



Safeguarding and Child Protection Policy (A6)

Scope:	Whole School (Including Boarding)
Release date:	September 2023 (<i>Board ratification pending</i>) <i>linked to updated KCSIE released September 2023</i>
Author:	Senior Deputy Head Senior School (DSL)
Reviewer:	Director for Safeguarding and Child Protection
Approval body:	Board of Directors
Review date:	September 2024

Linked documents

This Policy should be read in conjunction with the following published documents by third parties:

- Keeping Children Safe in Education September 2023
- Working Together to Safeguard Children July 2018
- Revised Prevent Duty Guidance: For England and Wales April 2021
- The Prevent duty: Departmental advice for Schools and childminders (Revised April 2021)
- The use of social media for on-line radicalisation July 2015
- Cambridgeshire County Council Basic Child Protection Booklet 2021
- Guidance for Safer Working Practice May 2019
- Preventing Bullying July 2017
- Relationships Education, Relationships and Sex Education (R50) and Health Education 2019
- Mental Health and Behaviour in Schools November 2018
- Elective Home Education April 2019
- Safeguarding and Remote Education During Coronavirus March 2021
- Sharing Nudes and Semi-Nudes December 2020

This Policy links to our:

- Child-on-child Abuse policy (Senior)
- Attendance Policy
- Behaviour Policy (Senior)
- Good Behaviour Policy (Prep)
- Mental Health and Wellbeing Policy
- Anti-Bullying (Prep)
- Complaints Procedure
- Health and Safety Policy
- Online Safety and Acceptable Use Policy
- Whistleblowing Policy
- Suitability of Staff Protocol
- Staff Code of Conduct
- Wisbech Grammar School Teachers' Guide

Acronyms

CCE	Child Criminal Exploitation
CSE	Child Sexual Exploitation
DBS	Disclosure and Barring Service
EYFS	Early Years Foundation Stage
FGM	Female Genital Mutilation
GDPR	General Data Protection Regulation
NCTL	National College For Teaching and Leadership
KCSIE	Keeping Children Safe In Education
LADO	Local Authority Designated Officer
MARAC	Multi-Agency Risk Assessment Conference
NRM	National Referral Mechanism
PSHCE	Personal, Social, Health and Citizenship Education
SCPB	Safeguarding Children Partnership Board
LADO	Local Authority Designated Officer
WGS	Wisbech Grammar School
COCA	Child-on-child Abuse
HBV	Honour-Based Violence
EHH	Early Help Hub
UKCCIS	UK Council for Children Internet Safety
WTTSC	Working Together to Safeguard Children
SEND	Special Educational Needs and Disability
MASH	Multi-Agency Safeguarding Hub

Availability

This Policy is available to parents and prospective parents on the School website, and a printed copy may be requested from the School Offices/Pupil Services Team.

Edition Changes

<u>Edition Release 2023</u>	
Location of change	Clause impacted
Throughout document: <ul style="list-style-type: none">• KCSIE 2022 updated to 2023 along with appropriate parts/sections/annexes/pages• Designated Person (DP) changed to Deputy Designated Safeguarding Lead (DDSL) as per update to CCC nomenclature• Inter-Agency has become Multi-Agency (KCSIE 2023)• Missing in Education has become Absent from Education (KCSIE 2023)• In cases where abuse is used as a general term there has been the addition of and/or exploitation (KCSIE 2023)• Early Help now preceded by 'Targeted Support' (new name)	
Changes to school staffing and infrastructure	All extensions listed for DST have been updated Suzanne Doherty Added to DST Members with updated extension
2. Procedures (changes due to KCSIE 2023)	Reporting changed to 'referring'
1. Prevention (changes due to KCSIE 2023)	The word trusted is added before adults Reworking of sentence regarding concerns being raised to include young people recognizing unsafe situations and understanding that this can involve adults and children The word jail has been replaced by the word prison
1. Prevention 'Prevention of Child-on-Child abuse'	New link added to Child Sexual Behavior Tool
2. Procedures	New link to Multi-Agency Policies and Procedures
2. Procedures (changes due to KCSIE 2023) 'Designated Safeguarding Team'	New link to Multi-Agency Policies and Procedures The word bulletin has been replaced by the word updates Clinical Commission Group has been renamed Integrated Care Board Further reading has been replaced by additional training

2. Procedures (changes due to KCSIE 2023) 'Training and Awareness of Every Member of Staff'	<p>Sentence regarding Abuse being Multi-faceted now reads: understanding that children can be at risk of harm inside and outside of the school, inside and outside of home, and online.</p> <p>Addition of 'filtering and monitoring' to training content.</p> <p>Update of staff training given context by expansion of paragraph to explain that updates provide relevant skills and knowledge to safeguard children effectively</p>
2. Procedures (changes due to KCSIE 2023) 'Multi-Agency Working'	Social Work Unit renamed Social Care Team
2. Procedures (changes due to KCSIE 2023) 'Record Keeping'	Social Care now reads Children's Social Care
2. Procedures (changes due to KCSIE 2023) 'Confidentiality and Information Sharing'	<p>Regarding disclosure of safeguarding information to the wider staff, addition of 'considering what is necessary, proportionate and relevant'</p> <p>Regarding the passing on to information with or without consent, sentence now reads 'where to do so would place a child at increased risk of harm. Information may be shared without consent if a person believes that there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner,'</p>
3. Supporting Children (changes due to KCSIE 2023) 'Children with Disabilities, Certain Health Conditions, Additional Needs or Special Educational Needs'	<p>Addition of 'Certain Health Conditions' to title</p> <p>Addition of 'both in the real world and online' to explain that PSHE should support in both realms</p> <p>Addition of sentence regarding the Equality Act.</p>
3. Supporting Children (changes due to KCSIE 2023) 'Children Frequently Absent from Education'	Addition of content to highlight that schools must also follow up attendance
3. Supporting Children (changes due to KCSIE 2023) 'Children Living with Domestic Abuse'	Addition of clarification that the Domestic Abuse Act 2021 applies to those aged 16 and over

3. Supporting Children (changes due to KCSIE 2023) 'Children at risk of 'Honour- Based' Abuse (Female Genital Mutilation and Forced Marriage)'	Paragraphs added regarding new Marriage and Civil Partnership (Minimum Age) Act 2023. Legal Age now 18 that it is now a criminal offence to force children to marry. Schools response outlined also
3. Supporting Children (changes due to KCSIE 2023) 'Children at risk of 'Radicalisation'	The word vulnerable has been replaced with 'susceptible'
3. Supporting Children (changes due to KCSIE 2023) 'Children who have Family Members in Prison'	Addition of the words 'specialist organisations' to those people the school will work with.
4. Preventing Unsuitable people from working with Children (changes due to KCSIE 2023) 'Use of Mobile Devices'	Addition of 'and other smart devices'
5. The Board of Directors' Responsibilities (changes due to KCSIE 2023)	Clarification that Directors should complete 'Director/Governor Safeguarding Training.' Addition of bullet point regarding safeguarding arrangements for outside agencies using school premises Expansion of Safeguarding report to Safeguarding Monitoring Report
Appendix A the four categories of abuse (changes due to KCSIE 2023)	Addition of a paragraph on exploitation
Appendix B Useful Contacts	Contacts and Guidance updated

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Roles and Staff

Role Definitions

- Staff** Every member of staff, whether paid or unpaid, including volunteers, agency or supply staff, Directors and Advisory Committee members.
- Quad** Senior Leadership Team;
This Team consists of Headmaster, Bursar, Senior Deputy Head (Senior School), Senior Deputy Head (Prep School), Deputy Head Academic and Deputy Bursar.
- DST** Designated Safeguarding Team
The Team consists of the Designated Safeguarding Leads and the **Deputy Designated Safeguarding Leads**, DSL Designated Safeguarding Lead (Job Description can be found in Appendix C)
The DSL manages the DST which is made up of **Deputy Designated Safeguarding Leads (DDSLs)** who cover the role of the DSL when they are unavailable. The lead responsibility for safeguarding and child protection remains with the DSL.
- DDSL** **Deputy Designated Safeguarding Lead** (Job Description can be found in Appendix C)
Deputy Designated Safeguarding Leads work with and are coordinated and managed by the Designated Safeguarding Lead (DSL). Together they form the 'Designated Safeguarding Team' (DST)

Designated Safeguarding Team (DST) - Current Personnel

The Designated Safeguarding Leads for Child Protection (DSLs) are:

Mr Peter Timmis – Senior Deputy Head (ext 213) (Senior School)

Mrs Keryn Neaves – Senior Deputy Head Prep School (ext 232) (including EYFS)

The **Deputy Designated Safeguarding Leads (DDSLs)** are:

Mrs Kate Bradley – Head of 6th Form (ext 0270)

Mr Al Duncan – Head of Middle School (ext 0350)

Mr Tom Calow – Head of Lower School (ext 0207)

Mrs Karen Fairbrother – Prep School (ext 0230)

Mrs Suzanne Doherty – EYFS (ext 0231)

Mr Chris Liston – Head of Boarding (ext 0204)

Note: All Resident Tutors will also receive Level 3 Safeguarding Training.

Further Members of the Safeguarding Team are:

Mrs Hannah Ryan – School Nurse (ext 0381)

The member of staff with responsibility as Domestic abuse lead is **Mr Al Duncan**

The member of staff with responsibility for PREVENT is **Mr Peter Timmis**

The member of staff with responsibility as Mental Health Lead is **Mrs Keryn Neaves**

Designated Safeguarding Responsibility and Oversight – Current Personnel

The Headmaster who retains overall responsibility for Safeguarding and Child Protection is:

Mr Barney Rimmer

The nominated Director for Safeguarding and Child Protection is:

Mr Jay Liu

The nominated Advisory Committee member for Safeguarding and Child Protection is:

Dr Karina Hart

Safer Recruitment – Current Personnel

The following members of staff have undertaken Safer Recruitment training:

Ms Ana Brady – Deputy Bursar and Head of HR

Mr Barney Rimmer – Headmaster

Mrs Keryn Neaves – Senior Deputy Head Prep School

Introduction

Wisbech Grammar School (Senior School, Prep School, EYFS Department, and Boarding) fully recognises the responsibility it has under section 175 of the Education Act 2002 and the Education (Independent School Standards) Regulations 2004 to have arrangements in place to safeguard and promote the welfare of children.

This responsibility is more fully explained in the statutory guidance for Schools and colleges 'Keeping Children Safe in Education' (September 2023). All staff must be made aware of their duties and responsibilities under part one of this document, which are set out below.

Staff, who work directly with children 'pupil facing', should read the above document together with 'Annex B' of 'Keeping Children Safe in Education' (September 2023) and 'What to do if you're worried a child is being abused: Advice for practitioners' (March 2015).

Through their day-to-day contact with pupils and direct work with families all staff in school have a responsibility to:

- Identify concerns early to prevent them from escalating,
- Provide a safe environment in which children can learn,
- Identify children who may benefit from early help,
- Know what to do if a child tells them he/she is being abused or neglected,
- Follow the referral process if they have a concern.

This Policy sets out how the School's Board of Directors discharges its statutory responsibilities relating to safeguarding and promoting the welfare of children who are pupils at the School.

Our policy applies to all staff, paid and unpaid, working in the School including volunteers, members of the Advisory Committee and Board of Directors (see definition). From this point any reference to staff will invoke this wide definition.

Teaching assistants, catering assistants, administrative staff as well as teachers can be the first point of disclosure for a child. Concerned parents/carers may also contact the School and its Board of Directors.

It is consistent with the Safeguarding Children Partnership Board (SCPB) procedures.

There are four main elements to our policy:

1. **Prevention** through the teaching and pastoral support offered to pupils and the creation and maintenance of a whole School protective ethos,
2. **Procedures** for identifying and referring cases, or suspected cases, of abuse or exploitation. The definitions of the four categories of abuse are attached (see Appendix A),
3. **Supporting children** particularly those who may have been abused or witnessed violence towards others,
4. **Preventing unsuitable people working with children** through following processes to ensure that those who are unsuitable to work with children are not employed.

