



St Edward's School
HAMPSHIRE

Safeguarding and Child Protection Policy, Procedure and Guidance: **Part 1**

This school is committed to safeguarding and promoting the welfare and wellbeing of its pupils with regards to both mental and physical health.

The school acknowledges the important contribution from colleagues in developing this policy.

The school's safeguarding and child protection policy should be read in conjunction with other school policies, some of which appear as appendices.

Part 1 is guided by DfE regulations including Keeping Children Safe in Education (2023) and Working Together to Safeguard Children (2018) and Hampshire Safeguarding Children Partnership advice, which require a child centred and coordinated approach to safeguarding.

This review: GM/JF/KT/SH September 2023

Approved by the Board: October 2023

Updates to Safeguarding and Child Protection Policy, Procedure and Guidance since September 2023

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Child Protection Policy

Policy Statement

We recognise our moral and statutory responsibility to safeguard and promote the welfare of all children in relation to protecting children from maltreatment; preventing impairment of children's mental and physical health or development; ensure that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

We make every effort to provide a safe, welcoming and nurturing environment. We seek to maintain a culture of openness where pupils and adults feel secure, able to talk and believe that they are being listened to.

Where safeguarding is concerned we maintain an attitude of "it could happen here".

This policy provides staff, volunteers, supply staff, agency staff and governors with the framework they need to keep children safe and secure in our school and to inform parents and carers how we will safeguard their children whilst they are in our care.

Specific guidance is available to staff within the procedure documents.

Safeguarding and promoting the welfare of children is **everyone's** responsibility. Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all staff should make sure their approach is child-centred. This means that they should consider, at all times, what is in the best interests of the child. The actions that we take to prevent harm; to promote wellbeing; to create safe environments; to educate on rights, respect and responsibilities; to respond to specific issues and vulnerabilities all form part of the safeguarding responsibilities of the school.

Definitions

Within this document:

Child Protection is an aspect of safeguarding, but is focused on how we respond to children who have been significantly harmed or are at risk of significant harm.

Contextual Safeguarding is an aspect of safeguarding that considers whether children are at risk of abuse or exploitation in situations outside their family homes.

The term **Staff** applies to all those working for or on behalf of the school, full time or part time, in either a paid or voluntary capacity. This also includes Governors.

Child refers to all young people under the age of 18. On the whole, this will apply to pupils of our school; however the policy will extend to visiting children and students from other establishments.

Parents/carers refers to birth parents and other adults in a parenting role for example adoptive parents, step parents, guardians and foster carers.

Abuse could mean neglect, physical, emotional or sexual abuse or any combination of these, as well as children witnessing domestic abuse. Parents, carers, peers and other people can harm children either by direct acts and / or failure to provide proper care i.e. child on child, so called honour based abuse and domestic abuse. Explanations of these are given within Part 2.

Safeguarding is defined in the Children Act 2004 as protecting from maltreatment; preventing impairment of health and development; ensuring that children grow up with the provision of safe and effective care; and

work in a way that gives the best life chances and transition to adult hood. Our safeguarding practice applies to every child.

Aims

- Provide staff with the framework to promote and safeguard the wellbeing of children and, in so doing, ensure they meet their statutory responsibilities.
- Ensure consistent good practice across the school.
- Demonstrate our commitment to protecting children and keeping children safe.

Principles and Values

- Children have a right to feel secure and cannot learn effectively unless they do so.
- All children have a right to be protected from harm.
- All staff have a key role in the prevention of harm and an equal responsibility to act on any suspicion or disclosure that may indicate a child is at risk of harm, either in the school or in the community; taking into account *contextual safeguarding*, in accordance with the guidance.
- Whilst the school will work openly with parents/carers as far as possible, the school reserves the right to contact Children's Services or the Police, without notifying parents/carers if we believe this to be in the child's best interests.
- We acknowledge that working in partnership with other agencies better safeguards children and reduces risk. Thus, we will engage in partnership working throughout the child protection process to safeguard children.
- All staff have the skills, knowledge and understanding to keep all pupils safe, particularly the more vulnerable looked after children, previously looked after children and those subject to a child protection or child in need plan.
- All staff working within the school should maintain professional curiosity if they are concerned about a child.

Leadership and Management

Clear lines of accountability, training and advice are intended to support the process and the individual staff within that process.

At St Edward's, any individual can contact the Designated Safeguarding Lead (DSL) if they have concerns about a young person.

St Edward's School's DSL is **Karen Thorne**

There are three Deputy DSLs (DDSL):

- **Gavin Sprout** (Upper School) (Lower School for the interim)
- **Andy Bazen** (Middle School)
- **Jim Fenemore**

The Headmaster; **Graham Maher**, receives reports of low-level concerns and allegations against members of staff.

There is a nominated governor - **Michael Tennant** - who will receive reports of allegations against the Headmaster and act on behalf of the Board of Governors.

As an employer, we follow safer recruitment guidance as set out in KCSiE 2023, including informing shortlisted candidates that online searches will be carried out.

Training

- All staff are expected to be aware of the signs and symptoms of abuse.
- All staff must be able to respond appropriately.
- All staff receive appropriate safeguarding and child protection training annually.
- Separate training via an online platform is provided during induction for all new staff without evidence of in date safeguarding and child protection training by a reputable provider.
- All staff and Governors are issued with a Safeguarding and Child Protection aide-memoire.
- In addition, all staff receive updates in the form of safeguarding and child protection e-newsletters which provide them with relevant skills and knowledge to effectively safeguard children.
- All new staff are required to complete online child protection training during their induction.
- The school's DSLs attend formal training every two years and update their knowledge and skills annually to enable them to fulfil their role.
- Training is informed by the school's participation in safeguarding events offered by Hampshire Safeguarding Children Partnership.
- Updates in national or local guidance – for example: 'Keeping Children Safe in Education' - are shared with all staff and later captured in subsequent whole school training.
- Bespoke governor training is provided as required by KCSiE 2023.
- Staff will receive appropriate training regarding child sexual development and the difference between sexual behaviour that is considered normal and expected for the age of the pupil, and sexual behaviour that is inappropriate and harmful.

Referral

Following any concerns raised by staff, the DSL will assess the information and consider if significant harm has happened or there is a risk that it may happen. If the evidence suggests the threshold of significant harm, or risk of significant harm has been reached; or they are not clear if the threshold is met, then the DSL will contact Children's Services and, if appropriate, the Police. If a DSL is not available and there are immediate concerns, staff must refer directly to Children's Services and the Police if appropriate. We will use the guidance from NPCC to determine when to contact the Police.

Generally the DSL will inform the parents/carers prior to making a referral. However, there are situations where this may not be possible or appropriate, particularly when informing parents/carers may place the child at further risk.

N.B. The exception to this process will be in those cases of known FGM where there is a mandatory requirement for the teacher to report directly to the Police. The DSL should also be made aware.

Confidentiality

- We maintain that all matters relating to child protection are confidential and only shared in accordance with the Working Together to Safeguard Children 2018 guidance and 'Information Sharing Advice for Practitioners' (DfE 2018) guidance.
- There is a lawful basis for child protection concerns to be shared with agencies who have a statutory duty for child protection.
- Information will only be shared with agencies who we have a statutory duty to share with or individuals within the school who 'need to know'.
- All staff are aware that they cannot promise a child to keep a disclosure confidential.
- Governing bodies and proprietors should ensure relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the GDPR.

As a school we will educate and encourage pupils to recognise when they are at risk and how to get help when they need it through:

- Our school's ethos which helps children to feel safe and able to talk freely about their concerns, believing that they will be listened to and valued. If a pupil is unable to talk freely, they can submit written concerns, if necessary anonymously, via the pupil red post box.
- The content of our school curriculum and our spiritual, moral, social and cultural activities.
- Pupils will be taught about how to keep themselves and others safe when online.
- Every child having access to a 'trusted adult' in the school.

Mental Health

- All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. However staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.
- Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.
- If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following this policy and speaking to the DSL or DDSL.

Dealing with concerns and allegations against adults who work with children (see Annex 3 for full details)

If a concern is raised about the practice or behaviour of a member of staff, which includes supply and agency staff, this information will be recorded and passed to the Headmaster. The Headmaster will make an assessment to determine if the matter is a 'low level concern' or an 'allegation'. The Local Authority Designated Officer (LADO) will be contacted and the relevant guidance will be followed. If the Headmaster needs advice or guidance they will contact the LADO.

If the allegation/concern is against the Headmaster, the person receiving the allegation/concern will contact the nominated governor – **Michael Tennant** – directly, or the **LADO** in the event the nominated governor is unavailable.

