young people* (Department for Science, Innovation and Technology and UKCIS, updated March 2024) (see also the **Youth Produced Sexual Imagery Policy**).

The initial response to a report from a child is incredibly important. How the school responds to a report can encourage, or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward. Schools and colleges not recognising, acknowledging or understanding the scale of harassment and abuse and/or downplaying of some behaviours can actually lead to a culture of unacceptable behaviour.

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. 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.

If staff have a concern about a child or a child makes a report to them, they should follow the referral process as set out in paragraph 12 of this policy. As is always the case, if staff are in any doubt as to what to do, they should speak to the DSL (or a Deputy).

18.6 Where there has been a report of sexual violence, the DSL (or a Deputy) should make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and

needs assessment for a report of sexual violence (which must be recorded and kept under review) should consider:

- 18.6.1 the victim, especially their protection and support;
  - 18.6.2 whether there may have been other victims;
  - 18.6.3 the alleged perpetrator(s);
  - 18.6.4 all the other children (and, if appropriate, adult students and staff) at Churcher's College, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms; and
  - 18.6.5 the time and location of the incident and any action required to make the location safer.
- 18.7 Following a report of sexual violence or sexual harassment, the DSL (or a Deputy) will engage with local authority children's social care and specialist services as required.
- 18.8 Reports of sexual violence and sexual harassment will be given careful consideration. The DSL (or Deputy) is likely to have a complete safeguarding picture and be the most appropriate person to advise on the school's initial response. Important considerations will include:
- The wishes of the victim in terms of how they want to proceed;
  - The nature of the alleged incident(s), including: whether a crime may have been committed and/or whether HSB (harmful sexual behaviour) 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 have well known social standing? Does the victim have a disability or a 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, or school staff; and
  - Other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation (see paragraph 14.6).
- 18.9 The DSL (or Deputy) will manage the report with the following likely scenarios (at all times following the guidance set out in Part Five of KSCIE 2024):
- Manage the incident internally via the School's own pastoral support processes
  - Early help (note that early help and the option to manage a report internally do not need to be mutually exclusive)

- Referral to the Children's Services Department in Hampshire
- Reporting to the police (generally in parallel with a referral to Children's Services)

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.

18.10 The School's ongoing response to allegations of sexual violence and/or abuse will be as follows:

- The DSL will manage each report on a case by case basis and will keep the risk assessment under review.
- 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 DSL will carefully consider how best to keep the victim and alleged perpetrator(s) a reasonable distance apart on school premises (including during before and after school-based activities) and on transport, where appropriate.
- Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, the School will 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 School would seriously harm the education or welfare of the victim (and potentially other pupils).
- Where a criminal investigation into sexual assault leads to a conviction or caution, the School will, if it has not already, consider any suitable sanctions in light of its behaviour policies, including consideration of permanent exclusion. Where the perpetrator(s) is/are going to remain at Churcher's College, the victim and perpetrator(s) will continue to be kept in separate classes and the School will continue to consider the most appropriate way to manage potential contact on school 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.
- The victim, alleged perpetrator and other witnesses will receive appropriate support and safeguards on a case-by-case basis.
- The School will take any disciplinary action against the alleged perpetrator(s) in line with the School's behaviour policy.
- The School recognises that taking disciplinary action and providing appropriate support are not mutually exclusive actions and will occur at the same time if necessary.

18.11 The School will give consideration to supporting children who have witnessed sexual violence, as this is likely to have been traumatic for them and support may be required. Following any report of sexual violence or sexual harassment, it is likely that some children will take 'sides'. The School will do all it can to ensure both the victim and alleged perpetrator(s), and any witnesses, are not being bullied or harassed.

18.12 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. A list of organisations that provide specialist online safety support can be found in Part Five and Annex B of KCSIE.

- 18.13 All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified, and addressed. Consideration should 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.
- 18.14 If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL 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 local authority children's social care may be appropriate.
- 18.15 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, in accordance with the School's behaviour policy.
- 18.16 Pupils, parents and professionals can also seek support, advice and guidance by calling the dedicated NSPCC helpline Report Abuse in Education on 0800 136 663 or by emailing [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

## **19 Mental Health**

- 19.1 Schools have an important role to play in supporting the mental health and wellbeing of their pupils.
- 19.2 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 that they may be experiencing a mental health problem or be at risk of developing one.
- 19.3 Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour attendance and progress at school.
- 19.4 If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following the procedures set out in this policy and speaking to the DSL or a deputy.

## **20 Domestic Abuse**

- 20.1 Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, wellbeing, development and ability to learn.
- 20.2 Further information about domestic abuse can be found in **paragraph 5 of Appendix 4.**

## **21 Sexting / Youth Produced Sexual Imagery**

- 21.1 Incidents of Youth Produced Sexual Imagery, commonly referred to as 'Sexting', often relate to the sharing of naked, 'nude' or 'semi-nude' pictures or video (including pseudo-images which are computer generated images that appear to be a photograph or video) through mobile phones and the internet. It also includes underwear shots, sexual poses and explicit text messaging.
- 21.2 While sexting often takes place in a consensual relationship between two young people, the use of Sexted images in revenge following a relationship breakdown is becoming more commonplace. Sexting can also be used as a form of sexual exploitation and take place between strangers. A sexting incident may be financially motivated; for example, an adult may threaten to release sexual/indecent images of a young person unless they pay money or do something else to benefit them (often known as "sextortion").
- 21.3 Sexting is prevalent amongst children and young people, and is an issue that requires awareness raising across all ages.
- 21.4 Through the PSHE programme of study, the School will use age appropriate educational material to raise awareness, to promote safety and deal with pressure.
- 21.5 As with all E-Safety related concerns, the School supports parents and offers advice and guidance.
- 21.6 The School has a clearly defined procedure for dealing with cases of Sexting (**see Youth Produced Sexual Imagery Policy**), which is underpinned by the following rationale: *The School's first and foremost priority is to do no further harm to the pupil victim. The investigation should be conducted with the outmost sensitivity for the pupil's mental wellbeing and regard for his or her privacy. The School must attempt to diffuse a quick moving situation in which the image can be spread to hundreds of other people in mere seconds.*

## **22 Action to be taken – what to do if you have safeguarding concerns or an allegation is made about a staff member, supply staff, a volunteer, a contractor, a Governor or the Headmaster**

- 22.1 If staff have any safeguarding concerns (no matter how small), or an allegation is made concerning a member of staff, supply staff, a volunteer, a contractor, a Governor or the Headmaster, the School will follow the procedure set out in **Appendix 5**, which follows the Department for Education statutory guidelines published in Part 4 of KCSIE.

22.2 Concerns and allegations that **may** meet the harm threshold will be addressed as set out in Section One of Part 4 of KCSIE (for details of the School's procedure see **Section 1 of Appendix 5**).

22.3 Concerns and allegations that **do not** meet the harm threshold (referred to in this policy as 'low-level concerns') will be addressed as set out in Section Two of Part 4 of KCSIE (for details of the School's procedure see **Section 2 of Appendix 5**).

### **23 Post Incident Support**

23.1 Churcher's College is aware of the possible need for counselling by specialist practitioners for pupils who have suffered abuse and any others closely involved, including the member of staff to whom the disclosure was made, and appropriate support would be provided.

### **24 Radicalisation and the Prevent Duty**

24.1 In accordance with section 26 of the Counter-Terrorism and Security Act 2015 all staff need to have due regard to the need to combat extremism and radicalisation, and prevent pupils from becoming terrorists or supporting terrorism.

24.2 In order to fulfil our Prevent Duty Churcher's College adopts a proactive approach. For further details on Radicalisation and the Prevent Duty see **Appendix 4**.

### **25 Potential Risk**

25.1 An entirely separate classification has been established for children who are in a position where the circumstances give cause for "grave concern". In such cases there is insufficient "hard evidence" to prove that the child has been, or is being abused, although there is sufficient concern to warrant protection from potential abuse.

25.2 Some examples to which this classification might apply include:

- (a) A child living in the same household as a child who has been abused and where the behaviour of the parent or carer gives serious concern about the child's future development.
- (b) A child or unborn child who is to live in any household which contains a person convicted of an offence against children, or which is regularly visited by such a person.
- (c) A child or unborn child in a situation where there is serious concern about the future health or development of a child, because of the parent's or carer's behaviour or attitude towards the child or any other child. An example may be where a parent is abusing drugs (including alcohol) or where a parent has made threats towards a child.

25.3 In all cases of alleged child abuse, including "potential risk", the degree of risk to a child is assessed and decided upon by a Child Protection case conference.

25.4 Sexual activity (**see Sexual Activity and Pregnancy Policy**)

## **26 Safeguarding Pupils who Self-Harm**

26.1 Self-harm is a serious action for any young person to undertake and the School recognises that young people who self-harm are likely to be at risk.

26.2 Churcher's College follows the procedures and guidance provided on self-harm and suicidal behaviour as laid down by the Hampshire Safeguarding Children Partnership.

26.3 The School co-operates with the Hampshire Safeguarding Children Partnership and other appropriate external agencies as needed to take part in any Child Protection investigation.

26.4 Self-harm is defined by the Hampshire Safeguarding Children Partnership<sup>2</sup> as follows:

"Self-harm describes a wide range of things that people do to themselves in a deliberate and usually hidden way. In the vast majority of cases self-harm remains a secretive behaviour that can go on for a long time without being discovered. Self-harm can involve:

- Attempted hanging;
- Overdosing of tablets or medicines;
- Cutting, often to the arms using razor blades, broken glass or knives;
- Burning using cigarettes or caustic agents;
- Punching and bruising;
- Inserting or swallowing objects;
- Head banging;
- Pulling out hair or eyelashes.

Self harm can sometimes be a coping mechanism with the aim of relieving emotional distress.

NB it must be recognised that the emotional distress that leads to self harm can also lead to suicidal thoughts and actions."

26.5 Any member of staff to whom a pupil discloses information related to self-harming must make clear to the pupil that this information cannot be kept confidential. The member of staff should immediately refer this information to the School's DSL.

26.6 The DSL will seek specialist help by liaising immediately with the School Nurse and/or School Doctor, who can assess the pupil's need and level of risk and where necessary refer the case to additional external agencies such as CAMHS (Child and Adolescent Mental Health Service).

26.7 Where the child is deemed to be at immediate risk the School's DSL, School Nurse and/or School Doctor may call an ambulance or make a direct referral to a Hospital Accident and Emergency Unit.

26.8 In all cases of self-harming, active consideration must be given to informing the parents of the child who is undertaking this activity. Unless there is a compelling reason not to do so, the parents should be informed and then kept closely in touch with developments.

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<sup>2</sup> See the Pan-Hampshire and Isle of Wight Self Harm Pathway for Non Health Professionals

## 27 Safeguarding Pupils Online

27.1 Mobile devices and computers are important tools for communication and education and are part of daily life. However, the use of technology has become a significant component of many safeguarding issues including child sexual exploitation, radicalisation and sexual predation.

27.2 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 eg consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and

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

27.3 The School ensures that appropriate filtering and monitoring systems are in place on school devices and school networks, in order to safeguard children from potentially harmful and inappropriate material on-line that takes into account the age range of the pupils. The School incorporates multiple applications and appliances for monitoring web activity, keyword searching and document misuse providing real time reporting. The School ensures that the appropriateness of the filters and monitoring deployed is informed by our **Risk Assessment for the Prevention of Radicalisation and Extremist Ideology**. The Senior Management Team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively, knowing how to escalate concerns when identified. See the Online Safety Policy for further details of the School's filtering and monitoring procedures.

27.4 Pupils and parents receive regular guidance regarding online safety in which they are reminded about the dangers of unrestricted 3G and 4G access of the internet.

27.5 The **Staff Code of Conduct** and **Online Safety Policy** explain the responsibilities of staff in relation to keeping children safe online (including when they are at home).

