St Swithun's School Winchester
Child Protection & Safeguarding Policy

Procedure and Guidance
This policy applies to St Swithun's School senior school, St Swithun's prep school and the Early Years Foundation Stage

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Policy History	
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Supporting Policies

This policy is one of a series in the school's integrated safeguarding portfolio. As such, it should be read in conjunction with the following policies/documents, which can all be found on the school portal here.

SEND policy	Allergy Policy
Staff handbook (including EYFS handbook)	Missing student policy
Behaviour, Rewards and Discipline policy (including restrictive physical intervention policy)	Children missing education policy
Anti-bullying policy	Staff IT terms and conditions
Whistleblowing policy	Student IT code of conduct
Recruitment policy and procedure	Social media policy
Staff code of conduct	Online safety policy
Part 1 of the latest version of Keeping Children Safe in Education and Annex B (KCSiE)	Prevent duty guidance: for England and Wales. HM Government
Nursery and Preschool Safeguarding policy – Annex	

Policy Review

This policy will be reviewed annually, or sooner if required, in line with relevant Department for Education (DfE), Hampshire Safeguarding Children Partnership (HSCP), Hampshire County Council (HCC) requirements and other statutory guidance.

An interim review may be undertaken in response to a safeguarding incident, changes in legislation or guidance, or where monitoring identifies a need for revision. The school is committed to addressing without delay any deficiencies or weaknesses identified in its safeguarding and child protection arrangements. In developing, implementing and reviewing its safeguarding policies and procedures, the school draws upon the expertise, experience and professional judgement of its staff to help shape and strengthen safeguarding practice across the school.

Date approved by School Council:	October 2026
Date reviewed by School Council:	October 2027

Availability

This policy is available to parents, staff and students via the school website, in the Parents' Handbook and on the staff portal. On request a copy may be obtained from the School Office.

St. Swithun's School Child Protection Policy

Policy Statement

*'Safeguarding and promoting the welfare of children is **everyone's** responsibility. **Everyone** who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners 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.'* KCSiE

We recognise our moral and statutory responsibility to safeguard and promote the welfare of all children.
We make every effort to provide a safe and welcoming environment underpinned by an inclusive and anti-discriminatory culture where both children and adults feel secure, able to talk and believe that they are being listened to.
We maintain an attitude of "it could happen here" where safeguarding is concerned.
The purpose of this policy is to provide staff, volunteers and governors with the framework they need in order to keep children safe and secure in our school, and to inform parents and guardians how we will safeguard their children whilst they are in our care.
Specific guidance is available to staff within the procedure documents.

Definitions

Within this document:

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

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

Child refers to all young people who have not yet reached their 18th birthday. On the whole, this will apply to pupils of our school; however, the policy will extend to visiting children and students from other establishments

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

Abuse could mean neglect, physical, emotional or sexual abuse or any combination of these, as well as children witnessing domestic abuse. Parents, carers and other people can harm children either by direct acts and / or failure to provide proper care. Explanations of these are given within the procedure document.

Aims

- To provide staff with the framework to promote and safeguard the wellbeing of children and in so doing ensure they meet their statutory responsibilities.
- To ensure consistent good practice across the school.
- To demonstrate our commitment to protecting children.

Principles and Values

- Children have a right to feel secure and cannot learn effectively unless they do so.
- All children have a right to be protected from harm.
- All staff have a key role in prevention of harm and an equal responsibility to act on any suspicion or disclosure that may indicate a child is at risk of harm, either in the school or in the community, whilst taking into account any contextual safeguarding.
- All staff will promote an inclusive, anti-discriminatory culture as part of their safeguarding responsibilities.
- We acknowledge it is essential that we work in partnership with other agencies that protect children and reduce risk and so we will engage in partnership working throughout the child protection process to safeguard children.
- Whilst the school will work openly with parents as far as possible, it reserves the right to contact Children's Social Care or the police, without notifying parents if this is believed to be in the child's best interests.
- All adults working within the school should maintain professional curiosity if they are concerned about a child.

Leadership and Management

We have established clear lines of accountability, training and advice to support the process of child protection and individual staff within that process.

In this school, any individual can contact the Designated Safeguarding Lead (DSL) or their Deputy (DDSL) if they have concerns about a child or young person. There are robust cover arrangements in place for periods when the DSL is unavailable due to illness, leave or other circumstances.

The **DSL** in the Senior school is **Graham Yates** and the **DDSL's** are **Alice Ludlow, Katy Barnett** and **Flic Lewington.**

The **DSL** in the Prep school is **Kate Grosscurth** and the **DDSL** is **Allison Greenfield.**

The **DSL** for EYFS in the Prep School is **Shelly Say.**

The **DSL** for the nursery and preschool is **Sarah Lindsay** and the **DDSL** is **Izzy Richardson**

There is a nominated safeguarding governor, **Dr. Steve Bailey**, who has leadership responsibility for safeguarding. The Chair of School Council, **Alison McClure**, will receive reports of allegations against the headteacher and act on the behalf of the School Council.

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

Training

All staff in our school are expected to be aware of the signs and symptoms of abuse and must be able to respond appropriately. Training is provided as required and is normally a combination of annual updates as well as relevant input though emails, bulletins and staff meetings.

Separate training is provided to all new staff as part of their induction. This includes

- the Child Protection & Safeguarding policy;
- the role and identity of the DSL and Deputy DSL's;
- the Behaviour policy;
- the staff Code of Conduct, including the School's whistleblowing procedure and the acceptable use of technologies policy, staff/student relationships and communications including the use of social media;
- the policy for Children Missing Education;
- the latest version of Keeping Children Safe in Education Part one. Staff that work directly with children should also read Annex B of KCSIE. Each time Part one of KCSIE is updated by the Department for Education, staff will be updated on the changes. a copy of Part one of *KCSIE* and Annex B of *KCSIE*
- Prevent duty training

Copies of the above documents are provided to all staff during induction and staff must read these.

The DSLs will attend appropriate level training at least every other year to enable them to fulfil their role.

Any update in national or local guidance will be shared with all staff in briefings and then captured in the next whole school training. This policy will be updated during the year to reflect any changes brought about by new guidance.

Training for members of School Council (governing body) is provided as required by KCSiE.

Referral

Following any concerns raised, the DSL will assess the information and consider if significant harm has happened or there is a risk that it may happen. If the evidence suggests the threshold of significant harm, or risk of significant harm has been reached, or if it is not clear if the threshold is met, the DSL will contact Children's Social Care and, if appropriate, the police. If the DSL or DDSL is not available or there are immediate concerns, the staff member will refer directly to Children's

Social Care and the police if appropriate. We will use the guidance from the National Police Chief's Council (NPCC) to determine when to contact the police.

Generally, the DSL will inform the parents prior to making a referral. However, there are situations where this may not be possible or appropriate, particularly when informing parents, may place the child at further risk.
***N.B**. The exception to this process will be in those cases of known FGM where there is a mandatory requirement for the teacher to report directly to the police. The DSL should also be made aware.*

DSLs will keep detailed, accurate, and secure written records of all concerns, discussions and decisions made including the rationale for those decisions. This includes instances where referrals were or were not made to another agency such as LA Children's Social Care or the Prevent program. This rationale will be recorded on CPOMs.

Confidentiality

- We maintain that all matters relating to child protection are to be treated as confidential and only shared as per the 'Information Sharing Advice for Practitioners' (DfE 2024) guidance
- There is a lawful basis for child protection concerns to be shared with agencies who have a statutory duty for child protection
- Information will be shared with individuals within the school who 'need to know'
- All staff are aware that they cannot promise a child to keep a disclosure confidential

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

- The content of the curriculum will be tailored to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with SEND
- A school ethos which helps children to feel safe and able to talk freely about their concerns, believing that they will be listened to and valued
- Every child having access to a 'trusted adult' in the school
- Children will be taught about how to keep themselves and others safe when online

Dealing with concerns and allegations against staff

If a concern is raised about the practice or behaviour of a member of staff, this information will be recorded and passed to the headteacher in the relevant school: Ms Gandee in the senior school and Mrs Norris in the Prep school. The headteacher will make an assessment to determine if the matter is a 'low level concern' or an 'allegation'. The Local Authority Designated Officer (LADO) will be contacted for all allegations and the relevant guidance will be followed. If the headteacher needs advice or guidance they will contact the LADO. If the allegation is against the headteacher, the person receiving the allegation will contact the LADO or Chair of Governors directly. (Annex 5)

Dealing with children abusing children

If a concern is raised that a child under 18 is abusing another child under 18, the 'Child on Child Abuse' guidance will be followed (Annex 6)

Legal context

Section 175 of the Education Act 2002; the Education (Independent School Standards) Regulations 2014; the Non-Maintained Special Schools (England) Regulations
Children Act 2004 & 1989

Guidance
Hampshire Safeguarding Children Partnership protocols and guidance and their procedures
Working together to safeguard children 2026
FGM Act 2003 Mandatory Reporting Guidance (2016)
Keeping children safe in education 2026 (comes into force from 1 September 2026)

Roles and responsibilities within St. Swithun's school

Staff responsibilities

All staff have a key role to play in identifying concerns early, providing help for children and preventing concerns from escalating. To achieve this, they will:

- Establish and maintain an environment where children feel secure, are encouraged to talk and are listened to.
- Ensure children know that there are adults in the school who they can approach if they are worried or have concerns.
- Plan opportunities within the curriculum for children to develop skills they need to recognise, assess and manage risk appropriately and keep themselves safe.
- Attend training in order to be aware of and be alert to the signs of abuse, neglect, exploitation and modern slavery, understanding that children can be at risk of harm inside and outside of the school, inside and outside the home and online
- Maintain an attitude of "it could happen here" with regards to safeguarding.
- Be aware that mental health problems can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide. This could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation
- Recognise that abuse, neglect, or other adverse childhood experiences, can have an impact on the mental health, behaviour and education of children.
- All staff will promote an inclusive, anti-discriminatory culture as part of their safeguarding responsibilities.
- Record their concerns if they are worried that a child is being abused and report these to the DSL as soon as is practical that day. If the DSL is not contactable immediately a DDSL should be informed
- Be prepared to refer directly to Children's Social Care, and the police if appropriate, if there is a risk of significant harm and the DSL or DDSL is not available.
- Follow the allegations procedures (Annex 5) if the disclosure is an allegation against a member of staff.
- Follow the procedures set out by the HSCP and take account of guidance issued by the DfE.
- Support children in line with their child protection plan.
- Treat information with confidentiality but never promise to "keep a secret".
- Notify the DSL or DDSL of any child on a child protection plan or child in need plan who has unexplained absence.
- Have an awareness of the process for community-based Family Help and the criteria for when a case should be referred to Family Help at targeted early help level and statutory services and be prepared to identify and support children who may benefit from this intervention (Annex 11).
- Liaise with other agencies that support children and provide early help.
- Ensure they know who the DSL and DDSL are and know how to contact them.
- Have an awareness of the Child Protection Policy, the Safeguarding Policy, the Behaviour Policy, the Staff Behaviour Policy (or Code of Conduct), child on child

abuse procedures, the safeguarding response for children who go missing or are absent from education and the role of the DSL.