Dealing with children abusing children

If a concern is raised that a child under 18 is abusing another child under 18, the 'Child on Child Abuse' guidance will be followed (see Annex 6: Child on Child Abuse including Sexual Violence and Sexual Harassment (SVSH) between children)

Legal context

Section 157 (independent schools and academies) of the Education Act 2002.
The Education (Independent School Standards) Regulations 2014
Children Act 2004 & 1989

Guidance

Hampshire Safeguarding Children Partnership protocols and guidance and their procedures

[Working Together to Safeguard Children 2018](#)

[Keeping Children Safe in Education 2023](#)

[Disqualification under the Childcare Act 2006 \(2018\)](#)

[FGM Act 2003 Mandatory Reporting Guidance \(2016\)](#)

Roles and Responsibilities

Staff Team – responsibilities:

All staff play a key role in identifying concerns early and in providing help for children.

To achieve this our staff will:

- Establish and maintain an environment where children feel secure, are encouraged to talk and are listened to.
- Ensure children know that there are adults in the school whom they can approach if they are worried about any problems or have concerns.
- Treat information with confidentiality but never promising to “keep a secret”.
- Promote a whole school approach towards online safety driven by a broad and balanced curriculum including ICT and life skills.
- Plan opportunities within the curriculum for children to develop the skills they need to recognise, assess and manage risk appropriately and keep themselves safe.
- Attend training in order to be aware of and alert to the signs of abuse.
- Maintain an attitude of “it could happen here” with reference to safeguarding.
- 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.
- Recognise that abuse, neglect, or other adverse childhood experiences, can have an impact on the mental health, behaviour and education of children.
- Ensure they know who the DSL and DDSLs are and know how to contact them.
- Notify the DSL of any pupil who has unexplained absence.
- Record their concerns if they are worried that a child is being abused and report these to the DSL as soon as practical that day or immediately if child is at risk of harm. If the DSL is not contactable immediately, a DDSL should be informed.
- Be prepared to refer directly to Children’s Services, and the Police if appropriate, if there is a risk of significant harm and the DSL or DDSL is not available.
- In the event of the disclosure of an allegation/concern against a member of staff, follow the allegations procedures (Annex 3).
- Follow the procedures set out by the placing authority’s Safeguarding Children’s Partnership and take account of guidance issued by the Department for Education.
- Support pupils in line with their child protection plan, where appropriate.
- Notify the DSL or DDSL of any child on a Child Protection plan or Child In Need plan who has unexplained absence.

- Have an understanding of 'Early Help' and be prepared to identify and support children who may benefit from this intervention.
- In the context of Early Help, notify colleagues and/or parents/carers of any concerns about their child(ren), and provide them with, or signpost them to, opportunities to change the situation.
- Liaise with other agencies that support pupils and provide early help.
- Consider the context within which such incidents and/or behaviours occur (contextual safeguarding).
- Have an awareness of the Safeguarding and Child Protection Policy (Part 1 and 2) and annexes (includes child on child abuse procedures), the Staff Behaviour Policy, procedures relating to the safeguarding response for children who go missing from education and the role of the DSL.
- Provide a safe environment in which children and young people can learn.
- Uphold the best interests of children and challenge professionals, including the Police, where required.
- Safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties (Teachers).

Senior Leadership Team - responsibilities:

- Via the Designated Teacher, promote the educational achievement of children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales, in addition to Looked After Children.
- Contribute to inter-agency working in line with guidance (Working Together to Safeguard Children 2018).
- Provide a co-ordinated offer of early support when additional needs of children are identified.
- Ensure staff are alert to the various factors that can increase the need for Early Help.
- Working with Children's Services, support their assessment and planning processes, including attendance at conference and core group meetings.
- Carry out tasks delegated by the Board of Governors such as training of staff; safer recruitment; maintaining the Single Central Register.
- Provide support and advice on all matters pertaining to safeguarding and child protection to all staff regardless of their position within the school.
- Treat any information shared by staff or pupils with respect and follow agreed policies and procedures.
- Ensure that allegations or concerns against staff are dealt with in accordance with guidance from the Department for Education (DfE), Hampshire Safeguarding Children Partnership (HSCP) and Hampshire County Council (HCC).
- Determine if a concern about a member of staff is a 'low level concern' or an allegation.

Responsibilities - the Board of Governors ensure that:

- The school has effective safeguarding policies and procedures including Child Protection Staff Behaviour, Behaviour Management (pupils) and Missing Person and Children Missing from Education.
- HSCP is informed annually about the discharge of duties via the safeguarding audit.
- Recruitment, selection and induction follows safer recruitment practice, including all appropriate checks.
- Allegations/concerns against staff are dealt with by the Headmaster.
- A member of the senior staff team has a stated responsibility to act in the capacity of DSL and this is recorded in their job description.
- Staff have been trained appropriately and this is updated in line with guidance.
- Any safeguarding deficiencies or weaknesses are remedied without delay.
- The Board has identified a Nominated Governor to manage allegations/concerns made against the Headmaster.
- The Nominated Governor is responsible for scrutinising child protection records during an unannounced visit(s).

DSL responsibilities (to be read in conjunction with DSL role description in KCSiE 2023)

St Edward's School's DSL is – Miss Karen Thorne

The Deputy DSLs are Mr Gavin Sprout, Mr Andy Bazen and Mr Jim Fenemore

In addition to the role of staff and the senior leadership team the DSL will:

- Refer cases to Children's Services, and the Police where appropriate, in a timely manner avoiding any delay that could place the child at more risk.
- Liaise with safeguarding partners and work with other agencies in line with Working Together to Safeguard Children. NPCC – *When to Call the Police* should help DSLs understand when they should consider calling the Police and what to expect when they do. This is displayed in several offices.
- Assist the Board of Governors in fulfilling their responsibilities set out in legislation and statutory guidance.
- Attend initial training for the role, refreshing this in line with current best practice guidance – currently: at least bi-annually.
- Demonstrate evidence of continuing professional development.
- Ensure every member of staff knows who the DSL and Deputies are, is aware of the DSL role and has their contact details.
- Ensure all staff and volunteers understand their responsibilities in being alert to the signs of abuse and responsibility for referring any concerns about a child to the DSL and concerns about staff/adults to the Headmaster.
- Ensure that those staff that need to know, are aware of those children who have experienced, or are experiencing abuse in order to promote their educational outcomes and provide the appropriate support.
- Ensure whole school training occurs regularly with at least annual updates so that staff and volunteers can fulfil their responsibilities knowledgeably.
- Ensure any members of staff joining the school receive appropriate child protection training during induction.
- Keep records of child protection concerns securely and separately from the main pupil file and use these records to assess the likelihood of risk.
- Ensure that copies of safeguarding records are transferred accordingly (separate from pupil files) and in a timely fashion when a child transfers school, including in-year transfers.
- Ensure that where a pupil transfers school and is on a child protection plan or is a child looked after, the information is passed to the new school immediately and that the child's social worker is informed. Consideration is given to a transition meeting prior to moving if the case is complex or on-going.
- Maintain links with Hampshire Safeguarding Children Partnership to ensure staff are aware of training opportunities and the latest local guidance on safeguarding.
- Notify the Local Authority of information which may suggest a pupil is being privately fostered.
- Develop, implement and review procedures at St Edward's School that enable the identification and reporting of all cases, or suspected cases, of abuse.
- Have due regard to the need to prevent pupils from being drawn into terrorism. This includes violent and non-violent extremism (Policy to counter radicalisation and extremism).
- Meet any other expectations set out for DSLs in KCSiE 2023.

Child Protection Procedures

Overview

The following procedures apply to all staff working in the school and will be covered by training to enable staff to understand their roles and responsibility.

The aim of our procedures is to provide a robust framework which enables staff to take appropriate action when they are worried a child is being harmed or is at risk of harm.

The prime concern at all stages must be the interests and safety of the child. Where there is a conflict of interest between the child and an adult, the interests of the child must be paramount.

All staff are aware that children, those with disabilities, special needs, certain medical conditions or with language deficit/English as an additional language may have more difficulty in communicating concerns or feelings. They may be more likely to communicate concerns with behaviours rather than words. Additionally, staff will question the cause of knocks and bumps, which will include children (for example younger siblings) visiting the site in addition to pupils.

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 experiences as harmful. Staff should maintain professional curiosity if concerned about a child.

If a member of staff suspects abuse, spots signs or indicators of abuse, or they have a disclosure of abuse made to them they must:

1. Report it to the DSL or a DDSL immediately (in person where possible or by phone)
2. The DSL will consider if there is a requirement for immediate medical intervention. However, urgent medical attention should not be delayed if the DSL or DDSLs are not immediately available
3. Make an accurate record using MyConcern (Management Information System for Safeguarding). Please bear in mind that this may be used in the event of any subsequent court proceedings. This needs to be actioned as soon as possible and within 24 hours of the occurrence. Include all that has happened, including details of:
 - Dates and times of their observations
 - Dates and times of any discussions they were involved in
 - Any injuries, complete a body map on MyConcern
 - Explanations given by the child / adult
 - What action was taken
 - Any actual words or phrases used by the child.
4. In the absence of the DSL or DDSLs, be prepared to refer directly to Children's Services (and the Police if appropriate) if there is the potential for immediate significant harm. A concern will still need to be raised on MyConcern to obtain an accurate chronology of events.