1. Prevention

We recognise that high self-esteem, confidence, supportive friends and good lines of communication with a trusted adult help to protect children.

The whole School will therefore:

- Establish and maintain an environment where children feel safe in both the real and the virtual world and are encouraged to talk and are listened to,
- Ensure children know that there are **trusted** adults in the School whom they can approach if they are worried or in difficulty and their concerns will be taken seriously, kept safe and never be made to feel like they are creating a problem for reporting abuse, sexual violence or sexual harassment,
- All concerns will be acted upon as appropriate,
- Tailor our curriculum to be age and stage of development appropriate so that it meets the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs or disabilities,
- Incorporate into the curriculum, activities and opportunities that enable children to develop their understanding of stereotyping, prejudice and equality,
- Ensure that all school staff challenge instances of prejudice related behaviour, including but not limited to, instances of sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment. Any prejudice related incidents will be responded to in accordance with our Child-on-Child Abuse and Behaviour Policies,
- Include in the curriculum activities and opportunities which equip children with the skills they need to stay safer from abuse and **exploitation** both in the real and the virtual world and information about who to turn to for help. in line with guidance provided by the government <https://www.gov.uk/guidance/teaching-about-relationships-sex-and-health> such as;
 - How to:
 - Determine whether other children, adults or sources of information are trustworthy,
 - Judge when a family, friend, intimate or other relationship is unsafe (and to recognise this in others' relationships); and
 - Seek help or advice, including **recognising** and reporting concerns about **adults and other children**, if needed,
 - The characteristics of positive and healthy friendships,
 - That some types of behaviour within relationships are criminal, including violent behaviour and coercive control,
 - What constitutes sexual harassment and sexual violence and why these are always unacceptable,
 - Online risks, including that any material someone provides has the potential to be shared online and the difficulty of removed potentially compromising material placed online,
 - What to do and where to get support to report material or manage issues online,
 - The impact of viewing harmful content,

- That specifically explicit material e.g. pornography presents a distorted picture of sexual behaviours, can damage the way people see themselves in relation to others and negatively affect how they behave towards sexual partners,
 - That sharing and viewing indecent images of children (including those created by children) is a criminal offence which carries severe penalties including **prison**,
 - The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, control, harassment, rape, domestic abuse, forced marriage, honour-based abuse and FGM and how they can affect current and future relationships,
 - How people can actively communicate and recognise consent from others, including sexual consent and how and when that can be withdrawn (in all contexts including online).
- Provide regularly updated safeguarding training (including online safety) to staff and also ensure that pupils themselves are taught about safeguarding and online safety.

Note: The Prep School use Personal Safety Units from the Cambridgeshire PSHE Service Personal Development Programme. These units support children to recognise if they are feeling safe or unsafe in their relationships with family, friends and online. This includes considering the importance of permission seeking and giving in relationships, and the sort of boundaries which are appropriate both on and offline. Children are encouraged to consider the qualities they would look for in a trusted adult, how to judge whether a secret feels safe or unsafe and how to seek support if they are asked to keep an unsafe secret. Children learn that each person's body belongs to them, the correct language for body parts, including genitals, how to identify unsafe or inappropriate physical contact. With the older children, they learn about what sorts of behaviours constitute abuse and neglect (PS5-6). All children have opportunities to practice seeking help or advice from others, including from their Networks of Support, and develop their problem-solving strategies, which can be applied in a range of contexts.

The Prep School also use Safer Spaces Toolkit developed by the Cambridgeshire PSHE Service which supports schools with listening to pupil voice, building awareness and engaging in reflection as part of a whole school approach to preventing sexist attitudes and behaviours which cause others to feel unsafe.

In the Senior School we use Safer Corridors Toolkit developed by the Cambridgeshire PSHE Service which supports schools and colleges in preventing and reducing sexual violence and harassment and responding to incidents.

Prevention of Child-on-Child Abuse

We recognise that child-on-child abuse can manifest itself in many ways. This can include but is not limited to:

- Bullying (including cyberbullying, prejudice based bullying and discriminatory bullying),
- Sexual violence and sexual harassment,
- The sending of consensual and non-consensual nude and semi-nude images and or videos (sexting or youth produced sexual imagery),
- School's response to sending of nudes, both consensual and otherwise,
- Abuse in intimate personal relationships between peers,
- Initiation/hazing type violence and rituals (these may include harassment abuse or humiliation),

- Physical abuse (which includes hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm),
- Causing someone to engage in sexual activity without consent (such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party) and
- Upskirting (part of the Voyeurism (Offences) Act, April 2019) which typically involves taking a picture under a person's clothing with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.

All forms of child-on-child abuse are unacceptable and will be taken seriously and challenged by staff.

The School will therefore:

- Create a whole School protective ethos in which there is a zero-tolerance approach to child-on-child abuse, including sexual violence and sexual harassment,
- Provide training for staff regarding:
 - Recognising and responding to child-on-child abuse, including raising awareness of the gendered nature of peer abuse, with girls more likely to be victims and boys perpetrators. However all forms of child-on-child abuse are unacceptable and will be taken seriously,
 - How child-on-child abuse cases should be reported as stated in the Child-on-child Abuse Policy and followed up,
 - How to manage a report of child-on-child sexual violence and sexual harassment,
 - How the victims, perpetrators and any other children affected by child-on-child abuse will be supported,
 - That online abuse can take place alongside abuse in the real world,
- Make it clear to staff that even though there may not be any reported cases of child-on-child abuse, such abuse may still be taking place, but not being reported,
- Provide training for staff so that they are aware of how child-on-child abuse cases should be reported and followed up,
- Ensure that staff understand that abuse is abuse. Instances of child-on-child abuse, including sexual violence and sexual harassment should never be dismissed as banter, just having a laugh, 'boys being boys' or an inevitable part of growing up, as this can lead to a culture of unacceptable behaviours and an unsafe environment for children,
- Include within the curriculum, information and materials that support children in keeping themselves safe from abuse, including abuse from their peers and online.
- Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with special educational needs and disabilities (SEND) and LGBT+ children are at greater risk. The School will ensure that these children have a trusted adult in school to talk to.
- Include within the curriculum, information and materials that support children in keeping themselves safe from abuse, including abuse from their peers and online,
- Provide high quality Relationship and Sex Education (RSE), including teaching about consent,
- Ensure that staff members follow the procedures outlined in this policy and the Child-on-Child abuse policy, when they become aware of child-on-child abuse. Reporting their concerns to the **DDSL** for the appropriate Section or any other member of the DST

- Recognise the risk of intra familial harms and provide support to siblings following incidents when necessary,
- The Designated Safeguarding Lead will refer to the Safeguarding Children Partnership Board's [Child-Sexual-Behaviour-Assessment-Tool.pdf](#) (safeguardingcambspeterborough.org.uk) if there is a concern that a young person may be displaying sexually harmful behaviours, may have experienced sexual violence or sexual harassment or other forms of sexual abuse.

2. Procedures

We will follow the procedures set out in the Cambridgeshire and Peterborough Safeguarding Children Partnership Board 'Multi-Agency Procedures'. A copy of these procedures can be found on the SCPB website:

[Multi-Agency Policies and Procedures | Cambridgeshire and Peterborough Safeguarding Partnership Board \(safeguardingcambspeterborough.org.uk\)](https://safeguardingcambspeterborough.org.uk)

Designated Safeguarding Team

The School will:

- Appoint a senior member of Staff, from Quad, to the role of DSL. The DSL will take lead responsibility for safeguarding and child protection. Whilst the activities of the DSL can be delegated to appropriately trained deputies, (Deputy Designated Safeguarding Leads ,DDSLs), the lead responsibility for child protection remains with the DSL and cannot be delegated. The DSL is also the Head of Online Safety for their setting,
- Ensure that the role of DSL is explicit in the role holder's job description, as outlined in Keeping Children Safe in Education, 2023 Annex C
- Ensure that the DSL has the appropriate status and authority within the School to carry out the duties of the post. The role of the designated safeguarding lead carries a significant level of responsibility, and they should be given the additional time, funding, training, resources and support they need to carry out the role effectively. Their additional responsibilities include providing advice and support to other staff on child welfare, safeguarding and child protection matters, taking part in strategy discussions and inter-agency meetings, and/or supporting other staff to do so, and to contributing to the assessment of children. (See 'Keeping Children Safe in Education 2023, Annex C'). Ensure that the DSL and deputies have undertaken the two day training provided by the Education Child Protection Service and that this training is updated at least every two years,
- Ensure that the DSL is supported by appropriately trained deputies, Deputy Designated Safeguarding Leads ,DDSLs) who work together in an effective Designated Safeguarding Team that can support each other and the School,
- Ensure that in addition to the formal training set out above, the members of the DST refresh their knowledge and skills e.g. via updates, meetings or additional training at least annually and complete updated training every two years,
- Ensure that a member of the DST is always available (during school hours, during term-time) to respond to and discuss any safeguarding concerns. Due to the size of the DST we are confident that a DSL or DDSL would be available in person on-site. However if this was not going to be possible the DST would nominate a DSL or DDSL to be available through Microsoft Teams or over the phone.
- Ensure that DSLs liaise with the three Safeguarding partners (Local Authority, Integrated Care Board and police) as appropriate and work with other agencies in line with Working Together to Safeguard Children, 2018,
- Ensure that members of the DST take advice from a child protection specialist when managing complex cases. The DST has access to professional consultations with staff working in the integrated Front Door (MASH and Early Help). The Emergency Duty Team (out of hours) is also available. Contact numbers are found in Appendix B.

Training and awareness of every member of staff

The School will:

- Ensure that every member of staff knows who the members of the DST are and the procedures for passing on concerns from the point of induction.
 - Staff members can find information on staff notice boards in the Child Protection section including the DST membership with photographs and contact information as well as the procedure staff need to follow. These notices are distributed annually and as and when personnel change, and are also provided at induction,
 - Staff members are to log all concerns on 'MyConcern' either through a computer or the IOS or android App. Where this is not available logging concern forms are still able to be processed. All concerns should be passed to a member of the DST,
 - Wherever possible referrals will be made by a **DDSL or DSL**, to Cambridgeshire Children's Social Care Centre (or the Children Services in the local authority where the child is resident) using their preferred form of referral. If it is considered that a child or young person is at risk of serious harm the Centre must be contacted immediately on 0345 045 5203 (8am-6pm Mon-Fri) or if an out of hours emergency on 01733 234724. All cases must be referred within 24 hours of a disclosure or a suspicion of abuse.
- Ensure that every member of staff is clear upon the course of action they must take if in exceptional circumstances there is no member of the DST available in either the Senior or Prep School. The appropriate course of action is as follows:
 - Contact the Headmaster and in his absence any available member of Quad,
 - Any staff member who is concerned that a child is at risk may make a direct referral to Children's Social Care Centre without parental consent. However in normal circumstances referrals will be made by one of the **DDSLs** and that the consent of a parent/guardian will be sought.
- Ensure every member of staff knows:
 - The location of documents and policies, and any recent changes in guidance, such as the recent changes to KCSIE 2023 and WTTSC in 2018,
 - That they have a responsibility to provide a safe environment in which children can learn,
 - The names of members of the DST and their role,
 - How to identify the signs of abuse and neglect; **understanding that children can be at risk of harm inside and outside of the school, inside and outside of home, and online**; and that they have an individual responsibility to be alert to the signs and indicators of **abuse and exploitation**; and for referring child protection concerns to the DST,
 - 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,

- How to pass on and log concerns about a pupil, who tells them they are being abused, exploited or neglected,
 - What is meant by, and the importance of, showing professional curiosity,
 - Where to find the Inter–Agency Procedures on the SCPB website,
 - That they have a responsibility to provide a safe environment in which children can learn,
 - Their role in the early help process the importance of this process and range of factors indicating a need for early help,
 - The process for making referrals to children’s social care, and that they can make a referral themselves using the numbers listed above, some referrals will not require parental consent (Section 47) but that routinely we would expect referrals to come through the safeguarding team and where appropriate parental consent would be sought,
 - The safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods,
 - The role of filtering and monitoring and the process for reporting issues,
 - To reassure victims that they are being taken seriously and that they will be supported and kept safe so that no victim will be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment and no victim will ever be made to feel ashamed for making report.
- Nominate both an Advisory Committee Member and a Board member for safeguarding and child protection who have appropriate training,
 - Ensure that every member of staff receives a safeguarding and child protection induction. This induction training will cover all the points set out above, the training will be regularly updated, as required, and at least annually, to continue to provide them with relevant skills and knowledge to safeguard children effectively.
 - Ensure that every member of staff receives regular safeguarding and child protection updates as required but at least annually,
 - At induction staff will be issued with:
 - Child Protection Policy,
 - Online Safety,
 - KCSIE Part 1, Annex B
 - Behaviour Policy,
 - Child-on-child Abuse,
 - Safeguarding Response to Pupils,
 - Who Go Missing In Education,
 - Staff Code of Conduct.

