

Widford Lodge  
PREPARATORY SCHOOL



7a  
**Arrangements for Safeguarding and  
Child Protection Policy**

**This policy applies to all pupils in the school including those in the EYFS and has full regard to the Department for Education documents 'Keeping Children Safe in Education' (2024) and 'Working Together to Safeguard Children' (2023).**

Reviewed and approved by Proprietor: November 2024  
Review Date: March 2025

**WIDFORD LODGE PREPARATORY SCHOOL**  
**ARRANGEMENTS FOR SAFEGUARDING / CHILD PROTECTION POLICY**  
**KEY CONTACTS WITHIN THE SCHOOL (As at September 2024)**

**THE DESIGNATED CHILD SAFEGUARDING LEAD FOR THE WHOLE SCHOOL INCLUDING THE EARLY YEARS FOUNDATION STAGE**

NAME: Samantha Pawsey (Deputy Head – Pastoral) CONTACT NUMBER: 01245 352581

**DEPUTY DESIGNATED SAFEGUARDING LEAD**

NAME: Michelle Cole (Headteacher) CONTACT NUMBER: 01245 352581

**EYFS - person responsible for Safeguarding**

NAME: Debbie Poston (Head of EYFS) CONTACT NUMBER: 01245 352581

**NOMINATED REPRESENTATIVE FOR THE PROPRIETORS FOR CHILD PROTECTION**

NAME: Louise Gear, Proprietor CONTACT NUMBER: 01245 250328 and  
01245 352581

Please note that all staff are aware that they can make a referral directly and do not have to report via the Designated Safeguarding Lead

**KEY CONTACTS WITHIN THE LOCAL AUTHORITY**

**ESSEX SAFEGUARDING CHILDREN BOARD** is able to provide advice and consultancy where there is a concern about child abuse. Referral to the Essex Workforce Allegations Team (LADO) is undertaken by the Essex Safeguarding Children Board (ESCB). Further information can be found on the Essex Safeguarding Children Board's website: [www.escb.co.uk](http://www.escb.co.uk)

The ESCB and Workforce Allegations Team (LADO) can be contacted by telephone on 03330 139 797 where there is an **allegation of abuse against a member of school staff/volunteer.**

**REFERRAL TO ESSEX SAFEGUARDING CHILDREN BOARD**

For URGENT and non urgent referrals and enquiries/advice, telephone the Children and Families Hub on 0345 603 7627 and state whether or not your call is urgent. You can ask for the Consultation Line or the Priority Line. The Essex Effective Support website should be used for non-urgent requests for support via its portal. The website is [essexeffectivesupport.org.uk](http://essexeffectivesupport.org.uk) and it provides information about the types of support available. Anyone can make a referral.

To make **URGENT** referrals **OUT OF OFFICE HOURS** telephone **0345 606 1212** or email **[Emergency.DutyTeamOutOfHours@essex.gov.uk](mailto:Emergency.DutyTeamOutOfHours@essex.gov.uk)**. **Any immediate risk of harm or a crime committed should be reported to the Police.**

For advice and support about extremism contact the local police on 101. Staff should contact the DfE non-emergency helpline on 0207 340 7264 or report a concern via <https://report-extremism.education.gov.uk>

Referrals for immediate danger should be made by calling 999. Referral forms (VTR) requested from the Channel Panel Coordinator should be returned securely to [Prevent@essex.pnn.police.uk](mailto:Prevent@essex.pnn.police.uk)

It is mandatory for teachers to report acts of Female Genital Mutilation themselves. Dial 999 in an emergency or report concerns to Essex Police's Central Referral Unit on 101.

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## 1. Introduction

Schools and their staff form part of the wider safeguarding system for children. Everyone who comes into contact with children and their families and carers has a role to play in safeguarding children. In order to fulfil this responsibility effectively, all professionals should make sure their approach is child-centred. This means that they should consider, at all times, what is in the **best interests** of the child.

*(Keeping Children Safe in Education – DfE, 2024)*

This Child Protection Policy is for all staff, parents, Proprietors, volunteers and the wider school community. It forms part of the safeguarding arrangements for our school. It should be read in conjunction with the Safer Recruitment Policy, Staff Code of Conduct, Absent/Missing/Child not collected Policy (specifically our safeguarding response to children missing from education), Harmful Sexual Behaviour/Child on child Abuse Policy, Anti-Bullying Policy, Attendance policy, Promotion of Good Behaviour Policy, Health and Safety Policy, Educational Visits Policy, E-safety Policy and the policy on the use of Cameras, Mobile Phones, smart watches and Recording Devices, including the taking, storing and using of images of children. These policies are available either on our school website or on request from the school office. It should also be read in conjunction with Keeping Children Safe in Education (DfE, 2024) and Appendix 8, the role of the Designated Safeguarding Lead.

Safeguarding and promoting the welfare of children (everyone under the age of 18) is defined in Keeping Children Safe in Education as:

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

This policy applies to all parts of Widford Lodge Preparatory School with specific additional Early Years Foundation Stage (EYFS) requirements. It is available for parents on the school’s website and from the school office on request, along with Keeping Children Safe in Education.

## 2. Aims

Our school has a whole school approach to safeguarding, which ensures that keeping children safe is at the heart of everything we do and underpins all systems, process and policies. It is important that our values are understood and shared by all children, staff, parents/carers, the Proprietor and the wider school community. Only by working in partnership can we truly keep children safe.

We recognise that for our pupils, high self-esteem, confidence, supportive friends and clear lines of communication with a trusted adult help to prevent abuse. We create a culture of vigilance where children feel safe and secure; they are encouraged to talk and are listened to. Pupils know there are adults within school they can approach if they are worried or having difficulties and that they will receive the right help at the right time to address risks and prevent issues escalating. The photographs of the Designated Safeguarding Lead and Deputy and the contact details of Childline are also displayed on posters around school.

Pupils are clear that any bullying, including cyber bullying, will not be tolerated. We promote the fundamental British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs. Pupils are provided with material to help them develop realistic attitudes to the responsibilities of adult life and how to build resilience towards risks. We work with parents to ensure that they are aware of our policies and practice for safeguarding and we aim to establish open, honest and effective working relationships with them.

### 3. Statutory framework

Section 157 of the Education Act 2002 places a statutory responsibility on the governing body to have policies and procedures in place that safeguard and promote the welfare of children who are pupils of the school.

There is government guidance set out in Working Together to Safeguard Children (DfE, 2023) on how agencies must work in partnership to keep children safe. This guidance places a shared and equal duty on three safeguarding partners (the Local Authority, Police and Health) to work together to safeguard and promote the welfare of all children in their area under multi agency-safeguarding arrangements. These arrangements sit under the Essex Safeguarding Children Board (ESCB). In Essex, the statutory partners are Essex County Council, Essex Police and three NHS Integrated Care Boards covering the county. In addition to statutory guidance, in Essex, all professionals must work in accordance with the **SET Procedures** [http://www.escb.co.uk/Portals/67/DNNGallery/SET\\_Procedures-November\\_2016-final.pdf](http://www.escb.co.uk/Portals/67/DNNGallery/SET_Procedures-November_2016-final.pdf). Our school also works in accordance with the following legislation and guidance:

- Children Act 1989
- Children Act 2004
- Education Act 2002
- Essex Effective Support
- Children Missing Education – Statutory guidance for local authorities (DfE, 2016)
- Education Access Team CME/Home Education Policy and Practice (ECC, 2018)
- Keeping Children Safe in Education (DfE, 2024) including Disqualification under the Childcare Act 2006
- Working Together to Safeguard Children (DfE, 2023)
- Essex Effective Support (ESCB 2021)
- Counter-Terrorism and Security Act (HMG, 2015) including Prevent Duty Guidance (2023)
- Channel and Prevent Multi-Agency Panel (PMAP) guidance (Home Office 2021)
- Serious Crime Act 2015 (Home Office, 2015)
- Sexual Offences Act (2003)
- Education (Pupil Registration) Regulations 2006
- Information sharing advice for safeguarding practitioners (HMG, 2018)
- Data Protection Act 2018
- What to do if you're worried a child is being abused (HMG, 2015)
- Searching, screen and confiscation (DfE, 2022)
- The Independent Schools Inspectorate Regulations
- Sexual Violence and Sexual Harassment between children in schools and colleges (DfE, 2021)
- Children and Social Work Act (2017)
- Preventing and Tackling Bullying (DfE, 2017)
- Female Genital Mutilation Act 2003 (S.74 – Serious Crime Act 2015)
- Let's talk: reducing the risk of suicide (ESCB 2022)
- Preventing youth violence and gang involvement (Home Office, 2015)
- Criminal Exploitation of children and vulnerable adult – county lines guidance (Home Office, 2018)

- Teaching online safety in schools (DfE, 2019)
- Understanding and Supporting Behaviour – safe practice for schools and educational settings (ECC 2024)
- Relationships Education, Relationships and Sex Education (RSE) and Health Education (DfE, 2019, 2021)
- Behaviour in Schools (DfE 2024)
- Meeting digital and technology standards in schools and colleges (DfE, 2022)
- Filtering and Monitoring Standards (DfE)
- Sharing nudes and semi-nudes: advice for education settings working with children and young people (March 2024)
- Working together to improve school attendance (DfE 2024)
- Victims and Prisoners Act (2024)

## 4. Roles and responsibilities

All adults working with or on behalf of children have a responsibility to protect them and to provide a safe environment in which they can learn and achieve their full potential. Please note that all staff are aware that they can make a referral directly and do not have to report via the Designated Safeguarding Lead. However, there are key people within schools, the Local Authority and other agencies who have specific responsibilities under child protection procedures. The names of those in our school with these specific responsibilities (the Designated Safeguarding Lead and deputy Designated Safeguarding Leads) are shown on the cover sheet of this document. We are clear that safeguarding is everyone’s responsibility and that everyone who comes into contact with children has a role to play.

We are committed to safer recruitment and our processes are set out in our Safer Recruitment policy, available on our website or from our school office on request. We also have procedures in place to ensure that visiting speakers are suitable and appropriately supervised.

### **The Proprietor**

The Proprietor, Louise Gear, is responsible for safeguarding. She ensures that the policies, procedures and training in our school are effective and comply with the law at all times. She ensures that all required policies relating to safeguarding are in place and that the child protection policy reflects statutory and local guidance and is reviewed at least annually. The Proprietor is responsible for facilitating a whole school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development and that all systems, processes and policies operate with the best interests of the child at heart.

The Proprietor ensures there is a named Designated Safeguarding Lead and deputy Designated Safeguarding Lead in place.

The Proprietor ensures the school contributes to inter-agency working, in line with statutory and local guidance. She ensures that information is shared and stored appropriately and in accordance with statutory requirements.

The Proprietor ensures that all adults in our school who work with children undergo safeguarding and child protection training at induction and that it is then regularly updated. All staff members receive regular safeguarding and child protection updates, at least annually, to provide them with the relevant skills and knowledge to keep our children safe.