Following a report of concerns from a member of staff, the DSL must:

1. Consider the context within which such incidents and/or behaviours occur, known as contextual safeguarding, and decide whether or not there are sufficient grounds for suspecting significant harm, in

which case a referral must be made to Children's Services and the Police if it is in keeping with the National Police Chiefs Council "[When to call the Police](#)" guidance. The rationale for this decision should be recorded by the DSL. A record will be kept on MyConcern as a chronology of all events.

2. Try to discuss any concerns about a child's welfare with the family and, where possible, seek their agreement before making a referral to Children's Services. However, in accordance with DfE guidance, this should only be done when it will not place the child at increased risk or could impact a Police investigation. The child's views should also be taken into account.

Where there are doubts or reservations about involving the child's family, the DSL should clarify with Children's Services or the Police whether the parents should be told about the referral and, if so, when and by whom. This is important in cases where the Police may need to conduct a criminal investigation.

3. If there are grounds to suspect a child is suffering, or is likely to suffer, significant harm they must contact the placing authority's Children's Services via the Inter-Agency Referral Form (IARF) and make a clear statement of:
 - the known facts
 - any suspicions or allegations
 - whether or not there has been any contact with the child's family.

If the DSL feels unsure about whether a referral is necessary, or if there is any indication that the child is suffering significant harm, they will contact the relevant local authority's Children's Services professional's line or equivalent.

4. If a child is in immediate danger and urgent protective action is required, the Police will be contacted. The DSL should also notify Children's Services of the occurrence and what action has been taken.
5. When a pupil is in need of *urgent* medical attention and there is suspicion of parental abuse causing the medical need, the DSL or a Deputy should take the child to the Accident and Emergency Unit at the nearest hospital, having first notified Children's Services. The DSL should seek advice about what action Children's Services will take and about informing the parents/carers, remembering that parents/carers should normally be informed that a child requires urgent hospital attention.
6. If there is not a risk of significant harm, then the DSL will either monitor the situation or consider the Early Help process having considered the 'Thresholds of Need' table for the relevant authority.
7. The DSL must confirm any referrals in writing to Children's Services, within 24 hours, including the actions that have been taken. The written referral should be made using the Inter-Agency Referral Form (IARF) which will provide Children's Services with the supplementary information required about the child and family's circumstances.
8. In cases of allegations against staff or low-level concerns, the HSCP procedure or the school's Low Level Concerns (LLC) procedure will be followed.

General Guidance

Daily monitoring

Every day, members of the Pastoral Care Team have an obligation to make specific enquiries about the welfare of children for whom they key-work, particularly in relation to pupils missing from education. All relevant observations will be relayed to the Assistant Head (Pastoral). Where these enquiries lead to contact being made with parents/carers, the school will hold more than one emergency contact number for each pupil.

The DSL will monitor MyConcern daily, to ensure that all concerns are triaged appropriately, that action taken is relevant and efficient and to monitor any trends/patterns.

All staff should be particularly alert to the potential need for early help for a child who:

- is disabled and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan)
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- is frequently missing/goes missing from care or from home
- is at risk of modern slavery, trafficking or exploitation
- is at risk of being groomed, radicalised or exploited
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing drugs or alcohol themselves
- has returned home to their family from care
- is a privately fostered child
- is prone to absence from school.

Headmaster's Open Door policy

Staff should ensure that the Headmaster's 'open-door' policy is known to all pupils and that they are made aware they have the right of direct access to him at any time.

The role of the Independent Listener

Members of the Senior Leadership and Pastoral Care teams have a duty to ensure pupils new to the school are made aware of, and meet at the earliest opportunity, the school's Independent Listener.

Managing physical contact

Working in a day and residential school with adolescent pupils who experience social, emotional and mental health difficulties requires staff to exercise due professional discretion in relation to physical contact. Staff are advised that if a pupil touches them in an unacceptable or overtly sexual way, this must be properly addressed as an issue by the member of staff in the capacity of responsible adult and notify the DSL. This may simply require a clear statement to the pupil that such touching is unacceptable. If this proves insufficient, the matter must be reported to the DSL. If staff are not sure of the pupil's motives, best practice is to share details of an incident, with the DSL.

Staff should not fear nor avoid the prospect of a level of physical contact with pupils. However, they must ensure that any physical contact is always appropriate to the role and can be witnessed by others.

One to one working

The Senior Leadership Team promote a culture whereby staff understand the risk of working one-to-one with a pupil and can consult with a member of SLT if they are concerned about working one-to-one. It is the responsibility of staff members to familiarise themselves with Individual Pupil Risk Assessments. These will clearly state, given a pupil's history, whether it is appropriate to work one-to-one.

When working one-to-one, staff are advised:

- a) to inform other staff of the location;
- b) to work in full view of the door or leave the door slightly ajar;
- c) to ensure door windows are not covered with posters or other obstacles.

If in any doubt, staff should actively avoid the prospect of working in isolation.

Staff are advised in the event of an emergency to use the internal telephone number - 401 - which rings around school giving the location of the call and displays 'HELP'.

Policy review

The school undertakes to review this policy at least annually in line with DfE, HSCP, HCC and other relevant statutory guidance.

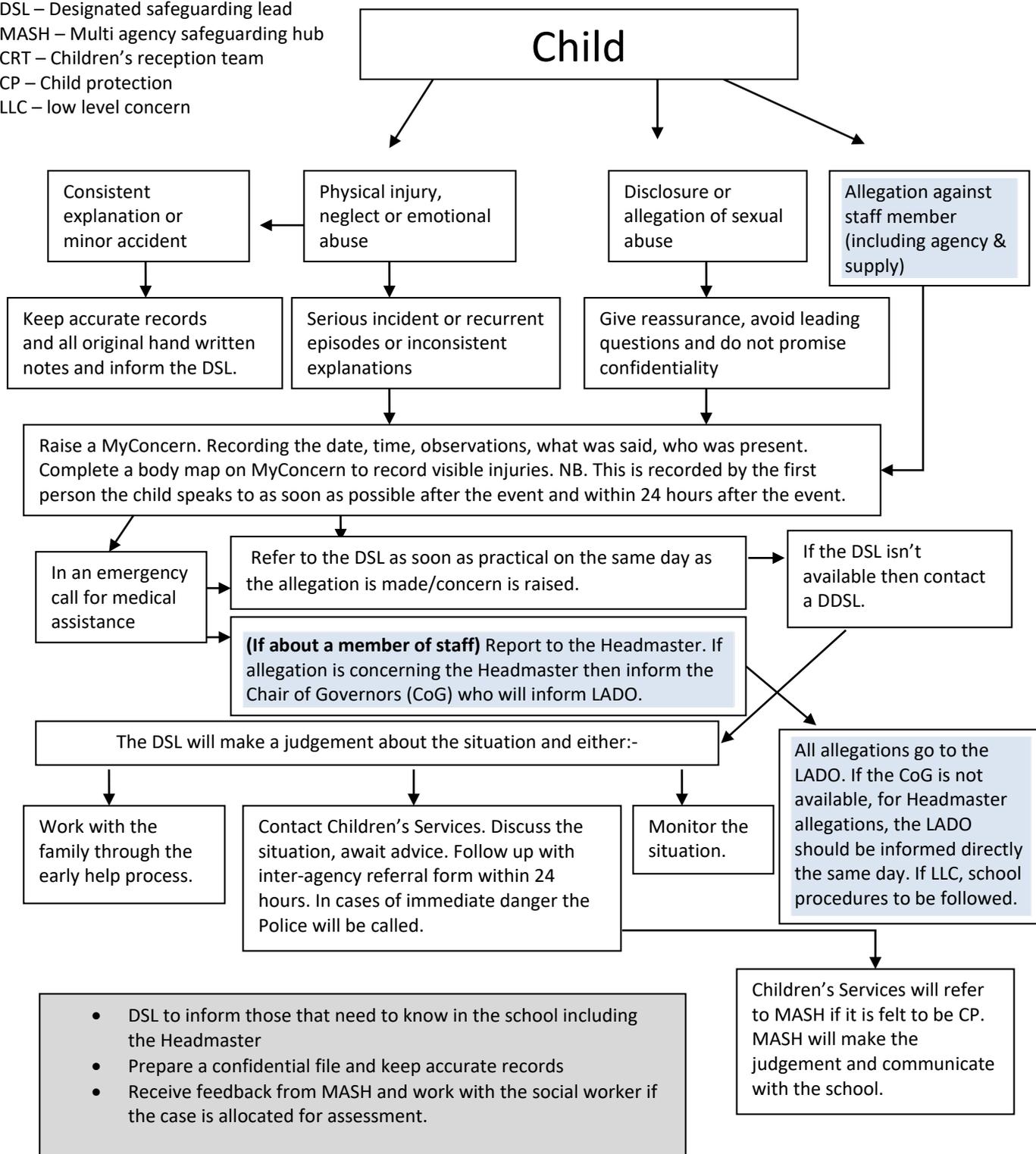
Annex 1 - 8

Annex 1 – Flowchart for Child Protection Procedures

(following Hampshire’s guidance)

In the cases of known FGM, the teacher who was made aware will also make contact with the Police.