Senior Leadership Team responsibilities:

- Contribute to inter-agency working in line with 'Working Together to Safeguard Children 2026 guidance.
- Provide a co-ordinated offer of Early Help when additional needs of children are identified.
- Ensure staff are alert to the various factors that can increase the need for Early Help (*para 18 KCSiE 2026*).
- Working with Children's Social Care, support their assessment and planning processes including the school's attendance at conference and core group meetings.
- Carry out tasks delegated by the School Council such as training of staff, safer recruitment and maintaining a single central record.
- Provide support and advice on all matters pertaining to safeguarding and child protection to all staff regardless of their position within the school.
- Treat any information shared by staff or children with respect and follow agreed policies and procedures.
- Ensure that allegations or concerns against staff are dealt with in accordance with guidance from Department for Education (DfE) and the Hampshire Safeguarding Children Partnership (HSCP) procedures.
- Determine if a concern about a member of staff is a 'low level concern' or an allegation.[1]

School Council responsibilities

- Ensure the school has effective safeguarding policies and procedures including a Child Protection Policy, a Staff Behaviour Policy or Code of Conduct, a Behaviour Policy and a response to children who go missing from education.
- Ensure HSCP is informed in line with local requirements about the discharge of duties via the annual safeguarding audit.
- Ensure recruitment, selection and induction follows safer recruitment practice, including all appropriate checks.
- Ensure allegations against staff are dealt with by the headteacher. Allegations against the headteacher are dealt with by the Chair of School Council.
- Ensure a member of the Senior Leadership Team is appointed as Designated Safeguarding Lead (DSL) and has this recorded in their job description.
- Ensure staff have been trained appropriately and this is updated in line with guidance
- Ensure any safeguarding deficiencies or weaknesses are remedied without delay
- Identify a nominated governor for safeguarding.

[1] See Keeping Children Safe in Education 2026 Part 4 section 1 paragraph 497 onwards

DSL responsibilities

(to be read in conjunction with DSL role description in KCSiE - Annex B – Page 181)

In the **Senior school** the **DSL** is **Graham Yates**

The **Deputy DSL's** are **Alice Ludlow, Katy Barnett, Flic Lewington**

In the **Prep school** the **DSL** is **Kate Grosscurth**

The **Deputy DSL** is **Allison Greenfield**

For **EYFS** the **DSL** is **Shelly Say**

The **Nursery** and **Preschool DSL is Sarah Lindsay**

The **Nursery** and **Preschool Deputy DSL is Izzy Richardson**

In addition to the role of all staff and the senior management team, the DSL will:

- Refer cases to social care, and the police where appropriate, in a timely manner avoiding any delay that could place the child at more risk.
- Refer cases to the Channel programme where there is a radicalisation concern as required.
- Assist the School Council in fulfilling their safeguarding responsibilities set out in legislation and statutory guidance.
- Attend appropriate training and demonstrate evidence of continuing professional development to carry out the role.
- Ensure every member of staff knows who the DSL and the deputies are, have an awareness of the DSL role and know how to contact them.
- Ensure all staff and volunteers understand their responsibilities in being alert to the signs of abuse and their responsibility for referring any concerns about a child to the DSL and concerns about an adult to the headteacher.
- Ensure that those staff that need to know, are aware of those children who have experienced, or are experiencing abuse in order to promote their educational outcomes and provide the appropriate support.
- Ensure whole school training occurs regularly with at least annual updates so that staff and volunteers can fulfil their responsibilities knowledgeably.
- Ensure any members of staff joining the school outside of the agreed training schedule receive induction training prior to the commencement of their duties.
- Keep records of child protection concerns securely and separate from the main pupil file and use these records to support the assessment and likelihood of risk.

- Ensure that safeguarding records are transferred accordingly (separate from pupil files) and in a timely fashion when a child transfers school, including in-year transfers.
- Consider if it would be appropriate to share any information with the new school/college in advance of a pupil leaving particularly where the information would support an assessment of risk to others in the school as well as the individual pupil.
- Ensure that where a pupil transfers school and is on a child protection plan or is a child looked after, their information is passed to the new school immediately and that the child's social worker is informed. Consideration is given to a transition meeting prior to moving if the case is complex or on-going.
- Be aware of the training opportunities and briefings provided by HSCP to ensure staff are aware of the latest local guidance on safeguarding.
- Develop, implement and review procedures in the school that enable the identification and reporting of all cases, or suspected cases, of abuse.
- Meet any other expectations set out for DSLs in KCSiE 2026.

St. Swithun's Child Protection Procedures

Overview

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

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

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

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

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

1. Make an initial record of the information either on CPOMS or by email to the senior school safeguarding team at: safegurding@stswithuns.com or the prep school safeguarding team at: prepsafeguarding@stswithuns.com

2. Report it to the DSL immediately.

3. The DSL will consider if there is a requirement for immediate medical intervention. Urgent medical attention should not be delayed if the DSL is not immediately available.

4. Make an accurate record (which may be used in any subsequent court proceedings) as soon as possible and within 24 hours of the occurrence. Include everything that has happened, including details of:

    - Dates and times of observations
    - Dates and times of any discussions in which they were involved
    - Any injuries
    - Explanations given by the child / adult
    - What action was taken
    - Any actual words or phrases used by the child

    If written, the records must be signed and dated by the author

5. In the absence of the DSL or their Deputy, be prepared to refer directly to Children's Social Care (and the police if appropriate) if there is the potential for immediate, significant harm.

Following a report of concerns the DSL must:

1. Decide whether or not there are sufficient grounds for suspecting significant harm, in which case a referral must be made to Children's Social Care and the police if it is in keeping with the National Police Chiefs' Council "When to call the Police" guidance. The rationale for this decision should be recorded by the DSL. Any allegation of harm or abuse within the Early Years must be reported to Ofsted.

2. Normally the school should try to discuss any concerns about a child's welfare with the family and where possible seek their agreement before making a referral to Children's Social Care. However, in accordance with DfE guidance, this should only be done when it will not place the child at increased risk or could have an impact on a police investigation. Where there are doubts or reservations about involving the child's family, the DSL should clarify with Children's Social Care or the police whether the parents should be told about the referral and, if so, when and by whom. This is important in cases where the police may need to conduct a criminal investigation. The child's views should also be taken into account when appropriate.

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

    If there is indication that the child is suffering significant harm, a call will also be made to Children's Reception Team (CRT) on 01329 225379.

4. If a child is in immediate danger and urgent protective action is required, the police must be called. The DSL must then notify Children's Social Care of the occurrence and what action has been taken.