- Ensure that every member of staff recognises their duty and feel able to raise concerns about poor or unsafe practice in regard to children and that such concerns are addressed sensitively and effectively in a timely manner in accordance with agreed whistle-blowing policies,
- Ensure that parents are informed of the responsibility placed on the School and staff in relation to child protection by setting out these duties on the school website,
- Ensure that this policy is available on the School website:
<https://www.wisbechgrammar.com/about-us/policies-isi-reports/>
- Promote educational outcomes by sharing information about the welfare, safeguarding and child protection issues that children (including children with a social worker) are experiencing/have experienced with teachers and School and senior staff.

Multi-Agency Working

The School understands that information sharing is vital in identifying and tackling all forms of abuse and neglect and in promoting children's welfare, including their educational outcomes. Providing as much information as possible will aid a contextual approach to safeguarding and the prevention of bullying, cyber bullying and discriminatory or prejudice-based bullying.

The School will:

- Work to develop effective links with relevant services to promote the safety and welfare of all pupils,
- Cooperate as required, in line with 'Working Together to Safeguard Children,' (July 2018), with key agencies in their enquiries regarding child protection matters including attendance and providing written reports at child protection conferences and core groups,
- Notify the relevant Social Care Unit immediately if:
 - It should have to exclude a pupil who is subject to a Child Protection Plan (whether fixed term or permanently),
 - There is an unexplained absence of a pupil who is subject to a Child Protection Plan,
 - There is any change in circumstances to a pupil who is subject to a Child Protection Plan.
- When a pupil who is subject to a child protection plan leaves, information will be transferred to the new school immediately. The Child Protection Chair and Social **Care Team** will also be informed.

Record Keeping

The School will:

- Keep clear, detailed, accurate, written records of concerns about children (noting the date, event and action taken), even where there is no need to refer the matter to **Children's Social Care immediately**
- Record all concerns, discussions and decisions made, and the reasons for those decisions, will be written up on MyConcern including:
 - A clear and comprehensive summary of the concern,
 - The child's wishes and feelings,
 - Details of how the concern was followed up and resolved,
 - A note of any action taken, decisions reached and the outcome,
 - A record of any discussion/communication with parents, other agencies etc.
- Ensure all remaining hard-copy pupil records are kept securely; separate from the main pupil file, and in a locked location and that new electronic records are stored on an identified, purpose-built, secure platform (MyConcern,)
- Ensure all relevant child protection records are sent to the receiving school or establishment when a pupil moves schools in accordance with 'Keeping Children Safe in Education, **2023, Page 167**) and the 'Education Child Protection Record Keeping Guidance'. The DSL will consider whether it would be appropriate to share information with the new school/college in advance of a child leaving,
- Make parents aware that such records exist except where to do so would place the child at risk of harm,
- Ensure all actions and decisions are led by what is considered to be in the best interests of the child.

Confidentiality And Information Sharing

The Data Protection Act 2018 does not prevent School staff from sharing information with relevant agencies, where that information may help to protect a child.

The School will:

- Ensure staff and volunteers adhere to confidentiality protocols and that information is shared appropriately,
- Ensure staff are aware that they have a professional responsibility to share information with other agencies in order to safeguard children, (as set out in 'Information sharing; Advice for practitioners providing safeguarding services to children, young people, parents and carers,' DfE, July 2018),
- Ensure that if a member of staff receives a Subject Access Request (under the Data Protection Act 2018) from a pupil or parent they will refer the request to the DSL or Headteacher,

- Ensure staff are clear with children that they cannot promise to keep secrets.

The DSL or **DDSL** will:

- Disclose information about a pupil to other members of staff on a 'need to know' basis, **considering what is necessary, proportionate and relevant**. Parental consent may be required,
- **Aim to gain consent to share information and be mindful of situations where to do so would place a child at increased risk of harm. Information may be shared without consent if a person believes that there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner,**
- Record when decisions are made to share or withhold information, who information has been shared with and why. (See 'Working Together to Safeguard Children,' July 2018),
- In cases where the 'serious harm test' is met, schools must withhold providing the data in compliance with schools' obligations under the Data Protection Act 2018 and the GDPR. Where in doubt schools should seek independent legal advice,
- Seek advice about confidentiality from the Information Governance Team and/or outside agencies if required. (See 'Information sharing; Advice for practitioners providing safeguarding services to children, young people, parents and carers,' DfE, July 2018).

Communication with Parents/Carers

The School will:

- Ensure that parents/carers are informed of the responsibility placed on the School and staff in relation to child protection by setting out its duties on the School prospectus/website,
- Undertake appropriate discussion with parents/carers prior to involvement of another agency, unless the circumstances preclude this action,
- *****Paragraph regarding thresholds removed – No longer available on SGCB website***,**
- Record what discussions have taken place with parents or if a decision has been made not to discuss it with parents. For example, if the school believes that notifying parents could place the child or another person at immediate risk of harm or prejudice the prevention or detection of crime. In circumstances where parents are not contacted a rationale for this decision must be recorded. Records may subsequently be disclosable to relevant partner agencies if Child Protection proceedings commence.

Dealing with Sexual Violence and Sexual Harassment Between Children

The School recognises that sexual violence and sexual harassment can occur between two children of any age and sex from Prep School and through Senior School. It can also occur wholly online, concurrently online and offline, or technology may be used to facilitate offline abuse. 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 will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physically and verbally) and are never acceptable.

Sexual violence may include rape, assault by penetration or sexual assault. Sexual harassment refers to 'unwanted conduct of a sexual nature', such as sexual comments, sexual taunting or physical behaviour such as deliberately brushing against someone. Online sexual harassment may include non-consensual sharing of sexual images and videos, sexualised online bullying, unwanted sexual comments and messages, and sexual exploitation, coercion and threats. This also includes 'upskirting' which 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. Upskirting is now a criminal offence.

The School will:

- Make it clear that there is a zero tolerance approach to sexual violence and sexual harassment, that it is never acceptable and it will not be tolerated,
- Take victims seriously acknowledging the scale of harassment and abuse and never downplay the behaviours involved,
- Provide training for staff on how to manage a report of sexual violence or sexual harassment,
- Make decisions on a case-by-case basis,
- Reassure victims that they are being taken seriously, offer appropriate support and take the wishes of the victim into account when decision making,
- Implement measures to keep the victim, alleged perpetrator and if necessary other children and staff members, safe. Record any risk assessments and keep them under review,
- Give consideration to the welfare of both the victim(s) and perpetrator(s) in these situations. Where the victim and perpetrator are both boarders they will be housed separately until such time as a risk assessment can be completed and further decisions be made,
- The Designated Safeguarding Lead will refer to the Safeguarding Children Partnership Board's Child Sexual Abuse Assessment Tool if there is a concern that a young person may have experienced sexual violence or sexual harassment or other forms of sexual abuse,
- Liaise closely with external agencies, including police and social care, when required,

- The School will refer to 'Keeping Children Safe in Education - Part Five', 2023, 'for full details of procedures to be followed in such cases, and can also consult 'Sharing nudes and semi-nudes: advice for education settings working with children and young people' (UKCIS, December 2020) Dealing with Child-on-child Abuse,
- All concerns regarding COCA must be recorded on MyConcern and reported to the DST via the Head of Section,
- Staff must challenge all abusive behaviours between peers,
- Pupils should report COCA to a trusted member of staff,
- Staff must take reports seriously,
- All instances of COCA are recorded on MyConcern and COCA log,
- Behaviour and COCA Policy,
- COCA must never be downplayed.

Responding to consensual / non-consensual sending of nudes

The School will deal with all cases of nudes being sent on a case by case basis and will either:

- Treat the situation as a safeguarding matter and deliver an educational response to support the young people involved going forward. Their parents will be informed, and the School will work with all parties to ensure that all images are deleted.

Or

- Treat it as COCA, considering the requirement of a referral to the police. Once referral complete or other actions agreed this will either be handled by external services or the School. If the School is dealing with it we will sanction robustly, educate pupils and support them going forward, risk assess perpetrator's position within the community and ensure all images are deleted.

3. Supporting Children

Mental Health

The School recognises that any child may be subject to abuse and neglect and 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 and as such will support all children by:

- Full guidance on supporting a pupil with their mental health as well as the curriculum opportunities and planned enrichment scheduled at WGS can be found in our Mental Health and Wellbeing Policy – <https://www.wisbechgrammar.com/about-us/policies-isi-reports/>,
- If staff have a mental health concern about a child which is also a safeguarding concern, immediate action should be taken – DSL or a member of DST,
- Providing curricular opportunities to encourage self-esteem and self-motivation,
- Creating an ethos that actively promotes a positive, supportive and safe environment and values the whole community,
- Applying the School's Behaviour Policy effectively. All staff will agree on a consistent approach, which focuses on the behaviour of the child but does not damage the pupil's sense of self-worth. The School will ensure that the pupil knows that some behaviour is unacceptable but that they are valued and not to be blamed for any abuse which has occurred,
- Liaising with other agencies which support the pupil such as social care, Child and Adolescent Mental Health Services, Cambridgeshire Sexual Behaviour Service or Early Help (Targeted Support) Teams,
- Developing productive and supportive relationships with parents/carers.

The School recognises that whilst any child may benefit from early help, staff are encouraged to consider the wider environmental factors present in a child's life which could pose a threat to their welfare or safety, (contextual safeguarding). Staff are required to be particularly alert to the potential need for early help for children in particular circumstances (see KCSIE 2023 for the complete list) the list includes:

Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)

The School recognises that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation. In some cases the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator.

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

The School recognises that the experiences of boys and girls in a CCE situation may be very different.

Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including:

- Gender,
- Sexual identity,
- Cognitive ability,
- Learning difficulties,
- Communication ability,
- Physical strength,
- Status,
- Access to economic or other resources.

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

- Appear with unexplained gifts, money or new possessions,
- Associate with other children involved in exploitation,
- Suffer from changes in emotional well-being,
- Misuse drugs and alcohol,
- Go missing for periods of time or regularly come home late,
- Regularly miss school or education or do not take part in education.

The School recognises that children who have been exploited will need additional support to help maintain them in education. CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

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

- Have older boyfriends or girlfriends,
- Suffer from sexually transmitted infections,
- Display sexual behaviours beyond expected sexual development,
- Become pregnant.