27.6 All teaching staff are provided with e-safety training as part of their wider safeguarding training.

## 28 Private Fostering

28.1 Children being privately fostered are required by law to be seen by a social worker.

- 28.2 If a member of staff becomes aware that a pupil may be in a private fostering arrangement, where a child under the age of 16 (or 18 if disabled) is provided with care and accommodation by a person who is not a parent, a person with parental responsibility for them or a close relative, in that person's home and with the intention that it should last for 28 days or more, they should raise this in the first instance with the DSL.
- 28.3 The DSL will then notify Hampshire Children's Services using the normal referral procedure, who will check that the arrangements are suitable and safe for the child.
- 28.4 Further information relating to private fostering can be obtained as follows:

Private Fostering  
Children's Services Department  
Hampshire County Council  
Elizabeth II Court North  
The Castle  
Winchester  
SO23 8UG  
Tel: 0300 555 1384

## **29 Children potentially at greater risk of harm**

Whilst **all** children should be protected, it is important to recognise that some groups of children are potentially at greater risk of harm than others (both online and offline). For example:

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

Children may need a social worker due to safeguarding or welfare needs. 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, consider the provision of pastoral and/or academic support alongside action by statutory services).

### **29.2 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. The School's response to persistently absent pupils and children missing education should support identifying such abuse and, in the case of absent pupils, help prevent the risk of them becoming a child missing education in the future. For further details see the list of specific safeguarding issues in **Appendix 4** and the statutory guidance Children Missing Education (DfE, August 2024).

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

Many home educated children have a positive learning experience and the parents' decision to home educate is made with their child's best education at the heart of the decision.

However, this is not always the case and elective home education can mean some children are not in receipt of suitable education and are less visible to the services that are there to keep them safe and supported in line with their needs. In cases where a parent/carer expresses an intention to remove a child from school with a view to educating at home, the School will arrange a meeting with the parents/carers where possible. This would be before a final decision has been made, to ensure that the parents/carers have considered what is in the best interests of each child.

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

Schools have an important role to play in supporting the mental health and well-being of their pupils. 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.

#### **29.5 Children with special educational needs, disabilities or health issues**

29.5.1 Children with special educational needs or disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges both online and offline. Additional barriers can exist when recognising abuse, neglect and exploitation in this group of children. These can include:

- (a) assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration;
- (b) these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
- (c) the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs;
- (d) communication barriers and difficulties in managing or reporting these challenges; and
- (e) cognitive understanding – being able to understand the difference between fact and fiction in online content and then repeating the content/behaviours in school or the consequences of doing so.

29.5.2 To address these additional challenges, the School will consider extra pastoral support for children with SEN and disabilities.

29.5.3 See also the School's **Anti-Bullying policy**.

#### **29.6 Children who are lesbian, gay, bisexual or gender questioning**

29.6.1 A child or young person being lesbian, gay or bisexual is not in itself an inherent risk factor for harm, however, they can sometimes be targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay or bisexual (whether they are or not) can be just as vulnerable as children who are.

29.6.2 Risks can be compounded where children lack trusted adults with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and create a culture where they can speak out or share their concerns with members of staff.

### **30 Educating Pupils about Safeguarding and Child Protection**

30.1 The curriculum and pastoral system are designed to foster the spiritual, moral, social and cultural development of all pupils. All staff play a vital role in this process, helping to ensure that all pupils relate well to one another and feel safe and comfortable within the School.

30.2 All staff are expected to lead by example and to play a full part in promoting an awareness that is appropriate to their age amongst all our pupils on issues relating to health, safety and well-being.

30.3 All staff have an important role in insisting that pupils always adhere to the standards of behaviour set out in our **pupil code of conduct**, our **Behaviour, Rewards and Sanctions Policy** (the Culture and Ethos Policy in the Junior School) and in enforcing our **Anti-Bullying Policy**.

30.4 All pupils are educated about Safeguarding, e-safety and Child Protection issues through the school's PSHE programme (including Relationships Education in the Junior School and Relationships and Sex Education in the Senior School). Assemblies, Form Tutor led discussion and external speakers are used to further pupil understanding on a range of relevant topics.

30.5 Pupils are taught about harmful sexual behaviours, including sexual violence and sexual harassment, through PSHE and Spiritual, Moral, Social and Cultural education, appropriate to their age and stage of development.

30.6 The School recognises that 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 and/or disabilities. The School also recognises that it has a crucial role to play in preventative education. Preventative education is most effective in the context of a whole-school approach that prepares pupils for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment. Churcher's College has a clear set of values and standards, upheld and demonstrated throughout all aspects of school life. These are underpinned by the school's behaviour policies and pastoral support systems, as well as by a planned programme of evidence based RSHE delivered in regularly timetabled lessons and reinforced throughout the whole curriculum.

30.7 All pupils know that there are adults in the School to whom they can turn to if they are worried; including, in the Junior School, the Deputy Head, the Head of Infants, Head of Middle School and Head of Upper School and, in the Senior School, Form/Personal Tutors, Heads of House, School Nurses, School Counsellor, Senior Teacher (Wellbeing, Inclusion and Safeguarding), Senior Teacher (Pastoral) and School Chaplains.

30.8 Every Senior School pupil has access to an electronic copy of the School Calendar booklet. This document offers advice on: 'Who Can I Talk To?' and 'Bullying – What You Can Do.'



- 30.9 All pupils have access to telephone numbers enabling them to call for support in private. For example, the Childline number (0800 1111) is in the Calendar booklet and is also displayed around the school site and in the Medical Centre. In the Junior School, there is an email address to which pupils can write to raise any bullying concerns. In the Senior School, there is an online reporting system through which students can raise concerns, including the option to do so anonymously.
- 30.10 The School operates an active and successful Peer Mentor scheme. In addition to Peer Mentors, the Junior School also operates a Play Leader scheme.
- 30.11 In the Senior School, both Peer Mentors and School Prefects undergo training which specifically covers Child Protection issues and the importance of offering support and assistance to younger and vulnerable pupils. Prefects cannot give sanctions. Junior School Peer Mentors receive training at an appropriate level, as determined by the Head of the Junior School.

### **31 Safeguarding Adults - advice to teachers**

- 31.1 All staff and volunteers, particularly those acting in any teaching, pastoral or extra-curricular capacity which places them in a one-to-one situation with pupils, should take great care not to put themselves at risk of any suspicion or allegation of physical or sexual abuse or harassment.
- 31.2 As a result of their knowledge, position and/or authority invested in their role, all adults working with children and young people are in positions of trust in relation to the young people in their care. A relationship between a member of staff and a pupil cannot be a relationship between equals. There is potential for exploitation and harm of vulnerable young people and all members of staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification. Staff should note that it is an offence for a person aged 18 or over and in a position of trust to:
- (a) Intentionally touch a child in a sexual way;
  - (b) Have a sexual relationship with a child, even if the relationship is consensual;
  - (c) Cause or incite a child to engage in sexual activity;
  - (d) Intentionally engage in a sexual activity in the presence of a child; or
  - (e) For the purpose of sexual gratification cause a child to watch a third person engaging in sexual activity or look at an image or any person engaging in sexual activity.
- 31.3 A position of trust could arise even if the member of staff does not teach the child. A child for these purposes is a person under the age of 18.
- 31.4 Staff working in the Early Years Foundation Stage should not use their own personal mobile phones, cameras or other electronic devices with imaging and sharing capabilities whilst working with the children to photograph or record the pupils. The Early Years Foundation Stage teachers will monitor use of equipment in the classroom and make all staff aware of this

protocol. Photographs of pupils will only be taken by approved individuals in agreement with the Early Years Foundation Stage class teacher and images will only be used for School purposes.

### **32 The use of 'reasonable force'**

32.1 There are circumstances where it is appropriate for staff to use reasonable force to safeguard children and young people. Further details can be found in the Staff Code of Conduct, the Behaviour, Rewards and Sanctions Policy (Senior School), the Culture and Ethos Policy (Junior School) and the Touch Policy (Junior School).

32.2 When using reasonable force in response to risks presented by incidents involving children with special educational needs or disabilities (SEND), mental health problems or with medical conditions, in considering the risks staff should carefully recognise the additional vulnerability of these groups and reasonable adjustments will be made as appropriate.

### **33 Safer Recruitment including Disqualification under the Childcare Act 2006**

33.1 Churcher's College follows the Government's recommendations for the safer recruitment and employment of staff who work with children, and acts at all times in compliance with the Independent School Standards Regulations.

33.2 In addition to carrying out safer recruitment procedures as set out in KCSIE, members of the teaching and non-teaching staff at the School including part-time staff, temporary and supply staff and visiting staff such as musicians and sports coaches are subject to the necessary statutory child protection checks before starting work.

33.3 All governors, volunteers and contractors working regularly during term-time, such as contract catering staff, are also subject to the relevant statutory checks.

33.4 A Single Central Register is maintained to confirm this.

33.5 Confirmation is also obtained that appropriate child protection checks and procedures apply to any staff employed by another organisation and working with the School's pupils at school or another site.

33.6 The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 set out the circumstances in which an individual will be disqualified for the purposes of the Childcare Act 2006 ("the Act"). Under the Act, a person who is disqualified under the Regulations may not provide relevant childcare provision or be directly concerned in the management of such provision. Staff will be covered by this legislation if they are employed and/or provide early years childcare (this covers the age range from birth until 1 September following a child's fifth birthday ie. up to and including reception age) or later years childcare (this covers children above reception age but who have not yet attained the age of 8), or if they are directly concerned with the management of such childcare.

33.7 Further details of the relevant offences which will result in disqualification under the Act can be found in the DfE guidance Disqualification under the Childcare Act 2006 (July 2018).

<https://www.gov.uk/government/publications/disqualification-under-the-childcare-act-2006>

- 33.8 See also the Recruitment, Selection and Disclosure Policy and Procedure and the Educational/External Visits Policy.

#### **34 School Child Protection Register**

- 34.1 As part of our procedures to continue to monitor at risk children the Headmaster's Executive Assistant holds a register of pupil concerns in the Senior School. A similar record is maintained by the Head of the Junior School. Children who are of concern are entered on this register at the instruction of the DSL. Coded details are added to indicate type of abuse, level of notification, action taken, and reporting member of staff. Specific details of concerns will be kept in pupil files but in restricted access folders.
- 34.2 Under data protection law, children and parents have access to information held within the school files, but not information relating to the possible child abuse.

#### **35 Charities Commission**

- 35.1 In all cases where there are concerns or allegations of abuse, the School will make a serious incident report to the Charity Commission whenever the Commission's guidelines deem it appropriate to do so.

#### **36 Use of School premises for non-school activities**

- 36.1 When the School facilities/premises are hired/rented out to organisations or individuals, appropriate arrangements are in place to keep children safe (regardless of whether or not the children who attend any of these services or activities are pupils of Churcher's College). The School will seek reassurance that the provider concerned has appropriate safeguarding and child protection policies and procedures in place and will ensure that there are arrangements in place for the provider to liaise with the School on these matters where appropriate. Safeguarding requirements are included in the Conditions of Hire agreement, as a condition of use and occupation of the premises, and that failure to comply with the requirements would lead to termination of the agreement.

## Appendix 1

### Contact Details: Key External Agencies, Services and Professionals

Local safeguarding partners ensure that organisations work together to safeguard children and promote their welfare.

Churcher's College works in close cooperation with the Hampshire Safeguarding Children Partnership.