DSL – Designated safeguarding lead
MASH – Multi agency safeguarding hub
CRT – Children’s reception team
CP – Child protection
LLC – low level concern



Annex 2 - Dealing with disclosures

A member of staff who is approached by a child should maintain a positive attitude and try to reassure them. They cannot promise complete confidentiality; rather, they should explain that they may need to pass information to other professionals to help keep the child or other children safe. The degree of confidentiality should always be governed by the need to protect the child.

Additional consideration needs to be given to children with communication difficulties and for those whose preferred language is not English. It is important to communicate with them in a way that is appropriate to their age, understanding and preference.

All staff should know:

- The Designated Safeguarding Lead (DSL) is **Miss Karen Thorne**.
- The Deputy DSLs (DDSL) are **Mr Gavin Sprout, Mr Andy Bazen and Mr Jim Fenemore**

Staff should also know who to approach if the DSLs are unavailable. Ultimately, all staff have the right to make a referral to the Police or Children's Services directly and should do this if, for whatever reason, there are difficulties following the agreed protocol.

Guiding principles - The Seven Rs

Receive

- Listen to what is being said, without displaying shock or disbelief.
- Accept what is said and take it seriously.
- Make a note of what has been said as soon as is practicable.

Reassure

- Reassure the pupil, but only so far as is honest and reliable.
- Don't make promises you may not be able to keep e.g. 'I'll stay with you' or 'everything will be alright now' or 'I'll keep this confidential'.
- Do reassure e.g. you might offer 'I believe you', 'I am glad you came to me', 'I am sorry this has happened', 'We are going to do something together to get help'.

Respond

- Respond to the pupil only as far as is necessary for you to establish whether or not you need to refer the matter. However, do not interrogate for full details.
- Do not ask 'leading' questions i.e. 'did he touch your private parts?' or 'did she hurt you?' Such questions may invalidate your evidence (and the child's) in any later prosecution in court.
- Do not ask the child why something has happened.
- Do not criticise the alleged perpetrator; the pupil may care about him/her, and reconciliation may be possible.
- Do not ask the pupil to repeat it all for another member of staff. Explain what you have to do next and whom you have to talk to. Reassure the pupil that it will be a senior member of staff.

Report

- Share concerns with the DSL as soon as possible.
- If you are not able to contact the DSL (or DDSL), and the child is at risk of immediate harm, contact the Children's Services department directly and raise a MyConcern, detailing all action taken.

Record

- If possible make some very brief notes at the time, and write or type them up as soon as possible.
- Hand original notes to DSL.
- Raise a Concern on MyConcern. Complete a body map on MyConcern if required, to indicate the location of any noticeable bruising or marks.

- Record the date, time, place, persons present and noticeable nonverbal behaviour; recall the words used by the child. If the child uses sexual 'pet' words, record the actual words used, rather than translating them into 'proper' words.
- Record facts and observable things, rather than your 'interpretations' or 'assumptions'.

Remember

- Support the child: listen, reassure, and be available.
- Complete confidentiality is essential. Share your knowledge only with appropriate professional colleagues.
- A victim should never be given the impression that they are creating a problem by reporting, nor should they ever be made to feel ashamed for making a report.
- Try to get some support for yourself if you need it.
- Children may not feel ready or know how to tell somebody that they are being abuse, exploited or neglected and/or they may not recognise their experiences as harmful.

Review (led by DSL)

- Has the action taken provided good outcomes for the child?
- Did the procedure work?
- Were any deficiencies or weaknesses identified in the procedure? Have these been remedied?
- Is further training required?

What happens next?

It is important that concerns are followed up and it is everyone's responsibility to ensure that they are. The member of staff should be informed by the DSL about what has happened following the report being made. If they do not receive this information they should be proactive in seeking it out.

If a staff member believes that their concerns have not been dealt with effectively or that the child remains at risk, they should initially ask the DSL to reconsider ensuring that the risks are understood. If this does not result in a satisfactory outcome, or the DSL rationale appears to miss the risk to the child, then the Whistleblowing procedures of the school should be followed. If the DSL is unhappy with the response from Children's Services, they should consider following the HSCP escalation protocol, which may include:

- contacting Duty Worker or Manager of MASH Team
- contacting Independent Reviewing Officer to ascertain their views on the case
- arranging a Professionals Meeting – agree a member of Social Care can attend
- raising of concerns with the Head of the Service and the Local Authority
- monitoring the case and raise concerns again should further issues arise
- gathering more information and seek further advice from professionals.

The school acknowledges that receiving a disclosure can be upsetting for the member of staff. There is a procedure for supporting staff. This can include:

- reassurance that they have followed procedure correctly
- confirmation that their swift action will enable the allegations to be handled appropriately
- the availability of named support from the DSL or DDSL
- confidential support and counselling lines available to all employees
- additional counselling to recognise that disclosures can and do have an impact on our emotions.

Annex 3 - Allegations against adults who work with children

Working Together to Safeguard Children (2018) states that organisations should have clear policies for dealing with allegations against people who work with children. Those policies should make a clear distinction between an allegation, a complaint or a concern about the quality of care or practice.

Allegations as defined by KCSiE should be reported to the Local Authority Designated Officer. Complaints or concerns can be managed independently by the school under internal procedures.

Complaints could include:-

- Breaches of the Staff Behaviour Policy
- Any breach of data protection or confidentiality
- Poor behaviour management
- Inappropriate use of social media
- Misadministration of medication.

Concerns could include:-

- Inappropriate use of touch, language, shouting or swearing
- Discussing personal or sexual relationships with, or in the presence, of pupils
- Making (or encouraging others to make) unprofessional comments which scapegoat, demean or humiliate children, or might be interpreted as such.

Low Level Concerns (LLCs), which do not reach the allegations harm threshold (or complaints criteria) should be dealt with under the school's LLC procedure.

Procedure for Allegations that meet the harm threshold

This procedure should be used in all cases when it is alleged a member of staff, supply staff, volunteer, Governor, or another adult who works with children has either:

- **behaved in a way that has harmed a child, or may have harmed a child; or**
- **possibly committed a criminal offence against or related to a child; or**
- **behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children; or**
- **behaved or may have behaved in a way that indicates they may not be suitable to work with children (transferable risk).**

When considering allegations of suitability, (the fourth criteria below) the LADO would consider the following situations:

- Parents of children who are placed on a CP/CIN plan or are receiving Early Help;
- Arrests for offences against adults;
- Presentation to other professionals around mental health, domestic abuse and/or substance misuse;
- Extreme political or religious viewpoints which could be considered Hate Crime;
- Concerns about behaviour in their private lives which may impact on children.

The LADO criteria for intervention in any of these situations will be assessed against the likelihood and impact of transferable risk to children.

In line with our referral process:

- Staff will report any concerns about the conduct of any member of staff, supply staff or volunteer to the Headmaster as soon as possible.

- If an allegation is made against the Headmaster, or a member of the Board of Governors, the concerns need to be raised with the Chair of Governors as soon as possible. If the Chair of Governors is not available, then the LADO should be contacted directly.
- There may be situations when the Headmaster or Chair of Governors will want to involve the Police immediately, if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence.
- Once an allegation has been received by the Headmaster or Chair of Governors, they will contact the LADO on 01962 876364 or child.protection@hants.gov.uk as soon as possible and before carrying out any investigation into the allegation.
- Inform the parents of the allegation unless there is a good reason not to.

In liaison with the LADO, the school will determine how to proceed and if necessary, the LADO will refer the matter to Children's Services and/or the Police.

When receiving information from outside agencies about school staff, the LADO will assess the potential for transferable risk, and make disclosure to the school where there is the likelihood of transferable risk to children and there is a pressing need.

If the matter is investigated internally, the LADO will advise the school to seek guidance from HR in following procedures set out in chapter 4 of 'Keeping Children Safe in Education' (2023) and the HSCP procedures.

Supply Staff

While supply staff are not the employee of the school, it is still required that the school report the allegation to the LADO.

If the matter requires an internal investigation, this will be carried out by the school in liaison with a HR rep (acting as the employer) from the supply agency.

Low Level Concerns (LLCs)

The LLC policy is part of the whole school approach to safeguarding. The purpose of the policy is to encourage an open and transparent culture, which enables the school to identify concerning, problematic or inappropriate behaviour at an early stage. It should also empower staff to share LLCs with the Headmaster. LLCs will be managed independently by the school under internal procedures.