The Proprietor ensures our pupils are taught about safeguarding, including online safety, through teaching and learning opportunities as part of a broad and balanced curriculum and has strategic oversight of filtering and monitoring systems for online usage. For further information please refer to the 7e e-safety and IT security policy. Our children will be taught how to keep themselves safe through teaching and learning opportunities as part of a broad and balanced curriculum. Our school works in accordance with government regulations which make the subjects of Relationships Education and Health Education mandatory.

The Proprietor and school leadership team are responsible for ensuring the school follows safer recruitment procedures that help to deter, reject or identify people who might abuse children. They adhere to statutory responsibilities to check adults working with children and have recruitment and selection procedures in place (see the school's 'Safer Recruitment' policy for further information). They ensure that volunteers are appropriately supervised in school.

The Proprietor carries out an annual review of the safeguarding and child protection procedures to ensure that they are operating effectively. This typically includes: discussion of the annual report produced by the Designated Safeguarding Lead; reviewing the ESCB audit completed by the Designated Safeguarding Lead; attendance at all safeguarding training provided to staff; attendance at termly safeguarding forums for Essex; discussion with a sample of pupils throughout the year; discussion with the head of Computing regarding the teaching of online safety; termly discussions with the Designated Safeguarding Lead about safeguarding procedures in the school.

#### **The Designated Safeguarding Lead (and Deputy)**

The Designated Safeguarding Lead in school has ultimate lead responsibility for safeguarding and child protection. This includes managing child protection referrals, working with other agencies, ensuring all staff are appropriately trained, leading on online safety (including filtering and monitoring standards) and raising awareness of all child protection policies and procedures. They ensure that everyone in school (including temporary staff, volunteers and contractors) is aware of these procedures and that they are followed at all times. They act as a source of advice and support for other staff (on child protection matters) and ensure that timely referrals to Essex Children's Social Care (Children and Families Hub) are made in accordance with current SET procedures. They work with the local authority and the ESCB as required and ensure that information is shared appropriately.

The deputy Designated Safeguarding Lead is trained to the same standard as the Designated Safeguarding Lead. If for any reason the Designated Safeguarding Lead is unavailable, the deputy Designated Safeguarding Lead will act in their absence.

The role of the Designated Safeguarding Lead is outlined in Appendix 8 to this policy and includes taking lead responsibility for safeguarding and child protection, maintaining an overview and having open channels of communication with local statutory agencies, as well as managing referrals, supporting staff in carrying out their safeguarding duties, monitoring the effectiveness of policies and procedures in practice and ensuring that child protection files are kept up to date.

#### **The Headteacher**

The Teachers' Standards 2012 state that teachers (which includes Headteachers) should safeguard children's wellbeing and maintain public trust in the teaching professions as part of their professional duties. The Headteacher works in accordance with all statutory requirements for safeguarding and is responsible for ensuring that safeguarding policies and procedures adopted by the governing body are followed by all staff.

### **All school staff**

Everyone in our school has a responsibility to provide a safe learning environment in which our children can learn. All staff are aware of the types of abuse and safeguarding issues that can put children at risk of harm, so we are able to identify children who may be in need of help or protection. We understand that behaviours linked to issues such as drug taking and/or alcohol misuse, missing education and consensual/non consensual sharing of nudes and semi nude images can be signs that children are at risk. In addition, we recognise that any child may benefit from early help and all staff members are aware of the local early help process and our role in it. Specifically staff are alert to the potential need for early help for children with additional physical, educational or mental health needs, those who are frequently absent from school, have a parent in custody or in a family circumstance presenting challenges for the child and those at risk of exploitation or honour based abuse. All staff members are aware of and follow school safeguarding processes (as set out in this policy) and are aware how to make a referral directly to Social Care if there is a need to do so. If staff have any concerns about a child's welfare, they must act on them immediately and speak with the Designated Safeguarding Lead or deputy – we do not assume that others have taken action. If a referral to a statutory agency is considered necessary, parental consent is not required.

We recognise our responsibilities towards not only children at risk of harm or neglect, but also to children who may benefit from early help. Through our pastoral care, we aim to recognise when a child needs support and prevent problems escalating. We work with external agencies to this end, as necessary. Our staff understand the importance of listening to children and children are also reminded regularly that all staff are ready to listen to them if they need to talk to someone.

Our staff understand that children may not always feel able or know how to tell someone that they are being abused. This may be because they are embarrassed, scared or do not recognise they are experiencing abuse, either at home or out in the community. We understand there are many factors which may impact on our children's welfare and safety and we also understand safeguarding in the wider context (contextual safeguarding). We recognise that abuse, neglect and safeguarding issues rarely occur in isolation and that, in most cases, multiple issues will overlap.

Our staff will always reassure children who report abuse that they are taken seriously and that they will be supported and kept safe. We will never make a child feel ashamed for reporting abuse, nor make them feel they are causing a problem. Staff will therefore build trusted relationships with children to facilitate communication and will speak to the DSL if they have concerns about a child.

The Designated Safeguarding Lead is the Pastoral Deputy Head and she has time and resources to speak to children either on a one off or regular basis and to offer them the support they need. Other staff can refer children to her who they feel would benefit from this. The Essex Effective Support portal provides staff with guidance for services available for children in need and staff are aware to use this, either themselves or in conjunction with the Designated Safeguarding Lead, to access services or make referrals to Social Care. We are aware of children in a Child in Need or Child Protection Plan and those requiring mental health support. Where there is immediate risk or a crime has been committed, staff are aware of their responsibilities to contact the Police themselves immediately. We work with Social Care and other appropriate agencies to ensure there is a joined up approach to planning for these children and that they receive the right help at the right time.

## **5. Types of abuse, neglect and exploitation/ specific safeguarding issues**

Keeping Children Safe in Education (DfE, 2024) defines abuse as “a form of maltreatment of a child”. It sets out that:



*“Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. 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. They may be abused by an adult or adults or another child or children.”*

The four main types of abuse referred to in Keeping Children Safe in Education are:

- Physical (causing physical harm to a child, including where an adult fabricates or deliberately induces illness in a child)
- Emotional (persistent emotional maltreatment such as to cause severe and adverse effects on the child’s emotional development)
- Sexual (forcing or enticing a child to take part in sexual activities physically or online)
- neglect (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)

All staff in our school are aware of the signs of abuse, neglect and exploitation so we are able to identify children who may be in need of help or protection. Fuller details of the types and signs of abuse, neglect and exploitation are given in Appendices 2 and 3 to this policy. Staff are aware that safeguarding incidents and/or behaviours can be associated with factors outside school and/or can occur between children outside school. All staff, but especially the designated safeguarding lead 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.

In addition, Annex B of Keeping Children Safe in Education contains important information about specific forms of abuse and safeguarding issues. Some of these, and our approach to them, are explained here:

#### Child on child abuse including sexualised behaviours

Our school may be the only stable, secure and safe element in the lives of some children, particularly those who have experienced harm and trauma. We have a duty to safeguard all children and, whilst inappropriate behaviours will be challenged and addressed, it is in the context of providing appropriate support to all children in our school where harmful behaviour has occurred. We will, at all times, take a balanced and proportionate approach to risky or harmful behaviour. Any incidents of child on child abuse will be managed in the same way as any other child protection concern and will follow the same procedures. We will seek advice and support from other agencies as appropriate and ensure that appropriate agencies are involved when required.

Our school recognises that some children may abuse other children and that this may happen in school or outside of it. We understand there are many factors which may lead a child to display abusive behaviours towards other children, and that these matters are sensitive and often complex. We never assume, if abuse is not being reported, that it is not occurring in our school - we are vigilant to signs of abuse and promote a culture of safety and understanding.

Child on child abuse can manifest itself in many ways. This may include bullying (including cyber bullying), on-line abuse including the sharing of nudes and semi-nudes, gender-related abuse, harmful sexual behaviours, physical abuse, sexting, upskirting, initiation/hazing type violence and rituals. We understand the importance of ensuring that abusive comments and interactions are recognised as abuse and will never be tolerated or passed off as banter, just having a laugh or part of growing up. We do not tolerate any such

harmful behaviour in school and will take swift action to intervene where this occurs, challenging inappropriate behaviours when they occur – we do not normalise abuse and it is not tolerated in our setting. Our culture is very much one of kindness, compassion, hope, connection and belonging.

We understand the barriers which may prevent a child from reporting abuse and work actively to remove these. We use lessons and assemblies to teach children about healthy, positive relationships, how to report concerns and to help them understand in an age-appropriate way, what abuse is. We aim to provide children with the language to report abuse and to tell a trusted adult if someone is behaving in a way that makes them feel uncomfortable. Our school understands the different gender issues that can be prevalent when dealing with child on child abuse ie that it is more likely that girls will be victims and boys perpetrators but we recognise that all child on child abuse is unacceptable and will be taken seriously. We will never make a child feel ashamed for reporting abuse, not that they are creating a problem by doing so. It will be explained that the law is in place to protect rather than criminalise them.

### Harmful sexual behaviour

We understand that children's sexual behaviours exist on a continuum, ranging from age-appropriate / developmental to inappropriate / problematic / abusive. We also understand that harmful sexual behaviour and child on child abuse can occur between children of any age and gender, either in person or online. We recognise that children who display harmful sexual behaviour may have experienced their own abuse and trauma, and we will support them accordingly.

Our school has a 'zero-tolerance' approach to harmful sexual behaviour of any kind, and any inappropriate behaviour is challenged and addressed. We work in accordance with all statutory guidance in relation to such behaviours and with other agencies as appropriate.

We seek to teach our pupils about healthy and respectful relationships, boundaries and consent, equality, the law and how to keep themselves safe (on and offline).

Please see our separate policy Harmful Sexual Behaviour/Child on child Abuse for further details of the action we would take.

### Children absent and missing from education

All children, regardless of their age, ability, aptitude and any special education needs they may have are entitled to a full-time education. Our school recognises that a child absent from education repeatedly and/or for prolonged periods or missing education with unexplainable absences is a potential indicator of abuse or neglect and will follow the school procedures for unauthorised absence and for children missing education. It is also recognised that, when not in school, children may be vulnerable to or exposed to other risks. We believe early intervention to address absence from school is vital, so we work with parents and other partners to keep children in school and remove any barriers to them accessing their education. Parents are required to provide at least two emergency contact numbers to the school to enable us to communicate with someone if we need to. Parents should always inform us of the reason for any absence. Where contact is not made, a referral may be made to another appropriate agency (Education Access Team, Social Care or Police).

Our school considers missing episodes like any other child protection concern and will take action as appropriate, for example, by contacting parents, the Children & Families Hub consultation line, and in an emergency, the priority line or the police. It may be appropriate to use the Early Help Procedures including holding a Team Around the Family meeting to address the issues and prevent escalation. Advice will be sought and concerns will be escalated if there is no improvement.