Further information may be sought from the Hampshire Safeguarding Children Partnership: <https://www.hampshirescp.org.uk/> with specific details on the HIPS Procedures website: <http://hipsprocedures.org.uk/>. Contact information can be found at:

<http://hipsprocedures.org.uk/ykyvzs/assessing-need-and-providing-help/referrals>

The key points of contact are as follows:

- If you are worried about yourself, or a child or young person please contact Hampshire Children's Services: **01329 225379** (office hours 8.30am – 5pm Monday-Thursday, 8.30am – 4.30pm Friday) or **0300 555 1373** (out of hours). You do not need to know everything about the child or young person and what is happening before contacting Children's Services.
- In an emergency contact the Police by dialling **999**.
- If you think a child or young person under the age of 18 has been or is being abused by a person in a position of trust, the LADO(s) (Local Authority Designated Officer or team of officers) – Barbara Piddington / Shona McMinn / Fiona Armfield should be contacted: **01962 876364**. The LADO(s) should be advised of all cases where it is alleged that a person who works with children has:
  - (a) behaved in a way that has harmed, or may have harmed, a child; and/or
  - (b) possibly committed a criminal offence against, or related to, a child; and/or
  - (c) behaved towards a child or children in a way that indicates they may pose a risk of harm to children; and/or
  - (d) behaved towards a child or children in a way that indicates s/he may not be suitable to work with children.
- The East Hants Early Help Hub meets on a weekly basis to coordinate the multi-agency response for families with complex needs who do not meet the threshold for statutory social care: **01730 235244** or [easthants.fss@hants.gov.uk](mailto:easthants.fss@hants.gov.uk).
- Further advice on Child Protection related matters is available from:
  - NSPCC: <https://www.nspcc.org.uk/>
  - Childline: <https://www.childline.org.uk/>
  - CEOP: <https://ceopeducation.co.uk>
  - Anti-Bullying Alliance: <http://www.anti-bullyingalliance.org.uk/>

## Nominated Staff and Contacts

### Designated Safeguarding Lead (DSL): -

**Deputy Head (Pastoral) - Mr Chris Jones** (Tel office: 01730 236808, Mobile: 07795 190947, E-mail: [cjones@churcherscollege.com](mailto:cjones@churcherscollege.com))

### The Deputy Designated Safeguarding Leads (Deputy DSL(s)) are as follows: -

**Senior Teacher (Wellbeing, Inclusion and Safeguarding) – Mr Richard Hoe** (Tel office: 01730 236854, Mobile: 07825 458828, E-mail: [rhoe@churcherscollege.com](mailto:rhoe@churcherscollege.com))

**Senior Teacher (Pastoral) – Mrs Suzanne Herrington** (Tel office: 01730 236828, Mobile: 07824 445757, E-mail: [sherrington@churcherscollege.com](mailto:sherrington@churcherscollege.com))

**Head of Sixth Form – Mr William Baker** (Tel office: 01730 236843, Mobile: 07747 665270, E-mail: [wbaker@churcherscollege.com](mailto:wbaker@churcherscollege.com))

**Head of the Junior School - Mrs Ffion Robinson**, who also takes lead responsibility for safeguarding children in the EYFS setting (Tel office: 01730 236871, Mobile: 07702 564452, E-mail: [frobinson@churcherscollege.com](mailto:frobinson@churcherscollege.com))

**Deputy Head of the Junior School - Mrs Philipa Yugin-Power** (Tel office: 01730 236874, Mobile: 07384 540249, E-mail: [pyuginpower@churcherscollege.com](mailto:pyuginpower@churcherscollege.com))

### The Governing Body

**Chair of the Governors - Mr C Strick**

**Designated Safeguarding Governor - Mrs Jo Bloomer**

Mr Strick and Mrs Bloomer's contact details can be obtained from the Bursar's PA, Mrs Alex Hind (Tel office: 01730 236802, E-mail: [ahind@churcherscollege.com](mailto:ahind@churcherscollege.com)).

## **Appendix 2**

### **Role of the Designated Safeguarding Lead (DSL)**

Whilst the activities of the Designated Safeguarding Lead (DSL) can be delegated to appropriately trained deputies, the ultimate lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place) remains with the DSL; this lead responsibility should not be delegated.

In summary, the DSL's responsibility is to maintain an overview of safeguarding within the School, to open channels of communication with local statutory agencies, support staff in carrying out their safeguarding duties and to monitor the effectiveness of policies and procedures in practice.

In accordance with Annex C of KCSIE, the main responsibilities of the DSL are:

#### **1 Manage referrals**

The Designated Safeguarding Lead is expected to refer cases:

- (a) of suspected abuse to Hampshire Children's Services as required and support staff who make referrals to Hampshire Children's Services;
- (b) to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme;
- (c) where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- (d) where a crime may have been committed to the Police as required.

#### **2 Working with others**

The Designated Safeguarding Lead is expected to:

- 2.1 Act as a source of support, advice and expertise for all staff;
- 2.2 Act as a point of contact with the safeguarding partners;
- 2.3 Liaise with the headteacher (where the DSL is not the headteacher) to inform him or her of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations (including being aware of the requirement for children to have an Appropriate Adult);
- 2.4 As required, liaise with the "case manager" (as per Part four of KCSIE) and the designated officer(s) at Hampshire Children's Services for child protection concerns (in cases which concern a staff member); and
- 2.5 Liaise with staff (especially teachers, pastoral support staff, school counsellors, school nurses, school doctor, IT technicians, the Head of Curriculum Support (Senior School) and the Head of Learning Enrichment (Junior School) on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically.

- 2.6 promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances;
- 2.7 work with the headteacher (where the DSL is not the headteacher) and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experiences, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at school.

### **3 Training, knowledge and skills**

- 3.1 The DSL (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The Deputy DSLs should be trained to the same standard as the DSL and the role should be explicit in their job descriptions.
- 3.2 The DSL (and any Deputies) should undertake Prevent awareness training.
- 3.3 Training should provide DSLs with a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of children, as well as specific harms that can put children at risk, and the processes, procedures and responsibilities of other agencies, particularly local authority children's social care, so they:
  - (a) Understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements;
  - (b) Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
  - (c) Understand the importance of the role that the Designated Safeguarding Lead has in providing information and support to local authority children's social care in order to safeguarding and promote the welfare of children;
  - (d) Understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes;
  - (e) Are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers;
  - (f) Understand the importance of information sharing, both within the School and with the safeguarding partners, other agencies, organisations and practitioners.

- (g) Understand and support the school with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
  - (h) are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school;
  - (i) can recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from bullying, grooming and radicalisation and are confident they have the capability to support children with SEND to stay safe online;
  - (j) Obtain access to resources and attend any relevant or refresher training courses; and
  - (k) Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school may put in place to protect them.
- 3.4 In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other DSLs, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.

#### **4 Raising Awareness**

The DSL should:

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



**5 Providing support to staff**

- 5.1 Training should support the DSL in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters. Specifically, this includes to:
- (a) Ensure that staff are supported during the referrals processes; and
  - (b) Support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

**6 Understanding the views of children**

- 6.1 It is important that all children feel heard and understood. Therefore, the DSL (and any Deputies) will be supported in developing knowledge and skills to:
- (a) Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school may put in place to protect them; and
  - (b) Understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships, which facilitate communication.

**7 Holding and sharing information**

- 7.1 The DSL should be equipped to:
- (a) Understand the importance of information sharing, both within the school and with other schools and colleges on transfer, including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners;
  - (b) Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR); and
  - (c) Be able to keep detailed, accurate, secure written records of all concerns, discussions and decisions made, including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program etc.

**8 Information sharing and managing the child protection file**

- 8.1 The DSL is responsible for ensuring that child protection files are kept up to date.
- 8.2 Child protection information is kept confidential and stored securely. Concerns and referrals are kept in a separate child protection file for each child. Records include the following:

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

- 8.3 Each child protection file can only be accessed by those who need to see it and where the file or content within it is shared, this will be in line with the information sharing advice set out in Parts One and Two of KCSIE.
- 8.4 Where children leave the school (including for in-year transfers) the DSL will 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 5 days of the start of a new term. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained.
- 8.5 Where a child protection file is received in relation to a child joining the school, key staff such as the DSL (and the Deputy DSLs) and the member of staff with oversight for pupils with special educational needs and disabilities (the Head of Learning Enrichment in the Junior School and Nursery and the Head of Curriculum Support in the Senior School) should be made aware as required.
- 8.6 In addition to the child protection file, the DSL must also consider if it would be appropriate to share any additional information with the new school or college in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school or college. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse and have that support in place for when the child arrives.

## **9 Availability**

- 9.1 During term time the DSL (or a deputy) should always be available for staff in the school to discuss any safeguarding concerns. Whilst generally speaking the DSL (or deputy) would be expected to be available in person, in exceptional circumstances availability via phone and/or Skype or other such media is acceptable.
- 9.2 The DSL will arrange adequate and appropriate cover arrangements for any out of hours/out of term activities

### **Appendix 3**

#### **The Governing Body – key responsibilities**

- 1 The Governing Body will ensure that they facilitate 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 should operate with the best interests of the child at their heart.
- 2 The Governing Body will ensure that the school's safeguarding policy and procedures are transparent, clear and easy to understand for staff, pupils, parents and carers. Further, it will ensure that systems are in place, and that they 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.
- 3 The Governing Body will ensure there are appropriate policies and procedures in place, including the Staff Code of Conduct, in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare.
- 4 The Governing Body will ensure that an appropriate senior member of staff, from the school's management team, is appointed to the role of DSL and ensure that he/she is trained and receives further update training at least every two years. The Governing Body will ensure that the DSL has the appropriate status and authority within the School to carry out the duties of the post. The DSL will be given the additional time, funding, training, resources and support needed to carry out the role effectively.
- 5 The Designated Safeguarding Governor will determine appropriate training (in liaison with the DSL) for the Governing Body. The Governing Body will ensure that all Governors receive appropriate safeguarding and child protection (including online) training at induction, which is regularly updated thereafter. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the school's safeguarding policy and procedures are effective and support the delivery of a robust whole school approach to safeguarding.
- 6 The Governing Body will be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010 and their local multi-agency safeguarding arrangements.
- 7 The Governing Body will ensure that all staff members undergo safeguarding and Child Protection training (including online safety) at induction and regular updates thereafter, as required, and at least annually. Amongst other things, this induction training will include an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring.
- 8 The Governing Body will receive and consider termly and annually a report from the DSL on safeguarding pupils in the School. The report will include an update and review of the effectiveness of Child Protection procedures and their implementation.

- 9 The Governing Body will determine any changes to the School's policies and procedures as appropriate, but at least annually, to ensure that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt.
- 10 The Governing Body is responsible for reviewing and amending the policy as appropriate. The last Full Board review of this policy was in December 2024.
- 11 The Governing Body will monitor the efficiency with which Child Protection related duties have been discharged, including the swift remediation of deficiencies.
- 12 The Governing Body will ensure that the School operates statutory safer recruitment procedures, as set out in Part Three of KCSIE, and that these are embedded and effective.
- 13 The Governing Body will ensure that the School contributes to multi-agency working through effective communication and good co-operation with local agencies in line with statutory guidance.
- 14 The Governing Body will ensure that the School's safeguarding arrangements take into account the procedures and practice of the local authority as part of the inter-agency safeguarding procedures set up by the Hampshire Safeguarding Children Partnership.
- 15 The Governing Body will ensure that procedures are in place to handle manage concerns/allegations against members of staff and volunteers and allegations against other children (peer on peer/child on child abuse). Following consultation with the LADO(s) (Local Authority Designated Officer or team of officers) and any agreed investigation, make a referral to the DBS, and any other relevant professional body, if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have had they not resigned.
- 16 The Governing Body will ensure that pupils are safeguarded from potentially harmful and inappropriate online material, by ensuring that appropriate filters and monitoring systems are in place and will regularly review their effectiveness.
- 17 The Governing Body will consider how pupils are taught how to keep themselves and others safe, including being taught about bullying, and online safety through the curriculum; this may be through PSHE, assemblies, Relationships and Sex Education etc.
- 18 The Governing Body will ensure that the child's wishes are taken into account when determining what action to take and what services to provide (although staff must not promise confidentiality).
- 19 The Governing Body will ensure that the school's Child Protection policy and procedures reflect the fact that pupils with special educational needs and/or disabilities (SEND) can face additional safeguarding challenges, and that additional barriers can exist when recognising abuse and neglect in this group of children.
- 20 The Governing Body will ensure that there are appropriate safeguarding arrangements in place to respond to children who are absent from education for prolonged periods and/or on repeat occasions and children missing education.