County Lines

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

The School recognises that children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children’s homes and care homes and that children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

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

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

Modern Slavery and the National Referral Mechanism

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

In practice, it can be challenging to identify a potential victim of modern slavery. Potential victims may be reluctant to come forward or not recognise themselves as victims. However staff should consider the following as some indicators of modern day slavery (this is not an exhaustive list):

- Have no access to their parents or guardians (although children may be living with their parents or guardians and still be exploited),
- Look intimidated,
- Behave in a way that does not correspond with behaviour typical of children their age,
- Have no friends of their own age,
- Have no access to education,
- Have no time for playing,
- Live apart from other children and in substandard accommodation,
- Eat apart from other members of the "family",
- Be given only leftovers to eat,
- Be engaged in work that is not suitable for children,
- Travel unaccompanied by adults,
- Travel in groups with persons who are not their relatives.

If staff believe a pupil is the victim of modern day slavery they must report this to the DSL or a member of the safeguarding team immediately. They will then contact childrens' services for the local authority that pupil resides in. They will also complete a NRM referral. under the 'Duty to Notify' through the online portal: <https://www.modernslavery.gov.uk/start>

Cybercrime

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

- Unauthorised access to computers (illegal 'hacking'),
- Denial of Service (Dos or DDoS) attacks or 'booting' (attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources),
- Making, supplying or obtaining malicious software (malware) e.g. viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offences.

The School recognises that children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If staff have concerns about child in this area, they must speak to the DSL or a member of the safeguarding team. They will then consider referring into the 'Cyber Choices' programme (a nationwide police programme supported by the Home Office and led by the National Crime Agency). It aims to intervene where

young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

Where the crime is cyber-enabled and is a crime in its own right (e.g. buying illegal drugs online) and pertains to a form of child-on-child abuse (e.g. online bullying), pupils will be supported as outlined in the appropriate sections within this policy and not through 'Cyber Choices'.

Children with Disabilities, **Certain Health Conditions, Additional Needs or Special Educational Needs**

We recognise that, statistically, children with additional needs, special educational needs, emotional and behavioural difficulties and disabilities are most vulnerable to abuse. Additional barriers can exist when recognising abuse and neglect in this group, such as:

- Assumptions that indicators of abuse relate to a child's condition without further exploration
- These children are more prone to peer group isolation or bullying, including prejudice-based bullying,
- Children with SEND or certain medical conditions can be disproportionately impacted by behaviours such as bullying without outwardly showing any signs,
- They also experience barriers and difficulties in managing and reporting these challenges.

School staff who deal with children with complex and multiple disabilities and/or emotional and behavioural problems should be particularly sensitive to indicators of abuse.

The School has pupils with emotional and behavioural difficulties and/or challenging behaviours. The School will support staff to decide appropriate strategies that will reduce anxiety for the individual child and raise self-esteem as part of an overall behaviour support plan agreed with parents/carers.

As part of the PSHCE curriculum staff will teach children personal safety skills commensurate with their age, ability and needs. Children will be taught personal safety skills such as telling and who to tell, good and bad touches and how to manage risk, **both in the real world and online**. The content of lessons will be shared with parents/carers so that these skills can be supported at home.

Under the Equality Act, there is also a duty to make reasonable adjustments for disabled children and young people.

Children who are Young Carers

The School recognises that children who are living in a home environment which requires them to act as a young carer for a family member or a friend, who is ill, disabled or misuses drugs or alcohol can increase their vulnerability and that they may need additional support and protection.

School will: seek to identify young carers; offer additional support internally; signpost to external agencies; be particularly vigilant to the welfare of young carers and follow the procedures outlined in this policy, referring to Early Help or social care as required if concerns arise.

Children Frequently Absent from Education

School recognises that children **who are absent from education**, particularly repeatedly, can act as a warning sign of a range of safeguarding possibilities including abuse, neglect, child sexual exploitation and child criminal exploitation, mental health problems, risk of substance abuse, risk of travelling to conflict zones, and risk of FGM or forced marriage.

The School **closely monitors and follows up on the attendance of individual pupils**, as outlined in the Attendance Policy, and analyses patterns of absence to aid early identification of concerning patterns of absence.

The School endeavours to hold more than one emergency contact for each pupil to provide additional options to make contact with a responsible adult when a child **who is absent from education** is identified as a welfare and/or safeguarding concern.

When a child is **absent from** education, the School follows the procedure as set out in Cambridgeshire's Children Missing Education guidance. The School will inform the Education Welfare Officer and social care if a child who is absent from education is subject to a Child Protection Plan or there have been ongoing concerns.

The School works in partnership with Cambridgeshire Police and Cambridgeshire County Council to identify and provide appropriate support to pupils who have gone missing through the Operation Encompass scheme. Cambridgeshire's Education Safeguarding Team will share police information of missing child episodes with the Designated Safeguarding Lead(s) (DSL). On receipt of any information, the DSL will decide on the appropriate support the child may require. The Operation Encompass information is stored in line with all other confidential safeguarding and child protection information.

Child Abduction and Community Safety Incidents

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

Staff should be aware of other community safety risks in the vicinity of a school which can raise concerns amongst children and parents, such as:

- People loitering nearby,
- Unknown adults engaging children in conversation.

Our pupils become more independent as they progress through the School and will need practical advice on how to keep themselves safe when out and about. The School will run outdoor-safety lessons run by teaching staff, appropriate external speakers or by local police staff. Lessons will focus on building children's confidence and abilities rather than simply warning them about all strangers.

Children Misusing Drugs or Alcohol

The discovery that a young person is misusing legal or illegal substances or reported evidence of their substance misuse is not necessarily sufficient in itself to initiate child protection proceedings but the School will consider such action in the following situations:

- When there is evidence or reasonable cause to believe the young person's substance misuse may cause him or her to be vulnerable to other abuse such as sexual abuse,
- To believe the pupil's substance related behaviour is a result of abuse or because of pressure or incentives from others, particularly adults,
- Where the misuse is suspected of being linked to parent/carer substance misuse,
- Where the misuse indicates an urgent health or safeguarding concern,
- Where the child is perceived to be at risk of harm through any substance associated criminality.

Children Living with Substance Misusing Parents/Carers

Misuse of drugs and/or alcohol is strongly associated with significant harm to children, especially when combined with other features such as domestic violence.

When the School receives information about drug and alcohol abuse by a child's parents/carers they will follow appropriate procedures.

This is particularly important if the following factors are present:

- Use of the family resources to finance the parent's dependency, characterised by inadequate food, heat and clothing for the children,
- Children exposed to unsuitable caregivers or visitors, e.g. customers or dealers,
- The effects of alcohol leading to an inappropriate display of sexual and/or aggressive behaviour,
- Chaotic drug and alcohol use leading to emotional unavailability, irrational behaviour and reduced parental vigilance,
- Disturbed moods as a result of withdrawal symptoms or dependency,
- Unsafe storage of drugs and/or alcohol or injecting equipment,
- Drugs and/or alcohol having an adverse impact on the growth and development of the unborn child.

Children Living with Domestic Abuse

The School has a Domestic Abuse Lead, please see Staff and Roles section.

The Domestic Abuse Act 2021, **applies to those aged 16 and over** and introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse.

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

Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16).

Domestic abuse is defined as any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been personally connected regardless of gender or sexuality. This can encompass but is not limited to the following types of abuse: psychological, physical, sexual, financial, emotional and coercive and controlling behavior.

The School recognises that where there is domestic abuse in a family, the children/young people will always be affected; the longer the violence continues, the greater the risk of significant and enduring harm, which they may carry with them into their adult life and relationships. Domestic abuse can also affect children in their personal relationships as well as in the context of home life.

Staff will follow the procedures outlined in this policy if concerns of domestic abuse arise. The School will vigilantly monitor the welfare of children living in domestic abuse households, offer support to them and contribute to any Multi-Agency Risk Assessment Conference (MARAC) safety plan as required.

The School works in partnership with Cambridgeshire Police and Cambridgeshire County Council to identify and provide appropriate support to pupils who have experienced domestic abuse in their home; this scheme is called Operation Encompass. In order to achieve this, Cambridgeshire's Education Safeguarding Team will share police information of all domestic incidents to which Police have been called and where one of our pupils has been present with the DSL/Domestic Abuse (DA) Lead.

On receipt of any information, the DSL/DA Lead will decide on the appropriate support the child may require. The Operation Encompass information is stored in line with all other confidential safeguarding and child protection information. All information sharing and resulting actions will be undertaken in accordance with the 'Cambridgeshire and Peterborough Joint Agency Protocol for Domestic Abuse – Notifications to Schools, Colleges and Early Years settings'.

So called 'honour-based' violence encompasses abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. The School takes these concerns seriously and staff are

made aware of the possible signs and indicators that may alert them to the possibility of HBV through training. Staff are required to treat all forms of HBV as abuse and follow the procedures outlined in this policy.

The new Marriage and Civil Partnership (Minimum Age) Act 2023 bans marriage for 16 and 17-year-olds, who no longer will be allowed to marry or enter a civil partnership, even if they have parental consent, as the legal age of marriage rises to 18.

It is now illegal and a criminal offence to exploit vulnerable children by arranging for them to marry, under any circumstances whether or not force is used.

School will manage any concerns relating to forced marriage sensitively and will report concerns immediately via the procedures outlined in this policy.

FGM is a procedure involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK. Any indication that a child is at risk of FGM, where FGM is suspected, or where the woman is over 18, will be dealt with under the child protection procedures outlined in this policy. Staff will report concerns to the DSL, who will make appropriate and timely referrals to social care. In these cases, parents will not be informed before seeking advice and the case will still be referred to social care even if it is against the pupil's wishes.

In accordance with the Female Genital Mutilation Act, it is a statutory duty for teachers in England and Wales to report 'known' cases of FGM in under-18s which they identify in the course of their professional work to the police. Teachers should still consider and discuss any such case with the DSL and involve social care as appropriate, but the teacher will personally report to the police that an act of FGM appears to have been carried out.

Children who have returned home to their family from care

The School recognises that a previously looked after child potentially remains vulnerable. School will vigilantly monitor the welfare of previously looked after children, keep records and notify social care as soon as there is a recurrence of a concern in accordance with the Cambridgeshire Local Safeguarding Children Board 'Multi-Agency Procedures.'

Children showing signs of Abuse and/or Neglect

School recognises that experiencing abuse or neglect may have an adverse impact on those children which may last into adulthood without appropriate intervention and support. School may be the only stable, secure and predictable element in the lives of children at risk. Children who have experienced abuse or neglect may display this through their own behaviour, which may be challenging and defiant or passive and withdrawn. We recognise that children may develop abusive behaviours and that these children may need to be referred on for appropriate support and intervention.

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the School and/or can occur between children outside of these environments. All staff, but especially the DSL (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

School will provide training for staff to ensure that they have the skills to identify and report cases, or suspected cases, of abuse in accordance with the procedures outlined in this policy. The definitions of the four categories of abuse are attached (see Appendix A).

Children at Risk of Radicalisation

The School has a Prevent Lead, please see Staff and Roles section.

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

The Board of Directors will ensure that the DSL has undertaken Prevent awareness training and that all staff receive training about the Prevent duty.

Staff are required to be alert to changes in children's behaviour which could indicate they need help or protection. Concerns that a child is at risk of radicalisation are referred to the DSL in the usual way. The School's DST should be aware of local procedures for making a Prevent referral to Channel.

See also 'The Prevent Duty, Departmental advice for schools and childcare providers', DfE (June 2015), and 'Revised Prevent Duty Guidance: for England and Wales,' HM Government, (July 2015).

Channel is a multi-agency approach to safeguarding, supporting and protecting children and young people at risk of radicalisation, extremism or terrorist related activity.

Privately Fostered Children

Private fostering is when a child under the age of 16, (under 18 if disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or relative in their own home for 28 days or more.

The School will follow the mandatory duty to inform the local authority of any 'Private Fostering' arrangements.

Children who have Family Members in Prison

The School is committed to supporting children and young people who have a parent or close relative in prison and will work with the family to find the best ways of supporting the child.

The School recognises that children with family members in prison are at risk of poor outcomes including: poverty, stigma, isolation, poor mental health and poor attendance.

The School will treat information shared by the family in confidence and it will be shared on a 'need to know' basis.