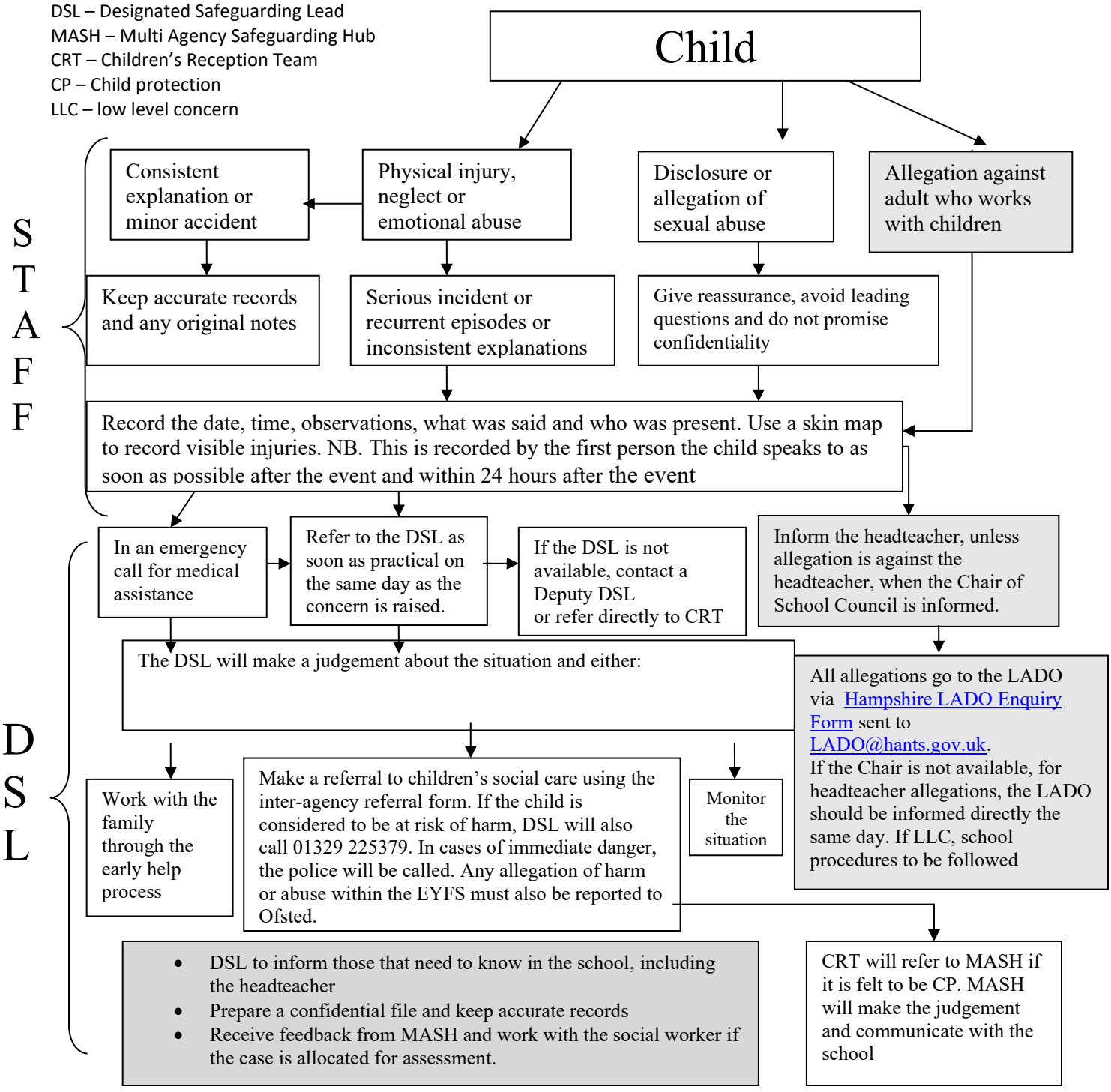
5. When a pupil needs *urgent* medical attention and there is suspicion of parental abuse causing the medical need, the DSL, their Deputy or an appropriate member of staff should take the child to the accident and emergency unit at the nearest hospital and inform Children's Social Care. Advice should be sought from Children's Social Care about informing the parents, remembering that parents should normally be informed that a child requires urgent hospital attention.

6. If there is not a risk of significant harm, the DSL will either actively monitor the situation or consider the community-based or targeted early help process.

7. In cases of allegations against staff or low-level concerns, the school Low Level Concerns (LLC) procedure will be followed.

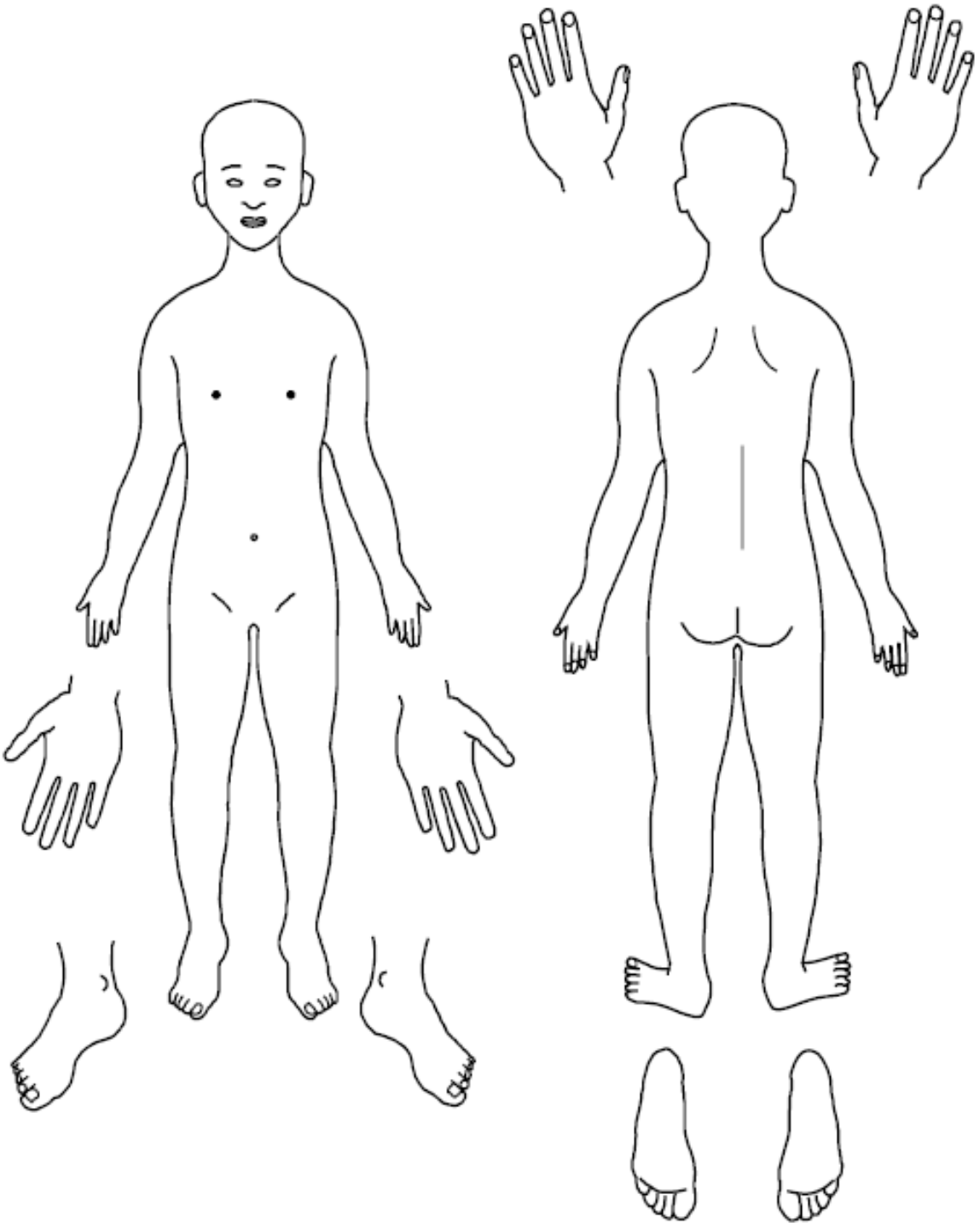
Annex 1 - Flowchart for child protection procedures

DSL – Designated Safeguarding Lead
MASH – Multi Agency Safeguarding Hub
CRT – Children's Reception Team
CP – Child protection
LLC – low level concern



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

Annex 2 - Skin map



Name of Child: _____

Date of birth: _____ Date of recording: _____

Name of completer: _____









Any additional information:

Annex 3 - Dealing with disclosures

All staff:

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

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

All staff should know who the DSL is and who to approach if the DSL is unavailable. Ultimately, all staff have the right to make a referral to the police or social care directly and should do this if, for whatever reason, there are difficulties following the agreed protocol, e.g. they are the only adult on the school premises at the time and have concerns about sending a child home.

Guiding principles, the seven R's

Receive

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

Reassure

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

Respond

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

Report

- Share concerns with the DSL as soon as possible either via CPOMS, an email or a direct discussion [clarify your process].
- If you are not able to contact your DSL or the Deputy DSL, and the child is at risk of immediate harm, contact the children's services social care department directly.

Record

- If possible, make some very brief notes at the time, and write them up as soon as possible either on CPOMS or via email to safeguarding@stswithuns.com or prepsafegaurding@stswithuns.com
  This allows you to devote your full attention to the child and to listen to what they are saying. It may be appropriate to make notes during the report (especially if a second member of staff is present). However, if making notes, you should be conscious of the need to remain engaged with the child and not appear distracted by the note taking. Either way, it is essential a written record is made
- Keep your original notes on file.
- Record the date, time, place, child's present and noticeable nonverbal behaviour, and the words used by the child. If the child uses sexual 'pet' words, record the actual words used, rather than translating them into 'proper' words.
- Complete a body map to indicate the position of any noticeable bruising or marks.
- Record facts and observable things, rather than your 'interpretations' or 'assumptions'.
- Sign and date if hand written record

Remember

- Support the child: listen, reassure, and be available.
- Complete confidentiality is essential. Share your knowledge only with appropriate professional colleagues.
- Try to get some support for yourself if you need it.
- All staff should be aware that children may not feel ready or know how to tell somebody that they are being abused, exploited or neglected and/or they may not recognise their experiences as harmful.

Review (led by DSL)

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

What happens next?

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

If a staff member believes that their concerns have not been dealt with effectively or that the child remains at risk, they should initially ask the DSL to reconsider ensuring that the risks are understood. If this does not result in a satisfactory outcome, or the DSL rationale appears to miss

the risk to the child, then the Whistleblowing procedures of the school should be followed. If the DSL is unhappy with the response from Children's Social Care, they should consider following the HSCP escalation protocol.

Receiving a disclosure can be upsetting for the member of staff and schools should have a procedure for supporting them after the disclosure. This might include reassurance that they have followed the procedure correctly and that their swift actions will enable the allegations to be handled appropriately. For some staff, use of an employee-based counselling service may be appropriate.

If you feel the DSL or their deputies are not taking the matter seriously enough, and you have already raised your concerns with the head (in line with the Whistleblowing policy) you have a legal responsibility to report the disclosure to Hampshire social services yourself

Annex 4 - Allegations against adults who work with children

Working Together to Safeguard Children (2026) states that organisations should have clear policies for dealing with allegations against people who work with children. Those policies should make a clear distinction between an allegation, a complaint or a concern about the quality of care or practice.

Allegations as defined by KCSiE should be reported to the LADO. Complaints or concerns can be managed independently by the school or college under internal procedures.

Complaints could include: -

- Breaches of the code of Conduct
- Any breach of data protection or confidentiality
- Poor behaviour management
- Inappropriate use of social media
- Misadministration of medication

Concerns could include: -

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

Low Level Concerns (LLCs) which do not reach the allegations harm threshold (or complaints criteria) should be dealt with under a school Low Level Concerns procedure – see below.