- 21 The Governing Body will ensure that the Child Protection policy reflects the whole school approach to child on child abuse and includes the School's policy and procedures in respect of child on child abuse.
- 22 The Governing Body will ensure that there are clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems.
- 23 The Governing Body will ensure that child protection files are maintained as set out in Annex C of KCSIE.
- 24 The Governing Body will ensure that the School has a pupil behaviour policy, which includes measures to prevent bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- 25 The Governing Body will ensure that the School, where reasonably possible, holds more than one emergency contact number for each pupil.
- 26 The Designated Safeguarding Governor is Mrs Jo Bloomer. Mrs Bloomer's contact details can be obtained from the Bursar's PA, Mrs Alex Hind (Tel office: 01730 236802, E-mail: [ahind@churcherscollege.com](mailto:ahind@churcherscollege.com)).

## Appendix 4

### Signs and Symptoms of Abuse, including 'Specific Safeguarding Issues'

To ensure that children are protected from harm, we need to understand what types of behaviour constitute abuse, neglect and exploitation. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse, neglect and exploitation, so that staff are able to identify cases of children who may be in need of help or protection.

Staff should be aware that abuse, neglect, exploitation and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases multiple issues will overlap.

All staff should understand that children can be at risk of harm inside and outside of school, inside and outside of home and online. All staff, but especially the DSL (and any deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation.

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

**In all cases, if staff are unsure, they should always speak to the DSL (or a deputy).**

Abuse and neglect are forms of maltreatment of a child. Somebody (adult or child) may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or another child or children. A child is a person who has not yet attained their 18th birthday. Child abuse can take many forms, but they are usually divided into four categories:

1. Physical abuse
2. Neglect
3. Sexual abuse
4. Emotional abuse

- 1 **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.
  - 1.1 **The nature of physical abuse:** Most children collect cuts and bruises quite routinely as part of the rough and tumble of daily life. Clearly, it is not necessary to be concerned about most of these minor injuries. But accidental injuries normally occur on the bony prominences – e.g., shins. Injuries on the soft areas of the body are more likely to be inflicted intentionally and should therefore make us more alert to other concerning factors that may be present.
  - 1.2 **A body map (Appendix 8)** can assist in the clear recording and reporting of physical abuse. The body map should only be used to record observed injuries and no child should be asked to remove clothing by a member of staff of the school.
  - 1.3 **Indicators of physical abuse / factors that should increase concern**
    - Multiple bruising or bruises and scratches (especially on the head and face)
    - Clusters of bruises – e.g. fingertip bruising (caused by being grasped)
    - Bruises around the neck and behind the ears – the most common abusive injuries are to the head
    - Bruises on the back, chest, buttocks, or on the inside of the thighs
    - Marks indicating injury by an instrument – e.g. linear bruising (stick), parallel bruising (belt), marks of a buckle
    - Bite marks
    - Deliberate burning may also be indicated by the pattern of an instrument or object – e.g. electric fire, cooker, cigarette
    - Scalds with upward splash marks or tide marks
    - Untreated injuries
    - Recurrent injuries or burns
    - Bald patches.
  - 1.4 In the social context of the School, it is normal to ask about a noticeable injury. The response to such an enquiry is generally light-hearted and detailed. So, most of all, concern should be increased when:
    - the explanation given does not match the injury
    - the explanation uses words or phrases that do not match the vocabulary of the child (adults words)
    - no explanation is forthcoming
    - the child (or the parent/carer) is secretive or evasive
    - the injury is accompanied by allegations of abuse or assault.
  - 1.5 You should be concerned if the child or young person:
    - is reluctant to have parents/carers contacted
    - runs away or shows fear of going home

- is aggressive towards themselves or others
- flinches when approached or touched
- is reluctant to undress to change clothing for sport
- wears long sleeves during hot weather
- is unnaturally compliant in the presence of parents/carers
- has a fear of medical help or attention
- admits to a punishment that appears excessive.

**2 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, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

- 2.1 **The nature of neglect:** Neglect is a lack of parental care but poverty and lack of information or adequate services can be contributory factors. Far more children are registered to the category of neglect on child protection plans than to the other categories. As with abuse, the number of children experiencing neglect is likely to be much higher than the numbers on the plans.
- 2.2 Neglect is a difficult form of abuse to recognise and is often seen as less serious than other categories. It is, however, very damaging: children who are neglected often develop more slowly than others and may find it hard to make friends and fit in with their peer group.
- 2.3 Neglect is often noticed at a stage when it does not pose a risk to the child. The duty to safeguard and promote the welfare of children (*What to do if you're worried a child is being abused*, 2015) would suggest that an appropriate intervention or conversation at this early stage can address the issue and prevent a child continuing to suffer until it reaches a point when they are at risk of harm or in significant need.
- 2.4 Neglect is often linked to other forms of abuse, so any concerns School staff have should at least be discussed with the DSL.
- 2.5 **Indicators of neglect:** The following is a summary of some of the indicators that may suggest a child is being abused or is at risk of harm. It is important to recognise that indicators alone cannot confirm whether a child is being abused. Each child should be seen in the context of their family and wider community and a proper assessment carried out by appropriate persons. What is important to keep in mind is that if you feel unsure or concerned, do something about it. Don't keep it to yourself.

**Physical indicators of neglect:**

- Constant hunger and stealing food
- Poor personal hygiene - unkempt, dirty or smelly



- Underweight
- Dress unsuitable for weather
- Poor state of clothing
- Illness or injury untreated.

#### **Behavioural indicators of neglect**

- Constant tiredness
- Frequent absence from school or lateness
- Missing medical appointments
- Isolated among peers
- Frequently unsupervised
- Stealing or scavenging, especially food
- Destructive tendencies.

3 **Sexual abuse** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Child sexual exploitation is a form of child sexual abuse. The sexual abuse of children by other children is a specific safeguarding issue in education and **all** staff should be aware of it and of the School's policy and procedures for dealing with it (see paragraph 17 of this policy).

3.1 **The nature of sexual abuse:** Sexual abuse is often perpetrated by people who are known and trusted by the child – e.g. relatives, family friends, neighbours, babysitters, people working with the child in school, faith settings, clubs or activities. Children can also be subject to child sexual exploitation.

#### 3.2 **Characteristics of child sexual abuse:**

- (a) it is often planned and systematic – people do not sexually abuse children by accident, though sexual abuse can be opportunistic
- (b) grooming the child – people who abuse children take care to choose a vulnerable child and often spend time making them dependent
- (c) grooming the child's environment – abusers try to ensure that potential adult protectors (parents and other carers especially) are not suspicious of their motives.
- (d) Most people who sexually abuse children are men, but some women sexually abuse too.

### 3.3 Indicators of sexual abuse:

#### (a) Physical observations

- Damage to genitalia, anus or mouth
- Sexually transmitted diseases
- Unexpected pregnancy, especially in very young girls
- Soreness in genital area, anus or mouth and other medical problems such as chronic itching. Unexplained recurrent urinary tract infections and discharges or abdominal pain.

#### (b) Behavioural observations

- Sexual knowledge inappropriate for age
- Sexualised behaviour or affection inappropriate for age
- Sexually provocative behaviour/promiscuity
- Hinting at sexual activity
- Inexplicable decline in school performance
- Depression or other sudden apparent changes in personality such as becoming insecure or clinging
- Lack of concentration, restlessness, aimlessness
- Socially isolated or withdrawn
- Overly-compliant behaviour
- Acting out, aggressive behaviour
- Poor trust or fear concerning significant adults
- Regressive behaviour, Onset of wetting, by day or night; nightmares
- Onset of insecure, clinging behaviour
- Arriving early at school, leaving late, running away from home
- Suicide attempts, self-mutilation, self-disgust
- Suddenly drawing sexually explicit pictures
- Eating disorders or sudden loss of appetite or compulsive eating
- Regressing to younger behaviour patterns such as thumb sucking or bringing out discarded cuddly toys
- Become worried about clothing being removed
- Trying to be 'ultra-good' or perfect; overreacting to criticism.

- 4 **Emotional abuse** is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently

to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

#### 4.1 The nature of emotional abuse

- (a) Most harm is produced in low warmth, high criticism homes, not from single incidents.
- (b) Emotional abuse is difficult to define, identify/recognise and/or prove.
- (c) Emotional abuse is chronic and cumulative and has a long-term impact.
- (d) All kinds of abuse and neglect have emotional effects although emotional abuse can occur by itself.
- (e) Children can be harmed by witnessing someone harming another person – as in domestic violence.
- (f) It is sometimes possible to spot emotionally abusive behaviour from parents and carers to their children, by the way that the adults are speaking to, or behaving towards children. An appropriate challenge or intervention could affect positive change and prevent more intensive work being carried out later on.

#### 4.2 Indicators of emotional abuse

- (a) Developmental issues
  - Delays in physical, mental and emotional development
  - Poor school performance
  - Speech disorders, particularly sudden disorders or changes.
- (b) Behaviour
  - Acceptance of punishment which appears excessive
  - Over-reaction to mistakes
  - Continual self-deprecation (I'm stupid, ugly, worthless etc.)
  - Neurotic behaviour (such as rocking, hair-twisting, thumb-sucking)
  - Self-mutilation
  - Suicide attempts
  - Drug/solvent abuse
  - Running away
  - Compulsive stealing, scavenging
  - Acting out
  - Poor trust in significant adults
  - Regressive behaviour – e.g. wetting
  - Eating disorders
  - Destructive tendencies

- Arriving early at school, leaving late.
- (c) Social issues
- Withdrawal from physical contact
  - Withdrawal from social interaction
  - Over-compliant behaviour
  - Insecure, clinging behaviour
  - Poor social relationships.
- (d) Emotional responses
- Extreme fear of new situations
  - Inappropriate emotional responses to painful situations (“I deserve this”)
  - Fear of parents being contacted
  - Self-disgust
  - Low self-esteem
  - Unusually fearful with adults
  - Lack of concentration, restlessness, aimlessness
  - Extremes of passivity or aggression.

## 5 Specific Safeguarding Issues

Keeping Children Safe in Education 2024 acknowledges the following as specific safeguarding issues:

- Child abduction and community safety incidents (see 5.1)
- Children and the court system
- Children who are absent or missing from education (see 5.2 below)
- Children with family members in prison
- Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE) (see paragraph 15 and 5.3 below)
- County lines (see 5.4 below)
- Modern Slavery and the National Referral Mechanism
- Cybercrime (see 5.5 below)
- Domestic abuse (see paragraph 20 and 5.6 below)
- Homelessness
- Mental health (see paragraph 19 and 5.7 below)
- So-called “honour-based” abuse (including Female Genital Mutilation and Forced Marriage) (see 5.8 below)
- Preventing radicalisation (see 5.9 below)
- Sexual violence and sexual harassment between children in schools and colleges (see paragraph 17)
- Serious violence (see paragraph 16)

5.1 **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.

- 5.2 **Children who are absent from education:** Staff should be aware that a child being absent from an education setting, particularly on repeat occasions 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.

The School has a responsibility for knowing the whereabouts of pupils while they are in its care. In most circumstances, there will be a satisfactory explanation for a pupil's absence. It is, however, possible that a pupil will be absent without permission and hence it is imperative that this unauthorised absence is followed up using the School's clearly defined procedures.

A child going missing from an education setting is not necessarily those with poor attendance records, but those children of compulsory school age who leave one education setting and are not known to start at another.