The School will work with the family, **specialist organisations** and the child to minimise the risk of the child not achieving their full potential.

Children who are Victims of Online Abuse and Offline Abuse Facilitated Online

The School recognises that abuse can occur directly online, in cases such as coercion to supply indecent images and that pupils must be given the tools and skills to avoid and report these forms of abuse, but also that this may then lead to abuse occurring in the real world in the form of sexual or criminal, exploitation, radicalisation and other forms of abuse. The online world may also be used to coordinate abuse in the real world without abuse having occurred directly online in the first place. An example of this would be the use of websites to engage vulnerable young people in radical political doctrine.

Children in the Court System

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. The School will refer to age appropriate guides suggested in **KCSIE 2023** to support pupils:

- Children 5-11
<https://www.gov.uk/government/publications/young-witness-booklet-for-5-to-11-year-olds>
- Children 12-17
<https://www.gov.uk/government/publications/young-witness-booklet-for-12-to-17-year-olds>

The School recognises that any court process can cause families stress and anxiety and that this can have a detrimental effect on the functioning of the family unit especially if there are allegations within the household or family. In such cases the School will recommend the Ministry of Justice's Child arrangements information tool. <https://helpwithchildarrangements.service.justice.gov.uk/>

Children who are Homeless

The School recognises that being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL (and any deputies) will therefore be aware of the contact details and referral routes in to the Local Housing Authority so they can raise/progress concerns at the earliest opportunity.

We understand that the indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. In such cases the School will liaise with local agencies regarding housing but will still refer to Children's Social Care as our primary support mechanism.

Whilst homelessness will largely affect children living with families, the School is aware that some young people aged 16-17 could be living independently, they will therefore require a different level of support and intervention. In such cases the School will liaise with Children's Services and appropriate referrals will be made.

The School also strives to engage with pupils and families at risk of homelessness ahead of them leaving the home, in such cases the School would make a referral to Early Help.

Children at Risk of Serious Violent Crime

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with, serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in well-being, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation. All staff should be aware of the associated risks and understand the measures in place to measure these. Advice for schools and colleges is provided in the Home Office's Preventing youth violence and gang involvement and its criminal exploitation of children and vulnerable adults: county lines guidance.

4. Preventing unsuitable people from working with children

The School will operate safer recruitment practices including ensuring appropriate DBS and reference checks are undertaken according to Part three of 'Keeping Children Safe in Education' (2023). This section should be read in conjunction with the School's Safer Recruitment Policy. When a member of staff moves from being a member of day staff into residential staff a further DBS check will be conducted.

The Board of Directors will ensure that at least one of the persons who conducts an interview has completed safer recruitment training.

The School has a number of members of staff who have completed safer recruitment training, please see Staff and Roles section.

Allegations

All allegations and concerns regarding staff must be reported straight away to the Headmaster. In discussion with appropriate members of Senior Management it will be decided whether or not the allegation or concern might indicate that a member of staff, supply staff or volunteer poses a risk of harm and as a result must be reported to the Local Authority Designated Officer (LADO).

The School is committed to ensuring that all concerns are shared responsibly and with the right person, recorded and dealt with appropriately to encourage an open and transparent culture. This will allow us to identify concerning, problematic or inappropriate behavior, minimise the risk of abuse and ensure all staff, supply staff and volunteers are clear of the professional boundaries and expectations we have of them. All adults working with young people and children at Wisbech Grammar School must work within these boundaries and meet these expectations as outlined in the Staff Code of Conduct and ensure at all times that they are positive ambassadors for the School's ethos and values.

Staff should also have the confidence to self-refer should they feel for any reason that they may have acted or been perceived to have acted in a way that does not reflect the School's expectations or is not in-line with advice outlined in Guidance for Safer Working Practices 2022

All allegations and concerns will therefore be dealt as described below:

Allegations of Abuse against Staff (Allegations that may meet the harms threshold)

Any allegation of abuse made against a member of staff or contractor, where the allegation might indicate that a person might pose a risk of harm will be reported straight away to the Headmaster. In cases where the Headmaster is the subject of such an allegation, it will be reported to the Board of Directors Representative (See Allegations flowchart Appendix E). The School will follow the procedures set out in Part Four of 'Keeping Children Safe in Education' (2023).

The School will consult with the LADO in the event of an allegation being made against a member of staff and adhere to the relevant procedures set out in 'Keeping Children Safe in Education', (2023) and the School's Code of Conduct.

The 2018 update to the Childcare Act, 2006 states that "schools are no longer required to establish whether a member of staff providing, or employed to work in childcare, is disqualified by association." "Schools are not entitled to ask their staff questions about cautions or convictions of someone living or working in their household." The School will instead engender an atmosphere of

openness amongst the staff body where conversations about homelife and life outside of school take place naturally. This will occur through regular informal conversations or at periodic review points. Staff should feel comfortable reporting any issues in their homelife that could have any effect on the safety of the pupils, in such cases the School will make reasonable adjustments to risk assess against such issues, e.g. banning of individuals from the School site. Staff must understand their responsibility to report such situations under their safeguarding duty.

The Headmaster/Board Representative will liaise with the LADO ensuring that all allegations are reported to the LADO within one working day. The LADO, will advise on all further action to be taken. Before contacting the LADO, the School should conduct basic enquiries in line with local procedures to establish the facts to help them determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation.

Where the school identifies that a child has been harmed, that there may be an immediate risk of harm to a child, or if the situation is an emergency, they should contact Children's Social Care and as appropriate the police immediately.

The School will consider:

- **Looking after the welfare of the child** - the DSL/DDSL is responsible for ensuring that the child is not at risk and referring cases of suspected abuse to the local authority Children's Social Care.
- **Investigating and supporting the person subject to the allegation** – The Headmaster/Board Representative should discuss with the LADO, the nature, content and context of the allegation, and agree a course of action.

The School will ensure that any disciplinary proceedings against a member of staff relating to child protection matters are concluded in full even when the member of staff is no longer employed at the School and that notification of any concerns is made to the relevant authorities and professional bodies and included in references where applicable.

Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly, and consistently and to be kept informed of its progress. Suspension is not mandatory, nor is it automatic but, in some cases, staff may be suspended where this is deemed to be the best way to ensure that children are protected. If the member of staff is involved in the School's Boarding provision they may be removed from School accommodation, in such cases arrangements for them to be accommodated appropriately offsite will be made.

Consideration must be given to the needs of the child and a recognition that a child may make an allegation against an innocent party because they are too afraid to name the real perpetrator. It is rare for a child to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events do happen.

The School will ensure that all staff are aware of the need for maintaining appropriate and professional boundaries in their relationships with pupils and parents/carers as advised within the School's Code of Conduct. As part of the induction process, all staff will receive guidance about how to create appropriate professional boundaries (in both the real and virtual world) with all children, especially those with a disability or who are vulnerable.

All staff have signed to confirm that they have read a copy of the School's Code of Conduct, 'Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings' (February 2023).

The School will ensure that staff are aware that sexual relationships with pupils aged under 18 are unlawful and could result in legal proceedings taken against them under the Sexual Offences Act 2003 (Abuse of Position of Trust).

The School will ensure that communication between pupils and adults, by whatever method, are transparent and take place within clear and explicit professional boundaries and are open to scrutiny.

The School has a legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult; where the harm test is satisfied in respect of that individual; where the individual has received a caution or conviction for a relevant offence, or if there is reason to believe that the individual has committed a listed relevant offence; and that the individual has been removed from working (paid or unpaid) at School, or would have been removed had they not left, it will not be appropriate to reach a settlement/compromise agreement.

If the allegation is substantiated and the person is dismissed, or the person resigns or otherwise ceases to provide his or her services, the designated officer(s) will discuss with the case manager and the HR Manager whether the School will decide to make a referral to the DBS for consideration of whether inclusion on the barred lists is required; and, in the case of a member of teaching staff, whether to refer the matter to the NCTL to consider prohibiting the individual from teaching.

When concerns are raised via a third party, the Headmaster will gather as much evidence as possible by speaking to the person raising the concern, the individual involved and any witnesses. A decision will then be made as to whether the harm threshold has been met and then the complaint will progress as set out above.

Reports of low level concerns will be recorded, including:

- Details of concern,
- Context,
- Action,
- Name of person raising concern (respect where possible).

The School will regularly report low level concerns so that problematic and inappropriate behaviour can be actioned and responded to.

Where a pattern of behaviour is identified, the School will decide whether to take further action through its own disciplinary processes or to take external action e.g contact the LADO.

Low level concerns against Staff (Allegations that do not meet the harms threshold)

The School recognises that whilst these concerns do not meet the harm threshold, they are still significant and must be acted upon. These concerns will be passed by the Headmaster or to the appropriate Senior Deputy Head and investigated, reported and documented as outlined in our Staff Disciplinary Policy, Complaints Policy, Staff Code of Conduct and procedures set out in Part Four of 'Keeping Children Safe in Education' (2023).

The School's Low Level Concern Policy can be found in Appendix F of this Policy and In the Staff Code of Conduct.

In cases where the Headmaster is the subject of such an allegation, it will be reported to the Board of Directors Representative. The school will follow the procedures outlined in Part Four Section 2 of Keeping Children Safe in Education (2023).

Use of Mobile Devices

As an educational setting that includes EYFS it is a requirement that the School has a policy on staff use of mobile devices. The School recognises that personal mobile phones have the potential to be used inappropriately and therefore has extended this requirement to a whole school policy to outline the required protocol for all staff and parents/carers.

Our Policy on use of mobile phones, and **other smart devices** cameras and sharing of images is set out in Appendices B, C, D, E and H of the Online Safety Policy and is reviewed annually.

- The School allows staff to bring in personal mobile telephones and devices for their own use,
- All Staff must ensure that their mobile telephones/devices are left inside their bag throughout contact time with children,
- Mobile phone calls may only be taken during staff breaks or in a staff member's own time - and in a designated staff area. If Staff have a personal emergency they are free to use the School's phone or make a personal call from their mobile in a designated staff area of the setting, e.g. a staff room,
- Members of staff are not to contact parents using their personal devices (unless the caller ID is withheld) – except for dire emergencies e.g. emergency contact with parents required and there is a malfunction of landlines due to power cuts,
- Users bringing personal devices onto site must ensure there is no inappropriate or illegal content on the device. Further guidance on this is laid out in Appendix C of the Online Safety Policy,
- EYFS specific: Parent permission is sought before photos are taken using the School iPads for use within the Tapestry programme where pupil development is tracked,
- Pupils bring phones in at their own risk and must use them in line with the Acceptable Use Policy,
- Pupils breaching the Policy will be sanctioned and can have the privilege of bringing devices into School removed.

5. The Board of Directors Responsibilities

The Board of Directors fully recognises that it has a strategic leadership responsibility for the School's safeguarding arrangements and to promote the welfare of children. It will ensure that the policies, procedures and training in School are effective and comply with their duties under legislation.

The Board understands that good safeguarding requires a continuing commitment to ensure the safety and welfare of children is embedded in all of the organisation's processes and procedures, and consequentially enshrined in its ethos and culture ³⁴²

These responsibilities are referenced to KCSIE 2023.