Further guidance on contacting the LADO can be found at: Allegations against adults in the children's workforce | Children and Families | Hampshire County Council

Procedure for allegations that meet the harm threshold.

This procedure should be used in all cases when it is alleged that an individual working in on behalf of the school/college in a paid or unpaid capacity (i.e. a member of staff, supply staff, volunteer, trainee teacher, contractor, Governor, or another adult who works with children) has either:

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

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

- Parents of children who are placed on a CIN plan or are receiving Early Help;
- Arrests for offences against adults;
- Presentation to other professionals around mental health, domestic abuse and/or substance misuse;

- Extreme political or religious viewpoints which could be considered Hate Crime;
- Concerns about behaviour in their private lives which may impact on children.

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

In line with our referral process:

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

- If an allegation is made against the headteacher, the concerns need to be raised with the Chair of Governors as soon as possible. If the Chair of Governors is not available, then the LADO should be contacted directly.

- There may be situations when the headteacher or Chair of Governors will want to involve the police immediately, if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence.

- Once an allegation has been received by the headteacher or Chair of Governors, they will contact the LADO via the Hampshire LADO Enquiry Form sent to LADO@hants.gov.uk as soon as possible and before carrying out any investigation into the allegation.

- Inform the parents of the allegation unless there is a good reason not to.

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

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

If the matter is investigated internally, the LADO will advise the school to seek guidance from their personnel/HR provider in following procedures set out in Part 4 of 'Keeping Children Safe in Education' (2026) and the HSCP procedures.

Supply Staff, trainee teachers and all contracted staff

While supply staff, trainee teachers or contracted staff provided by an employment agency or business are not employees of the school, it is still required that the school ensures allegations are dealt with properly and are reported to the LADO.

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

Low Level Concerns (LLCs)

Low-Level Concerns

We are committed to embedding a culture of openness, transparency, and trust. The Low-Level Concerns (LLC) Policy forms an important part of our whole-school safeguarding approach. It helps to ensure adults consistently model the school's values, promotes a culture of vigilance, and supports the early identification of concerning, problematic, or inappropriate behaviour. It also helps protect children and staff by reducing the risk of misunderstandings and enabling concerns to be addressed at an early stage.

The early identification, reporting, and prompt management of concerns about adults is critical to maintaining an effective safeguarding culture.

Staff are not expected to determine whether a concern constitutes a low-level concern, meets the threshold for an allegation, or requires referral to the Local Authority Designated Officer (LADO). Any concern regarding an adult's conduct should be reported. The appropriate Head will determine the nature of the concern and the appropriate course of action.

All low-level concerns must be reported to the appropriate Head. This enables concerns to be assessed appropriately and allows any patterns of concerning, problematic, or inappropriate behaviour to be identified and addressed.

Concerns may be raised:

- In person;
- By telephone; or
- By completing the relevant Low-Level Concern Form available on the staff portal.

Where the concern relates to a member of Prep School (including Nursery and Preschool) staff, the Prep School Low-Level Concern Form should be used.

Concerns relating to any other member of staff should be reported using the Senior School Low-Level Concern Form.

Concerns may be raised in confidence and will be handled sensitively. Information will be shared only with those who need to know. However, anonymity or confidentiality cannot be guaranteed where safeguarding, disciplinary, or legal obligations require further investigation.

Staff are encouraged to identify themselves when making a report, as this may assist with clarification, investigation, and ensuring a full understanding of the circumstances.

If the Head is the subject of the concern, it should be reported directly to the Chair of Council. If the Head is unavailable, the concern should be reported to the Designated Safeguarding Lead (DSL).

The Low-Level Concerns (LLC) policy (as reference in the staff handbook) aims to:

- Ensure staff understand what constitutes appropriate professional conduct and can distinguish this from concerning, problematic, or inappropriate behaviour in themselves and others.
- Encourage and empower staff to report low-level safeguarding concerns.
- Address unprofessional behaviour at an early stage and support individuals in making any necessary changes.
- Ensure concerns are managed in a responsive, sensitive, and proportionate manner.
- Help identify any weaknesses within the school's safeguarding systems and procedures.

In line with this policy:

- All low-level concerns should be reported to the Head using the relevant Microsoft Form available on the staff portal.

- The Head will record and review all concerns and share them with the DSL.
- Concerns will be considered individually and collectively so that any emerging patterns of behaviour can be identified.
- Where concerns indicate that the harm threshold may have been met, a referral will be made to the Local Authority Designated Officer (LADO).
- Where there is any uncertainty about how a concern should be managed, advice will be sought from the LADO.

Staff Responsibilities
All adults working at St Swithun's have a legal and professional responsibility to safeguard and promote the welfare of pupils. This includes reporting any behaviour that may constitute a safeguarding concern, whether relating to their own conduct or that of another adult.
This policy applies to all adults working on behalf of the school, including:

- Teaching and support staff;
- Members of the School Council;
- Volunteers;
- Casual workers;
- Temporary and supply staff;
- Agency staff and contractors; and
- Students, apprentices, and those undertaking initial teacher training placements.

Types of Behaviour
Appropriate Conduct

- Behaviour that is consistent with the school's Staff Behaviour (Code of Conduct) Policy and the law.

Low-Level Concern

- A low-level concern is any concern, however small, or even a "nagging doubt", that an adult may have:
- Acted in a way that is inconsistent with the school's Staff Behaviour (Code of Conduct) Policy, including conduct outside work; and/or
- Behaved in a manner that has caused a sense of unease about their suitability to work with children; and
- Does not meet the harm threshold for referral under the school's allegations procedures but nevertheless gives rise to concern about the individual's conduct or suitability to work with children.

Allegation

- An allegation is behaviour indicating that an adult has:
- Behaved in a way that has harmed, or may have harmed, a child;
- Possibly committed a criminal offence against, or related to, a child; or
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children.

A low-level concern is not insignificant. All safeguarding concerns must be taken seriously. The term *low-level* simply refers to concerns that do not meet the harm threshold for an allegation. Early reporting is vital, as more serious safeguarding concerns are often preceded by less significant incidents, boundary crossings, grooming behaviours, or other inappropriate conduct.

Low-level concerns may sit on a spectrum ranging from inadvertent or thoughtless behaviour through to behaviour intended to enable abuse.
Examples may include:

- Being overly friendly with children;
- Showing favouritism;
- Humiliating or belittling a child;
- Taking photographs of pupils on a personal device contrary to school policy;
- Meeting with a child in a secluded area or behind a closed door without appropriate safeguards; or
- Using inappropriate, intimidating, offensive, or sexualised language.
- Reporting and Managing Low-Level Concerns

This procedure applies equally to concerns relating to employees, agency staff, contractors, volunteers, governors, and any other adult working on behalf of the school.
All low-level concerns must be reported to the appropriate Head as soon as possible, either verbally or through the relevant Low-Level Concern Form. Concerns may be raised in confidence and will be handled sensitively. However, confidentiality or anonymity cannot be guaranteed where safeguarding, disciplinary, or legal obligations require further investigation.
Where a concern is reported verbally, the Head will create a written record as soon as reasonably practicable. Records will include:

- The details of the person raising the concern (unless anonymity has been specifically requested).
- The details of the individual about whom the concern is being raised;
- Relevant context;
- A chronological account of the concern; and
- The date, time, and author of the record.

The Head will review the information, consulting with the DSL where appropriate, and determine whether the reported behaviour:

- Is consistent with the school's Staff Behaviour (Code of Conduct) Policy and the law;
- Constitutes a low-level concern;
- Meets the threshold for consultation with or referral to the LADO; or
- Forms part of a wider pattern of concerning behaviour.

Where there is any uncertainty, advice will be sought from the LADO.
The Head or DSL will normally speak with the individual about whom the concern has been raised, unless advised not to do so by the LADO or another relevant agency. Where the concern relates to an agency worker or contractor, the relevant employer will be informed.
Appropriate records will be maintained of:

- The concern raised;
- Any internal discussions and enquiries;
- Any discussions with the individual concerned;
- Advice sought from the LADO or other agencies;
- The rationale for the decision reached; and
- Any action taken.

Where a concern is determined to be consistent with the Staff Behaviour (Code of Conduct) Policy and the law, the individual concerned will normally be informed and given the opportunity to

respond. Consideration will also be given to whether any policies, procedures, training, or guidance require amendment or clarification.
Where a concern is determined to constitute a low-level concern, it will be managed in a proportionate and supportive manner. This may include guidance, training, supervision, monitoring, or other appropriate action. Any discussion with the individual concerned will:

- Explain why the behaviour caused concern;
- Clarify the expected standards of conduct;
- Identify any support required; and
- Outline any consequences should the behaviour be repeated.

Where a concern is sufficiently serious, either in isolation or when considered alongside previous concerns, it will be managed as an allegation in accordance with the School's Safeguarding and Child Protection Policy.

Self-Reporting
Staff are encouraged to report any incident in which they believe their own behaviour may have been misinterpreted, may appear unprofessional, or may have fallen below the standards expected by the School. Self-reporting can:

- Enable concerns to be addressed at an early stage;
- Demonstrate professional judgement and self-awareness; and
- Support a culture of openness, accountability, and safeguarding.

Record Keeping and Review
Records of all low-level concerns will be maintained centrally by the appropriate Head. To ensure effective whole-school oversight, all low-level concerns will also be available for review by the Headmistress and DSL so that patterns, trends, or emerging safeguarding concerns can be identified across the school.
Where appropriate, records may also be retained on an individual's personnel file, in accordance with safeguarding and data protection requirements.
The central low-level concerns record will be reviewed by the Head at least annually, and more frequently where appropriate, to identify recurring themes, patterns of behaviour, or wider safeguarding concerns. A record of each review will be maintained.
Low-level concerns will not normally be included in employment references. However, where concerns relate to substantiated misconduct, poor performance, disciplinary matters, capability procedures, or have met the threshold for referral to external agencies, they may be disclosed in line with legal and safeguarding obligations.