In such circumstances the pupil's 'home' Local Authority must be notified. For children in Hampshire the route to do so is by contacting 'Children Missing in Education (CME)', using the following contact details:

E-mail: [cme@hants.gov.uk](mailto:cme@hants.gov.uk)

Tel: 01962 845363

- 5.3 **Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE):** Different forms of harm often overlap, and 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 (eg. money, gifts, 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 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 drugs and alcohol;
- go missing for periods of time or regularly come home late; and
- regularly miss school or education or do not take part in education.

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.

As a school we educate all staff in the signs and indicators of sexual exploitation. We use the child exploitation risk assessment form (CERAF) and associated guidance to identify pupils who are at risk and the DSL will share this information as appropriate with Hampshire Children's Services.

- 5.4 **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. 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 drugs 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 (see 5.3) 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 (from school or home) and are subsequently found in areas away from their home;
- have been the victim, perpetrator or alleged perpetrator of serious violence (eg 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 call 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.

5.5 **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 papers 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 any concerns about a child in this area, the DSL will consider a referral to the Cyber Choices programme, which is a nationwide police programme supported by the Home Office and led by the National Crime Agency.

5.6 **Domestic abuse:** The Domestic Abuse Act 2021 introduced the first statutory definition of domestic abuse, which 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 ensures that different types of relationships are captured, including ex-partners and family members, and captures a range of different abusive behaviours, including physical, emotional and economic abuse and

coercive and controlling behaviour. Under the statutory definition, 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 sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. 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 child on child 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.

Further advice on identifying children who are affected by domestic abuse and how they can be helped can be found in Annex B of KCSIE. This includes details about Operation Encompass, which operates in all police forces across England, helping police and schools work together to provide emotional and practical help to children (but does not replace statutory safeguarding procedures).

## 5.7 **Mental health**

Where children have suffered abuse and neglect, or other potentially 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, attendance and progress at school.

Further information can be found in the non-statutory guidance [Mental health and behaviour in schools \(DfE, November 2018\)](#).

- 5.8 **So-called “honour”-based abuse (HBA) (including Female Genital Mutilation and Forced Marriage):** 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. HBA is a crime or incident which may have been committed to protect or defend the honour of the family and/or community. It is often linked to family or community



members who believe someone has brought shame to their family or community by doing something that is not in keeping with their unwritten rule of conduct. For example, honour based abuse might be committed against people who:

- become involved with a boyfriend or girlfriend from a different culture or religion
- want to get out of an arranged marriage
- want to get out of a forced marriage
- wear clothes or take part in activities that might not be considered traditional within a particular culture
- convert to a different faith from the family.

Women and girls are the most common victims of honour based abuse however it can also affect men and boys. Crimes of 'honour' do not always include violence. Crimes committed in the name of 'honour' might include:

- domestic abuse
- threats of violence
- sexual or psychological abuse
- forced marriage
- being held against your will or taken somewhere you don't want to go
- assault.

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.

If staff believe that a pupil is at risk from honour based abuse the DSL will follow the usual safeguarding referral process. However, if it is clear that a crime has been committed or the pupil is at immediate risk the police will be contacted in the first place. It is important that if honour based abuse is known or suspected that communities and family members are NOT spoken to prior to referral to the police or social care as this could increase risk to the child.

**5.8.1 Female Genital Mutilation (FGM)** comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs for non-medical reasons. It has no health benefits and harms girls and women in many ways. It involves removing and damaging healthy and normal female genital tissue, and hence interferes with the natural function of girls' and women's bodies.

- (a) The age at which girls undergo FGM varies enormously according to the community. The procedure may be carried out when the girl is new-born, during childhood or adolescence, just before marriage or during the first pregnancy. However, the majority of cases of FGM are thought to take place between the ages of 5 and 8 and therefore girls within that age bracket are at a higher risk.

- (b) FGM is illegal in the UK.
- (c) Teachers must report cases, where they discover that it appears that FGM has been carried out, to the police. In these situations, the DSL will be informed that the member of teaching staff has called the police to report suspicion that FGM has happened.
- (d) **At no time will staff examine pupils to confirm this.**
- (e) For cases where it is believed that a girl may be vulnerable to FGM or there is a concern that she may be about to be genitally mutilated the member of staff with the concern will inform the DSL who will report it as with any other child protection concern.
- (f) Further advice and guidance on FGM can be found in the document Multi-Agency statutory guidance on female genital mutilation (July 2020) (<https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation>) and the [FGM resource pack](#).

5.8.2 **Forced Marriage:** A forced marriage is '*a marriage in which one or both spouses cannot consent to the marriage and duress is involved. Duress can include physical, psychological, financial, sexual and emotional pressure*'. From 27 February 2023, The Marriage and Civil Partnership (Minimum Age) Act 2022 made it an offence to carry out any conduct causing a child to marry before their 18th birthday, even if violence, threats or another form of coercion or deception aren't used. The Act raised the minimum marriage and civil partnership age to 18, removing all consent requirements. In developing countries 11% of girls are married before the age of 15. One in 3 victims of forced marriage in the UK is under 18.

- (a) It is important that all members of staff recognise the presenting symptoms, how to respond if there are concerns and where to turn for advice. Advice and help can be obtained nationally through the Forced Marriage Unit and locally through the local police safeguarding team or children's social care. The Forced Marriage Unit can be contacted as follows: 020 7008 0151 or [fm@fcdo.gov.uk](mailto:fm@fcdo.gov.uk).
- (b) Policies and practices in this school reflect the fact that while all members of staff, including teachers, have important responsibilities with regard to pupils who may be at risk of forced marriage, teachers and school leaders should not undertake roles in this regard that are most appropriately discharged by other children's services professionals such as police officers or social workers.
- (c) **Characteristics that may indicate forced marriage:** While individual cases of forced marriage, and attempted forced marriage, are often

very particular, they are likely to share a number of common and important characteristics, including:

- an extended absence from school, including truancy;
- a drop in performance or sudden signs of low motivation;
- excessive parental restriction and control of movements;
- a history of siblings leaving education to marry early;
- poor performance, parental control of income and students being allowed only limited career choices;
- evidence of self-harm, treatment for depression, attempted suicide, social isolation, eating disorders or substance abuse; and/or
- evidence of family disputes/conflict, domestic violence/abuse or running away from home.

On their own, these characteristics may not indicate forced marriage. However, it is important to be satisfied that where these behaviours occur, they are not linked to forced marriage. It is also important to avoid making assumptions about an individual pupil's circumstances or act on the basis of stereotyping. For example, an extended holiday may be taken for entirely legitimate reasons and may not necessarily represent a pretext for forced marriage.

- (d) Further advice and guidance on forced marriage can be found in the document *Multi-Agency statutory guidance for dealing with forced marriage and multi-agency practice guidelines: Handling cases of forced marriage* (March 2022, updated April 2023): <https://www.gov.uk/government/publications/the-right-to-choose-government-guidance-on-forced-marriage>.

5.9 **Preventing Radicalisation:** In accordance with section 26 of the Counter-Terrorism and Security Act 2015 all staff need to have due regard to the need to combat extremism and radicalisation, and prevent pupils from being drawn into terrorism.

5.9.1 In order to fulfil our Prevent Duty Churcher's College adopts a proactive approach:

- (a) We have cultivated a good working relationship with the Hampshire Special Branch Prevent Team. Our first point of contact for all enquiries is Prevent Officer Ish Damani (Tel: 07831 615167, e-mail: [ishret.damani@hampshire.pnn.police.uk](mailto:ishret.damani@hampshire.pnn.police.uk))
- (b) We build our pupils' resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views (see **SMSC Policy and PSHE scheme of work**).
- (c) We encourage pupils and staff in a safe and controlled environment to debate controversial issues, thus allowing all members of the

School community to understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments.

- (d) We use external speakers (for example, the Hampshire Constabulary Prevent Team) to empower our pupils to reject extremism and terrorism in all its forms.
- (e) We ensure that the DSL and Deputy DSL(s) have undertaken higher level Prevent awareness training and are thus able to provide advice and support to other members of staff on protecting children from the risk of radicalisation. The DSL and Deputy DSLs are aware of local procedures for making a Prevent referral.
- (f) Additionally, all staff have undertaken Prevent Awareness Training by completing a Home Office Prevent eLearning module (**see CP Training Register**). Subsequently, all staff have the knowledge and confidence to identify children at risk of being drawn into terrorism and to challenge extremist ideas.
- (g) We ensure that our pupils are safe from terrorist and extremist material when accessing the internet in School, by ensuring that suitable filtering is in place (**see Online Safety Policy**). More generally, we educate our pupils to stay safe online, both in school and outside. Internet safety is an integral part of the Junior School's Computing curriculum, the Senior School's KS3 Computing curriculum and is embedded in the PSHE scheme of work.
- (h) We set out clear protocols for ensuring that any visiting speakers, whether invited by staff or by the pupils themselves, are suitable and appropriately supervised (**see Visiting Speakers Policy**).

- 5.9.2 Although there is no single way of identifying whether a child is likely to be susceptible to an extremist ideology, there are possible indicators that should be taken into consideration alongside other factors and contexts. Further information and a list of such indicators can be found at <https://educateagainsthate.com/radicalisation-and-extremism/>.

However, it is possible to protect people from extremist ideologies and intervene to prevent those at risk of radicalisation being drawn to terrorism. As with managing other safeguarding risks staff should be alert to changes in a pupil's behaviour which could indicate that they may be in need of help or protection.

- 5.9.3 Children at risk of radicalisation may display different signs or seek to hide their views.

5.9.4 Staff should use their professional judgement in identifying children who might be at risk of radicalisation and, if concerned, report to the DSL (or Deputy DSL).

5.9.5 The DSL (or Deputy DSL) will act proportionately, consider the level of risk and, if deemed necessary, will make a referral to the Channel programme. If a child who is receiving support through the Channel programme leaves the school, the DSL will consider if it would be appropriate to share any information with the new school or college in advance of the child leaving, to enable them to continue to provide support to the child and have that support in place for when the child arrives.

5.9.6 Staff and Governors should also be aware of the following key contact details for support and advice about extremism:

Hampshire Constabulary non-emergency number **101**, or e-mail [prevent.engagement@hampshire.pnn.police.uk](mailto:prevent.engagement@hampshire.pnn.police.uk)

DfE dedicated telephone helpline **020 7340 7264** and mailbox [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk)

5.9.7 Further guidance can be found in the following Government documents:

*Revised Prevent Duty Guidance: Guidance for specified authorities in England and Wales (December 2023)*

<https://www.gov.uk/government/publications/prevent-duty-guidance>

*Channel duty guidance: protecting people susceptible to radicalisation (HM Government February 2021, updated October 2023)*

<https://www.gov.uk/government/publications/channel-guidance>

*Managing risk of radicalisation in your education setting (DfE, October 2022, updated September 2023)*

## **Appendix 5**

### **Dealing with safeguarding allegations made against/concerns raised in relation to members of staff, supply staff, volunteers, contractors, Governors or the Headmaster**

The School has procedures in place for dealing with allegations made against, or safeguarding concerns (no matter how small) raised in relation to, members of staff, supply staff, volunteers, contractors, Governors or the Headmaster. The procedure to be followed will depend upon nature of the allegation/concern, details as follows:

- (a) Allegations that may meet the harm threshold – see **Section 1** of this Appendix 5.
- (b) Allegations/concerns that do not meet the harm threshold – referred to in KCSIE and throughout this Appendix as “low level concerns” – see **Section 2** of this Appendix 5.