Examples of LLCs include, but is not limited to:

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

The LLC policy will:-

- ensure that staff are clear about what constitutes appropriate behaviour, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others;
- empower staff to share any low-level safeguarding concerns with the Headmaster and encourage self-reporting;
- address unprofessional behaviour and support the individual to correct this at an early stage;

- provide a responsive, sensitive and proportionate handling of such concerns when they are raised;
- help identify any weakness in the school or colleges safeguarding system.

In line with the LLC policy:-

- All LLCs will be shared responsibly with the Headmaster, recorded in writing and dealt with in an appropriate and timely manner.
- All LLCs will be reviewed, so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.
- If LLCs are found to be escalating and are reaching the harm threshold, a referral will be made to the LADO.

If there is any doubt about the level at which behaviour needs to be addressed, LADO advice will be taken.

Annex 4 - Online Safety

As a school it is essential that we safeguard children from potentially harmful and inappropriate online material.

Online safety is taught in line with the school's Online Safety Policy (see separate policy) as it is essential that children are safeguarded from potentially harmful and inappropriate online material.

An effective whole school approach to online safety empowers the school to protect and educate pupils and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.

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

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

Online safety is also embedded throughout the curriculum, with teaching always made appropriate to pupils' ages and developmental stages; however, it is particularly addressed in the following subjects:

- RSHE
- Health education
- Citizenship
- Computing.

Pupils are taught the underpinning knowledge and behaviours that can help them to navigate the online world safely and confidently regardless of the device, platform or app they are using.

The underpinning knowledge and behaviours pupils learn through the curriculum include the following:

- How to evaluate what they see online,
- How to recognise techniques used for persuasion
- Acceptable and unacceptable online behaviour
- How to identify online risks
- How to recognise unsafe online contacts
- How and when to seek support
- How to report concerns about themselves or others.

All staff members, pupils and parents/carers will be made aware of the potential risks and dangers they may experience online.

Filtering and Monitoring

The school is responsible for ensuring appropriate levels of security protection procedures are in place in order to safeguard systems, staff and pupils. These procedures are reviewed periodically to keep up with evolving cyber-crime technologies.

The school will ensure that appropriate filtering systems are in place on school devices and school networks to prevent children accessing inappropriate material, in accordance with school policy. The school will, however, ensure that the use of filtering and monitoring systems does not cause “over blocking”, which may lead to unreasonable restrictions as to what pupils can be taught online. The school will also ensure that it meets the [filtering and monitoring standards](#) published by the DfE.

The school uses Smoothwall, a real-time web filter for education. The filtering system includes a safeguarding feature that automatically alerts the IT Team and DSLs when a user is attempting to access inappropriate material and/or content that would raise concern (for example pornography, radicalisation, suicide, self-harm).

Staff will be made aware of the filtering and monitoring systems in place and will know how to escalate concerns where they are identified. Staff will be made aware of their expectations and responsibilities relating to filtering and monitoring systems.

Any material found by members of the school community that is believed to be unlawful will be reported to the appropriate agencies.

Statement of intent

St Edward's strives to ensure the safety and wellbeing of all pupils. Members of our staff team have a duty to safeguard and protect children against CSE and CCE.

This policy outlines the school's procedures for managing cases of CSE and CCE, including:

- Prevention;
- Staff training;
- Embedding it into the curriculum; and
- Reporting cases of CSE and CCE.

Within this policy, the responsibilities of staff members in relation to safeguarding and protecting children are outlined. These include those in relation to the Headmaster, Designated Safeguarding Lead and the school's Board of Governors.

Parents, carers and professionals have a responsibility to communicate any concerns or potential risks that they have identified in respect of CSE and CCE. This information will inform practice; building a picture in respect of contextual safeguarding.

Legal framework

This policy has consideration for, and is compliant with legislation and statutory guidance including:

- Children Act 1989
- Children Act 2004
- Education Act 2011
- Education (Health Standards) (England) Regulations 2003
- Safeguarding Vulnerable Groups Act 2006
- DfE (2018) 'Working together to safeguard children'
- DfE (2023) 'Keeping children safe in education'
- DfE (2017) 'Child sexual exploitation'.

a. Definitions

Child sexual and criminal exploitation are forms of child abuse. They occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person into sexual or criminal activity:

- a) In exchange for something the victim needs or wants.
- b) For the financial advantage or increased status of the perpetrator or facilitator.
- c) Through violence or threat of violence.

The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact, it can also occur through the use of technology. Even where a young person is old enough to legally consent to sexual activity, the law states that consent is only valid where they make a choice and have the freedom and capacity to make that choice. Like all forms of child sexual abuse, **child sexual exploitation:**

- can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex;

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

If sexual gratification, or exercising power and control, is the only motive of the perpetrator, this would not normally constitute CSE, but will be responded to as a different form of child sexual abuse and dealt with in line with the Child Protection and Safeguarding Policy.

Child Criminal Exploitation:

The victim may have been criminally exploited even if the criminal activity appears consensual. Child Criminal Exploitation does not always involve physical contact, it can also occur through the use of technology. Like all forms of child abuse, children who are criminally exploited:

- can become entrapped in this type of exploitation, because perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt;
 - may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others;
 - can 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;
 - may still have been criminally exploited even if the activity appears to be something they have agreed or consented to;
 - can include children being forced or manipulated into transporting drugs or money through County Lines, working in cannabis factories, shoplifting or pickpocketing;
 - can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.
- 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 professionals 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.

b. Roles and responsibilities

Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families has a role to play and all school staff will

undertake their responsibilities with due diligence to this policy and all safeguarding and child protection policies.

The **Board of Governors** ensure that:

- A lead Governor for child protection and safeguarding is appointed (**Mr Michael Tennant**);
- Necessary child protection and safeguarding policies and procedures are in place at the school;
- The effectiveness of the care provided to pupils and whether they are safeguarded is evaluated;
- Staff members effectively carry out their duties, including those in relation to child protection.

The **Headmaster** is responsible for:

- Ensuring that the school complies with its duties under the above child protection and safeguarding legislation;
- Ensuring that all staff members are aware of the school's policies and procedures, and effectively carry out their duties, particularly concerning referrals of cases of suspected abuse and neglect, are followed by staff members;
- Safeguarding pupils' wellbeing and maintain public trust in the teaching profession;
- Guaranteeing that the policies, procedures and training opportunities in the school are effective and comply with the law at all times;
- Guaranteeing that the school contributes to inter-agency working in line with the statutory guidance 'Working Together to Safeguard Children';
- Confirming that the school's safeguarding arrangements take into account the procedures and practices of the placing LA as part of the inter-agency safeguarding procedures;
- Ensuring all relevant persons are aware of the school's local safeguarding arrangements, including the Board of Governors, SLT and DSL;
- Understanding the local criteria for action and the local protocol for assessment, and ensure these are reflected in the school's policies and procedures;
- Complying with its obligations under section 14B of the Children Act 2004 to supply the local safeguarding arrangements with information to fulfil its functions;
- Appointing an appropriate person as Designated Safeguarding Lead (DSL), together with Deputy DSL(s);
- Ensuring that staff members have due regard to relevant data protection principles that allow them to share (and withhold) personal information;
- Making sure that pupils are taught about safeguarding, including protection against dangers online (including when they are online at home), through teaching and learning opportunities, as part of providing a broad and balanced curriculum;
- Making sure that pupils' wishes and feelings are taken into account when determining what action to take and what services to provide to protect individual pupils;
- Guaranteeing that there are systems in place for pupils to express their views and give feedback;
- Establishing an early help procedure and ensure all staff understand the procedure and their role in it;
- Ensuring that pupils and parents are made aware of CSE through the curriculum and literature sent out from the school, respectively;
- Introducing mechanisms to assist staff in understanding and discharging their roles and responsibilities;
- Implementing appropriate safeguarding responses for pupils who go missing from school, particularly on repeat occasions, to help identify any risk of abuse and neglect, including sexual abuse or exploitation, and prevent the risk of their disappearance in future;

- Creating a culture where staff are confident to challenge senior leaders over any safeguarding concerns;
- Providing staff, upon induction, with the Child Protection and Safeguarding Policy, Staff Behaviour Policy, part one of the 'Keeping Children Safe in Education' (KCSIE) guidance, the Children Missing from Education Policy, online safety training, and the identity of the DSL and any deputies.