When it is suspected that a child is missing from school this would be addressed immediately. Active steps to locate the child will be taken, for example, searching the premises and surrounding areas, and contacting their parents. If none of these actions locate the child, then they will be reported missing to the Police by dialling 101, **or 999 if there is a belief that the child is immediately suffering significant harm**. It is important that the police are informed of any checks already completed as it may save time and prevent duplication of tasks set by the police to locate a child.

Staff must inform the child's parents that the child has been reported missing. Where there is a Social Worker allocated to the child, they should also be informed.

After a child has been reported missing, any further information will be communicated to the police by telephoning 101 and quoting the incident number that the police would have provided following the initial report. Further information must be passed to the police as soon as possible, as officers will continue to search for the child until informed of their return.

Our school must inform the local authority of any pupil who fails to attend school regularly, or has been absent without school permission for a continuous period of 10 days or more. Please refer to our Absent/Missing/Child not collected policy and our Attendance policy.

#### Children who need a social worker

We understand that children who need a social worker due to safeguarding or welfare needs may be vulnerable to further harm and educational disadvantage and we are aware of our responsibilities to make decisions in the best interests of the child's safety, welfare and educational outcomes in such instances, in particular when responding to absences and when promoting welfare.

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

Both CCE and CSE 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.

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others. CSE is a form of abuse which can happen to boys and girls from any background or community. It may occur over time, or be a one off occurrence. In Essex, the definition of CSE from the DfE 2017 has been adopted:

*Child Sexual Exploitation is a form of child sexual abuse. It occurs when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.*

We recognise that a significant number of children who are victims go missing from home, care and education at some point. Our school is alert to the signs and indicators of a child becoming at risk of, or subject to, CSE or CCE and will take appropriate action to respond to any concerns. The Designated Safeguarding Lead is the named lead in school on these issues and will work with other agencies as appropriate.

We are aware of and vigilant with regard to additional specific safeguarding issues, such as:

- Child abduction and community safety incidents
- Children and the court system
- Children with family members in prison
- Modern slavery and the National Referral mechanism
- Homelessness

and would follow the guidance referred to in Annex B of Keeping Children Safe in Education.

### Risk in the community

We understand that safeguarding incidents and behaviours can be associated with factors outside a child's home or our school. All staff are aware of contextual safeguarding and we are therefore mindful wider environmental factors present in a child's life are a threat to their safety and/or welfare. To this end, we always consider relevant information when assessing any risk to a child and share it with other agencies where appropriate to support better understanding of a child and their family. This is to ensure our children and families receive the right help at the right time.

### Mental Health

Staff are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. We understand that, where children have suffered abuse or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. Where we have concerns this may impact on mental health, we will seek advice and work with other agencies as appropriate to support a child and ensure they receive the help they need.

We recognise that good mental health for all our pupils and staff is very important and we understand the part our school plays in this. Our school aims to develop the emotional wellbeing and resilience of all pupils and staff, as well as specific support for those with additional needs. We understand that there are risk factors which increase someone's vulnerability and protective factors that can promote or strengthen resilience. The more risk factors present in an individual's life, the more protective factors or support interventions are needed to counter-balance these to promote resilience and keep children safe. We have timetabled wellbeing sessions and use the Jigsaw PSHE scheme of work which includes focus on mental health and wellbeing.

It is vital that we work in partnership with parents to support the wellbeing of our pupils. Parents should share any concerns about the wellbeing of their child with school, so appropriate support and interventions can be identified and implemented.

If staff have a mental health concern about a child that is also a safeguarding concern, they should take immediate action and in accordance with this policy speak to the Designated Safeguarding Lead or deputy. The school has systems and processes in place to identify possible mental health problems and via the Designated Safeguarding Lead would escalate and refer as necessary.

### So-called 'Honour based Abuse'

So-called 'honour'-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. We understand that this form of abuse often involves a wider network of family or community pressure and can include multiple perpetrators.

Our staff understand how to report concerns when they suspect or know that this type of abuse has taken place. We are aware of the additional risk factors that may be present because of the possible wider network of family or community pressure and would liaise with other agencies as appropriate.

### Female Genital Mutilation (FGM)

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to female genital organs for non-medical reasons. It is illegal to practice FGM in the UK, or to take girls who are British nationals or permanent residents in the UK abroad for FGM, and is a form of child abuse which can have devastating physical and psychological consequences for girls and women.

Staff should be aware that girls at risk of FGM may not be aware of the practice or that it may be conducted on them, so the subject should be approached with sensitivity. Suspicions that a child is being prepared for FGM may include: the child talking about a special procedure or ceremony, preparations to take a holiday eg absence from school, vaccinations. Girls are at particular risk of FGM during the summer holidays.

As of October 2015, the Serious Crime Act 2015 (Home Office, 2015) introduced a duty on teachers (and other professionals) to notify the police of known cases of female genital mutilation where it appears to have been carried out on a girl under the age of 18. Our school operates in accordance with the statutory requirements relating to this issue, and in line with existing local safeguarding procedures: staff understand that they should still discuss such a case with the Designated Safeguarding Lead and involve children's social care as appropriate, unless there is good reason not to. A failure to report the discovery in the course of their work could result in a referral to their professional body.

### Forced marriage

A forced marriage is one entered into without the full consent of one or both parties. It is where violence, threats or other forms of coercion are used and is a crime. Our staff understand how to report concerns where this may be an issue.

### Domestic abuse

Domestic abuse can involve a wide range of behaviours and can include intimate partner violence, abuse by family members, teenage relationship abuse and child to parent abuse. We understand that anyone can be a victim of domestic abuse and that it can take place inside or outside of the home.

Domestic abuse may be a single incident or a pattern of incidents. Domestic abuse is not limited to physical acts of violence or threatening behaviour and can include psychological, physical, sexual, financial, controlling or coercive behaviour and emotional. Our school recognises that exposure to domestic abuse (either by seeing, hearing or experiencing its effects) can have a serious, long term emotional and psychological impact on children. We work with other key partners and receive/share relevant information where there are concerns that domestic abuse may be an issue for a child or family or be placing a child at risk of harm.

As part of our safeguarding arrangements and our work with safeguarding partners our school has signed up to Operation Encompass. This is a national initiative which aims to provide support to children who have experienced domestic abuse. It means the Police inform us if they have attended an incident of domestic abuse which involves a child on our roll, so that appropriate support can be put in place. Any information in relation to this will be held on the child's child protection file, as with any other safeguarding information.

### Prevention of radicalisation

As of July 2015, the Counter-Terrorism and Security Act (HMG, 2015) placed a duty on schools and other education providers. Under section 26 of the Act, schools are required, in the exercise of their functions, to have “due regard to the need to prevent people from being drawn into terrorism”. This duty is known as the Prevent duty. Our staff are aware of the risks to children from extremism, radicalisation and terrorism and are alert to changes in children’s behaviour and factors that may indicate concern. The Prevent Duty requires schools to:

- teach a broad and balanced curriculum which promotes spiritual, moral, cultural, mental and physical development of pupils and prepares them for the opportunities, responsibilities and experiences of life and must promote community cohesion
- be safe spaces in which children / young people can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, and learn how to challenge these ideas
- be mindful of their existing duties to forbid political indoctrination and secure a balanced presentation of political issues

CHANNEL is a national programme which focuses on providing support at an early stage to people identified as vulnerable to being drawn into terrorism. If a child on roll at our school is referred to the Channel Panel, a representative from the school may be asked to attend the Channel Panel to help with an assessment and support plan.

Our school works in accordance with local procedures for Prevent and with other agencies, sharing information and concerns as appropriate. Where we have concerns about extremism or radicalisation, we will seek advice from appropriate agencies and, if necessary, refer to the Police, Social Care and/or the Channel Panel. We understand that radicalisation is the process of a person legitimising support for, or use of, terrorist violence.

We have an internet filtering and monitoring system in place to safeguard children from potentially harmful and inappropriate material online, including terrorist and extremist material. Please refer to the 7e e-safety and IT security policy.

### Sexual Violence and Sexual Harassment

We are aware of the need to have a whole school approach to preventing child on child sexual violence and sexual harassment and staff are aware that these can occur between two children or a group of children. Staff are also clear that the definitions include online harassment and that the procedures to follow include incidents brought to their attention that take place away from school. If a report of sexual violence is received, the designated safeguarding lead (or a deputy) would make an immediate risk and needs assessment. If there has been a report of sexual harassment, the need for a risk assessment would be considered on a case-by-case basis. We will also consider intra-familial harms, and any necessary support for siblings following an incident.

Please refer to our separate policy Harmful Sexual Behaviour/Child on child Abuse for full details of our whole school approach.

### Serious Violence

All staff are aware of the risk factors and indicators that may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that a child has been approached by, or is involved with, individuals

associated with criminal networks or gangs. As with other safeguarding issues, we work with other relevant agencies to share information and address concerns, to help safeguard all children.

#### Children potentially at risk of greater harm, including children with special educational needs and disabilities

We recognise that some children may potentially be at risk of greater harm and require additional help and support. These may be children with a Child in Need or Child Protection Plan, those in care or previously in care or those requiring mental health support. We work with Social Care and other appropriate agencies to ensure there is a joined-up approach to planning for these children and that they receive the right help at the right time.

Our school understands that children with special educational needs (SEN) and/or disabilities can face additional safeguarding challenges. Barriers can exist when recognising abuse, neglect and exploitation in this group of children. This can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- that they may be more prone to peer group isolation than others;
- the potential to be disproportionately impacted by things like bullying- without outwardly showing any signs;
- communication difficulties in overcoming these barriers.

We consider extra pastoral support for these children and are aware of organisations such as SENDIASS, Mencap and NSPCC who offer information and support.

Children who are lesbian, gay, bisexual or gender questioning - The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT. We will take a cautious approach when supporting a gender questioning child and will consider the broad range of their individual needs in partnership with the child's parents, clinical advice and wider vulnerabilities such as the risk of bullying, following the DfE's guidance on Gender Questioning Children when deciding how to proceed. Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. Our staff endeavour to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of staff. LGBT inclusion forms part of our Relationships and Sex Education and Health Education curriculum.

Please see our separate policy Relationships and Sex Education (RSE) and Health Education Policy for further details of the curriculum.

## 6. Teaching children how to keep safe including online safety

We recognise that children are growing up in an increasingly complex world, living their lives on and offline. This presents many positive and exciting opportunities, but we recognise it also presents challenges and risks. All staff are aware of the risks to children online. We understand any pupil can be vulnerable online and their vulnerability can fluctuate depending on their age, developmental stage and personal circumstances. We aim to equip our pupils with the knowledge they need to use the internet and technology safely and we want to work with parents to support them to keep their children safe online.