The Board of Directors will:

- 5.1. Facilitate a whole school approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.
- 5.2. Facilitate a whole school approach to safeguarding⁸¹. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.
- 5.3. Ensure that all systems, processes and policies should operate with the best interests of the child at their heart.
- 5.4. Support the Headmaster, DSL and DST, to ensure that where there is a safeguarding concern, a child's wishes and feelings are taken into account when determining what action the School will take and what services will be provided.
- 5.5. Ensure that well-promoted, easily accessible and understood systems are in place, for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.
- 5.6. Ensure that that there are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare, including⁹⁸⁻⁹⁹
 - an effective Safeguarding and Child Protection Policy including the Low Level Concerns Policy,
 - Child-on-Child Abuse Policy,
 - Pupil Behaviour Policy,
 - Staff Code of Conduct including Low-Level Concerns Policy.
- 5.7. Ensure that appropriate safeguarding arrangements are in place for pupils who go missing from education⁹⁹
- 5.8. Ensure that an appropriate senior member of staff, from the leadership team, is appointed to the role of DSL and has the status and authority to take lead responsibility for safeguarding and child protection (including online safety). The DSL should be given the additional time, funding, training, resources, and support needed to carry out the role effectively ¹⁰³⁻¹⁰⁴
- 5.9. Nominate a Director who will take leadership responsibility for the School's safeguarding arrangements and practice and champion child protection issues⁸⁰

- 5.10. Ensure that all new Directors receive appropriate **Director** safeguarding and child protection (including online) training at induction. This training will equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in school are effective and support the delivery of a robust whole school approach to safeguarding. This training will be regularly updated⁸¹
- 5.11. Ensure that all Directors are aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, the Public Sector Equality Duty (PSED) and the local multi-agency safeguarding arrangements⁸²
- 5.12. Nominate an Advisory Committee Member with a specific remit for providing advice and support in relation to the School's safeguarding arrangements and practice and champion child protection issues.
- 5.13. Ensure that all staff undergo safeguarding and child protection training (including online safety) at induction ¹²⁴ and then receive regular updates¹²⁵ to continue to provide them with relevant skills and knowledge to safeguard children effectively. They will be invited to contribute to and shape safeguarding arrangements and the child protection policy¹⁶⁵
- 5.14. Ensure that those involved with the recruitment and employment of staff to work with children have received appropriate safer recruitment training²⁰⁸
- 5.15. Ensure that the School contributes to multi-agency working¹⁰⁷ (in line with statutory guidance Working Together to Safeguard Children), follows local arrangements¹¹¹, and shares information with appropriate bodies as required¹⁶¹.
- 5.16. Ensure that, in accordance with GDPR regulations, personal information will be processed fairly and lawfully, and held safely and securely⁹⁴
- 5.17. Ensure that online safety is reflected in policies, the curriculum, teacher training, DST responsibilities and parental engagement¹³⁷
- 5.18. Ensure that children's exposure to potential risks while using the School's IT is limited by having in place age appropriate filtering and monitoring systems that are regularly reviewed for effectiveness¹⁴¹
- 5.19. Ensure that there are appropriate arrangements in place for staff to report concerns, whether low level or that meet the harm threshold¹⁵²⁻¹⁵³
- 5.20. Ensure that if it provides extended school facilities or before or after school activities directly under the supervision or management of School staff, the School's arrangements for child protection as written in this policy shall apply¹⁶⁶⁻¹⁶⁷
- 5.21. Ensure that where services or activities are provided separately by another body, either on or off School site, the body concerned has appropriate policies and procedures in place for safeguarding children and child protection and there are arrangements to liaise with the School on these matters where appropriate¹⁶⁶⁻¹⁶⁷

5.22. The governing body will use the guidance on 'Keeping children safe in out-of-school settings' which details the safeguarding arrangements that schools and colleges should expect these providers to have in place.

5.23. Ensure an annual **safeguarding monitoring** report is made to the Board of Directors, and copied to the Education Child Protection Service. Any weaknesses will be rectified without delay.

5.24. Ensure that this Safeguarding and Child Protection Policy is annually reviewed and updated and shared with staff. It will be made available on the School website.

This policy has been put to the Board for ratification and will be reviewed by 01 September 2024

Appendix A: Four Categories of Abuse

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

1. Physical Abuse

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

2. Neglect

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

It may occur during pregnancy as a result of maternal substance misuse.

It may involve the neglect of or lack of responsiveness to a child's basic emotional needs.

It also includes parents or carers failing to:

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

3. Emotional Abuse

Emotional abuse is the persistent emotional maltreatment so as to cause severe and adverse effects on a child's emotional development.

It may involve conveying to a child that they are:

- Worthless,
- Unloved,
- Inadequate,
- Valued only insofar as they meet another person's needs.

It may include:

- Not giving the child opportunities to express their views,
- Deliberately silencing them,
- 'Making fun' of what they say or how they communicate.

It may also feature age or developmentally inappropriate expectations being imposed on children including:

- Interactions that are beyond the child's developmental capability,
- Overprotection and limitation of exploration and learning,
- Preventing participation in normal social interaction.

It may involve:

- Seeing or hearing the ill-treatment of another,
- Serious bullying (including cyberbullying) causing children frequently to feel frightened or in danger,
- The exploitation or corruption of children.

Some level of emotional abuse is involved in all types of maltreatment although it may occur alone.

4. Sexual Abuse

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

This may involve:

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

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

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

Appendix B: Useful Contacts

Education Safeguarding Team	ECPSGeneral@cambridgeshire.gov.uk	Tel 01223 703800
Early Help Hub (EHH) – Targeted support Service		Tel 01480 376666
Multi-Agency Safeguarding Hub – referrals and professional consultation		Tel: 0345 045 1362
Emergency Duty Team (Out of hours)		Tel: 01733 234724
Police Child Abuse Investigation Unit		Tel: 101
Local Authority Designated Officer (LADO)	LADO@cambridgeshire.gov.uk	Tel: 01223 727967
Prevent Officers	prevent@cambs.police.uk	Tel: 01480 422596
Senior Leadership Advisor – Phil Nash		Tel: 07920270820
Cambridgeshire and Peterborough Safeguarding Children Partnership Board – Safeguarding Inter-Agency Procedures	https://www.safeguardingcambspeterborough.org.uk/children-board/	

Relevant Documents

Keeping Children Safe in Education: Statutory guidance for schools and colleges (September 2023)

“Keeping children safe during community activities, after-school clubs and tuition: non-statutory guidance for providers running out-of-school settings” (April 2022)

Guidance for Safer Working Practice for those working with children and young people in education settings (May 2022)

Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers (July 2018)

“Meeting digital and technology standards in schools and colleges, Filtering and monitoring standards for schools and colleges” (March 2023)

The Prevent Duty, Departmental advice for schools and childcare providers (June 2015, Revised April 2021)

Revised Prevent Duty Guidance: for England and Wales (June 2015 and Revised April 2021)

Sharing nudes and semi-nudes: advice for education settings working with children and young people published by the UK Council for Child Internet Safety (UKCCIS) (December 2020)

Sexual violence and sexual harassment between children in schools and colleges (September 2021)

When to Call the Police: guidance for schools and colleges, (National Police Chief Council)

What to do if you're worried a child is being abused: Advice for practitioners (March, 2015)

Working Together to Safeguard Children: A guide to inter-agency working to safeguard and promote the welfare of children (July 2018)

Appendix C: Job Descriptions

Job Description: Designated Safeguarding Lead (DSL)

The Designated Safeguarding Lead (DSL) is the person appointed to take lead responsibility for child protection matters in School and providing advice and support to other staff on child welfare. All schools must have a designated safeguarding lead in place to deal with child protection concerns.

The DSL will contribute to the assessment of children by taking part in strategy discussions and inter-agency meetings, or support other Staff to attend in their place. This role forms part of the wider position of Senior Deputy Head, and the DSL role is also set out in that post holder's job description.

The DSL manages the Designated Safeguarding Team (DST) which is made up of **Deputy Designated Safeguarding Leads (DDSLs)** who cover the role of the designated safeguarding lead when they are unavailable. The lead responsibility for safeguarding and child protection remains with the DSL.

The DSL or a DDSL should always be available during school hours for Staff to discuss any safeguarding concerns.

Training

The DSL should attend training to enable them to carry out their role. This should be updated every two years as a minimum. The course to be undertaken as a minimum requirement are:

- Basic Child Protection (one day),
- **Designated or Deputy Designated Safeguarding Lead** for Child Protection training (two days).

In addition to formal training, the DSL should keep their knowledge and skills up to date via online training, e-bulletins, opportunities to network with other DSLs, and attend locally arranged briefings. These opportunities should be taken up at least once a year but more regularly if possible so that the DSL:

- Identifies, understands and responds to specific needs that can increase the vulnerability of pupils as well as the specific harms that can put them at risk, in order to safeguard and promote the welfare of pupils,
- Understands the importance of and the systems relating to referral and assessment process for early help and Children's Social Care intervention,
- Understands the importance of information sharing both within the School community and with other schools and other appropriate agencies, organisations and practitioners, to promote contextual safeguarding,
- Knows about child protection case conferences and reviews and can contribute to these effectively when required,
- Ensures that all Staff have access to and understand the School's Safeguarding and Child Protection Policy,

- Is aware of the needs of any children with special educational needs, relevant health conditions and disabilities, young carers and those receiving support from the local authority including a child in need, a child on a child protection plan or a looked after child,
- Understands the relevant data protection legislations and regulations (Data protection act 2018 and UK GDPR),
- Keeps detailed, accurate and secure records of concerns and referrals and understand the purpose of this record keeping,
- Understands the role of the School in terms of the Prevent duty where required,
- Attends refresher and other relevant training,
- Understands the lasting impact that trauma can have on a child's behavior, mental health, wellbeing and ultimate educational outcomes,
- Encourages a culture of listening to children and taking account of their wishes and feelings in terms of what the School does to protect them.

Responsibilities

Working with Others: The DSL should:

- Work with Quad to ensure safeguarding is at the heart of the School ethos and that all Staff are supported in knowing how to recognise and respond to potential concerns,
- Liaise with the Headmaster to keep them informed of any safeguarding of issues especially ongoing enquiries and police investigations, pupils who have a social worker and ensure that their academic progress and attainment is understood, maintaining at all times, high aspirations for these pupils,
- As required, liaise with the local authority case manager or the designated officer at the local authority if a concern has arisen regarding a member of Staff ,
- Liaise with staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies,
- Support teaching staff to provide additional academic support and reasonable adjustments to help our pupils that have or have had, a social worker, to ensure that they reach their potential,
- Act as a source of support, advice and expertise for staff,
- Overall responsibility for Online Safety (working with the Assistant Head Academic Administration),
- To annually review the School's safeguarding procedures and feedback to the Director with specific responsibility and then the Board of Directors via an annual report,
- To liaise with the Advisory Committee member with specific remit to support safeguarding,

- Liaise with the Mental Health Lead or appropriate other staff when safeguarding matters are related to mental health,
- Promote supportive engagement with parents with regard to safeguarding and child welfare, especially those who are facing challenging circumstances.

Managing Referrals: The DSL should:

- Refer cases of suspected abuse to Children's Social Care, and support staff who have raised concerns about a child or have made a referral to Children's Social Care,
- Where there are concerns about radicalisation, to make referrals to the Channel programme and offer support to other staff who have concerns about radicalisation,
- Refer cases to the Disclosure and Barring Service (DBS), where a member of staff has been dismissed following concerns they posed a risk to a child,
- Refer cases to the police where a crime has been or may have been committed.

Raising Awareness: The DSL should:

- Work with the Board of Directors to ensure the School's Safeguarding and Child Protection Policy is updated and renewed annually and that all members of staff have access to it and understand it, especially new and part time staff,
- Provide regular briefings and updates at staff, departmental and Director meetings to help ensure that everyone is kept up to date on latest policy developments and reminded of their responsibilities,
- Ensure the Child Protection Policy is available publicly and that parents are aware of the policy and that schools may make referrals to Children's Social Care if there are concerns about abuse or neglect,
- Link with the SCPB to keep up to date with training opportunities and the latest local policies.

Providing Support to Staff: The DSL will:

- Work to support staff in developing the expertise necessary to feel confident in supporting pupils in safeguarding and child protection matters by:
 - Ensuring that staff are supported during the referrals processes,
 - Supporting staff to consider how safeguarding welfare and educational outcomes are linked, allowing them to specifically inform those pupils' pastoral and academic support framework.