The **DSL** is responsible for:

- Ensuring CSE and CCE Risk Assessments are carried out;
- Understanding and keep up-to-date with local safeguarding arrangements;
- Acting as the main point of contact with the three safeguarding partners;
- Making the necessary child protection referrals to appropriate agencies;
- Acting as a source of support, advice and expertise to staff members on matters of safeguarding by liaising with relevant agencies;
- Liaising with the Headmaster to inform them of safeguarding issues and ongoing enquiries;
- Liaising with the Deputy DSL(s) to ensure effective safeguarding outcomes;
- Understanding the assessment process for providing early help and intervention;
- Ensuring that all new members of staff receive learning resources to raise awareness of CSE/CCE as a feature of induction prior to training;
- Supporting staff members in liaising with other agencies and setting up inter-agency assessments where early help is deemed appropriate;
- Keeping cases of early help under constant review and refer them to Children's Services if the situation does not appear to be improving;
- Having a working knowledge of how LAs 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;
- Ensuring each member of staff has access to and understands the school's Child Protection and Safeguarding Policy and procedures – this will be discussed during the staff induction process;
- Being alert to the specific requirements of children in need, including those with SEND and young carers;
- Ensuring that staff members regularly receive safeguarding training, including that in relation to CSE/CCE;
- Understanding when they should consider calling the Police, in line with the National Police Chiefs' Council (NPCC) guidance;
- Tracking and meeting with any pupils who have unauthorised absences;
- Liaising with staff members and external agencies regarding unauthorised absences and/or CSE/CCE issues;
- Arranging appropriate CSE/CCE-related resources and information to be available to staff members, including training and regular safeguarding bulletins;
- Making all staff members aware of the appropriate information sharing protocols;
- Ensuring that all CSE/CCE-related concerns are recorded using MyConcern;
- Ensuring the voice of the child is heard, where risk of CSE/CCE is identified and that this is managed in a safe and sensitive manner;
- Keeping detailed, accurate and secure records of concerns and referrals;
- Securing access to CSE/CCE related resources and attend any relevant training courses;
- Ensuring information is displayed within school which signposts pupils to where they can access advice about CSE/CCE;
- Undertaking child protection and safeguarding training annually, including that in relation to CSE and CCE, on a regular basis;

- Encouraging a culture of listening to children and taking account of their wishes and feelings;
- Working with the governing board to ensure the school's Child Protection and Safeguarding Policy is reviewed annually and the procedures are updated regularly;
- Ensuring the school's Child Protection and Safeguarding Policy is available publicly, and parents are aware that the school may make referrals for suspected cases of abuse or neglect, as well as the role the school plays in these referrals;
- Ensuring the best educational outcomes by identifying at-risk pupils to the school and its staff, so that the relevant personnel understand each pupil's educational and welfare needs;
- Supporting teaching staff to identify the challenges that at-risk pupils may face and the additional academic support and adjustments they can make to support these pupils;
- Linking with local safeguarding arrangements to make sure that staff members are aware of the training opportunities available and the latest local policies on safeguarding;
- Ensuring that a pupil's child protection file is copied when transferring to a new school;
- available at all times during school hours to discuss any safeguarding concerns;
- Acting as the lead professional in undertaking an early help assessment, where necessary;
- Liaising with staff to support social workers in making decisions about individual children.

All staff members have a responsibility to:

- Safeguard pupils' wellbeing and maintain public trust in the teaching profession as part of their professional duties;
- Maintain an attitude of 'it could happen here' where safeguarding is concerned;
- Play an active role in supporting the school in its commitment to promoting the safety and welfare of all pupils;
- Act in accordance with statutory and good practice guidance;
- Report any concerns which they may have to the DSL;
- Be aware of the signs of abuse and neglect;
- Be aware of the early help process and understand their role in it;
- Be aware of, and understand, the process of making referrals to Children's Services;
- Be confident of the processing conditions under relevant data protection legislation, including information which is sensitive and personal, and information that should be treated as special category data;
- Make a referral to Children's Services and/or the Police immediately, if at any point there is a risk of immediate serious harm to a child;
- Be aware of and understand the procedure to follow in the event that a child confides they are being abused or neglected;
- Follow the guidance set out in the DfE's 'Working Together to Safeguard Children' where they believe a child may be at risk of harm;
- Ensure the early sharing of information;
- Respect the confidentiality of information;
- Ensure that they are aware of each individual pupil's CSE/CSE risk assessment;
- Ensure that timescales are adhered to and any issues concerning CSE/CCE are passed on to the DSL immediately and reported on MyConcern;
- Attend safeguarding and child protection training, including that in relation to CSE/CCE;
- Contact the Police if they think a child is in immediate risk of harm;
- Create a safe learning environment for pupils;
- Ensure incidents of child on child abuse are dealt with by the school quickly and effectively;
- Maintain appropriate levels of confidentiality when dealing with individual cases, and always act in the best interest of the child;
- Challenge senior leaders over any safeguarding concerns, where necessary.

c. Staff training

- Sufficient child protection and safeguarding training will be undertaken by all staff and members of the Board of Governors;
- Staff members will undergo safeguarding and child protection training at induction, which will be regularly updated as required, but at least annually or whenever there is a change in legislation;
- Notifications with a specific CSE/CCE focus will be shared with parents and carers in order to help combat CSE/CCE;
- When planning training, the DSL and Headmaster will take the context of the school into consideration, ascertaining whether there are specific issues which need to be addressed with more emphasis than others;
- Staff training will be updated on a regular basis, at the discretion of the DSL and Headmaster, ensuring that the information staff members have is up-to-date with sector developments;
- Training will cover, at a minimum:
 - The issues surrounding sexual violence and sexual harassment;
 - Contextual safeguarding;
 - Child criminal exploitation and the need to refer cases to the National Referral Mechanism;
 - Warning signs and indicators of CSE/CCE;
 - The different forms of CSE/CCE;
 - Pupils most at risk of CSE/CCE;
 - Protecting and supporting pupils;
 - Procedures for reporting suspected cases of CSE/CCE;
 - Information sharing protocols;
 - Facilitating conversations with pupils, parents and carers about CSE/CCE.
- Information shared with staff members in CSE/CCE-related training will be up-to-date and take account of sector developments;
- All staff members will be trained to respond to concerns in ways that are:
 - Child-centred;
 - Developed and informed by the involvement of the pupil's family, where appropriate;
 - Responsive and pro-active;
 - Relationship-based;
 - Informed by an understanding of the complexities of CSE/CCE.
- The DSL and Deputy DSLs will undergo training every two years, as well as refresh their skills and knowledge at regular intervals (at least annually) to allow them to keep up-to-date with any developments relevant to their role.

d. Indicators of CSE/CCE

Staff members will be aware of the pupils most at risk of being sexually and/or criminally exploited.

All staff members must be aware of the warning signs of CSE/CCE and alert to the following indicators that children may:

- Being secretive
- Acting withdrawn and isolated
- Acquiring money and goods without sufficient justification
- Unexplained school absences
- Staying out late or going missing
- Consuming alcohol or drugs
- Acting hostile or aggressive
- Associating with gangs

- Displaying inappropriate sexualised behaviour for age
- Developing relationships, particularly of a sexual nature, with a significantly older person
- Having older boyfriends or girlfriends
- Changing their physical appearance
- Acting in a defensive manner
- Becoming involved in petty crime
- Self-harming or displaying significant changes in emotional well-being
- Having physical injuries without plausible explanation
- Suffering from sexually transmitted infections or become pregnant
- Trying to conceal marks or scars on their body
- Refusing to uncover parts of their body
- Entering or leaving vehicles driven by unknown adults
- Having a lack of positive relationships
- Using the internet in a manner which causes concern
- Associating with other young people involved in exploitation
- Displaying a concerning use of internet and social media.

e. Effects of CSE/CCE

CSE/CCE can have long-lasting effects on a pupil. St Edward's is committed to early identification in order to reduce these effects.

All staff members will be made aware of the indicators and effects of CSE/CCE in order to aid early identification.

Staff members are aware that CSE/CCE can affect every aspect of a pupil's life, including, but not limited to, the following:

- Physical wellbeing;
- Mental health;
- Education;
- Employment prospects;
- Family relationships;
- Social relationships, as children and as adults;
- Their relationships with their own children in the future.

f. Consensual and non-consensual sharing of indecent images and videos

The school will ensure that staff are aware to treat the consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual images) as a safeguarding concern.

The sharing of nudes and semi-nudes will be handled as a child protection issue in line with the Child Protection and Safeguarding Policy. Staff must never ask to view the image/video. Where a member of staff becomes aware of an incident of sharing nudes and/or semi-nudes, they will refer this to the DSL (Designated Safeguarding Lead) immediately.

The consensual and non-consensual sharing of indecent images and videos does not include the sharing of sexual photos and videos of those under the age of 18 with or by adults. This is a form of child sexual abuse and must be referred to the police.

The sending and receiving of sexually explicit messages or images is a serious offence, and is often utilised by CSE/CCE offenders to communicate with victims.

The dangers of sharing nudes and semi-nudes are taught alongside CSE/CCE in the RSHE curriculum, in order to convey to pupils how the two are linked and why they are dangerous.

Pupils are made aware that, regardless of age, the Police consider the sharing of nudes and semi-nudes amongst people under the age of 16 a criminal offence.

Parents are informed of the dangers of sharing nudes and semi-nudes and the appropriate safety measures to be implemented.

g. Relationships and Sex Education

CSE/CCE is addressed as part of a programme of work regarding relationships and sex education, following DfE guidance.