The range of online risks could be categorised as:

**content** – being exposed to illegal, inappropriate or harmful material, for example pornography, fake news, suicide, racist or radical and extremist views;

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

**conduct** – personal online behaviour that increases the likelihood of, or causes, harm, for example making, sending and receiving explicit images, or online bullying;

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

Our school seeks to help children keep themselves safe online in a range of ways, using appropriate resources and also provides information to parents including Thinkuknow and the UK Safer Internet Centre. The school has a whole school approach to online safety to ensure that children are educated in their use of technology and are provided with a safe environment in which to learn. Children are taught about safeguarding, including online safety, through the PHSEE and Computing curricula, as well as via assemblies. This may include covering relevant issues through Relationships Education. In particular, they are taught how to reduce risks and build resilience, with specific reference to using electronic equipment and the internet. Pupils are not allowed to bring phones or devices into school.

The monitoring and filtering system, Securly, incorporates all use of the school wifi, thereby encompassing staff, pupils and visitors who use it. Categories that are blocked for all users include: pornography, drugs, gambling, other adult content, network misuse, hate, search engines without safe search functions. Pupils are also blocked from streaming, social media/networking, chat/messaging and most games. Daily exception reports from the filtering system are received and reviewed by the Headteacher and staff are aware of the requirement for them to report immediately to the Headteacher or Designated Safeguarding Lead any inappropriate content that does bypass the filter. Staff are trained in online safety and how to report concerns. Information sent out in our newsletter is used to reinforce the importance of children being safe online to parents and carers. We also provide information in our curriculum booklets and in the school planners of websites that the children are being asked to visit. Further details are included in our e-safety policy, available on our school website.

## 7. Procedures

Our school works with key local partners to promote the welfare of children and protect them from harm. This includes providing a co-ordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans which provide additional support (through a Child in Need or a Child Protection plan). All staff members have a duty to identify and respond to suspected/actual abuse or disclosures of abuse. Any member of staff, volunteer or visitor to the school who receives a disclosure of allegation of abuse, or suspects that abuse may have occurred **must** report it immediately to the Designated Safeguarding Lead (or in their absence the deputy Designated Safeguarding Lead). All action is taken in accordance with the following guidance;

- Essex Safeguarding Children Board guidelines - the SET (Southend, Essex and Thurrock) Child Protection Procedures (ESCB, 2022)
- Keeping Children Safe in Education (DfE, 2024)
- Working Together to Safeguard Children (DfE, 2023)
- PREVENT Duty - Counter-Terrorism and Security Act (HMG, 2015)
- Prevent duty guidance: for England and Wales (Home Office, 2023)



- Safeguarding and radicalisation (DfE, 2017)
- Channel and Prevent Multi-Agency Panel (PMAP) guidance (Home Office 2021)
- Counter Extremism Strategy (Home Office, 2015)
- Sexual Violence and Sexual Harassment Between Children in Schools and Colleges (DfE, 2021)
- Effective Support for Children and Families in Essex (ESCB)
- Essex Effective Support

When new staff, volunteers or regular visitors join our school they are informed of the safeguarding arrangements in place and the name of the Designated Safeguarding Lead (and deputy) and how to share concerns with them. We also provide information on safeguarding to any visitor to our school, so they understand how to report a concern if they have one.

Any member of staff, volunteer or visitor to the school must refer any concerns to the Designated Safeguarding Lead (or, in their absence, the deputy Designated Safeguarding Lead). Staff are also aware of their role in the local early help process. Where there is risk of immediate harm, concerns will be referred immediately by telephone to the Children and Families Hub and the Police if a crime has been committed. Less urgent concerns or requests for support will be sent to the Children and Families Hub via Essex Effective Support. The school may also seek advice from Social Care or another appropriate agency about a concern, if we are unsure how to respond to it.

Wherever possible, the school will always undertake to share any safeguarding concerns or an intention to refer a child to another agency with the parents or carers, unless to do so could place the child at greater risk of harm or impede a criminal investigation. In an emergency it may not be possible to gain parental consent. If it is necessary for another agency to meet with a child in school, we will always seek to inform parents or carers, unless we are advised not to by that agency. It may be necessary to seek advice from the Children and Families Hub and / or Essex Police in making decisions about when it is appropriate to share information with parents / carers.

If a member of staff continues to have concerns about a child and feels the situation is not being addressed or does not appear to be improving, all staff understand they should raise this with the Designated Safeguarding Lead. All staff are also made aware that they can make a referral directly.

Where an immediate response is required and if for any reason the Designated Safeguarding Lead or deputy is not immediately available, this will not delay any appropriate action being taken. Safeguarding contact details are displayed in the school to ensure that all staff members have access to urgent safeguarding support should it be required. Any individual may refer to Social Care where there is suspected or actual risk of harm to a child.

School employees have access to an electronic reporting system to log concerns. Club leaders, relief teachers and other non-school employees use paper forms which are colour coded depending on the level of severity, and staff are aware of the action to take and the timescales for passing forms to the Designated Safeguarding Lead.

## 8. Training

In line with statutory requirements, the Designated Safeguarding Lead and deputy undertake Level 3 child protection training at least every two years, as well as other informal and formal updates in between. The Headteacher, all staff members including volunteers and the Proprietor receive appropriate child protection

training which is regularly updated and in line with advice from the Essex Safeguarding Children Board (ESCB). In addition, all staff members receive safeguarding and child protection updates as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. Records of any safeguarding/child protection training undertaken are kept for all staff and the Proprietor.

The school ensures that the Designated Safeguarding Lead and deputy also undertake training in inter-agency working and other matters as appropriate.

All new staff, including temporary staff and volunteers, are provided with induction training which includes: provision of this policy and the Staff Code of Conduct including the whistleblowing procedures; provision and signature of the Acceptable Use of Technology agreement including communication with pupils and the use of social media; signature of a declaration regarding disqualification; provision of the policy for absent or missing children; notification that the Designated Safeguarding Lead is Samantha Pawsey and the Deputy is Michelle Cole; provision and discussion of Part 1 of Keeping Children Safe in Education; and a discussion about school specific procedures, including those relating to online filtering and monitoring.

All staff are reminded at least annually of the importance of recognising and acting upon reports of child on child sexual violence and sexual harassment.

## 9. Records, information sharing and confidentiality

Confidentiality is an issue which needs to be fully understood by all those working with children, particularly in the context of child protection. A member of staff must never guarantee confidentiality to anyone about a safeguarding concern (including parents/carers or pupils) or promise to keep a secret. In accordance with statutory requirements, where there is a child protection concern, this must be reported to the Designated Safeguarding Lead and may require further referral to and subsequent investigation by appropriate authorities.

Information on individual child protection cases may be shared by the Designated Safeguarding Lead or deputy with other relevant staff members. This will be on a need to know basis only and where it is in the child's best interests to do so.

Accurate records are essential to good child protection practice. Our school is clear about the need to record any concern held about a child or children within our school and when these records should be shared with other agencies. Information sharing can help to ensure that a child receives the right help at the right time and can prevent a concern from becoming more serious and difficult to address.

Where there are concerns about the safety of a child, the sharing of information in a timely and effective manner between organisations can reduce the risk of harm. Sharing information is a key part of safeguarding work and decisions about how much information to share, with whom and when, can have a profound impact on a child's life. Whilst the Data Protection Act 2018 places duties on organisations and individuals to process personal information fairly and lawfully, it is not a barrier to sharing information where the failure to do so would result in a child or vulnerable adult being placed at risk of harm. Similarly, human rights concerns, such as respecting the right to a private and family life would not prevent sharing where there are real safeguarding concerns. Fears about sharing information cannot (and will not) be allowed to stand in the way of the need to safeguard and promote the welfare of children at risk of abuse or neglect. Generic data flows relating to child protection are recorded in our records of processing activity and regularly reviewed; and our online school privacy notices accurately reflect our use of data for child protection purposes. Relevant staff are aware of the processing conditions which allow information to be stored and shared for safeguarding purposes, including information which is sensitive and personal. These allow practitioners to share information without consent where there is good reason to do so and to withhold data where the

serious harm test under the legislation is met. The DfE Data Protection guidance for schools outlines how staff should complete with data protection law, develop processes and follow good practices for preventing personal data breaches. Where in doubt, the school would seek independent legal advice.

Staff receiving a disclosure of abuse or noticing signs or indicators of abuse, will make an accurate record as soon as possible noting what was said or seen (if appropriate, using a body map to record), giving the date, time and location. The Designated Safeguarding Lead or deputy will decide on appropriate action and will record this accordingly, dated and signed.

Any records related to child protection are kept in an individual child protection file for that child (which is separate to the pupil file). All child protection records are stored securely and confidentially and will be retained for 25 years after the pupil's date of birth, or until they transfer to another school/educational setting. We use the secure CPOMS system to record all concerns, incidents and safeguarding issues.

In line with statutory guidance, where a pupil transfers from our school to another school, their child protection records will be forwarded to the new educational setting. These will be marked 'Confidential' and for the attention of the receiving school's Designated Safeguarding Lead, with a return address on the envelope so it can be returned to us if it goes astray. We will obtain evidence that the paperwork has been received by the new school and then destroy any copies held in our school. Where appropriate, the Designated Safeguarding Lead may also make contact with the new setting in advance of the child's move there, to enable planning so appropriate support is in place when the child arrives.

Where a pupil joins our school, we will request child protection records from the previous educational establishment (if none are received).

## 10. Interagency Working

It is important that agencies work together to keep children safe, and there is a legal requirement to do so. We work with other relevant agencies, including where a child on roll (or previously known to us) has a Child in Need, Child Protection or Care Plan. Where this is the case, it is the responsibility of the Designated Safeguarding Lead to ensure that the school is represented at, and that a report is submitted to, any statutory meeting called. Where possible and appropriate, any report will be shared in advance with the parent(s) / carer(s). The member of staff attending the meeting will be fully briefed on any issues or concerns the school has and be prepared to contribute to the discussions.

If a child is subject to a Care, Child Protection or a Child in Need plan, the Designated Safeguarding Lead will have oversight of their school attendance, emotional well-being, academic progress, welfare and presentation. Where the school is part of the core group, the Designated Safeguarding Lead will ensure the school is represented, provides appropriate information and contributes to the plan at these meetings. We will report on the child's progress in school and any concerns about them will be shared at the meeting, unless to do so would place them at risk of harm. In this case the Designated Safeguarding Lead would speak to the child's key worker outside of the meeting and as soon as there is a concern.

The Designated Safeguarding Lead and Deputy will follow NSPCC – When to call the police to help them understand when to consider calling the police and what to expect when they do.