Understanding the Views of Children

The DSL must understand the importance of pupils feeling that they have been heard and understood, they must work with the support of Quad to develop the knowledge and skills to:

- Encourage a culture among staff of listening to children, taking account of their wishes and feelings when putting in place measures to protect them,
- Understand the difficulties that children have may encounter in approaching staff about their circumstances,
- Build trusted and appropriate relationships that facilitate communication.

Record Keeping

It is also the DSL's responsibility to keep detailed, accurate and secure written records of safeguarding concerns. These records are confidential and should be kept separately from pupil records. They should include a chronology of concerns, referrals, meetings, phone calls and emails.

Where children leave the School, ensure their child protection file is transferred to the new school or college as soon as possible. This should be transferred separately from the main pupil file, ensuring secure delivery and confirmation of receipt should be obtained.

Training of Other Staff

It is the role of the DSL, working with the Headmaster, to ensure all staff:

- Have induction training covering child protection, an understanding of safeguarding issues including the causes of abuse and neglect, the Prevent Duty and Online Safety
- Are able to identify the signs and indicators of abuse, respond to disclosures appropriately and respond effectively and in a timely fashion when they have concerns.

Job Description: **Deputy Designated Safeguarding Lead** for Safeguarding and Child Protection (DDSL)

Deputy Designated Safeguarding Leads (DDSLs) work with and are coordinated and managed by the Designated Safeguarding Lead (DSL). Together they form the Designated Safeguarding Team (DST)

The DSL or a **DDSL** should always be available during school hours for staff to discuss any safeguarding concerns. As such a **DDSL** will carry out the role of the DSL if they are not available.

Training

The **DDSLs** should attend training to enable them to carry out their role. This should be updated every two years as a minimum. The course to be undertaken as a minimum requirement are:

- Basic Child Protection (one day),
- **Designated or Deputy Designated Safeguarding Lead** for Child Protection training (two days).

In addition to formal training, the **DDSL** should keep their knowledge and skills up to date via online training, e-bulletins, and opportunities to network with other **DDSLs** and DSLs, and attend locally arranged briefings. These opportunities should be taken up at least once a year but more regularly if possible so that the DSL can be supported by a **DDSL** who:

- Identifies, understands and responds to specific needs that can increase the vulnerability of pupils as well as the specific harms that can put them at risk, in order to safeguard and promote the welfare of pupils,
- Understands the importance of and the systems relating to referral and assessment process for early help and Children's Social Care intervention,
- Understands the importance of information sharing both within the School community and with other schools and other appropriate agencies, organisations and practitioners,
- Knows about child protection case conferences and reviews and can contribute to these effectively when required,
- Ensures that Staff have access to and understand the School's Safeguarding and Child Protection Policy
- Is aware of the needs of any children with special educational needs, relevant health conditions and disabilities, young carers and those receiving support from the local authority including a child in need, a child on a child protection plan or a looked after child,
- Understands the relevant data protection legislations and regulations (Data protection act 2018 and UK GDPR),
- Keeps detailed, accurate and secure records of concerns and referrals and understand the purpose of this record keeping,
- Understands the role of the School in terms of the Prevent duty where required,
- Attends refresher and other relevant training,
- Understands the lasting impact that trauma can have on a child's behaviour, mental health, wellbeing and ultimate educational outcomes,
- Encourages a culture of listening to children and taking account of their wishes and feelings in terms of what the School does to protect them,

Responsibilities

Member of the DST: The **DDSL** should:

- Work under the guidance of the DSL and alongside the DST to ensure safeguarding is at the heart of the School ethos and that staff are supported in knowing how to recognise and respond to potential concerns,
- Liaise with the DSL to keep them informed of any safeguarding of issues especially ongoing enquiries and police investigations,
- Act as a source of support, advice and expertise for staff,
- Liaise with the DSL and other Staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies
- Support the DSL as required with their responsibilities, this may include but is not limited to:
 - Staff training
 - Policy updates
 - Pupil interventions
 - Leading sessions aimed at informing the pupil body of safeguarding issues
 - Record keeping.

If the DSL is unavailable: the **DDSL** should be prepared to:

- Liaise with the local authority case manager or the designated officer at the local authority if a concern has arisen regarding a member of staff,
- Refer cases of suspected abuse to Children's Social Care, and support staff who have raised concerns about a child or have made a referral to Children's Social Care,
- Where there are concerns about radicalisation, to make referrals to the Channel programme and offer support to other Staff who have concerns about radicalization,
- Refer cases to the Disclosure and Barring Service (DBS), where a member of Staff has been dismissed following concerns they posed a risk to a child,
- Refer cases to the police where a crime has been or may have been committed,
- Provide briefings and updates at staff, departmental and Director meetings to help ensure that everyone is kept up to date on latest policy developments and reminded of their responsibilities.

Record Keeping: the DDSL should

- Work with the DSL to ensure accurate and confidential records of safeguarding concerns are kept,
- Be familiar with the process for recording child protection concerns and be aware of the School's filing and record management procedures,
- Must also have access to the child protection records if the DSL is unavailable.

Understanding the Views of Children: the DDSL must

- Understand the importance of pupils feeling that they have been heard and understood, they must work with the support of the DSL to develop the knowledge and skills to:
 - Encourage a culture among all staff of listening to children, taking account of their wishes and feelings when putting in place measures to protect them,
 - Understand the difficulties that children have may encounter in approaching staff about their circumstances,
 - Build trusted and appropriate relationships that facilitate communication.

Appendix D: Notices for Staff Areas



Designated Safeguarding Team (DST)

If you have any concerns that someone you know is being put at risk of being harmed by anybody else, you should tell one of the team below:

This includes if you think someone may be at risk of:

- physical abuse
- emotional abuse
- sexual abuse
- neglect
- being exposed to extremism
- Radicalisation
- Exploitation

Don't worry that you or anyone else will get into trouble if you say something: if you are worried about someone it is better that you share your worries.

Think "what if I'm right" not "what if I'm wrong"!



Mr P Timmis
~~PWTimmis~~
Senior Deputy Head (Senior)
DSL (Senior) Prevent Lead



Mrs K Neaves
~~KNeaves~~
Senior Deputy Head (Prep)
DSL (Prep)



Mr A Duncan
~~ACDuncan~~
Head of Middle School
Domestic Abuse Lead



Mr C Liston
~~CPListon~~
Head of Boarding



Mrs K Bradley
~~KLTaylor~~
Head of Sixth Form



Mr T Calow
~~TWCalow~~
Head of Lower School

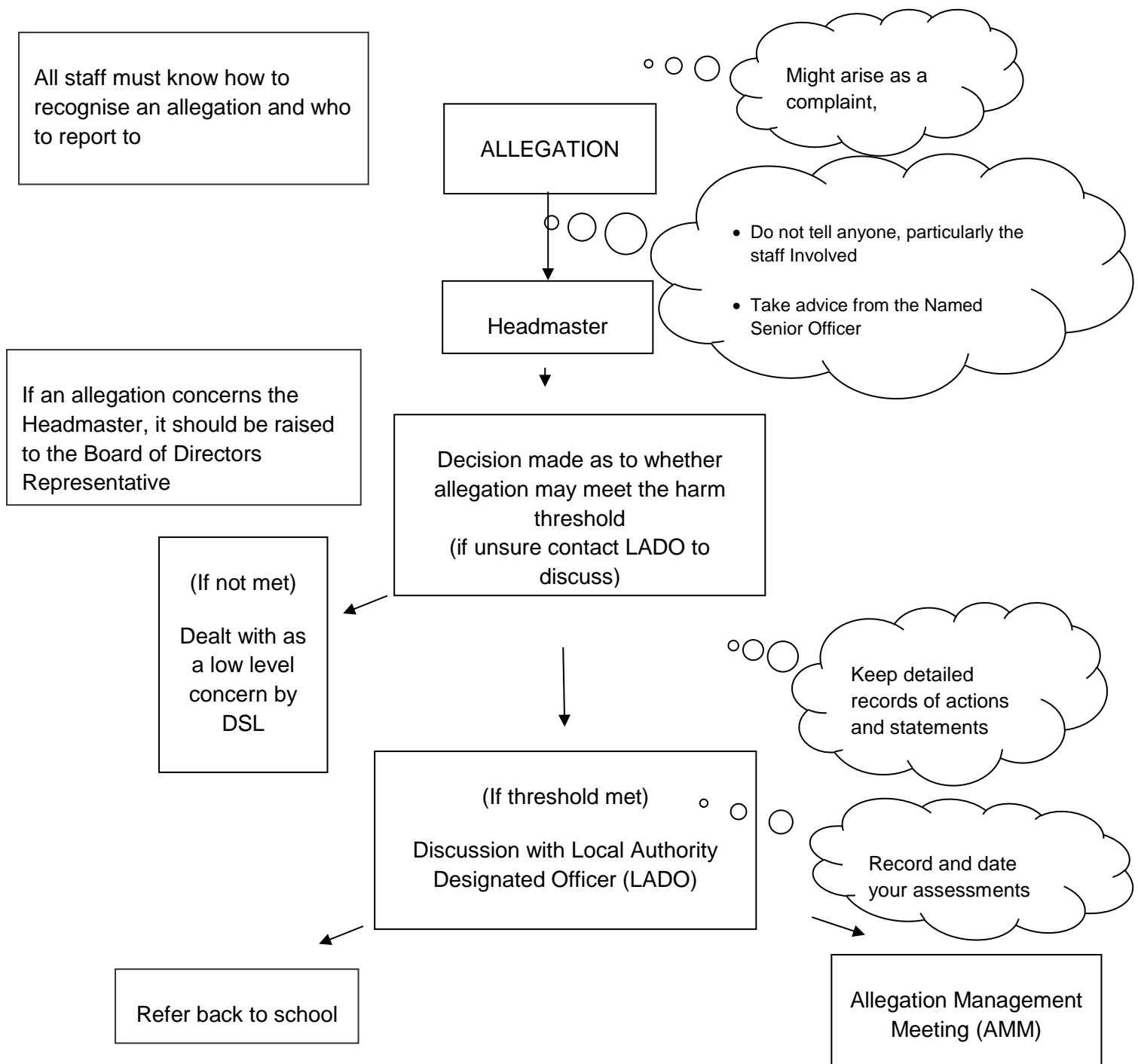


Mrs K Fairbrother
~~KCFairbrother~~
Assistant Deputy Head Prep



Mrs S Doherty
~~SDoherty~~
EYFS/KS1 Lead

Appendix E: Managing an Allegation Against a Member of Staff in your Establishment



Appendix F: Low Level Concern Policy



Low Level Concerns Policy (18b)

Scope:	Whole School (including Boarding)
Release date:	August 2023
Author:	Head of HR
Reviewer:	Senior Deputy Head (Senior) in role as DSL
Approval body:	Bursar
Review date	August 2024

Linked documents

This Policy should be read in conjunction with:

- Disciplinary Procedure
- Staff Code of Conduct
- Safeguarding Policy

Definitions

- Staff** Every member of staff, whether paid or unpaid, including volunteers, agency or supply staff, Directors and Advisory Committee members.
- Quad** Senior Leadership Team;
This Team consists of Headmaster, Bursar, Senior Deputy Head (Senior School), Senior Deputy Head (Prep School), Deputy Head Academic and Deputy Bursar.

Availability

This Policy is available to Staff and is within the Employee Handbook

Policy Statement

At Wisbech Grammar School, we aim to create an open and transparent culture where all concerns about all adults involved with our School are dealt with promptly and appropriately.

We aim to identify any concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of our school are clear about professional boundaries and act within these boundaries, and in accordance with our school ethos. This Policy should be read alongside the Policies detailed in the header.

It may be possible that a member of staff acts in a way that does not cause risk to children, but is however inappropriate.

A member of staff who has a concern about another member of Staff or contractor should inform the Headmaster about their concern using a Low-Level Record of Concern Form. If the Headmaster cannot be contacted, the Proprietor should be contacted instead.