#### **Section 1: The School's procedures for dealing with allegations that may meet the harm threshold**

##### **1 The School's procedures**

- 1.1 This section sets out the School's procedures for 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. The School's procedures for dealing with allegations that may meet the harms threshold will be used where the member of staff, supply staff, volunteer, contractor, Governor or Headmaster has:
  - (a) behaved in a way that has harmed a child, or may have harmed a child; and/or
  - (b) possibly committed a criminal offence against or related to a child; and/or
  - (c) behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children; and/or
  - (d) behaved or may have behaved in a way that indicates they may not be suitable to work with children (this includes behaviour that may have happened outside school, that might make an individual unsuitable to work with children; this is known as transferable risk).
- 1.2 Advice from the LADO(s) will be sought in borderline cases. Any allegations not meeting these criteria will be dealt with in accordance with the Hampshire Safeguarding Children Partnership procedures.
- 1.3 All such allegations must be dealt with as a priority so as to avoid any delay.
- 1.4 In the case of any allegations relating to the EYFS setting, OFSTED will be notified within 14 days of any allegations of serious harm or abuse by any person living, working or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere).
- 1.5 Allegations against a teacher who is no longer teaching will be referred to the police. Historical allegations of abuse will also be referred to the police.

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

- 2.1 In some circumstances the School may have to consider an allegation against an individual not directly employed by the School, 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.
- 2.2 Whilst the School will not be the direct employer of supply teachers, any allegations will be dealt with properly. The School will not 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.

## **3 Organisations or individuals using school premises**

- 3.1 The School may receive an allegation relating to an incident that happened when an individual or organisation was using the School premises for the purpose of running activities for children (eg community groups, sports associations or service providers that run extra-curricular activities). As with any safeguarding allegations, the School will follow its safeguarding policy and procedures, including informing the LADO.

## **4 Reporting an allegation**

- 4.1 Any allegations of abuse against a member of staff, supply staff, volunteer, contractor or a Governor should be reported straight away to the Headmaster, who will contact the LADO(s) immediately (within one working day at the latest) for advice or direction; for example, to consider the nature, content and context of the allegation and agree a course of action including any involvement of the police.
- 4.2 In the case of allegations against the Headmaster or where the Headmaster is absent, the Chair of Governors, Mr C Strick, should be informed straight away. The Chair of Governors, with the Designated Safeguarding Governor Mrs Jo Bloomer, will lead the response in line with guidelines for all staff. In cases of serious harm, the police should be informed from the outset.
- 4.3 Where an allegation is against the Headmaster, the Headmaster must not be informed of the allegation prior to contact with the Chair of Governors and LADO(s).
- 4.4 In the unlikely event that these procedures cannot be carried out the LADO(s) should be contacted immediately using the contact details in **Appendix 1**.
- 4.5 The person taking action in accordance with the procedures in this Appendix is known as the "case manager".
- 4.6 The School must not undertake its own investigation of allegations without prior consultation with the LADO(s), or in the most serious cases, the police, so as not to jeopardise statutory investigations. In borderline cases discussions with the LADO(s) can be held informally and without naming the School or individual.

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

- 5.1 If the School identify that a child has been harmed, that there may be an immediate risk of harm to a child or if the situation is an emergency, the School will contact local authority children's social care and, as appropriate, the police, immediately, as set out in paragraph 12 of this policy.
- 5.2 There are two aspects for the School to consider when an allegation is made:
- Looking after the welfare of the child
  - Investigating and supporting the person subject to the allegation
- 5.3 Before contacting the LADO, the School will conduct basic enquiries in line with local procedures to establish the facts and to help determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation.

## **6 Disclosure of information**

- 6.1 The case manager will inform the accused person of the allegation as soon as possible after the LADO(s) and, if appropriate, local authority children's social care and the police, have been consulted.
- 6.2 The Parents or carers of the child[ren] involved will be informed of the allegation as soon as possible if they do not already know of it. They will also be kept informed of the progress of the case, only in relation to their child – no information will be shared regarding the staff member.
- 6.3 Where the LADO(s) advises that a strategy discussion is needed, or the police or local authority children's social care need to be involved, the case manager will not inform the accused or the parents or carers until these agencies have been consulted and it has been agreed what information can be disclosed.
- 6.4 The reporting restrictions preventing the identification of a teacher who is the subject of such an allegation in certain circumstances will be observed.

## **7 Action to be taken against the accused**

- 7.1 A school has a duty of care towards its employees and as such, it must ensure that effective support is provided for anyone facing an allegation. Individuals will be informed of concerns or allegations as soon as possible and given an explanation of the likely course of action, unless external agencies object to this. A representative will be appointed to keep him or her informed of the progress of the case and to consider what other support is available for the individual, as appropriate.
- 7.2 Where an investigation by the police or local authority children's social care is unnecessary, the LADO(s) will discuss the steps to be taken with the case manager. The appropriate action will depend on the nature and circumstances of the allegation



and will range from taking no further action to dismissal or a decision not to use the person's services in the future.

- 7.3 It may be necessary to undertake further enquiries to determine the appropriate action. If so, the LADO(s) will discuss with the case manager how and by whom the investigation will be undertaken (whether by the police, local authority children's social care, the school, or a combination of these). The appropriate person will usually be a senior member of the School's staff, but in some instances it may be appropriate to appoint an independent investigator as advised by the Hampshire Safeguarding Children Partnership.

## **8 Suspension**

- 8.1 Suspension will not be an automatic response to an allegation and will only be considered in a case where:
- (a) there is cause to suspect a child or other children at the School is or are at risk of harm; or
  - (b) the allegation is so serious that there might be grounds for dismissal.
- 8.2 The School will consider carefully the views of the LADO(s), local authority children's social care and or the police as required, before making any decision regarding appropriate staff disciplinary arrangements, including suspension.
- 8.3 Suspension will not be automatic and consideration will be given to whether the result that would be achieved by suspension could be obtained by alternative arrangements, for example, redeployment either within or outside of the School, providing an assistant when the individual has contact with children or moving the child[ren] to classes where they will not come into contact with the member of staff (this decision will only be made if it is in the best interests of the child[ren] concerned and takes account of their views). The LADO(s) will be contacted for advice if necessary.
- 8.4 A member of staff will only be suspended if there is no reasonable alternative. If suspension is deemed appropriate, the reasons and justification will be recorded and the member of staff notified of those reasons in writing within one working day. Appropriate support will be provided for the suspended individual and contact details provided.
- 8.5 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 the School, immediate action will be taken to ensure the individual does not carry out work in contravention of the order and must not carry out teaching work.

## **9 Criminal proceedings**

- 9.1 The School will consult with the LADO(s) following the conclusion of a criminal investigation or prosecution as to whether any further action, including disciplinary action, is appropriate and if so, how to proceed. The options will depend on the

circumstances of the case, including the result of the police investigation or trial and the standards of proof applicable.

## **10 Return to work**

- 10.1 If it is decided that the person who has been suspended should return to work, the School will consider how best to facilitate this, for example, arranging a phased return and /or the provision of a mentor to provide assistance and support in the short term. The School will also consider how to manage the contact with the child[ren] who made the allegation.

## **11 Ceasing to use staff**

- 11.1 The School must report promptly to the Disclosure and Barring Service (DBS), using the referral form at <https://www.gov.uk/government/publications/dbs-referrals-form-and-guidance> any person (whether employed, contracted, a volunteer or student) whose services are no longer used because he or she is considered unsuitable to work with children. Alternatively, the address for referrals to the DBS is: PO Box 3963, Royal Wootton Bassett, SN4 4HH (tel. **03000 200 190**).
- 11.2 If the School ceases to use the services of a member of staff or volunteer because they are unsuitable to work with children, a settlement/compromise agreement will not be used and a referral to the DBS will be made as soon as possible if the criteria are met. Any such incidents will be followed by a review of the safeguarding procedures within the School, with a report being presented to the Governors without delay.
- 11.3 Ceasing to use a person's services includes: dismissal; non-renewal of a fixed-term contract; no longer engaging/refusing to engage a supply teacher provided by an employment agency; terminating the placement of a student teacher or other trainee; no longer using staff employed by contractors; no longer using volunteers; resignation; and voluntary withdrawal from supply teaching, contract working, a course of initial teacher training, or volunteering.
- 11.4 The legal duty to refer applies equally in circumstances where an individual is deployed to another area of work that is not regulated activity, or they are suspended or resign.
- 11.5 If a member of staff or volunteer tenders his or her resignation, or ceases to provide his or her services, any Child Protection allegations will still be followed up by the School in accordance with this policy and a referral will be made to the DBS promptly if the criteria are met.
- 11.6 Failure to make a report to the DBS constitutes an offence and the School may be removed from the DfE register of independent schools.
- 11.7 Churcher's College will refer to the Teaching Regulation Agency any instance where a member of teaching staff has been dismissed or has resigned and a prohibition order may be appropriate. Reasons for dismissal could include "unacceptable professional

conduct", "conduct that may bring the profession into disrepute" or a "conviction, at any time, for a relevant offence".

## **12 Timescales**

- 12.1 In any situation when an allegation is made against a teacher, volunteer, Governor, the Headmaster or other member of staff (including supply staff), the clear priority will be the quick resolution of the allegation to the benefit of all concerned. Any unnecessary delays should be eradicated, although the pace of investigation is a matter for the LADO(s) and in complex cases can demand time.
- 12.2 All allegations must be dealt with as a priority so as to avoid any delay. Where it is clear immediately that the allegation is unsubstantiated or malicious, the case should be resolved within one week. It is expected that most cases of allegations of abuse against staff will be resolved within one month with exceptional cases being completed within 12 months. If the nature of the allegation does not require formal disciplinary action, the Headmaster should instigate appropriate action within three working days. If a disciplinary hearing is required and can be held without further investigation, it should be held within 15 working days.

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

- 13.1 If an allegation is determined to be unsubstantiated, unfounded, false or malicious, the LADO and the case manager 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.
- 13.2 Where an allegation by a pupil is shown to have been deliberately invented or malicious, the Headmaster will consider whether to take disciplinary action in accordance with the School's Behaviour Policies.
- 13.3 Where a parent has made a deliberately invented or malicious allegation the Headmaster will consider whether to require that parent to withdraw their child or children from the School on the basis that they have treated the School or a member of staff unreasonably.
- 13.4 Whether or not the person making the allegation is a pupil or a parent (or other member of the public), the School reserves the right to contact the police to determine whether any action might be appropriate.

## **14 Record keeping**

- 14.1 Details of allegations following an investigation that are found to have been malicious or false will be removed from personnel records, unless the individual gives their consent for retention of the information.

- 14.2 For all other allegations (ie substantiated, unfounded and unsubstantiated), the following information will be recorded on the confidential personnel file of the person accused:
- 14.2.1 a clear and comprehensive summary of the allegation;
  - 14.2.2 details of how the allegation was followed up and resolved;
  - 14.2.3 a note of any action taken, decisions reached and the outcome ie substantiated, unfounded or unsubstantiated;
  - 14.2.4 a copy provided to the person concerned, where agreed by local authority children's social care or the police; and
  - 14.2.5 a declaration on whether the information will be referred to in any future reference.
- 14.3 Records which contain information about allegations of sexual abuse will be retained indefinitely. All other records will be retained at least for a period of ten years from the date of the allegation as defined in 'Dealing with Allegations' dated October 2012.
- 14.4 An allegation that has be found to be false, unfounded, unsubstantiated or malicious will not be referred to in employer references. Substantiated allegations will be referred to in employer references, provided that the information is factual and does not include opinions.

## **15 Confidentiality and information sharing**

- 15.1 In any situation where a member of staff has had an allegation of abuse made against him or her, Churcher's College will make every effort to maintain confidentiality and guard against unwanted publicity. These restrictions will apply up to the point where the accused member of staff is charged with an offence, or the DfE/Teaching Regulation Agency publish information about an investigation or decision in a disciplinary case.