Annex 5 – Child on child abuse including sexual violence and sexual harassment between children in schools and colleges

Child on child abuse policy.

HSCP have developed a child-on-child abuse toolkit to provide schools with additional guidance: Child on Child abuse - Hampshire SCP *as well as the child sexual abuse toolkit:* Child Sexual Abuse - Hampshire SCP.

Child on child abuse

Child-on-child abuse is any form of physical, sexual, emotional and financial abuse, and coercive control, exercised between children and within children's relationships (both intimate and non-intimate). Child-on-child abuse can take various forms. This is most likely to include, but may not be limited to:

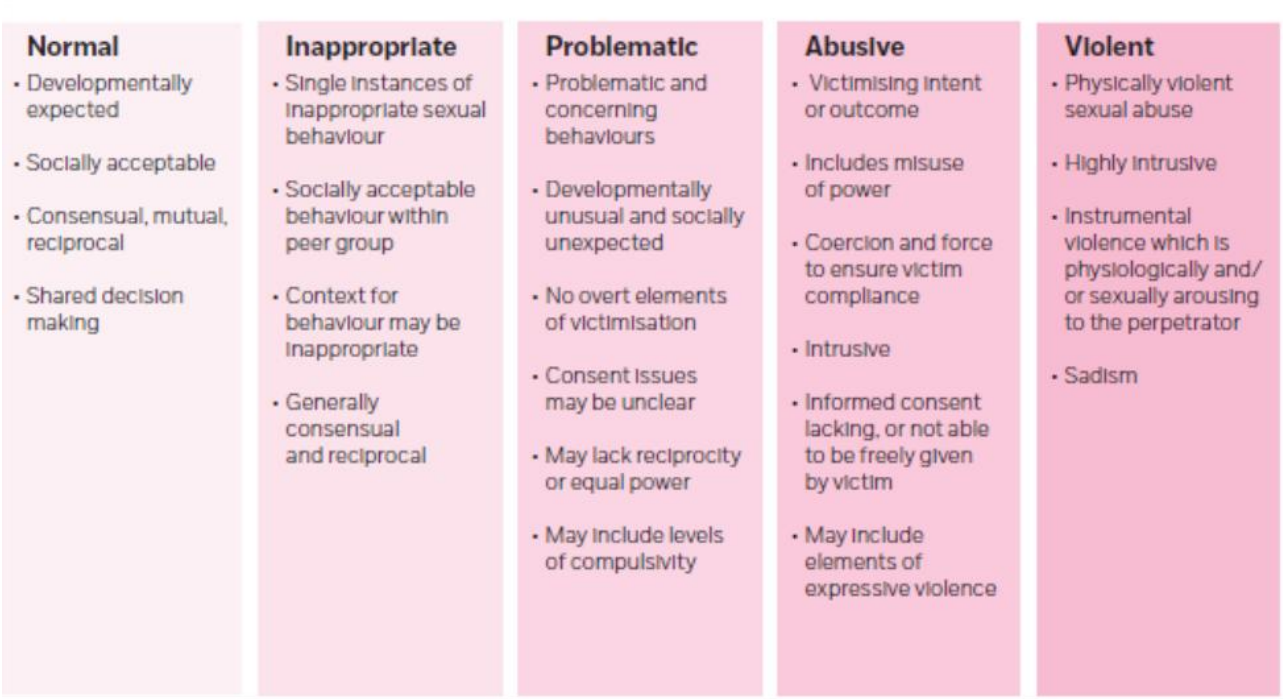
- bullying (including cyberbullying, prejudice-based and discriminatory bullying),
- discriminatory behaviour, including racism, faith-targeted abuse, and other prejudice-based incidents,
- abuse in intimate personal relationships between children (also known as teenage relationship abuse),
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm,
- physical assault and harm, or the threat of harm with a weapon,
- harmful sexual behaviour, sexual violence and sexual harassment – which may include misogyny/misandry
- consensual and non-consensual making or sharing of nudes and semi nudes, including those generated using AI
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party,
- upskirting (which is a criminal offence), which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and initiation/hazing type violence and rituals.

Harmful sexual behaviour (HSB)

Awareness

Harmful Sexual Behaviour exists on a continuum and may escalate into sexual harassment or sexual violence, it can occur online or face-to-face (both physically and verbally) and is never acceptable. Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally appropriate to inappropriate, problematic, abusive or violent.

Simon Hackett has proposed the following continuum model to demonstrate the range of sexual behaviours presented by children, which may be helpful when seeking to understand a student's sexual behaviour and deciding how to respond to it:



Behaviour that is problematic, abusive or violent is developmentally inappropriate and may cause Developmental damage. Advice on stages of typical sexual development and behaviour for different age groups can be found in Sexual development and behaviour in children | NSPCC Learning.

Sexual harassment

Sexual harassment refers to '*unwanted conduct of a sexual nature*' that can occur online and offline. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names
- sexual "jokes" or taunting
- physical behaviour, such as deliberately brushing against someone or interfering with someone's clothes
- displaying pictures, photos or drawings of a sexual nature
- upskirting
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
    - consensual and non-consensual sharing of nudes or semi nudes. (UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people provides detailed advice for schools and colleges,
    - sharing of unwanted explicit content
    - sexualised online bullying;
    - unwanted sexual comments and messages, including, on social media;

- sexual exploitation; coercion and threats.

Sexual violence

For the purpose of this advice, when referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

- Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.
- Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.
- Sexual assault**:** A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.
- Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (NOTE – this could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party).

What is consent?

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

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

How can a child who is being abused by other children be identified?

All staff should be alert to the well-being of students and to signs of abuse, and should engage with these signs, as appropriate, to determine whether they are caused by child-on-child abuse. However, staff should be mindful of the fact that the way(s) in which children will disclose or present with behaviour(s) as a result of their experiences will differ.

Signs that a child may be suffering from child-on-child abuse can also overlap with those indicating other types of abuse and can include:

- failing to attend school, disengaging from classes or struggling to carry out school related tasks to the standard ordinarily expected;
- physical injuries;

- experiencing difficulties with mental health and/or emotional wellbeing;
- becoming withdrawn and/or shy; experiencing headaches, stomach aches, anxiety and/or panic attacks; suffering from nightmares or lack of sleep or sleeping too much;
- broader changes in behaviour including alcohol or substance misuse;
- changes in appearance and/or starting to act in a way that is not appropriate for the child's age;
- abusive behaviour towards others.

Abuse affects children very differently. The above list is by no means exhaustive and the presence of one or more of these signs does not necessarily indicate abuse. The behaviour that children present with will depend on their particular circumstances.

Where a child exhibits any behaviour that is out of character or abnormal for his/her age, staff should always consider whether an underlying concern is contributing to their behaviour (for example, whether the child is being harmed or abused by other children) and, if so, what the concern is and how the child can be supported going forwards.

Further support
Advice on responding to children who display sexualised behaviour is available in:
Responding to children who display sexualised behaviour.

HSCP have developed a child-on-child abuse toolkit to provide schools with additional guidance: Child on Child abuse - Hampshire SCP as well as the child sexual abuse toolkit: Child Sexual Abuse - Hampshire SCP.

Further resources and support agencies can be found in KCSiE 2026 paragraphs 550 and 551 and Annex A.

Context

This policy is about how staff should respond to all signs, reports and concerns of harmful sexual behaviour (HSB), child-on-child sexual violence and sexual harassment, including those that have happened outside of school or college premises, and/or online. All staff are advised to maintain an attitude of "It could happen here."

Schools and colleges not recognising, acknowledging or understanding the scale of harassment and abuse, and /or downplaying some behaviours relating to abuse can lead to a culture of unacceptable behaviour, misogyny, an unsafe environment and in a worst-case scenario a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Harmful sexual behaviour, sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of HSB, sexual violence and sexual harassment will likely find the experience stressful and distressing. This can adversely affect their educational attainment as well as their emotional well-being. HSB, sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and offline (both physically and verbally) and are never

acceptable. It is important that all victims are taken seriously and offered appropriate support. It is also important to recognise that some perpetrators may themselves also be victims and that child-on-child abuse is a safeguarding issue for both the victim and alleged perpetrator.

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

Policy
We believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm by adults in the school and by other children.

We recognise that children are capable of abusing their peers and this will be dealt with under our child protection policy and in line with KCSiE (2026)

This policy is underpinned by the principle that there is a zero-tolerance approach to sexual violence and sexual harassment. We are clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up.

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

Prevention:

- Taking a whole school approach to safeguarding and child protection.
- Providing training to staff
- Providing a clear set of values and standards, underpinned by the school's behaviour policy and pastoral support system, and by a planned programme of evidence-based content delivered through the curriculum
- Engaging with specialist support and interventions

Responding to reports of HSB, sexual violence and sexual harassment:

- Children making a report of HSB, sexual violence or sexual harassment will be taken seriously, kept safe and be supported
- Understanding that our initial response to a report from a child is incredibly important and can encourage or undermine the confidence of victims of HSB, sexual violence and harassment to report or to come forward in the future
- If the report includes an online element, staff will be mindful of the Searching, Screening and Confiscation: advice for schools (DfE 2022): Searching, Screening and Confiscation (publishing.service.gov.uk) guidance
- Staff taking the report will inform the DSL or their Deputy as soon as practicably possible but at least within 24 hours
- Staff taking a report will never promise confidentiality
- Parents or carers will normally be informed (unless this would put the child at greater risk).
- If a child is at risk of harm, is in immediate danger, or has been harmed, a referral will be made to Children's Social Care (01329 225379)

Risk Assessment:
Following a report of sexual violence, the DSL will carry out an immediate risk and needs assessment. The risk and needs assessment for a report of sexual violence should consider:

- The victim's safety and support needs
- The alleged perpetrator, their support needs, and any disciplinary action.
- All other children at the school, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms
- The location and time of the incident, and any action required to make the location safer
- The victim and the alleged perpetrator sharing classes and space at school.