Pupils will be made aware of the dangers of CSE/CCE, together with information on how to spot the indicators of CSE/CCE, through assemblies, leaflets, posters, the curriculum and whole school initiatives, both in respect of their own safety and that of their peers.

Teachers, when teaching about CSE/CCE, will be sensitive to the feelings of pupils who may have been traumatised by similar incidents in their past.

Teachers understand that they will need to differentiate their material in respect of age, cognitive ability and emotional literacy in order to effectively deliver the programme. Topics taught in relation to CSE/CCE will include the following:

- Friendship;
- Private body parts;
- Appropriate physical contact;
- Keeping safe;
- Recognising and assessing risks;
- Knowing where to get help;
- Respect and responsibilities;
- Consent;
- Different types of abuse;
- Unhealthy relationships;
- Skills to develop positive and healthy relationships;
- Child on child abuse and sexual violence and harassment;
- Understanding dangerous and exploitative situations;
- Gender stereotypes;
- Risk taking and consequences.

h. Working with parents and carers

St Edward's will ensure that parents and carers:

- Understand the risks of CSE/CCE and recognise that the issue is something that could affect their child;
- Understand that CSE/CCE can occur both online and offline;
- Know the indicators of CSE/CCE;
- Know how to report concerns;

- Know where to go for support if their child has been the victim, or is the suspected victim, of CSE/CCE;
- Are reassured that services will work with them, as appropriate, to try to protect their child;
- Have support to manage the emotional impact of CSE/CCE on their child and themselves.

Parents and carers will, as required, be provided with the contact information of relevant services and outside agencies.

Parents and carers will be made aware of whom to report concerns to within the School, via information posted on the school website and in Admission information.

Concerns expressed by parents and carers will always be listened to and taken seriously.

The school respects the legal right of parents and carers to withdraw their child from all or part of the relationships and sex education programme, including that regarding CSE/CCE, except for those statutory parts included in the science National Curriculum.

i. Reporting and Referrals

All members of staff and pupils are aware of child protection and safeguarding reporting procedures in respect of CSE/CCE, as well as the contact details for the relevant outside agencies. Staff understand their responsibilities in relation to confidentiality and information sharing.

If a member of staff has any concern about a child's welfare, or suspects that a pupil is at risk of, or has been the victim of CSE/CCE, they will act on them immediately by speaking to the DSL or a Deputy. All concerns and information regarding cases of CSE/CCE are recorded on MyConcern.

Where staff have safeguarding concerns or an allegation is made about another member of staff, this should be reported to the Headmaster. If there is a conflict of interest in reporting the matter to the Headmaster, it should be reported to the Chairman of the Board.

Parents, carers and members of the school community should raise any concerns they have regarding CSE/CCE with staff members as soon as possible.

All safeguarding and child protection concerns, including those in relation to CSE/CCE, will be addressed in line with the procedures outlined in school policies, including the Child Protection and Safeguarding Policy, Procedure and Guidance.

If a pupil is in immediate danger, a referral will be made to Children's Services and/or the Police immediately.

When making a referral to Children's Service or other external agencies, information will be shared in line with confidentiality requirements and will only be shared where necessary to do so.

The DSL will work alongside external agencies, maintaining continuous liaison, including multi-agency liaison where appropriate, in order to ensure the wellbeing of the pupils involved.

The DSL will work closely with the Police to ensure the school does not jeopardise any criminal proceedings, and to obtain help and support as necessary.

Where a pupil has been harmed or is in immediate danger or at risk of harm, the referrer will be notified of the action that will be taken within one working day of a referral being made. Where this

information is not forthcoming, the referrer will contact the assigned social worker (if allocated) for more information.

The school will not wait for the start or outcome of an investigation before protecting the victim and other pupils: this applies to criminal investigations as well as those made by Children's Services.

Where Children's Services decide that a statutory investigation is not appropriate, the school will consider referring the incident again if it is believed that the pupil is at risk of harm.

Where Children's Services decide that a statutory investigation is not appropriate and the school agrees with this decision, the school will consider the use of other support mechanisms, such as Early Help and pastoral support.

At all stages of the reporting and referral process, the pupil will be informed of the decisions made, actions taken and reasons for doing so. The school will ensure that the pupil's wishes are always taken into account, and that there are systems available for pupils to provide feedback and express their views.

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

Discussions of concerns with parents/carers will only take place where this would not put the pupil or others at potential risk of harm.

The school will work closely with parents/carers to ensure that the pupil, as well as their family, understands that the arrangements in place, such as in-school interventions, are effectively supported and know where they can access additional support.

All concerns, discussions and decisions made, as well as the reasons for making those decisions, will be recorded by the DSL and kept securely.

When responding to safeguarding concerns, staff members will act calmly and supportively, ensuring that the pupil feels like they are being listened to and believed.

j. Providing support

Staff members will undergo safeguarding training on an annual basis so that they can fully understand the needs of a pupil that has experienced CSE/CCE and provide effective support.

Staff members will build trusting relationships with pupils which reinforce positive relationships.

A listening culture within the school is actively promoted by all staff members. Pupils are constantly reassured that they can talk to staff members if they feel unsafe. Pupils are encouraged to identify named adults in the school who they feel they could approach to talk to if they have a concern. Pupils are also informed of the role of the School's Independent Listener.

Therapeutic support will be offered to pupils who have experienced CSE/CCE.

Staff will offer pastoral support and work alongside outside agencies as a response to pupils falling victim to CSE/CCE.

External Mentors and/or internal Keyworkers will be allocated to pupils who have experienced CSE/CCE and frequent contact will be maintained in order to develop a trustworthy and consistent relationship.

k. Monitoring and review

The Headmaster is responsible for reviewing the Child Protection and Safeguarding policy annually, in consultation with the DSL, SLT and the Board of Governors.

Members of staff are afforded the opportunity to share any concerns or issues in relation to this policy with the Headmaster or DSL.

In the event of a case of CSE/CCE occurring at the school, the effectiveness of the school's procedures will be evaluated and the pupil's plans and risk assessments will be reviewed.

Any changes made to this policy by the Headmaster and DSL will be communicated to all members of staff. All members of staff are required to familiarise themselves with all processes and procedures outlined in this policy as part of their induction programme.

Annex 6 - Child on Child Abuse including Sexual Violence and Sexual Harassment (SVSH) Between Children

The school adopts a zero-tolerance policy towards all forms of child on child abuse including sexual violence and sexual harassment, making it clear that it is never acceptable and it will not be tolerated. No form of any such abuse (no matter how 'low level' it may appear) is ever dismissed as a joke, banter or an inevitable part of growing up. 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. We will also take seriously any sharing of sexual images (photos, pictures or drawings) and videos; sexual jokes, comments or taunting either in person or on social media; or on-line sexual harassment. The school acknowledges 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.

Staff will remain vigilant and intervene early to prevent low level behaviours from becoming abusive experiences.

All staff should be aware that safeguarding issues can manifest themselves via child on child abuse. This can include, but may not be limited to:

- bullying (including cyberbullying);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence, such as rape, assault by penetration and sexual assault;
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse;
- upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
- consensual and non-consensual sharing of indecent images and videos;
- initiation/hazing type violence and rituals; and
- abuse that can affect the mental health of a young person.

Sexual violence and sexual harassment can occur between two children of any age and sex from primary to secondary stage and into colleges. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This can adversely affect their educational attainment as well as their emotional well-being. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and offline (both physically and verbally) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. It is also important to recognise that some perpetrators may themselves also be victims.

Reports of sexual violence and sexual harassment are extremely complex to manage. It is essential that victims are protected, offered appropriate support and every effort is made to ensure their education is not disrupted. It is also important that other children and young people and staff are supported and protected as appropriate.

While a clear focus of child on child abuse is linked to sexual abuse and harassment, physical assaults and initiation violence and rituals from pupils to pupils can also be abusive. These are equally not tolerated and, if it is believed that a crime has been committed, will be reported to the Police.

The principles from the anti-bullying policy will be applied in these cases, with recognition that any Police investigation will need to take priority.

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 children.

We recognise that children are capable of abusing their peers and this will be dealt with under our child protection policy and in line with KCSiE (2023).

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.

We will minimise the risk of child on child abuse by -

Prevention:

- Taking a whole school approach to safeguarding and child protection.
- Providing training to staff.
- Providing a clear set of values and standards, underpinned by the school's policies and systems, and by a planned programme of evidence-based content delivered through the curriculum.
- Modelling appropriate behaviour.
- Engaging with specialist support and interventions where appropriate.
- Inviting outside agencies in to school to enrich the curriculum.
- Facilitating a Student Council and pupil voice.
- Ensuring the RSHE curriculum covers expected behaviours and relationship expectations, bullying, relationship abuse, harassment and attitudes towards sexual assault.
- Delivering a Social Skills curriculum that includes friendship skills.