## 11. Allegations about members of staff

All staff members are made aware of the boundaries of appropriate behaviour and conduct and are regularly reminded of this. These matters form part of staff induction and are outlined in the Staff Code of Conduct, which includes clear procedures and arrangements for situations where children are engaged in close one

to one teaching, for example in peripatetic lessons as well as our whistleblowing policy. Appendix 6 of this policy also provides guidelines for professional distance. KCSIE and the SET procedures (ESCB, 2022) <https://www.escb.co.uk/media/2739/set-procedures-may2022.pdf>

Outline the procedures to be followed with regard to allegations against an adult working with children (in a paid or voluntary capacity). These procedures should be followed where an adult has:

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

The school has processes in place for reporting any concerns about a member of staff (including, inter-alia, supply staff, volunteers or any adult working with children). Any concerns about the conduct of a member of staff will be referred to the Headteacher (or the Designated Safeguarding Lead in their absence), as they have responsibility for managing employment issues, who will then decide how to take this forward. In some cases, it might not be clear whether an incident constitutes an allegation. If this is the case, it will be necessary for us to explore the concerns to establish some facts – this initial fact finding is not an investigation, it is to clarify information and to direct our response to the concern raised.

Where an allegation against a member of staff is received, and it is felt that any of the above criteria apply, the SET procedures (ESCB, 2022) require this to be reported to the Essex Workforce Allegations Team at [LADO@essex.gov.uk](mailto:LADO@essex.gov.uk) This should be done by the Headteacher, Designated Safeguarding Lead or Proprietor within one working day (or sooner via 03330 139797 if immediate safeguarding is required. We will not carry out any investigation before a Workforce Allegations Team referral has been made. In the event of an allegation relating to the conduct and behaviour of a club leader or cleaner or other contractor, the Headteacher will liaise with the contractor, while following due process, to facilitate a joint investigation or enable the agency to move this forward.

Any concern relating to the Headteacher should be reported to the Proprietor, who will refer the matter to the Workforce Allegations Team.

Staffing matters are confidential and the school must operate within statutory guidance around Data Protection. The school will make every effort to maintain confidentiality, not sharing information with anyone other than an appropriate statutory agency and guard against unwanted publicity until the accused person is charged with an offence or the DfE/Teaching Regulation Agency publish information.

All discussions with the LADO and all records about substantiated allegations will be recorded in writing and communication with the individual and parents carried out in accordance with Keeping Children Safe in Education. Any deficiencies or weaknesses identified in school procedures will be remedied without delay. The school will give due weight to the views of the LADO and Keeping Children Safe in Education when making a decision about suspension.

Where a teacher is dismissed for misconduct or would have been had they not resigned, or where the school ceases to use the services of any person because that person was considered unsuitable to work with children, the school will make a prompt and detailed report to the DBS. The school will also refer any cases of professional misconduct by teachers to the Teaching Regulation Agency in accordance with their criteria.

In borderline cases, the school may discuss the situation informally with the LADO without naming the school or individual.

Keeping Children Safe in Education 2022 introduced two levels of allegation/concern: those that may meet the harms threshold and those that do not (low level concerns). We would follow the provisions in Keeping Children Safe in Education (2024), summarised as follows:

Allegations that may meet the harms threshold- where it is alleged that anyone working at the school has behaved in a way that has or may have harmed a child; and/or possibly committed a criminal offence against or related to a child; and/or behaved in a way that indicates they may pose a risk of harm to children; and/or behaved or may have behaved in a way that indicates they may not be suitable to work with children, including because of transferable risk. In such a case, the procedures outlined above regarding reporting allegations without delay would be followed. If the school identifies that a child has been harmed, that there may be an immediate risk of harm to a child or the situation is an emergency, we would contact children's social care and as appropriate the police immediately.

We will consider looking after the welfare of the child and investigating and supporting the person subject to the allegation, as well as the parents of any child involved. Prior to contacting the LADO, we will conduct basic enquiries to establish facts that will help us determine whether there is any foundation to the allegation, without jeopardising any future police investigation. We will agree with the LADO the course of action. All discussions will be recorded in writing and communication with children and parents agreed. We will follow the detailed guidance in Keeping Children Safe in Education including when to inform the individual, where the initial discussion leads to no further action, suspension, confidentiality and information sharing, allegation outcomes, unsubstantiated, unfounded, false or malicious accusations, returning to work, resignations and settlement agreements, record keeping, references, learning lessons and non-recent allegations.

For all allegations other than those found to have been malicious or false, we will keep the information required on the file of the person accused, including a clear and comprehensive summary of the allegation, how it was followed up and resolved, a note of action taken, decisions reached and whether the outcome was substantiated, unsubstantiated or unfounded, a copy to the person concerned where agreed by children's social care or the police and a declaration on whether the information will be included in any future reference, noting that substantiated allegations should be included in references, provided the information is factual.

Concerns that do not meet the harm threshold (low level concerns) – we understand that it is critical to have a culture where all concerns about adults are shared responsibly and with the right person, recorded and dealt with appropriately. This will create and embed a culture of openness, trust and transparency in which the school's values and expected behaviour are constantly lived, monitored and reinforced by all staff.

All staff are aware that they should report any concern that an adult may have acted in a way that is inconsistent with the staff code of conduct, including inappropriate contact outside of work and does not meet the allegations or reporting to the LADO threshold. This could include being over friendly with children, having favourites, taking photographs of children on their mobile phone, engaging with children on a one to one basis in a secluded area or behind a closed door or using inappropriate sexualised, intimidating or offensive language. Low level concerns should be reported to the Headteacher and staff should feel confident to self-refer.

The Headteacher will then collect as much evidence as possible by speaking directly to the person who raised the concern, to the individual involved and any witnesses and will record all low level concerns in writing including all the information detailed in Keeping Children Safe in Education (including details, context, evidence collected, decision categorising the type of behaviour, action taken, rationale for decisions and action, name of individual sharing the concerns but respecting any wish to remain anonymous as far as possible). These records will be kept confidential and will be reviewed to identify potential patterns of concerning, problematic or inappropriate behaviour; if such patterns are identified, we will take action through disciplinary procedures (7b Staff Disciplinary, Grievance & Whistleblowing procedures) or via the LADO if necessary. We will also consider whether any training is needed. We will follow the guidance in Keeping Children Safe in Education as to when to refer to a low-level concern in a reference.

Further details of our low level concerns policy are outlined in Appendix 10 and in our Staff Code of Conduct.

## 12. Behaviour, use of physical intervention and reasonable force

Our behaviour policy sets out our approach to behaviour for all children. We recognise that there are some children who have needs that require additional support and a more personalised approach and we always consider all behaviour and our response to it in the context of safeguarding. There are occasions when staff will have cause to have physical contact with children and young people for a variety of reasons, this may include:

- to comfort a child or young person in distress (*appropriate to their age and individual specific needs identified through a risk assessment*);
- to direct a child or young person;
- for curricular reasons (*for example in PE, Music, Drama etc*);
- in an emergency, to avert danger to the child or young person or others;

The guidance produced by the Department for Education Use of Reasonable Force (DfE, 2013) states that:

*“Schools **should not** have a ‘no contact’ policy. There is a real risk that such a policy might place a member of staff in breach of their duty of care towards a child or young person or prevent them taking action needed to prevent a child or young person causing harm.”*

The term reasonable force covers a broad range of actions used by staff that involve a degree of physical contact to control or restrain children. There are circumstances when it is appropriate for staff to use reasonable force to safeguard children, such as guiding a child to safety or breaking up a fight. Reasonable means using no more force than is needed. Our school works in accordance with statutory and local guidance on the use of reasonable force and recognises that where intervention is required, it should always be considered in a safeguarding context. Any use of reasonable force or physical intervention by staff is recorded.

## 13. Whistleblowing

Whistleblowing is ‘making a disclosure in the public interest’ and occurs when a worker (or member of the wider school community) raises a concern about danger or illegality that affects others, for example pupils in the school or members of the public. Staff are reminded of the whistleblowing procedures at least annually at the safeguarding training each September.

All staff and the wider school community should be able to raise concerns about poor or unsafe practice and feel confident any concern will be taken seriously by the school leadership team. Staff are made aware of the duty to raise concerns about the attitude or actions of staff in line with the school’s Code of Conduct. We have a culture of safety and of raising concerns; our staff are valued and reflective. Any concerns about safeguarding practices are reported and followed up, but staff are aware of their obligation to challenge inaction. All staff are aware that they can make a referral themselves and do not have to report via the Designated Safeguarding Lead and also of their obligation to report immediate risks of harm or neglect to the Police. This includes concerns about poor or unsafe practice and potential failings in the school’s safeguarding regime.

We want everyone to feel able to report any child protection / safeguarding concerns. However, for members of staff who feel unable to raise these concerns internally or where they feel their concerns have not been addressed, they can call the NSPCC Whistleblowing helpline on: 0800 028 0285 (line is available from 8:00 AM to 8:00 PM, Monday to Friday) or email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

Parents or others in the wider school community with concerns can contact the NSPCC general helpline on: 0808 800 5000 (24 hour helpline) or email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

## 14. Specific EYFS Requirements

Staff mobile phones or smart watches are not used in rooms where children are present. All photographs taken of EYFS children are taken on school ipads or cameras and stored on the school data files, shared with parents via the Evidence Me software or deleted. Permission to take photographs of children is obtained from parents upon joining the Pre School or Reception.

Debbie Poston will take the lead responsibility for safeguarding children within the EYFS setting and liaising with local statutory agencies as appropriate.