Following a report of HSB or sexual harassment, the DSL will consider the need for a risk assessment on a case-by-case basis.

Risk and needs assessments will be recorded and kept under review.

Where there has been other professional intervention and/or other specialist risk assessment, these professional assessments will be used to inform the school's approach to supporting and protecting pupils.

Action: The DSL will consider:

- The wishes of the victim regarding how they want to proceed. Alleged victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered
- The nature of the alleged incident including whether a crime has been committed and/or whether HSB was displayed
- Ages of the children/young people involved
- Developmental stages of the children/young people
- Any power imbalance between the children/young people. For example, is the alleged perpetrator significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?
- Any previous incidents
- On-going risks to the alleged victim or other children
- Other related issues or wider context, including links to child sexual exploitation or child criminal exploitation

If the report involves two children who are likely to be in close proximity then, whilst the facts of the case are being established the alleged perpetrator should be removed from any classes they share with the alleged victim. The school should consider how best to keep the alleged victim and alleged perpetrator a reasonable distance apart on school premises and on transport to and from the school, where appropriate. These actions are in the best interests of both children and should not be perceived to be a judgment on the guilt of the alleged perpetrator.

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

Options: The DSL will manage the report with the following options:

- Manage internally
    - In some cases of sexual harassment, for example, one-off incidents, the school may take the view that the children concerned are not in need of early help or statutory intervention and that it would be appropriate to handle the incident internally, perhaps through utilising the behaviour and bullying policies and by providing pastoral support.
- Refer for support through community based early help
    - Early help can be particularly useful to address non-violent harmful sexual behaviour and may prevent escalation of sexual violence.

- Refer to Children's Social Care
    - Where a child has been harmed, is at risk of harm, or is in immediate danger, a referral should be made a referral to local children's social care.
    - At the referral to children's social care stage, the school will generally inform parents or carers, unless there are compelling reasons not to (if informing a parent or carer is going to put the child at additional risk). Any such decision should be made with the support of children's social care.
    - Schools should not wait for the outcome (or even the start) of a children's social care investigation before protecting the victim and other children in the school. It will be important for the designated safeguarding lead (or a deputy) to work closely with children's social care (and other agencies as required) to ensure any actions the school takes do not jeopardise a statutory investigation. The risk assessment will help inform any decision. Consideration of safeguarding the victim, alleged perpetrator, any other children directly involved in the safeguarding report and all children at the school should be immediate.

- Report to the police (generally in parallel with a referral to Social Care).
    - Alleged criminal behaviour will ordinarily be reported to the Police.
    - Where a report of rape, assault by penetration or sexual assault is made, the starting point is this should be passed on to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of reporting to the police remains. The police will take a welfare, rather than a criminal justice, approach.
    - At this stage, the school will generally inform parents or carers unless there are compelling reasons not to, for example, if informing a parent or carer is likely to put a child at additional risk. In circumstances where parents or carers have not been informed, it will be especially important that the school is supporting the child in any decision they take. This should be with the support of children's social care and any appropriate specialist agencies.

- Where a report has been made to the police, the school should consult the police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator and their parents or carers. They should also discuss the best way to protect the victim and their anonymity.
- In some cases, it may become clear very quickly, that the police (for whatever reason) will not take further action. In such circumstances, it is important that the school continue to engage with specialist support for the victim as required.

Ongoing Response:

- **All** concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and addressed.
- The DSL will keep the risk assessment under review.
- The DSL will manage each report on a case-by-case basis and will keep the risk assessment under review.
- Where there is a criminal investigation into a rape, assault by penetration or sexual assault, the alleged perpetrator should be removed from any classes they share with the victim during that investigation.
- The DSL will consider how best to keep the victim and perpetrator apart on school premises and transport where appropriate.
- Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, the school will take suitable action. In all but the most exceptional of circumstances, the rape or assault is likely to constitute a serious breach of discipline and lead to the view, that allowing the perpetrator to remain in the same school or college would seriously harm the education or welfare of the victim (and potentially other pupils and students).
- Where a criminal investigation into sexual assault leads to a conviction or caution, the school or college will, if it has not already, consider any suitable sanctions in light of their behaviour policy, including consideration of permanent exclusion. Where the perpetrator is going to remain at the school or college, the principle of keeping the victim and perpetrator in separate classes where possible should be maintained and continued. Consideration would be given to the most appropriate way to manage potential contact on school and college premises and transport. The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases.
- The victim, alleged perpetrator and other witnesses (children and adults) will receive appropriate support and safeguards on a case-by-case basis - see further guidance on supporting the victim and alleged perpetrator below
- When ongoing support is required by the victim, the victim should be asked whether they would find it helpful to have a designated trusted adult to talk about their needs. The choice of any such adult should be made by the victims (as far as reasonably possible), and this choice should be supported.

- The school will take any disciplinary action against the alleged perpetrator in line with behaviour and discipline in the school.
- The school recognises that taking disciplinary action and providing appropriate support are not mutually exclusive actions and will occur at the same time if necessary.

Unsubstantiated, unfounded, false, or malicious reports

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

- If a report is shown to be deliberately invented or malicious, the school or college, should consider whether any disciplinary action is appropriate against the individual who made it as per their own behaviour policy.

Safeguarding and supporting the victim

When making any decisions regarding safeguarding and supporting the victim the following principles should be considered:

- The needs and wishes of the victim should be paramount (along with protecting the child) in any response. It is important they feel in as much control of the process as is reasonably possible. Wherever possible, the victim, if they wish, should be able to continue in their normal routine. Overall, the priority should be to make the victim's daily experience as normal as possible, so that the school is a safe space for them.
- the age and the developmental stage of the victim, the nature of the allegations and the potential risk of further abuse. Schools should be aware that, by the very nature of sexual violence and sexual harassment, a power imbalance is likely to have been created between the victim and alleged perpetrator.
- The victim should never be made to feel they are the problem for making a report or made to feel ashamed for making a report.
- Consider the proportionality of the response. Support should be tailored on a case-by-case basis. The support required regarding a one-off incident of sexualised name-calling is likely to be vastly different from that for a report of rape.
- Sexual assault can result in a range of health needs, including physical, mental, and sexual health problems and unwanted pregnancy. Children and young people that have a health need arising from sexual assault or abuse can access specialist NHS support from a Sexual Assault Referral Centre (SARC). SARCs offer confidential and non-judgemental support to victims and survivors of sexual assault and abuse. They provide medical, practical, and emotional care and advice to all children and adults, regardless of when the incident occurred, and
- Victims may not disclose the whole picture immediately. They may be more comfortable providing information gradually. It's important to keep communication open and supported. When it is clear that ongoing support will be required, we should ask the victim if they would find it helpful to have a designated trusted adult (for

example, their form tutor or designated safeguarding lead) to talk to about their needs. The choice of any such adult should be the victims. The school should respect and support this choice

- A victim of sexual violence is likely to be traumatised and, in some cases, may struggle in a normal classroom environment.
- While we should avoid any action that would have the effect of isolating the victim, in particular from supportive child groups, there may be times when the victim finds it difficult to maintain a full-time timetable and may express a wish to withdraw from lessons and activities. This should be because the victim wants to, not because it makes it easier to manage the situation. If required, schools should provide a physical space for victims to withdraw.
- It may be necessary for schools to maintain arrangements to protect and support the victim for a long time. Schools should be prepared for this and should work with children's social care and other agencies as required.
- It is important that the school do everything they reasonably can to protect the victim from bullying and harassment as a result of any report they have made.
- Whilst they should be given all the necessary support to remain in their school, if the trauma results in the victim being unable to do this, alternative provision or a move to another school or college should be considered to enable them to continue to receive suitable education. This should only be at the request of the victim (and following discussion with their parents or carers).
- It is important that if the victim does move to another educational institution (for any reason), that the new educational institution is made aware of any ongoing support needs. The designated safeguarding lead should take responsibility to ensure this happens (and should discuss with the victim and, where appropriate their parents or carers as to the most suitable way of doing this) as well as transferring the child protection file.
- Where there is a criminal investigation into a rape, assault by penetration or sexual assault, the alleged perpetrator should be removed from any classes they share with the victim. The school should also consider how best to keep the victim and alleged perpetrator a reasonable distance apart on school or college premises and on transport to and from school or college where appropriate. This is in the best interests of both children and should not be perceived to be a judgement on the guilt of the alleged perpetrator.
- Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, the school or college should take suitable action, if they have not already done so. In all but the most exceptional of circumstances, the rape or assault is likely to constitute a serious breach of discipline and lead to the view that allowing the perpetrator to remain in the same school or college would seriously harm the education or welfare of the victim (and potentially other students or students).
- Where a criminal investigation into sexual assault leads to a conviction or caution, the school or college should, if it has not already, consider any suitable sanctions in light of their behaviour policy, including consideration of permanent exclusion. Where the perpetrator is going to remain at the school or college, the principle would be to continue keeping the victim and perpetrator in separate classes and continue to consider the most appropriate way to manage potential contact on school and college premises and transport. The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases.