If on reflection a member of staff recognises that their actions could have been viewed as a risk, they should also make a record of incident using the Low-Level Record of Concern Form, and self-refer to the Headmaster.

A member of the public who has a concern about a member of staff should inform the School about their concern. Any such contact either into the School or any staff member (whether in person, by telephone, by email or by letter) will be immediately referred to the Headmaster's Office who will capture their concern using a Low Level of Concern Form. This will then be passed to the Headmaster and treated in the same way as any other allegation.

A member of the public wishing to make such a report can contact the Headmaster's office using office@wisbechgrammar.com or call on 01945 583631 ext 210.

Who does this policy apply to?

For the purposes of this policy, the term and references to 'adult' mean the following: Board and school members, all teaching and support staff (whether paid or unpaid, employed, or self-employed and whether or not employed directly by the School, external contractors providing services to pupils on behalf of the school, teacher trainees and other trainees/apprentices, volunteers and any other individuals who work for or provide services on behalf of or for the school.

Employees of external agencies and providers of services (e.g. contractors) will be expected to abide by the provisions of this policy, and it will be a term of their engagement with us that they do so, whilst working on School premises. Failure to follow the expectations set out in this policy may result in agency workers being asked to no longer provide their services.

Who is responsible for carrying out this policy?

The implementation of this policy will be monitored by the Headmaster and Board and will remain under constant review by Wisbech Grammar School.

Policy

Policy Principle

The following is taken from Keeping Children Safe in Education Part Four.

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

Creating a culture in which all concerns about adults are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. If implemented correctly, this should:

- Encourage an open and transparent culture
- Enable schools and colleges to identify inappropriate, problematic or concerning behaviour early
- Minimise the risk of abuse, and
- Ensure that adults working in or on behalf of the school or college are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.

What is a low-level concern?

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

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

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

- Being over friendly with children
- Having favourites
- Taking photographs of children on their mobile phone, contrary to school policy
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
- Humiliating pupils.

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

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

It is crucial that all low-level concerns are shared responsibly with the right person, and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools and colleges from becoming the subject of potential false low-level concerns or misunderstandings.

Clarity around Allegation vs Low-Level Concern vs Appropriate Conduct

Allegation

Behaviour which indicates that an adult who works with children has:

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

Low-Level Concern

Any concern – no matter how small, even if no more than a ‘nagging doubt’ – that an adult may have acted in a manner which:

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

For example

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

Appropriate Conduct

Behaviour which is entirely consistent with the School Code of Conduct, and the law.

Clarity around Allegation vs Low-Level Concern vs Appropriate Conduct

Low-Level Concerns and follow-up information will be stored securely within the School, with access only by Quad. This will be stored in accordance with the School’s Data Protection Policy.

The individual reporting the concern must keep the information confidential and not share the concerns with others apart from the Headmaster or those aware in Quad.

Low-Level Concerns and follow-up will be stored on a Low-Level Concerns and Allegations Log, which will be shared with the relevant staff in the Senior Team to identify patterns, trends and emerging needs around training, coaching or further intervention.

Low-Level Concerns will not be referred to in references unless they have been formalised into more significant concerns resulting in disciplinary or misconduct procedures.

Whenever staff leave the school, any record of low-level concerns which are stored about them will be reviewed as to whether that information needs to be kept. Consideration will be given to:

- (a) whether some or all the information contained within any record may have any likely value in terms of any potential historic employment or abuse claim to justify keeping it, in line with normal safeguarding records practice; or
- (b) if, on balance, any record is not considered to have any likely value, still less actionable concern, and ought to be deleted accordingly

Process to follow when a low-level concern is raised

Please refer to the diagram in Appendix 1 for a flow chart of the process to follow when a low-level concern is raised.

Low level concerns should be reported using the reporting form (see an example in Appendix 2). Schools should make all staff aware as to where they can get a copy of the form and how they can report in School.

LLC Forms should be passed on to the Headmaster. If the concern relates to the Headmaster, then the Proprietor should be contacted. If the concern relates to the Proprietor or members of the Board, the Owner should be contacted.

The Headmaster (or Proprietor) will seek to collect as much evidence as possible by speaking to the person who raised the concern, unless it has been raised anonymously to the individual involved and any witnesses.

If, as the concern comes to light the Headmaster decides that the harm threshold has been met, the concern will be escalated and the LADO will be contacted.

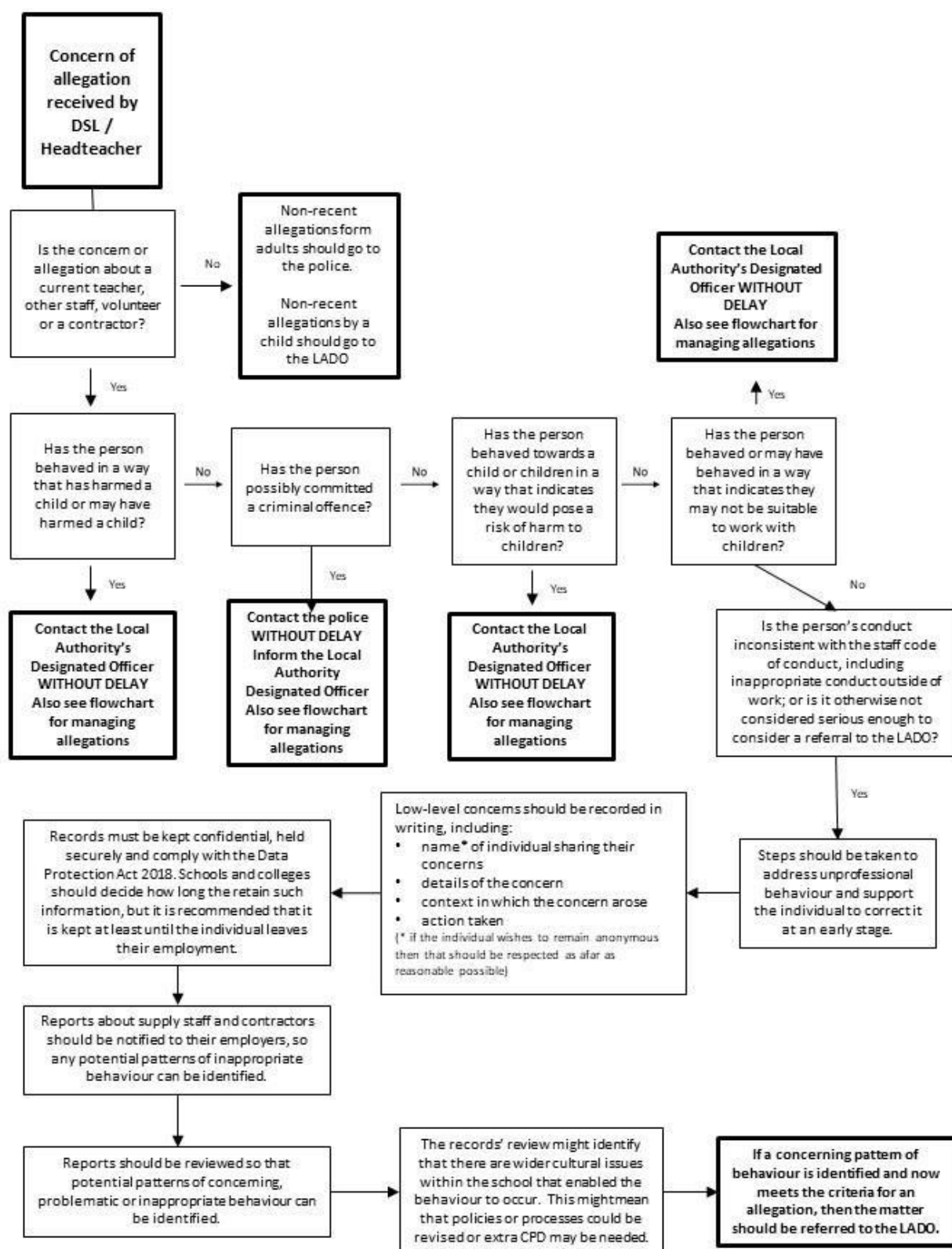
If, as the concern comes to light the Headmaster is unsure as to whether the harm threshold has been met and requires further discussion, the LADO will also be contacted to discuss the matter.

Policy Review

This Policy will be reviewed annually or as required by legislature changes.

Appendix 1

Process to follow when a low-level concern or allegation is raised



N.B – if the concern relates to the Headmaster, then the Proprietor should be contacted. If the concern relates to the Proprietor or members of the Board the Owner should be contacted.

Appendix 2

Low level Concerns Reporting Form

Your details		
Name (optional)		
Role		
Date and time of completing this form		
Details of individual (including yourself for self-reporting) whom the concern is about		
Name		
Role		
Relationship to the individual reporting e.g., manager, colleague		
Details of concern		
<p>Please include as much detail as possible. Think about the following: What behaviour and/or incident are you reporting? What exactly happened? Why does the behaviour and/or incident worry you? Why do you believe the behaviour and/or incident is not consistent with our School Professional and Safe Conduct Policy?</p>		
Details of any children or young people involved		
Name(s)		
Next Steps		
Are you willing to meet with the Headmaster and DSL to discuss your concern? Please circle as appropriate.	Yes	No
Please state any other information that you feel is relevant to the processing of this concern.		
Signature		

For use by HT/safeguarding team upon receipt of the concern	
Date and time concern received	
Signature	
Role	
Does the concern meet the threshold for referral to the Designated Officer? If so, a referral must be made within one working day.	
Actions to be taken and follow-up. Please include your rationale.	
Has the concern/allegation been logged on the Low-Level Concerns and Allegations Log?	

Appendix G: Safeguarding Statement on WGS Website

Statement of the responsibilities placed on the school and staff in relation to child protection

Under section 175 of the Education Act 2002 (as amended), the Education (Independent School Standards) Regulations 2014, the Non-Maintained Special Schools (England) Regulations 2015, and the Apprenticeships, Skills, Children and Learning Act 2009 (as amended) to have arrangements in place to safeguard and promote the welfare of children.

We will endeavour to provide a safe and welcoming environment where children are respected and valued.

The School will therefore be alert to signs of abuse and neglect and will follow the Cambridgeshire and Peterborough Safeguarding Children Partnership Board's procedures to ensure that children receive appropriate and effective support and protection.

Parents/carers should know that the law requires all school staff to pass on information which gives rise to a concern about a child's welfare, including risk from neglect, physical, emotional or sexual abuse. Parents/carers should know that records of safeguarding concerns may be kept about their child. They should be informed that school staff will seek, in general, to discuss any concerns with them including referrals to other agencies.

Local procedures state that "Consent should always be sought from an adult with parental responsibility for the child/young person before passing information about them to Children's Social Care, unless seeking consent would place the child at risk of significant harm or may lead to the loss of evidence for example destroying evidence of a crime or influencing a child about a disclosure made." This includes allowing them to share information without consent, if it is not possible to gain consent, if it cannot be reasonably expected that a professional gains consent, or if to gain consent would place a child at risk.

Where there is a need to share special category personal data, the Data Protection Act 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows professionals to share information.

In accordance with legislation and local Information Sharing protocols, we will ensure that information is shared securely and sensitively. Information will only be shared with other services where it is deemed necessary and proportionate to ensure that children and young people are safe and receive the right service. In all circumstances, the safety of the child will be the paramount concern.

Schools will contact Children's Social Care when they have reasonable cause to suspect a child may be suffering or likely to suffer significant harm. Occasionally, concerns are passed on which are later shown to be unfounded. Parents/carers will appreciate that the member of staff in the school with responsibility for child protection (known as the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead) was carrying out their responsibilities in accordance with the law and acting in the best interests of all children.

Under Section 3 (5) of the Children Act 1989, any person who has care of a child "may....do what is reasonable in all the circumstances of the case for the purpose of safeguarding promoting the child's welfare". This means that on rare occasions, a school may need to "hold" a child in school whilst Social Care and the Police investigate any concerns further.