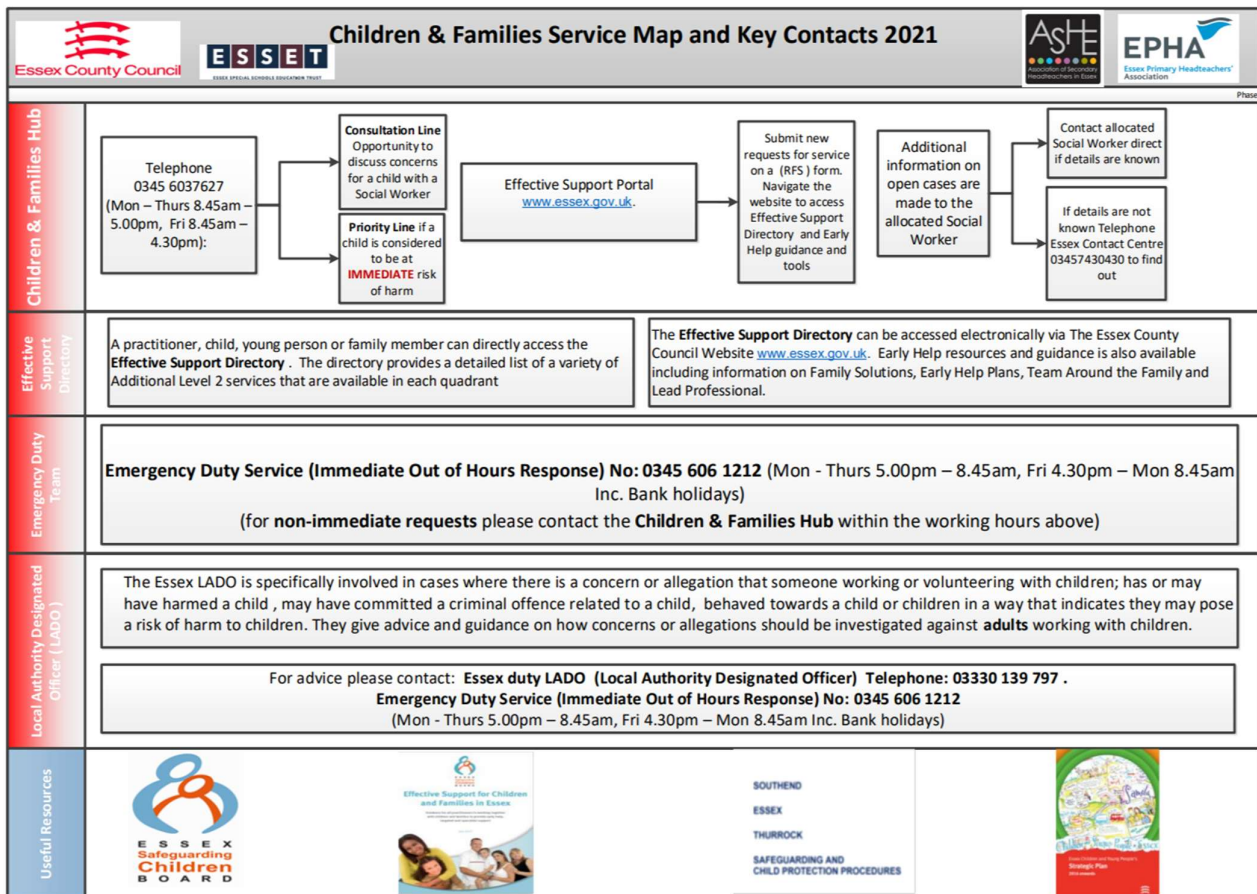
EYFS staff must respond in a timely and appropriate way to inappropriate behaviour displayed by other members of staff or any other people working with children in the EYFS setting.

Staff must seek medical advice if they are taking any medication which may affect their ability to care for children and any staff medication must be stored securely at all times.

All staff, not just those directly involved in the EYFS, are required to complete a declaration of Disqualification upon employment and annually thereafter, in accordance with the Disqualification Under the Childcare Act 2006. Annual safeguarding training includes reminders of their obligation to disclose any relevant information.



# Appendix 1A: Children and Families Hub flow chart

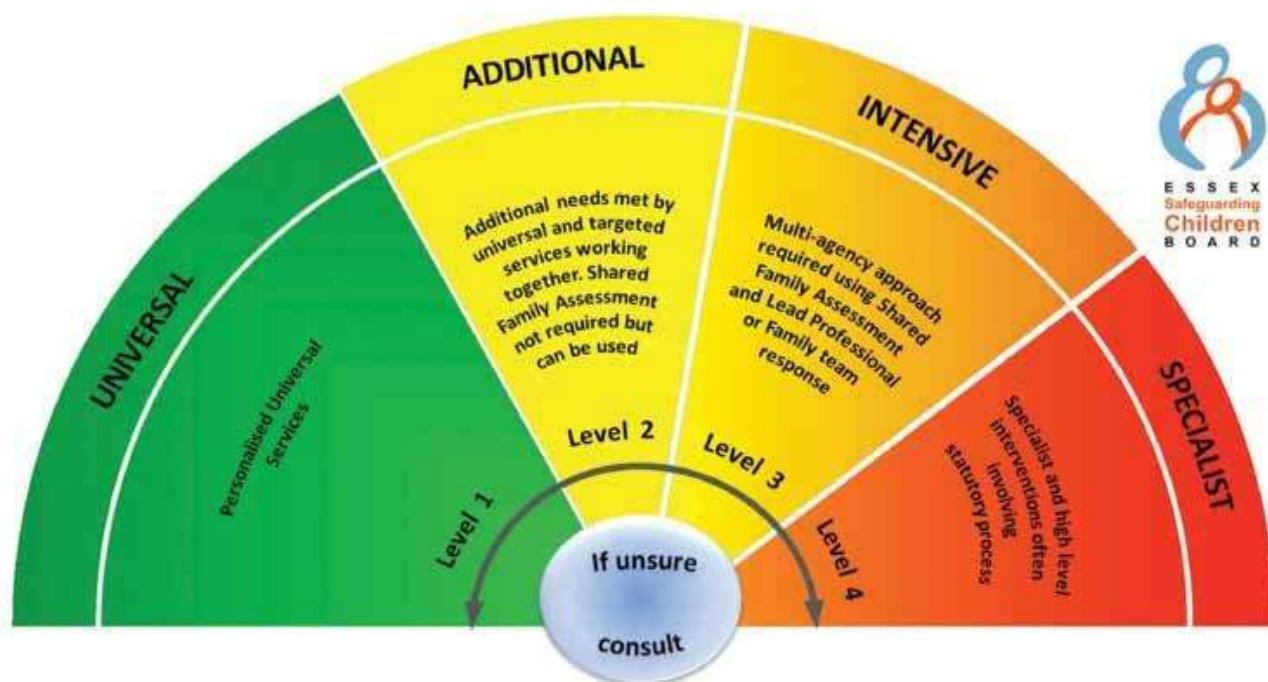


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## Essex Windscreen of Need and levels of intervention



All partners working with children, young people and their families will offer support as soon as we are aware of any additional needs. We will always seek to work together to provide support to children, young people and their families at the lowest level possible in accordance with their needs.

Children with **Additional** needs are best supported by those who already work with them, such as Family Hubs or schools, organising additional support with local partners as needed. When an agency is supporting these children, an Early Help Plan and a Lead Professional are helpful to share information and co-ordinate work alongside the child and family.

For children whose needs are **Intensive**, a coordinated multi-disciplinary approach is usually best, involving either an Early Help Plan or a Shared Family Assessment (SFA), with a Lead Professional to work closely with the child and family to ensure they receive all the support they require. Examples of intensive services are children’s mental health services and Family Solutions.

**Specialist** services are where the needs of the child are so great that statutory and/or specialist intervention is required to keep them safe or to ensure their continued development. Examples of specialist services are Children’s Social Care or Youth Offending Service. By working together effectively with children that have additional needs and by providing coordinated multi-disciplinary/agency support and services for those with intensive needs, we seek to prevent more children and young people requiring statutory interventions and reactive specialist services.

## Appendix 1b – What to do if a child discloses abuse (adapted from advice from NSPCC)

It can be very hard for children and young people to reveal abuse. Often they fear there may be consequences. Some delay telling someone about abuse for a long time, while others never tell anyone, even if they want to.

Children value being believed and, as the adult they have chosen to tell, it's vital that you act on what you've been told.

Below you can find advice on what steps to take if a child tells you they've been abused and how you can help keep them safe.

### If a child discloses abuse

If you're in a situation where a child discloses abuse to you, there are a number of steps you can take.

- **Stay calm and in control of your emotions. Listen carefully to the child.** Avoid expressing your own views on the matter. A reaction of shock or disbelief could cause the child to 'shut down', retract or stop talking
- **Let them know they've done the right thing.** Reassurance can make a big impact to the child who may have been keeping the abuse secret
- **Tell them it's not their fault.** Abuse is never the child's fault and they need to know this
- **Say you believe them.** A child could keep abuse secret in fear they won't be believed. They've told you because they want help and trust you'll be the person to believe them and help them
- **Don't investigate or talk to the alleged abuser.** Avoid asking leading questions as this could be harmful to the investigation. Confronting the alleged abuser about what the child's told you could make the situation a lot worse for the child
- **Explain what you'll do next.** If age appropriate, explain to the child you'll need to report the abuse to someone who will be able to help. **Do not promise confidentiality**
- **Don't delay reporting the abuse.** The sooner the abuse is reported after the child discloses the better. Report as soon as possible so details are fresh in your mind and action can be taken quickly.

## Appendix 2 - Types of Abuse, Neglect and Exploitation

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. They may be abused by an adult or adults or another child or children.

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

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

Harm can include the impact of witnessing ill treatment of others, for example in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

## **Appendix 3 – Recognising and responding to Abuse/Neglect/Exploitation**

The following signs may or may not be indicators that abuse has taken place, but the possibility should be considered.

### **PHYSICAL SIGNS OF ABUSE**

1. Any injuries not consistent with the explanation given for them
2. Injuries which occur to the body in places which are not normally exposed to falls, rough games, etc.
3. Injuries which have not received medical attention
4. Neglect - under nourishment, failure to grow, constant hunger, stealing or gorging food, untreated illnesses, inadequate care, etc.
5. Reluctance to change for, or participate in, games or swimming
6. Repeated urinary infections or unexplained tummy pains
7. Bruises, bites, burns, fractures etc. which do not have an accidental explanation
8. Cuts/scratches/substance abuse
9. Frequent “accidents”
10. Frequent/repeated accidents
11. Parents not leaving the side of an injured child
12. Aggressive play/conduct problems
13. Preoccupation with own body and health
14. Unusual degree of parental hostility
15. Unusual lack of parental concern
16. Different accounts of events

### **NEGLECT**

1. Developmental delay
2. Excessive hunger
3. Inadequate clothing
4. Very poor condition – skin, hair, nails and general physical appearance
5. Poor hygiene
6. Marked drop in weight/height centiles without organic reason
7. Tired and apathetic presentation
8. Poor school attendance
9. Inability to play – due to lack of stimulation
10. Parents with mental health/drug/alcohol problems
11. Untreated illness or injury
12. Evidence of failure to protect a child from exposure to any kind of danger
13. Other physical conditions resulting from inadequate care
14. Withdrawn
15. Food scavenging
16. Poor school achievement

## **INDICATORS OF POSSIBLE SEXUAL ABUSE**

1. Any allegation made by a child concerning sexual abuse
2. Child with excessive preoccupation with sexual matters and detailed knowledge of sexual behaviour, or who regularly engages in age-inappropriate sexual play
3. Sexual activity through words, play or drawing
4. Child who is sexually provocative or seductive with adults
5. Inappropriate bed-sharing arrangements at home
6. Severe sleep disturbances with fears, phobias, vivid dreams or nightmares, sometimes with overt or veiled sexual connotations
7. Eating disorders - anorexia, bulimia

## **EMOTIONAL SIGNS OF ABUSE**

1. Changes or regression in mood or behaviour, particularly where a child withdraws or becomes clinging. Also depression/aggression, extreme anxiety
2. Nervousness, frozen watchfulness
3. Obsessions or phobias
4. Sudden under-achievement or lack of concentration
5. Inappropriate relationships with peers and/or adults
6. Attention-seeking behaviour
7. Persistent tiredness
8. Running away/stealing/lying