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

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

Support options are listed clearly in paragraph 620 of KCSiE 2026

Safeguarding and supporting the alleged perpetrator

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

- The school will have a difficult balancing act to consider. On one hand we need to safeguard the victim (and the wider student/student body) and on the other hand provide the alleged perpetrator with an education, safeguarding support as appropriate and implement any disciplinary sanctions. Taking disciplinary action and still providing appropriate support are not mutually exclusive actions. They can, and should, occur at the same time if necessary.
- We should consider the age and the developmental stage of the alleged perpetrator and nature of the allegations. Any child will likely experience stress as a result of being the subject of allegations and/or negative reactions by their peers to the allegations against them.
- We should also consider the proportionality of the response. Support (and sanctions) should be considered on a case-by-case basis. An alleged perpetrator may potentially have unmet needs (in some cases these may be considerable) as well as potentially posing a risk of harm to other children. Harmful sexual behaviours in young children may be (and often are) a symptom of either their own abuse or exposure to abusive practices and or materials. Advice should be taken, as appropriate, from children's social care, specialist sexual violence services and the police.
- It is important that if the alleged perpetrator does move to another educational institution (for any reason), that the new educational institution is made aware of any ongoing support needs and where appropriate, potential risks to other children and staff. The designated safeguarding lead should take responsibility to ensure this happens as well as transferring the child protection file

The Lucy Faithfull Foundation has developed a HSB toolkit, which amongst other things, provides support, advice and information on how to prevent it, links to organisations and helplines, resources about HSB by children, internet safety, sexual development and preventing child sexual abuse.

The Lucy Faithfull Foundation in collaboration with the Home Office, has developed 'Shore Space', an online resource which works to prevent harmful sexual behaviour. Shore Space offers a confidential chat service supporting young people who are concerned about their own or someone else's sexual thoughts and behaviour.

The NSPCC provides free and independent advice about HSB: NSPCC Learning: Protecting children from harmful sexual behaviour and NSPCC - Harmful sexual behaviour framework.

Beyond Referrals | Contextual Safeguarding provides a school self assessment toolkit and guidance for addressing HSB in schools.

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

Anonymity

Where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system, schools and colleges should be aware of anonymity, witness support, and the criminal process in general so they can offer support and act appropriately. Relevant information can be found in: CPS: Safeguarding Children as Victims and Witnesses.

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

Schools and colleges should also consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities.

Physical Abuse

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

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

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

Annex 6 - Online Safety

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

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

A comprehensive approach to online safety empowers staff to protect and educate pupils, students, and colleagues in their use of technology and establishes the following mechanisms to identify, intervene in, and escalate any concerns where appropriate.

- For more detail see the Online Safety policy

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

• **Content**: being exposed to illegal, inappropriate or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories.

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

• **Conduct**: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography) including those generated using AI, and online bullying; and

• **Commerce** - risks such as online gambling, inappropriate advertising, phishing and or financial scams. If we feel pupils, students or staff are at risk, we will report it to the Anti-Phishing Working Group (https://apwg.org/).

We ensure that online safety is a running and interrelated theme when devising and implementing our whole school approach to safeguarding and related policies and procedures.

We understand the DfE expectation that schools implement a mobile phone policy whereby pupils do not have access to their mobile phones during the school day including during lessons, the time between lessons, breaktimes and lunchtimes. We will refer to appropriate guidance to decide how best to achieve this within our school context (Creating a mobile phone-free environment: school case studies - GOV.UK, Mobile phones in schools - GOV.UK)
Our approach is outlined in our Acceptable Use of IT, senior school Smartphone policy and Prep Smart device policy.

Appropriate filtering and monitoring systems are in place on all school devices and school networks. These are regularly reviewed, at least once every academic year, and a record is kept of these checks. Staff training includes understanding of roles and responsibilities in relation to filtering and monitoring. In developing our policies and procedures, we will refer to the DfE guidance: Meeting digital and technology standards in schools and colleges - Filtering and monitoring standards for schools and colleges - Guidance - GOV.UK (www.gov.uk) and the department's Plan technology for your school - GOV.UK to carry out a self-assessment against the filtering and monitoring standards.

We recognise that AI in education affords both opportunities and challenges in schools. Schools can decide whether to permit AI use by age-appropriate pupils, limit AI access to approved tools, or adopt a mixed approach for trusted and untrusted staff. In developing our approach to AI, we will refer to DfE guidance Generative artificial intelligence (AI) in education - GOV.UK and Using AI in education settings: support materials - GOV.UK.

We understand that education settings are directly responsible for ensuring they have the appropriate level of cyber security protection procedures in place in order to safeguard their systems, staff and learners and review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.

We are aware that guidance on e-security is available from the National Education Network. In addition, schools and colleges should consider meeting the Cyber security standards for schools and colleges.GOV.UK. and that broader guidance on cyber security including considerations for governors and trustees can be found at Cyber security training for school staff - NCSC.GOV.UK.

We will consider how online safety, including the use of generative artificial intelligence, is reflected as required in all relevant policies and embedded across all areas of the curriculum, included in teacher training and within the role and responsibilities of the designated safeguarding lead as well as discussions with parents.

We understand that technology, and risks and harms related to it, evolve, and change rapidly and we will carry out regular reviews of our approach to online safety to consider and reflect the risks to our pupils.

Annex 7 - Whistleblowing

Whistleblowing in a safeguarding context

Every school should have a whistleblowing procedure. Whistleblowing procedures protect staff members who report colleagues they believe are doing something wrong or illegal, or who are neglecting their duties.

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

The whistleblowing policy is not designed to be used for concerns that fall under statutory procedures (for example child protection or allegations against staff) as these should be reported under the relevant procedures. However, the whistleblowing policy will apply if there is good reason to believe that the relevant procedure is not being followed or will not be followed effectively.

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

If your concern is about the headteacher, you should raise this with the Chair of School Council.

If you would prefer to raise your concerns outside the school environment you can contact Children's Social Care by calling 0300 555 1384 (office hours) or 0300 555 1373 (outside of office hours) or the Local Authority Designated Officer at LADO@hants.gov.uk.

Annex 8 - Briefing sheet for temporary and supply staff

For supply staff and those on short contracts in St. Swithun's school

While working in St. Swithun's school, you have a duty of care towards the children and young people here. This means that at all times you should act in a way that is consistent with their safety and welfare. In addition, if at any time you have a concern about a child or young person, particularly if you think they may be at risk of abuse or neglect, it is your responsibility to share that concern with the relevant school designated safeguarding lead (DSL), who is Graham Yates in the senior school – room F18 (yatesg@stswithuns.com) and Kate Grosscurth – deputy head office(grosscurthk@stswithuns.com) in the Prep school.

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

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

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

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

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

The school has a policy on safeguarding children and young people which you can find, together with the local procedures to be followed by all staff, on the staff portal or a hard copy can be accessed in the school office.

If your concern involves the DSL or a member of the senior staff, contact the LADO via Hampshire LADO Enquiry Form sent to LADO@hants.gov.uk.

Remember, if you have a concern, report it.

Annex 9 - What is child abuse?

The following definitions are taken from W*orking Together to Safeguard Children* HM Government (2026) and KCSIE 2026. In addition to these definitions, it should be understood that children can also be abused through criminal and sexual exploitation, coercive and controlling behaviour, teenage relationship abuse, honour-based violence, faith-based abuse, and online child sexual abuse and exploitation. To support the local context, all staff have access to the Hampshire Safeguarding Children Partnership (HSCP) threshold chart.

What is abuse and neglect?
Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. Children may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by a stranger. Abuse may take place wholly online, or technology may be used to facilitate abuse. Children may be abused by an adult or adults, or another child or children.

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

Emotional abuse
Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include verbal abuse such as persistent criticism, belittling, or name-calling, as well as 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 cyber bullying), 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.

Sexual abuse
Sexual abuse involves forcing, causing or inciting 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 penetration with an object) 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. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific

safeguarding issue in education and all staff should be aware of it and the school's policy and procedure for dealing with it. Children can be sexually abused within the family, an institution or a community setting, and are more likely to know their abuser than not.
There are specific offences for children under 13, who can never provide valid consent to sexual activity and there are specific offences which make clear that sexual activity with a child under 16 is an offence, regardless of whether they agreed to that activity.

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

- provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- protect a child from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate caregivers)
- ensure access to appropriate medical care or treatment.

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

The HSCP neglect strategy is used to provide a more detailed summary of neglect and the local thresholds for referrals.

Indicators of abuse

Neglect

The nature of neglect
Neglect is a lack of parental care, but poverty and lack of information or adequate services can be contributory factors.

Far more children are registered to the category of neglect on child protection plans than to the other categories. As with abuse, the number of children experiencing neglect is likely to be much higher than the numbers on the plans.

Neglect can include parents or carers failing to:

- provide adequate food, clothing and shelter
- protect a child from physical and emotional harm or danger
- ensure adequate supervision or stimulation
- ensure access to appropriate medical care or treatment

NSPCC research has highlighted the following examples of the neglect of children under 12:

- frequently going hungry
- frequently having to go to school in dirty clothes
- regularly having to look after themselves because of parents being away or having problems such as drug or alcohol misuse
- being abandoned or deserted
- living at home in dangerous physical conditions
- not being taken to the doctor when ill

- not receiving dental care.

Neglect is a difficult form of abuse to recognise and is often seen as less serious than other categories. It is, however, very damaging: children who are neglected often develop more slowly than others and may find it hard to make friends and fit in with their peer group.

Neglect is often noticed at a stage when it does not pose a risk to the child. The duty to safeguard and promote the welfare of children (*What to do if You're Worried a Child is Being Abused* DfE 2015) would suggest that an appropriate intervention or conversation at this early stage can address the issue and prevent a child continuing to suffer until it reaches a point when they are at risk of harm or in significant need.

Neglect is often linked to other forms of abuse, so any concerns school staff have should at least be discussed with the DSL.

Indicators of neglect
The following is a summary of some of the indicators that may suggest a child is being abused or is at risk of harm. It is important to recognise that indicators alone cannot confirm whether a child is being abused. Each child should be seen in the context of their family and wider community and a proper assessment carried out by appropriate persons. What is important to keep in mind is that if you feel unsure or concerned, do something about it. Don't keep it to yourself. The HSCP neglect toolkit provides a more detailed list of indicators of neglect and is available to all staff

Physical indicators of neglect
- Constant hunger and stealing food
- Poor personal hygiene - unkempt, dirty or smelly
- Underweight
- Dress unsuitable for weather
- Poor state of clothing
- Illness or injury untreated.