Responding to reports of all forms of child on child abuse, including sexual violence and sexual harassment:

- Children making a report of child on child abuse will be taken seriously, kept safe and be well supported.
- Understanding that our initial response to a report from a child is incredibly important and can encourage or undermine the confidence of victims of sexual violence and harassment to report or to come forward in the future.
- If the report includes an online element, staff will be mindful of the Searching, Screening and Confiscation: advice for schools (DfE 2018) guidance.
- Staff taking the report will raise the concern with the DSL immediately.
- The staff member that took the concern will also raise a concern on MyConcern as soon as practicably possible but at least within 24 hours; which will automatically alert the DSL and DDSLs.
- Staff taking a report will follow safeguarding guidance, including never promising confidentiality.
- Parents or carers will be informed (unless this would put the child at greater risk).
- If a child is at risk of harm, is in immediate danger, has been harmed or is at risk of harming others, a referral will be made to Children's Services or emergency services if appropriate.

Immediate risk assessment and response

Following a report, the DSL will make an immediate risk and needs assessment on a case-by-case basis.

The risk assessment will consider:

- The victim, especially their protection and support.
- The alleged perpetrator, their support needs and any other action.
- All other children at the school.
- The victim and the alleged perpetrator sharing classes and space at school.

The immediate risk assessment details will be recorded.

Further assessment and response:

The DSL will use Farrer and Co guidance to assess where the alleged behaviour falls on a spectrum and to decide how to respond. This could include, for example, whether it:

- is socially acceptable,
- involves a single incident or has occurred repeatedly over a period of time,
- is problematic and concerning,
- involves any overt elements of victimisation or discrimination e.g. related to race, gender, sexual orientation, physical, emotional, or intellectual vulnerability,
- involves an element of coercion or pre-planning,
- involves a power imbalance between the child/ children allegedly responsible for the behaviour and the child/children allegedly the subject of that power, involves a misuse of power i.e. age, developmental stage
- is an example of historical behaviour, i.e. see individual pupil risk assessment
- is a crime that has been committed.

The DSL will also consider:

- The voice of the victim and how the child is dealing with the situation and if there is need for an external assessment to determine what needs are present for the child.
- Other related issues or wider context.
- Whether there has been other professional intervention and/or other specialist risk assessments, if so, these professional assessments will be used to inform the school's approach to supporting and protecting pupils.

Action: not deemed to be child on child abuse

The DSL will manage the report internally.

Action: possible or confirmed child on child abuse

The DSL will manage the report with the following options where relevant:

- Contact parents/carers, local authority and all relevant agencies – both victim and perpetrator
- Contact Children's Services Professionals Line and complete an inter-agency referral form if advised
- Refer to Children's Services
- Refer to Early Help
- Contact LADO
- Report to the Police (generally in parallel with a referral to Children's Services)
- Commence safeguarding chronology of actions on MyConcern

Ongoing Response:

- All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded on MyConcern. Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and addressed.
- The DSL will keep the risk assessment under review.
- The DSL will manage each report on a case by case basis and will ensure documentation is updated.
- Where there is a criminal investigation into a rape, assault by penetration or sexual assault, the alleged perpetrator should be removed from any classes (and bedroom if residents) they share with the victim during that investigation.
- The DSL will consider how best to keep the victim and perpetrator a reasonable distance apart on school premises and in 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. 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 to remain in the 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 policy, including consideration of permanent exclusion. The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases. Where the perpetrator is going to remain at the school, the principle of keeping the victim and perpetrator in separate classes where possible should be maintained and continued. Consideration would be given to the most appropriate way to manage potential contact on school premises and transport.
- The victim, alleged perpetrator and other witnesses (children and adults) will receive appropriate support and safeguards on a case-by-case basis.
- When ongoing support is required by the victim, the victim should be asked whether they would find it helpful to have a designated trusted adult to talk about their needs. The choice of any such adult should be made by the victim (as far as reasonably possible) and this choice should be supported.
- The school will take any disciplinary action against the alleged perpetrator in line with behaviour and discipline in the school.
- 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.

Unsubstantiated, unfounded, false, or malicious reports

- If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL 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 whether this is a cry for help. In such circumstances, a referral to Children's Services may be appropriate.
- If a report is shown to be deliberately invented or malicious, the school will consider whether any disciplinary action is appropriate against the individual who made it, in line with school policy.

Physical Abuse

While a clear focus of child on child abuse is linked to sexual abuse and harassment, physical assaults and initiation violence and rituals from pupils to pupils can also be abusive.

These are equally not tolerated and, if it is believed that a crime has been committed, will be reported to the Police.

The principles from the anti-bullying policy will be applied in these cases, with recognition that any Police investigation will need to take priority.

Annex 7 - Whistleblowing in a safeguarding context

While the school has a separate whistleblowing policy, this is a summary sheet that outlines the process when there is a concern that safeguarding issues have not been reported or followed correctly. Whistleblowing procedures protect staff members who report colleagues they believe are doing something wrong or illegal, or who are neglecting their duties.

This does not replace the whistleblowing policy and should be read in conjunction with the school policy.

Whistleblowing is a term that is used when staff want to report a concern within their organisation that involves their manager or a person senior to them in the organisation which may prevent them from following the normal reporting systems. The whistleblowing policy is not designed to be used for concerns that fall under statutory procedures (for example child protection or allegations against staff) as these should be reported under the relevant procedures. However, the whistleblowing policy will apply if there is good reason to believe that the relevant procedure is not being followed or will not be followed effectively.

There are a limited number of areas that can be called whistleblowing, and the policy protects staff from being punished for raising concerns.

Within St Edward's School, the Headmaster is responsible for all staff. If you are concerned that any member of staff within the school is not following safeguarding processes or is behaving in a way that is placing children at risk, you should in the first instance make the Headmaster aware.

If your concern is about the Headmaster, you should raise this with the Chair of Governors (details are displayed on staff noticeboards and available on the N Drive).

If you are worried about how child protection issues are being handled, you can contact the NSPCC whistleblowing line on 0800 028 0285 or email help@nspcc.org.uk. Alternatively, you can contact Hampshire Children's Services by calling 0300 555 1384 (office hours) or 0300 555 1373 (outside of office hours) or the Local Authority Designated Officer on 01962 876364.

If you believe that a child is being abused by individuals outside the school, you should report immediately to the DSL.

If you have concerns regarding the conduct of a visiting professional (including the Police and Children's Services), you should report immediately to the DSL. The DSL will contact the Local Authority Designated Officer on 01962 876364. Whistleblowing procedures for the relevant body will be followed if required.

Annex 8 - Safeguarding Awareness for people not employed by St Edward's School

While working at St Edward's School, you have a duty of care towards the pupils here. This means that at all times you should act in a way that is consistent with their safety and welfare.

In addition, if at any time you have a concern about a child or young person, particularly if you think they may be at risk of abuse or neglect, it is your responsibility to share that concern with the school Designated Safeguarding Lead (DSL), who is *Miss Karen Thorne (Assistant Head (Pastoral), 01794 885 229)* and can be found *in the Pastoral Care Office*.

In the event that the DSL is unavailable, we have three deputy DSLs;

- Mr Gavin Sprout (Pastoral Care Manager, ext. 238)
- Mr Andy Bazen (Deputy Head (Academic), ext. 375)
- Mr Jim Fenemore (Deputy Head (Pastoral), ext. 251)

This is not an exhaustive list but you may have become concerned as a result of:

- Observing a physical injury, which you think may have been non-accidental.
- Observing something in the appearance of a child or young person which suggests they are not being sufficiently well cared for.
- Observing behaviour that leads you to be concerned about a child or young person.
- Observing any change in behaviour that leads you to be concerned about their mental health.
- A child or young person telling you that they have been subjected to some form of abuse.
- Observing adult behaviour that leads you to be concerned about their suitability to work with children or young people.

In any of the circumstances listed here, you must write down what you saw or heard, date and sign your account, and give it to the DSL as soon as possible and no longer than 24 hours later. This may be the beginning of a legal process – it is important to understand that legal action against a perpetrator can be seriously damaged by any suggestion that the child has been led in any way.

If a child talks to you about abuse, you should follow these guidelines:

- Rather than directly questioning the child, just listen and be supportive.
- Never stop a child who is freely recalling significant events, but don't push the child to tell you more than they wish.
- Make it clear that you may need to pass on information to staff in other agencies who may be able to help – do not promise confidentiality. You are obliged to share any information relating to abuse or neglect.
- Write an account of the conversation immediately, as close to verbatim as possible. Put the date and timings on it, and mention anyone else who was present. Then sign it, and give your record to the DSL, who will contact Children's Services if appropriate.

The school has a policy on safeguarding children and young people which you can find, together with the local procedures to be followed by all staff on the school's website.

If your concern involves the DSL or a member of the senior staff, contact the LADO on 01962 847364 or the NSPCC whistleblowing line on 0800 028 0285.

Remember, if you have a concern, report it.