## Appendix 4a - Concern about a Child

<b>Name and Form:</b>
<b>Date:</b>
<b>Concern raised by:</b>
<b>Reason for concern:</b>
<b>Immediate action to be taken:</b>
<b>Detail of follow-up with dates:</b>

## Appendix 4b

### CHILD PROTECTION RECORD – Report of a Concern

<b>Date of record:</b>	
<b>Date of incident:</b>	

<b>Name of referrer:</b>		<b>Role of referrer:</b>	
<b>Child name:</b>		<b>Year Group / class:</b>	

<b>Details of concern:</b>	<ul style="list-style-type: none"> <li>• <i>use body map if appropriate (with advice of Designated Lead)</i></li> <li>• <i>use initials for other children / young people involved, unless there is a specific need to name them in full</i></li> <li>• <i>contemporaneous notes, if taken, may be attached to this form</i></li> </ul>		
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<b>Reported to:</b>		<b>Role of person reported to:</b>	
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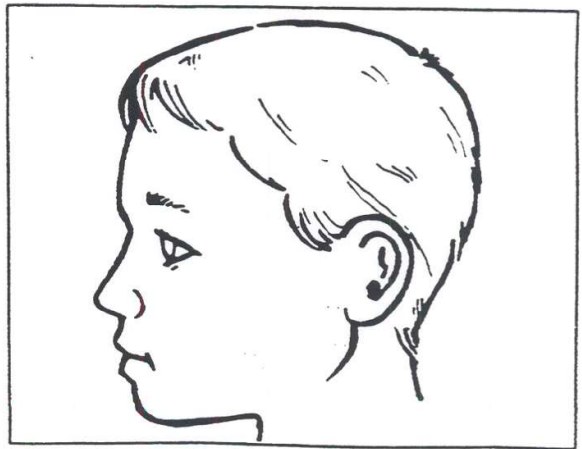
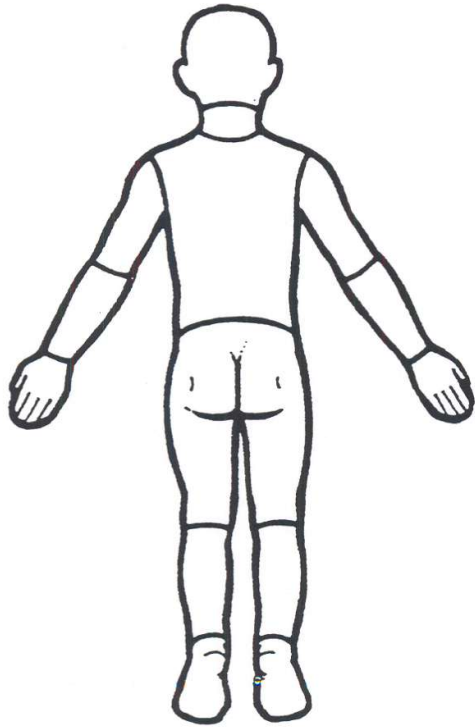
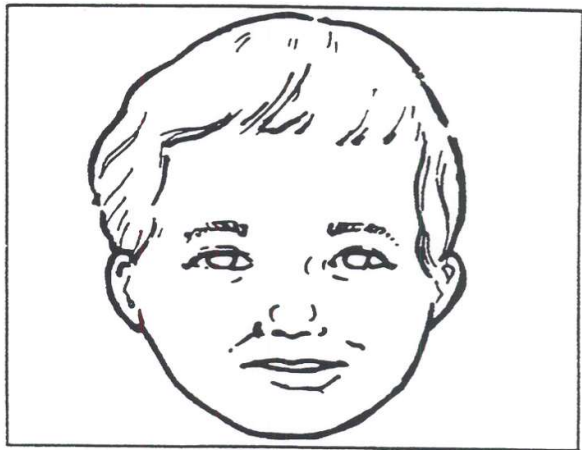
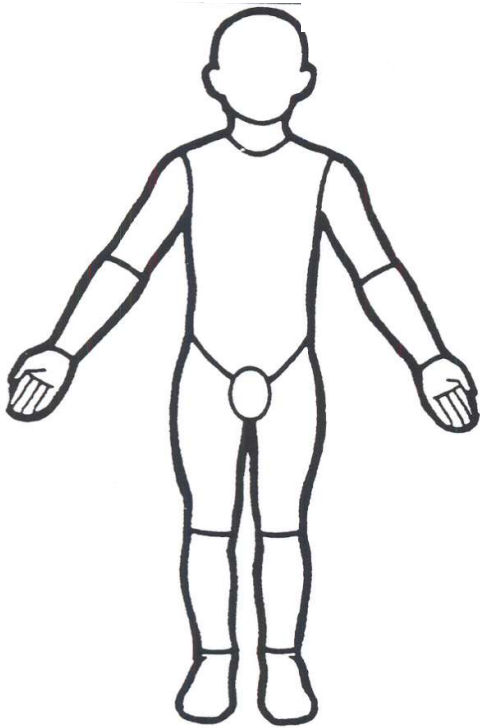
<b>Signed:</b>	
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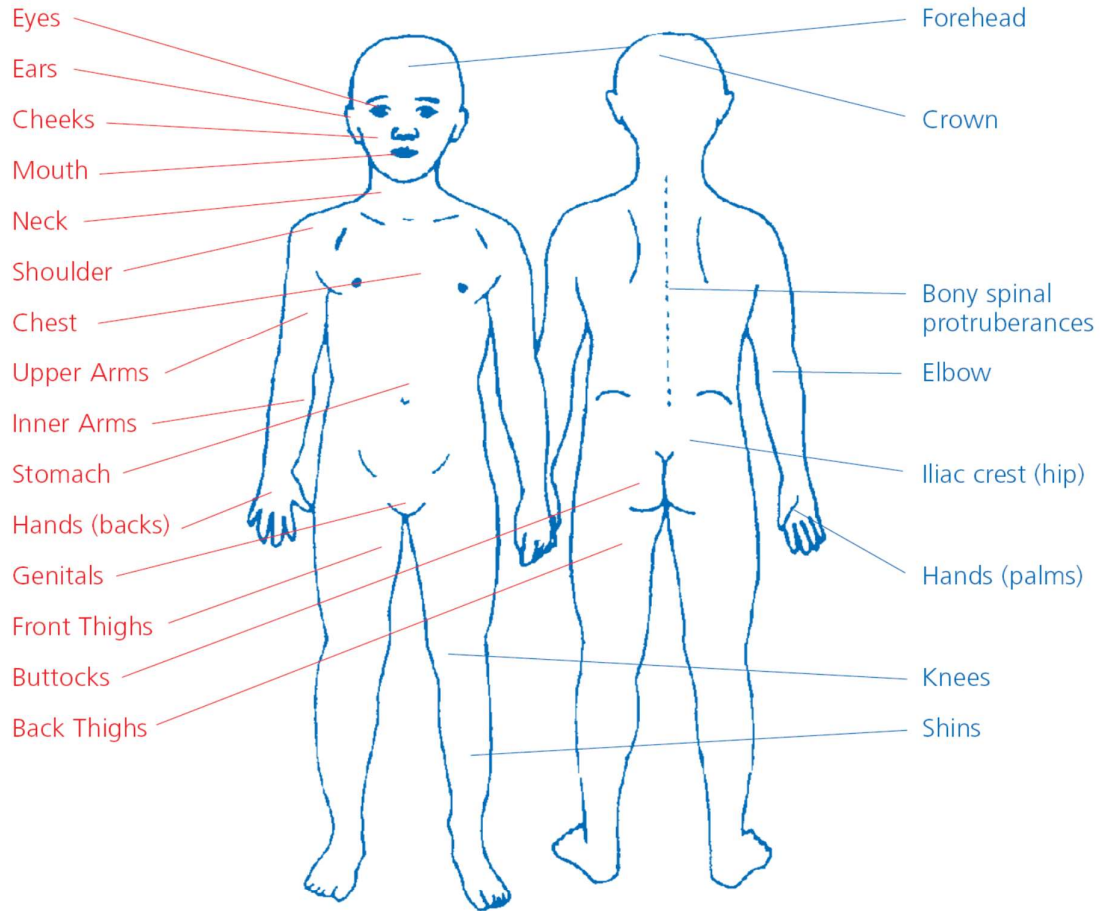
# Appendix 5 – Body Maps

## Body Map



**COMMON SITES FOR  
NON-ACCIDENTAL INJURY**

**COMMON SITES FOR  
ACCIDENTAL INJURY**



## Appendix 6 - Guidelines for staff regarding professional distance

We wish to ensure that staff's behaviour and actions do not place pupils or the member of staff at risk of harm or of allegations of harm to a pupil.

### Professional Distance:

- Staff should rarely need to touch pupils. In all circumstances staff should maintain a safe and appropriate distance. If any form of manual/physical touching is required, it should be provided openly. Staff need to ensure that their behaviour and physical contact with pupils do not inadvertently lay them open to allegations of abuse. Where circumstances mean that they are alone with a child, for example in an individual music lesson or sports coaching lesson, it is good practice to ensure that others are within earshot. Where possible, a gap or barrier should be maintained between teacher and child at all times: examples of good practice include keeping a door open, having a window in the door, asking the child before initiating physical contact eg before demonstrating the use of a technique or instrument.
- In sporting situations manual/physical touching should be according to guidelines provided by the appropriate National Governing Body.
- Staff should be wary of inappropriate electronic communication with pupils and should avoid social interaction on social networking sites.
- If staff think it is necessary to restrain a child from doing something they should try non-physical approaches – e.g. by talking to them, asking them not to move if they are injured or by standing in the way. If staff have to use physical restraint, it should be the minimum necessary for their safety. If they are in imminent danger, it might be necessary to hold them by their clothing. Whatever the circumstances, physical restraint must be reasonable. Any physical intervention should be reported to the Headteacher and recorded on the Physical Intervention log.
- Where possible staff should avoid being alone with a pupil. Where this is impracticable (e.g. a timetabled individual lesson) staff should be sensible (e.g. keep an open door or be in a room which has a window in the door). There might be rare occasions when students visit the homes of members of staff (e.g. those staff who have children at the school). It is common sense that these visits occur with parental permission and that staff should be mindful of the potential difficulties of such situations.
- In the rare situations where a pupil is to be driven in a car by a member of staff, the parents' approval will always be required in advance (unless there is an emergency) and there will always be either more than one pupil in the car with the member of staff or two members of staff with one pupil. Any home visits by staff will be agreed in advance with the parent and the parent must be present at all times.

# Appendix 7 – Policy statement

For display in School Office

WIDFORD LODGE PREPARATORY SCHOOL  
CHILD PROTECTION POLICY STATEMENT

This Child Protection Policy was authorised by Mrs Louise Gear on:

.....

We are committed to supporting our parents and families.

As employees of Widford Lodge Preparatory School we are committed to the nurturing, protection and safeguarding of all, especially the young and vulnerable.

We recognise that child protection is everybody's responsibility.