## **16 Review**

- 16.1 Throughout the process in handling allegations and at conclusion of a case in which an allegation is substantiated, the School will work with the LADO(s) to identify any improvements to be made to the School's procedures to prevent similar events in the future. For all other cases, where the allegation concluded to be either unfounded, false, malicious or unsubstantiated, the case manager (or if they have been involved, the LADO) will consider the facts and determine whether lessons can be learned and if any improvements can be made.

## Section 2: Concerns and/or allegations that do not meet the harm threshold

### 1 The School's procedures

- 1.1 This section sets out the School's processes to deal with any concerns (including allegations) which **do not** meet the harm threshold set out in Section 1 above (referred to in this policy as low-level concerns).
- 1.2 Low-level concerns may arise in several ways and from a number of sources. For example:
  - suspicion;
  - complaint;
  - disclosure made by a child, parent or other adult within or outside of the organisation;
  - as a result of vetting checks undertaken.

### 2 Low level concerns

- 2.1 Churcher's College promotes an open and transparent culture in which **all** low-level concerns about all adults working in or on behalf of the school (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately. The School seeks to create a culture in which all concerns about adults are shared responsibly and with the right person, recorded and dealt with appropriately.
- 2.2 The term "low-level" concern does not mean it is insignificant. A low level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a "nagging doubt" – that an adult working in or on behalf of the School may have acted in a way that:
  - is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside of work; and
  - does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.
- 2.3 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 contrary to the school policy;
  - engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or
  - humiliating pupils.

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.

2.4 The purpose of the School's policy on low level concerns is to create and embed a culture of openness, trust and transparency in which the School's values and expected behaviour, set out in the Staff Code of Conduct, are lived, monitored and reinforced constantly by all staff.

2.5 In order to achieve the purpose of this low level concerns policies, the School will:

- ensure that staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from inappropriate, problematic or concerning behaviour, in themselves and others;
- empower staff to share any low-level concerns;
- address unprofessional behaviour and support the individual to correct it at an early stage;
- handling and responding to such concerns sensitively and proportionately when they are raised; and
- helping identify any weakness in the School's safeguarding system.

### 3 **Sharing low level concerns**

3.1 Low-level concerns about a member of staff, supply staff, volunteer or contractor should be reported as follows:

- to the Headmaster
- If the low-level concern is about the Headmaster, it should be reported to the Chair of Governors, Mr C Strick
- If there is a conflict of interest in reporting the matter to the Chair of Governors, then it should be reported directly to the LADO

3.2 Low-level concerns which are shared about supply staff and contractors should be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified.

3.3 Staff are encouraged 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.

3.4 The School will consult with the LADO if there is any doubt whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold.

### 4 **Recording low level concerns**

4.1 All low-level concerns should be recorded in writing. The record will include:

- details of the concern
- the context in which the concern arose
- the action taken

- the name of the individual sharing their concerns – if the individual wishes to remain anonymous then that should be respected as far as reasonably possible

4.2 In the Senior School, the Headmaster's Executive Assistant maintains the confidential record of low-level concerns. In the Junior School & Nursery, the Head of the Junior School maintains a confidential record of low-level concerns, which is shared with the Headmaster. The low-level concerns records are kept securely in accordance with data protection legislation.

## 5 **Responding to low-level concerns**

5.1 If the low-level concern has been raised by a third party, the Headmaster (or a nominated deputy) will collect as much evidence as possible by speaking:

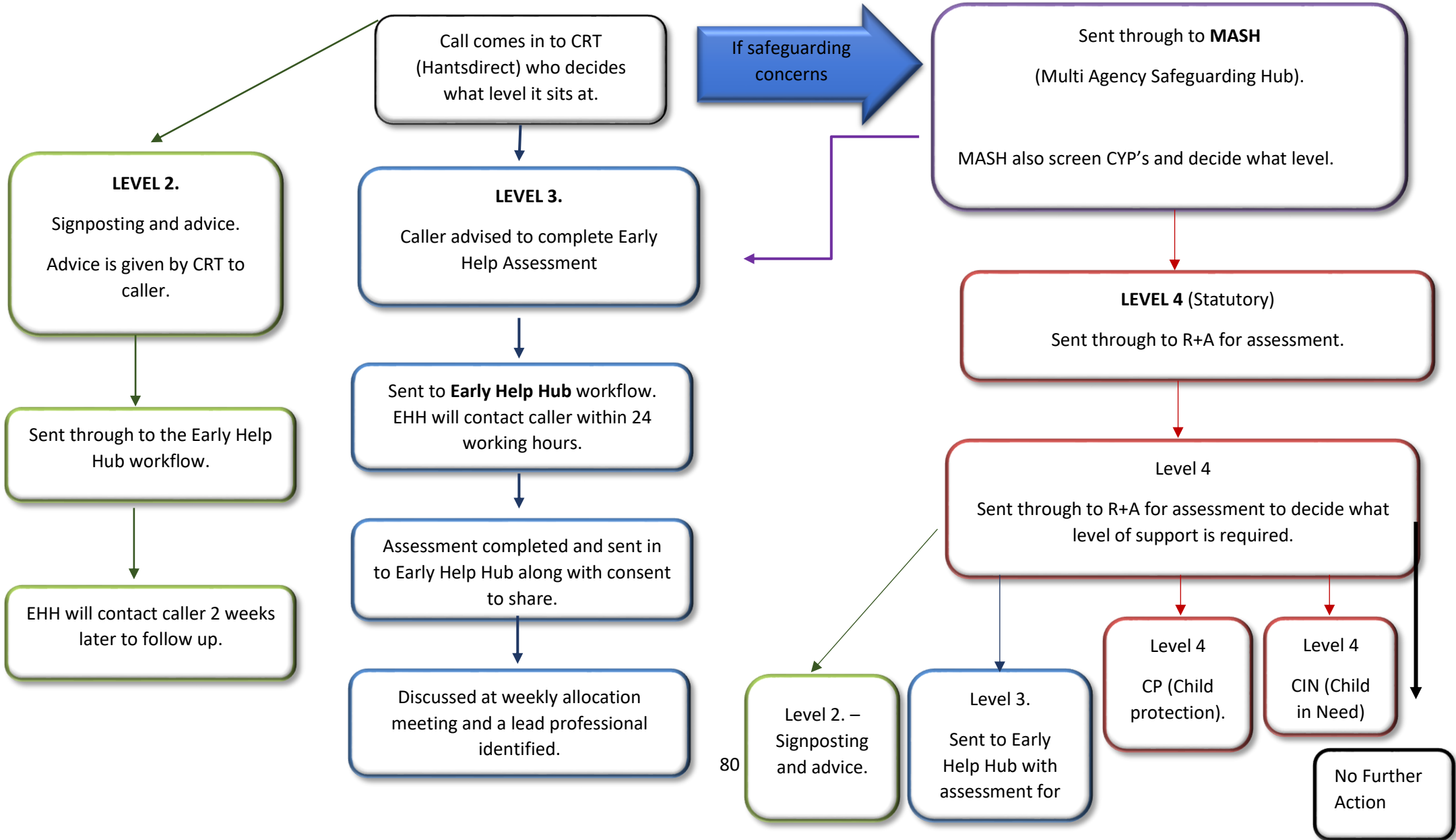
- directly to the person who raised the concern, unless it has been raised anonymously; and
- to the individual involved and any witnesses.

5.2 The information collected will help the Headmaster to categorise the type of behaviour and determine what further action may need to be taken. This information needs to be recorded in writing, along with the rationale for the Headmaster's decisions and action taken.

## 6 **References**

6.1 Low-level concerns will not be included in references unless they relate to issues which would normally be included in a reference eg. misconduct or poor performance. However, if a low-level concern (or group of concerns) meets the harm threshold for referral to the LADO and is found to be substantiated, then it should be referred to in a reference.

**Appendix 6 - Early Help and Referral Response**





Appendix 7



Hampshire and Isle of Wight Safeguarding Children Partnership and Children's Trust Thresholds Chart –  
 September 2023



Threshold:	1. Universal	2. Early Help	3. Targeted Early Help	4. Children's Social Care (child in need/child in need of protection)
<b>The Child or Young Person (maybe unborn):</b>	Has needs met within universal provision. May need limited intervention within the setting to avoid needs arising.	Has additional needs identified within the setting that can be met within identified resources through a single-agency response and partnership working.	Has multiple needs requiring a multi-agency coordinated response.	Has a high level of unmet and complex needs or is in need of protection.
	<p>The following circumstances and key indicators are for guidance and should always be considered in respect of the impact on the child or young person including unborn and newborn infants. Each child's case will be individually considered taking into account the child's circumstances and the strengths of the family.</p>			
<b>Circumstances and Key Features:</b>	<b>Developmental Needs of child</b> <ul style="list-style-type: none"> <li>Achieving age related expectations in education</li> <li>Good attendance at school</li> <li>Meeting developmental milestones</li> <li>Has psychological wellbeing</li> <li>Socially interactive and skilled</li> <li>Ability to protect self and be protected</li> </ul>	<b>Developmental Needs of Child</b> <ul style="list-style-type: none"> <li>Absence/truancy from school</li> <li>Incidence of absence/missing from home</li> <li>Has special educational needs (whether or not they have a statutory Education, Health and Care Plan)</li> <li>Is disabled and has specific additional needs</li> <li>Is a young carer</li> <li>Is showing signs of being drawn into antisocial or criminal behaviour including gang involvement and association with organised crime groups</li> <li>Is misusing drugs or alcohol</li> <li>Has previously been in care/returned home to their family from care</li> <li>Subject to fixed-period suspensions</li> <li>At risk of social exclusion</li> <li>Has poor attachments</li> <li>Language and communication difficulties</li> <li>Reduced access to core services</li> <li>Potential for becoming NEET (not in education, employment or training)</li> <li>Potential not to attain</li> <li>Slow in meeting developmental milestones</li> <li>Child appears underweight and there are concerns about nutrition<sup>1</sup></li> <li>Child appears overweight or obese<sup>2</sup></li> <li>Missing health checks/immunisations</li> <li>Minor health problems</li> <li>Poor self-esteem</li> <li>Low level emotional/mental health issues</li> </ul>	<b>Developmental Needs of Child</b> <ul style="list-style-type: none"> <li>Persistent absence from school</li> <li>Missing from school/home regularly</li> <li>Has special educational needs (whether or not they have a statutory Education, Health and Care Plan)</li> <li>No access to core services</li> <li>Social exclusion</li> <li>Poor attachments</li> <li>Is disabled and has specific additional needs</li> <li>Is subject to permanent exclusions/no school place</li> <li>Not in education, employment or training (NEET)</li> <li>Has returned home to their family from care</li> <li>Developmental milestones not being met due to persistent parental failure/inability</li> <li>Child is underweight and there is significant concern about lack of nutrition/potential consequences to their health and wellbeing or lack of parent/carer engagement</li> <li>Child appears overweight/obese and health professional confirms that intervention over time is not impacting and there is concern about consistent engagement of parents/carers in support given.</li> <li>Chronic/recurring health problems</li> <li>Regular missed appointments affecting developmental progress</li> <li>Teenage pregnancy</li> </ul>	<b>Developmental Needs of Child</b> <ul style="list-style-type: none"> <li>Chronic persistent or severe absence, permanent exclusions or no school place that risks entry to the care system</li> <li>Is frequently missing/goes missing from care or from home</li> <li>Persistent social exclusion</li> <li>Poor attachments</li> <li>Complex/multiple disabilities</li> <li>Has special educational needs (whether or not they have a statutory Education, Health and Care Plan)</li> <li>Actual or suspected bruising or other injury in an infant who is not independently mobile</li> <li>A child of any age, who is not independently mobile with bruising or unexplained marks.</li> <li>Complex mental health issues affecting developmental needs including self-harm</li> <li>High level emotional health issues and very low self-esteem</li> <li>Has recently returned home to their family from care</li> <li>Unexplained (Non-organic) failure to thrive</li> <li>Lack of food or very poor diet linked to neglect (please see Hampshire and Isle of Wight Neglect toolkit and Indicators chart)</li> <li>Child appears overweight/obese and there is imminent severe health risk due to obesity (medical conditions and psychosocial risks such as difficulties with physical function, self-esteem or a</li> </ul>

<sup>1</sup> Children who appear under or overweight should be referred to a health professional for assessment.  
<sup>2</sup> Children who may be overweight or obese should be referred to a health professional for assessment.