We are committed to following the agreed procedures and following statutory and specialist guidelines.

We review the full policy, and its implementation annually.

If you have any concerns for a child or in relation to any child protection matter then speak to one of the following who have been approved as Designated Safeguarding Leads for this school.

Samantha Pawsey, Michelle Cole or Debbie Poston

A copy of the full policy can be seen in the School Office and on the School Website.

Signed:.....

.....

Date: .....

## Appendix 8 – The role of the Designated Safeguarding Lead and Deputies

### Referrals

- Refer promptly all cases of suspected abuse, neglect and exploitation to the local authority children's Social Care team and support staff making the referrals
- Refer cases to the Channel programme where there is a radicalisation concern as required and support staff making the referrals
- Refer cases where a person is dismissed or left due to risk/harm to a child to the DBS as required
- Refer cases where a crime may have been committed to the Police as required

### Work with others

- Liaise with the Headteacher and Proprietor to inform them of issues, especially ongoing enquiries and police investigations, including being aware of the requirement for children to have an Appropriate Adult
- As required, liaise with the case manager and designated officer at the local authority for child protection concerns
- Liaise with staff on matters of safety, safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies and act as a source of support, advice and expertise for staff, including considering how safeguarding, welfare and educational outcomes are linked
- Act as a point of contact with safeguarding partners
- Liaise with mental health support teams as appropriate
- Promote supportive engagement with parents/carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances

### Knowledge, skills and training

- Receive appropriate training every year as well as refresher courses or updates of their knowledge and skills at least annually; also undertake Prevent awareness training
- Understand the assessment process for providing early help and intervention including local criteria for action and have a working knowledge of how local authorities conduct child protection case and review conferences, and be able to attend and contribute to these effectively when required to do so
- Ensure each member of staff has access to and understands the school's safeguarding policy and procedures, especially new and part time staff
- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation
- Understand the importance of information sharing both within the school and with safeguarding partners, other agencies, organisations and practitioners
- Be alert to the specific needs of children in need, those with SEND, health conditions and young carers
- Keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those discussions, including where referrals were or were not made to another agency
- Act as the first point of contact for parents, pupils, staff and external agencies in all matters relating to the Prevent duty and provide advice and support

- Be able to understand the unique risks associated with online safety and be confident they have the relevant knowledge and up to date capability to keep children safe while online at school
- Recognise the additional risks children with SEND face online, eg from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online
- Obtain access to resources and attend relevant or refresher training courses
- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff
- Understand the importance of their role in providing information and support to social care and understand the lasting impact adversity and trauma can have and how to respond to this to promote educational outcomes
- Understand the difficulties children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication

### Raise awareness

- Ensure the school's safeguarding policy is known, understood and used appropriately
- Ensure the school's safeguarding policy is reviewed annually and the procedures and implementation are updated and reviewed regularly, working with the Proprietor to achieve this
- Ensure the safeguarding policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this
- Link with the ESCB to make sure staff are aware of training opportunities and the latest local policies on safeguarding
- Take responsibility for promoting educational outcomes by knowing, sharing and identifying the impact that welfare, safeguarding and child protection issues children are experiencing or have experienced with school staff can have, and maintaining a culture of high aspirations for this cohort, supporting staff to identify the challenges these children might face and how they can best be supported academically

### Child protection files

- Ensure that concerns, referrals and child protection files are kept up to date, confidential and stored securely. These should include a clear and comprehensive summary, details of follow up action taken, decisions reached and the outcome. Any sharing of the file is only carried out in line with information sharing advice.
- Where children leave school, ensure their child protection file is transferred to any new school as soon as possible and within five days of the start of a new term but transferred separately from the main pupil file, ensuring secure transit and obtaining confirmation of receipt
- Consider whether it would be appropriate to share any information with a new school in advance of a child leaving, for example to allow the new school to have appropriate support in place for when the child arrives

### Availability

- During term time school hours the DSL or Deputy DSL should always be available for staff to discuss safeguarding concerns. Outside school hours the Deputy DSL is available via telephone or via email checked at least twice weekly.

## Appendix 9 Low level concerns policy

### Purpose of the Policy

We understand that it is critical to have a culture where all concerns about adults are shared responsibly and with the right person, recorded and dealt with appropriately. This will create and embed a culture of openness, trust and transparency in which the school's values and expected behaviour are constantly lived, monitored and reinforced by all staff.

Behaviour which is not consistent with the standards and values of Widford Lodge needs to be addressed and can exist on a wide spectrum, from the inadvertent or thoughtless through to that which is ultimately intended to enable abuse. We promote an open and transparent culture in which all concerns about adults working in or on behalf of Widford Lodge are dealt with promptly and appropriately. A low level concern can be no more than a sense of unease or a nagging doubt that an adult may have acted in a way that is inconsistent with our staff code of conduct, including inappropriate conduct outside of work. The policy applies to all staff including club leaders, volunteers, peripatetic staff, contractors and all those working on behalf of the school.

Staff do not need to be able to determine whether their concern is low level or whether it meets the threshold for referral to the LADO: once staff share what they believe to be a low level concern, that determination is made by the Headteacher.

Training was initially provided to all staff in September 2022 on the policy, with guidance given as to how organisational based grooming occurs and with real life examples. Staff had the opportunity to discuss the policy and this will continue, so that feedback can be incorporated into the process. This training was repeated in September 2023 and will be at least annually and to new joiners as part of their induction.

To achieve the purpose of this low level concerns policy It is essential that:

- staff are clear in distinguishing between expected and appropriate behaviour from concerning, problematic or inappropriate behaviour by themselves and others
- staff interpret the sharing of concerns as a neutral act
- the school addresses unprofessional behaviour and supports the individual to correct it an early stage
- the school identifies concerning, problematic or inappropriate behaviour, including any patterns, that may need to be followed up with the LADO
- the school provides responsive, sensitive and proportionate handing of concerns when they are raised and reflects on any weaknesses identified in its safeguarding processes.

### Procedure for reporting and recording low level concerns

All low level concerns must be shared with the Headteacher within 24 hours of becoming aware of it, where the concern relates to a particular incident, although it is never too late to share a low level concern. Concerns about the Headteacher must be shared with the Proprietor. The concern should be shared verbally with the Headteacher or alternatively a written summary can be provided.

If the staff member raising the concern does not wish to be named, they can leave an anonymous written note for the Headteacher. However, anonymity cannot be promised to members of staff sharing concerns and wherever possible, staff are encouraged to consent to be named to help create a culture of openness and transparency.

Occasionally a member of staff may find themselves in a situation which could be misinterpreted or might appear compromising to others, or they may have behaved in a manner which, on reflection, they consider



falls below the standard in the code of conduct. Self-reporting in these circumstances can be positive: it is self-protective and enables a potentially difficult issue to be addressed at the earliest opportunity; it demonstrates awareness of the expected standards and how the actions could be perceived; and it contributes towards maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

Where the concern is provided verbally, the Headteacher will make an appropriate record of the conversation immediately following the discussion. This will include: the names and roles of the individual sharing the concern and the individual about whom the concern is being raised; and brief context and concise, accurate details of the concern and any relevant incidents. The record should be signed, timed and dated.

The Headteacher will take the following action according to the nature and detail of the concern shared with them:

- Speak to the person raising the concern
- Speak to any potential witnesses (unless advised not to by the LADO, where they have been contacted)
- Speak to the individual about whom the concern has been raised (unless advised not to by the LADO, where they have been contacted)
- Review the information and determine whether the behaviour is (i) entirely consistent with the staff code of conduct and the law or (ii) constitutes a low level concern or (iii) is not serious enough to consider a referral to the LADO but may merit seeking advice from the LADO on a no names basis or (iv) when considered with any other previous low level concerns, could meet the threshold of an allegation and should be referred or (v) meets the threshold of an allegation and should be referred. Where there is any doubt, the Headteacher will seek advice from the LADO on a no names basis.
- Make appropriate records of all conversations and their determination of the concern, as well as the rationale for the decision and any action taken.
- Speak to the person who shared the concern to provide them with feedback.
- Act with discretion when carrying out any investigations, and on a need to know basis.
- Speak to the person about whom the concern was raised to ensure that they understand the importance of maintaining a positive professional relationship, including with the person raising the concern and also to discuss any support or training they might need.
- Consider whether the low level concern raises issues of misconduct or performance and where necessary, triggering disciplinary or capability procedures.
- Consider the employment status of the individual who is the subject of the concern ie where they are a contractor or volunteer the response may need to be tailored accordingly.
- Consider whether any internal procedures need to be changed as a result of the investigation of the low level concern.

The Headteacher will retain all records of low level concerns, including those which are deemed to be consistent with the staff code of conduct, in a central paper file. Where multiple low level concerns have been shared regarding the same individual these will be kept in chronological order with a timeline. These records will be kept confidential and held securely. Where the concern triggers disciplinary or grievance procedures, it will also be recorded on the relevant personnel files in the normal way, as well as if the LADO advises that the concern meets the threshold of an allegation.

The Headteacher will review the low level concerns file at least annually to ensure that all such concerns are being dealt with promptly and appropriately and that any potential patterns of behaviour are identified. The concerns will be retained until further guidance about retention is issued.

Low level concerns which have not met the threshold for referral to the LADO should not be included in references unless they relate to issues which would normally be included in a reference, for example misconduct or poor performance.

#### Examples of real life behaviours that came before child sexual abuse in organisational settings

- A position of power within the staff group was such that although staff became increasingly concerned about crude language, they felt unable to challenge. A student on placement was petrified of the member of staff.
- Staff member was difficult to manage, flouting school rules and teaching lessons that lacked structure. Staff member instilled fear in staff through behaviour. Staff had concerns about the way pupils were selected to take part in his club, but parents were desperate for their children to be part of the club.
- Common knowledge amongst staff and pupils that staff member made inappropriate jokes and sat children on their lap.
- Staff member aligned themselves with those in power, making it difficult to challenge behaviour that may have caused concern. Pupils were selected to go on trips.
- Colleagues noticed a staff member had favourite pupils and that there were blurred boundaries between pupils and the staff member, with a culture of pranks.
- Pupils felt emotionally blackmailed or were afraid of the staff member. There was a highly competitive atmosphere which led to high levels of compliance with the staff member's expectations and gratitude for what was achieved.
- Staff member was involved in church and scout groups in the community and was described as a person of great charm and persuasiveness.
- Inappropriate use of social media, with photos and comments that elsewhere identify the school and show the member of staff in social situations involving alcohol and relationships.
- Example of a context where further training was deemed as the outcome: on a trip, the staff member spends almost all day on the edge of the group with one particular child.
- Example of a context where staff member self-referred but no further action was taken: parents were unable to collect a child from a club and asked the member of staff to take the child home, which they did without anyone else in the car.
- Example of a context would could result in a disciplinary procedures: member of staff often seen shouting at pupils