		<ul style="list-style-type: none"> <li>• Inappropriate use of social media (e.g., use of inappropriate images)</li> </ul>	<ul style="list-style-type: none"> <li>• Is misusing drugs or alcohol</li> <li>• Problematic sexual behaviour/underage sexual activity</li> <li>• Offending/antisocial behaviour resulting in risk of entering the Youth Justice System</li> <li>• Emotional/mental health issues including self-harm</li> <li>• Is showing signs of being drawn into antisocial or criminal behaviour including gang involvement and association with organised crime groups</li> <li>• Inappropriate/problematic use of social media (e.g., sexting/use of inappropriate images)</li> <li>• Is at risk of exploitation</li> </ul>	<p>lack of progress at level 3 and parents/carers are consistently failing to engage with support given.</p> <ul style="list-style-type: none"> <li>• Problematic/harmful sexual behaviour</li> <li>• Sexually aggressive behaviour</li> <li>• Teenage parent or pregnancy under the age of 13</li> <li>• Drug/alcohol use severely impairing development</li> <li>• Relationship breakdown between child and parent/carer that risks entry to the care system</li> <li>• Offending/antisocial behaviour and in the Youth Justice System</li> <li>• Refugee children – defined as separated children seeking asylum or having been granted asylum in the UK.</li> <li>• Is at risk of modern slavery, trafficking, missing or exploitation is evidenced</li> <li>• Is at risk of being radicalised (PREVENT) or exploited</li> <li>• Is a privately fostered child</li> <li>• Inappropriate/problematic use of social media (e.g., sexting/use of inappropriate images)</li> <li>• Sexual exploitation/abuse (including online)</li> </ul>
	<p><b>Family and Environment</b></p> <ul style="list-style-type: none"> <li>• Supportive relationships</li> <li>• Housed, good diet and kept healthy</li> <li>• Supportive networks</li> <li>• Access to positive activities</li> </ul>	<p><b>Family and Environment</b></p> <ul style="list-style-type: none"> <li>• Family or household member relies on child for some care</li> <li>• Poor parent/child relationships</li> <li>• Children of prisoners/parent subject to community order(s)</li> <li>• Child exposed to bullying environment</li> <li>• Poor housing, poor home environment or poor/limited diet impacting on child's health</li> <li>• Community harassment/discrimination</li> <li>• Low income affects achievement</li> <li>• Parenting advice needed to prevent needs escalating</li> <li>• Poor access to core services</li> <li>• Risk of relationship breakdown</li> <li>• Concerns about possible domestic abuse</li> </ul>	<p><b>Family and Environment</b></p> <ul style="list-style-type: none"> <li>• Housing tenancy at risk</li> <li>• Imminent risk of homelessness</li> <li>• Community harassment/discrimination</li> <li>• Domestic abuse</li> <li>• Relationship breakdown</li> <li>• Transient family</li> <li>• Is in a family circumstance presenting challenges for the child such as drug and alcohol misuse, adult mental health issues and domestic abuse</li> <li>• Community harassment/discrimination</li> <li>• Child and adolescent to parent, violence and abuse (CAPVA). Repeated abusive behaviour, that may include physical violence, emotional, economic or sexual abuse and coercive control. Risk of family breakdown and/or siblings at risk due to exposure to the abuse.</li> <li>• Poverty and financial hardship affecting child's wellbeing</li> </ul>	<p><b>Family and Environment</b></p> <ul style="list-style-type: none"> <li>• Suspicion of physical, emotional or sexual abuse, or neglect</li> <li>• Domestic abuse resulting in child being at risk of significant harm</li> <li>• Homeless child/young person</li> <li>• Family intentionally homeless</li> <li>• Extreme poverty significantly affecting child's wellbeing</li> <li>• Forced marriage, Honour-Based Violence, Female Genital Mutilation, Fabricated or Induced Illness (FII)</li> <li>• Child and adolescent to parent, violence and abuse (CAPVA). Significant repeated abusive behaviour, that may include physical violence, emotional, economic or sexual abuse and coercive control. Risk of immediate family breakdown and/or siblings at risk of continued physical harm due to the abuse</li> </ul>

	Parents and Carers	Parents and Carers	Parents and Carers	Parents and Carers
	<ul style="list-style-type: none"> <li>Protected by carers</li> <li>Secure and caring home</li> <li>Receive and act on information, advice and guidance</li> <li>Appropriate boundaries maintained</li> </ul>	<ul style="list-style-type: none"> <li>Inconsistent care arrangements</li> <li>Poor supervision by parent/carer</li> <li>Inconsistent parenting</li> <li>Poor response to emerging needs</li> <li>Historic context of parents/carers own childhood</li> <li>Parent or other family member involved in offending behaviour/subject to supervision within the criminal justice system</li> </ul>	<ul style="list-style-type: none"> <li>Parental learning or physical disability, substance misuse or mental health issues impact on parenting</li> <li>Inconsistent care arrangements</li> <li>Poor supervision by parent/carer</li> <li>Inconsistent parenting</li> <li>Poor response to identified needs</li> <li>Historic context of parents/carers own childhood</li> <li>Parent or other family member involved in offending behaviour/subject to supervision within the criminal justice system</li> </ul>	<ul style="list-style-type: none"> <li>Previous history of child/ren of one or more adult in the household being in care or subject to child protection plans</li> <li>Parental encouragement of abusive/offending behaviour</li> <li>Continuing poor supervision in the home resulting in significant harm or risk of significant harm</li> <li>Parental non-compliance/disguised compliance or cooperation</li> <li>Inconsistent parenting affects child's developmental progress</li> </ul>
<b>What Do I Do Next?</b>	Go direct to the family information site: <a href="#">IOW Family Information Hub</a> <a href="#">Hampshire Family Information and Services Hub</a>	Consider Early Help checklist. Referral to agency for support to meet identified needs. For further advice or guidance in respect of Early Help, contact your local Family Support Service.	Early Help assessment to be considered. If you require advice or guidance in respect of the child or young person's needs, submit an <a href="#">Inter-Agency Referral Form</a> to the Children's Reception Team.	Use the <a href="#">Inter-Agency Referral Form</a> to refer to the Children's Reception Team or phone on <b>0300 300 0117</b> (Hampshire) <b>0300 300 0901</b> (Isle of Wight) if the matter is an urgent safeguarding issue. Alternatively, ring police on <b>999</b> if at immediate risk.
<b>Level of Assessment:</b>	<b>No formal assessment</b>	<a href="#">IOW Early Help Information</a> <a href="#">Hampshire Early Help Information</a>	<b>Early Help assessment</b>	<b>Child and Family assessment / child protection (S47) investigation</b>

Refer via [Inter-Agency Referral Form \(IARF\)](#)

Hampshire Professionals Number: 01329 225379

Hampshire Public Number: 0300 555 1384

Isle of Wight Professionals Number: 0300 300 0901

Isle of Wight Public Number: 0300 300 0117

**Emergencies: 999**

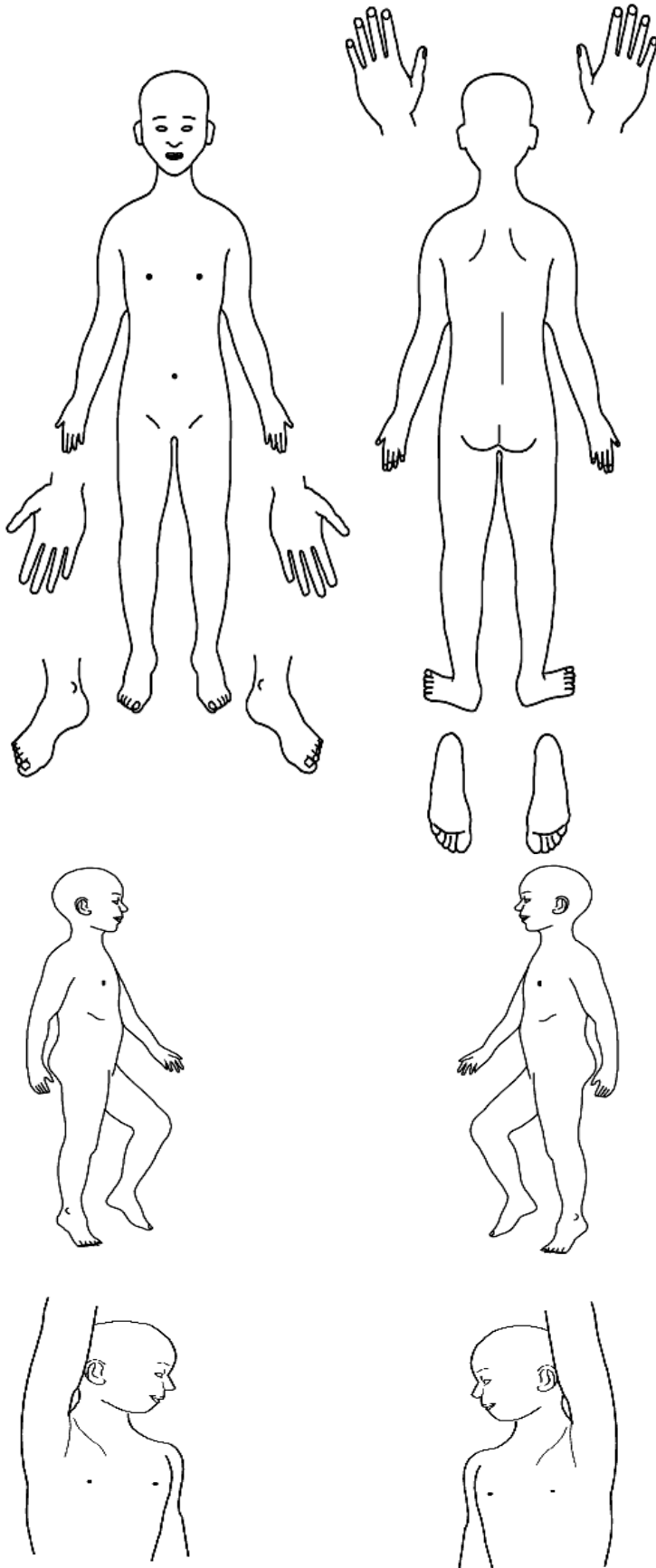
**Further Resources:**

<a href="#">HIPS Child Sexual Abuse toolkit</a>	<a href="#">HSCP and IOWSCP Neglect toolkit</a> including the Neglect Indicators Chart
<a href="#">HSCP and IOWSCP Safeguarding Adolescent Toolkit</a>	<a href="#">HIPS Adopting a Family Approach Toolkit</a>
<a href="#">Every Sleep Counts IOW SCP and HSCP</a>	<a href="#">Abusive Head Trauma/ICON – HSCP and IOWSCP</a>

<a href="#">Strengthening Parental Relationships Toolkit - HSCP</a>	Child on Child Abuse: <a href="#">addressing-child-on-child-abuse.pdf (farrer.co.uk)</a> as noted in KCSIE 2022  <a href="#">HIPS CSA Toolkit Harmful Sexual Behaviour - Hampshire SCP</a>  HIPS Procedures: Child on Child Abuse – Waiting final approval.
<a href="#">Supporting Parental Relationships - IOW Council</a>	Child and Adolescent to Parent Violence and Abuse: <a href="#">CAPVA   Respect</a>

## Appendix 8

### Body Map



Name of Child	
Date of Birth	
Date of Recording	
Name of Completer	
Additional Information	