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

<u>Emotional abuse</u>

The nature of emotional abuse
Most harm is produced in *low warmth, high criticism* homes, not from single incidents.
Emotional abuse is difficult to define, identify/recognise and/or prove.
Emotional abuse is chronic and cumulative and has a long-term impact.
All kinds of abuse and neglect have emotional effects although emotional abuse can occur by itself.

Children can be harmed by witnessing someone harming another person – as in domestic violence.

It is sometimes possible to spot emotionally abusive behaviour from parents and carers to their children, by the way that the adults are speaking to, or behaving towards children. An appropriate challenge or intervention could affect positive change and prevent more intensive work being carried out later on.

Indicators of emotional abuse

Developmental issues

- Delays in physical, mental and emotional development
- Poor school performance
- Speech disorders, particularly sudden disorders or changes.

Behaviour

- Acceptance of punishment which appears excessive
- Over-reaction to mistakes
- Continual self-deprecation (I'm stupid, ugly, worthless etc)
- Neurotic behaviour (such as rocking, hair-twisting, thumb-sucking)
- Self-mutilation
- Suicide attempts
- Drug/solvent abuse
- Running away
- Compulsive stealing, scavenging
- Acting out
- Poor trust in significant adults
- Regressive behaviour – e.g., wetting
- Eating disorders
- Destructive tendencies
- Neurotic behaviour
- Arriving early at school, leaving late.

Social issues

- Withdrawal from physical contact
- Withdrawal from social interaction
- Over-compliant behaviour
- Insecure, clinging behaviour
- Poor social relationships.

Emotional responses

- Extreme fear of new situations
- Inappropriate emotional responses to painful situations ("I deserve this")
- Fear of parents being contacted
- Self-disgust
- Low self-esteem
- Unusually fearful with adults
- Lack of concentration, restlessness, aimlessness
- Extremes of passivity or aggression.

Physical abuse

The nature of physical abuse
Most children collect cuts and bruises quite routinely as part of the rough and tumble of daily life. Clearly, it is not necessary to be concerned about most of these minor injuries. However, accidental injuries normally occur on the *bony prominences* – e.g., shins. Injuries on the *soft* areas of the body are more likely to be inflicted intentionally and should therefore make us more alert to other concerning factors that may be present.

A body map (annex 2*)* can assist in the clear recording and reporting of physical abuse. The body map should only be used to record observed injuries, and no child should be asked to remove clothing by a member of staff of the school.

Indicators of physical abuse / factors that should increase concern

- Multiple bruising or bruises and scratches (especially on the head and face)
- Clusters of bruises – e.g., fingertip bruising (caused by being grasped)
- Bruises around the neck and behind the ears – the most common abusive injuries are to the head
- Bruises on the back, chest, buttocks, or on the inside of the thighs
- Marks indicating injury by an instrument – e.g., linear bruising (stick), parallel bruising (belt), marks of a buckle
- Bite marks
- Deliberate burning may also be indicated by the pattern of an instrument or object – e.g., electric fire, cooker, cigarette
- Scalds with upward splash marks or *tide marks*
- Untreated injuries
- Recurrent injuries or burns
- Bald patches.

In the social context of the school, it is normal to ask about a noticeable injury. The response to such an enquiry is generally light-hearted and detailed. So, most of all, concern should be increased when:

- the explanation given does not match the injury
- the explanation uses words or phrases that do not match the vocabulary of the child (adult words)
- no explanation is forthcoming
- the child (or the parent/carer) is secretive or evasive
- the injury is accompanied by allegations of abuse or assault.

You should be concerned if the child or young person:

- is reluctant to have parents/carers contacted
- runs away or shows fear of going home
- is aggressive towards themselves or others
- flinches when approached or touched
- is reluctant to undress to change clothing for sport

- wears long sleeves during hot weather
- is unnaturally compliant in the presence of parents/carers.
- has a fear of medical help or attention
- admits to a punishment that appears excessive.

Sexual abuse

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

Sexual exploitation is seen as a separate category of sexual abuse. Indicators of Child Sexual Exploitation (CSE) can be found in the school's safeguarding policy below.

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

Most people who sexually abuse children are men, but some women sexually abuse too.

Indicators of sexual abuse

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

Behavioural observations
- Sexual knowledge inappropriate for age
- Sexualised behaviour or affection inappropriate for age
- Sexually provocative behaviour/promiscuity
- Hinting at sexual activity Inexplicable decline in school performance
- Depression or other sudden apparent changes in personality as becoming insecure or clinging
- Lack of concentration, restlessness, aimlessness
- Socially isolated or withdrawn
- Overly-compliant behaviour
- Acting out, aggressive behaviour
- Poor trust or fear concerning significant adults

- Regressive behaviour,
- Onset of wetting, by day or night; nightmares
- Onset of insecure, clinging behaviour
- Arriving early at school, leaving late, running away from home
- Suicide attempts, self-mutilation, self-disgust
- Suddenly drawing sexually explicit pictures
- Eating disorders or sudden loss of appetite or compulsive eating
- Regressing to younger behaviour patterns such as thumb sucking or bringing out discarded cuddly toys
- Become worried about clothing being removed
- Trying to be 'ultra-good' or perfect; overreacting to criticism.

Annex 10: What staff should look out for: support before statutory intervention

It is important for all school staff to have a clear understanding of the process for community-based Family Help assessments and that any child may benefit from support before statutory intervention, including universal services and community-based Early Help, or the targeted early help level of Family Help. In addition, it is important that staff should be particularly alert to the potential need for early help for a child who:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care plan)
- has a mental health need
- is a young carer
- is pregnant or is a parent themselves
- has exhibited early signs of abusive, violent and/or harmful behaviour
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and associations with organised crime groups or county lines
- is frequently missing/goes missing from education, home or care
- has been repeatedly removed from the classroom, has experienced multiple suspensions, is on a part-time timetable, is at risk of being permanently excluded from schools, colleges and in Alternative Provisions or a Pupil Referral Unit
- is at risk of exploitation, modern slavery, trafficking, sexual and/or criminal exploitation
- is at risk of being radicalised into terrorism
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- is at risk of honour or faith-based abuse such a Female Genital Mutilation or Forced Marriage
- is a privately fostered child.

Reference: KCSIE 2026

Annex 11 - Useful contacts

Key Personnel	Name (s)	Contact details:
Senior school DSL	Graham Yates	Tel: 01962 835700 (internal 2706) Email: safeguarding @stswithuns.com
Senior school Deputy DSL(s)	Alice Ludlow Katy Barnett Flic Lewington	Tel: 01962 835700 Email: safeguarding @stswithuns.com
Prep school DSL	Kate Grosscurth	Tel: 01962 835750 (internal 2752) Email: prepsafeguarding@stswithuns.com
Prep school Deputy DSL(s)	Allison Greenfield	Tel: 01962 835750 (internal 2757) Email: prepsafeguarding@stswithuns.com
EYFS DSL	Shelly Say	Tel: 01962 835750(internal 2835) Email: says@stswithuns.com prepsafeguarding@stswithuns.com
Nursery and preschool DSL	Sarah Lindsay	Tel: 01962 835766 (internal 2766) Email: nurseryandpreschool@stswithuns.com
School's named Prevent lead	Senior school: Graham Yates Prep school: Kate Grosscurth	yatesg@stswithunss.com grosscurth@stswithuns.com
Schools Mental Health Lead	Senior: Graham Yates Prep:	yatesg@stswithuns.com Grosscurthk@stswithuns.com
School Lead Nurse	Caroline Weeks	Tel: 01962 835700 (internal 2772) Email: weeksc@stswithuns.com
Nominated Safeguarding Governor	Dr. Steve Bailey	Via: office@stswithuns.com
Chair of Governors	Alison McClure	chairofCouncil@stswithuns.com

Children's Reception Team		01329 225379
Out of hours social care		0300 555 1373
Police	NPCC guidance	101 or in emergencies 999
Safeguarding Advisors / Local Authority Designated Officers (LADOs)	Cindy Pritchard (Lead Safeguarding Adviser) cindy.pritchard@hants.gov.uk	HCC Safeguarding Unit 01962 876364 Child.protection@hants.gov.uk (safeguarding advice) LADO@hants.gov.uk (Concerns about adults)

St. Swithun's School Safeguarding Policy

Policy Statement

Safeguarding determines the actions that we take to keep children safe and protect them from harm in all aspects of their school life. As a school we are committed to safeguarding and promoting the welfare of all our pupils.

The actions that we take to prevent harm; to promote wellbeing; to create safe environments; to educate on rights, respect and responsibilities; to respond to specific issues and vulnerabilities all form part of the safeguarding responsibilities of the school. As such, this overarching policy will link to other policies which will provide more information and greater detail.

Aims

- To provide staff with the framework to promote and safeguard the wellbeing of children and in so doing ensure they meet their statutory responsibilities.
- To ensure consistent good practice across the school.
- To demonstrate our commitment to protecting children.

Principles and Values

Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all staff should make sure their approach is child centred. This means that they should consider, at all times, what is in the best interests of the child.

Safeguarding measures are put in place to minimise harm to children. There may be occasions where gaps or deficiencies in our policies and processes will be highlighted. In these situations, a review will be carried out in order to identify learning and inform the policy, practice and culture of the school.

All pupils in our school can talk to any member of staff about situations, or to share concerns, which are causing them worries. The staff will listen to the pupil, take their worries seriously and share the information with the safeguarding lead.

In addition, we provide pupils with information about who they can talk to outside of school, both within the community and with local or national organisations that can provide support or help.

Any links to local or national advice and guidance can be accessed via the safeguarding in education webpages: www.hants.gov.uk/educationandlearning/safeguardingchildren/guidance

Links to online specific advice and guidance can be found at https://www.hants.gov.uk/socialcareandhealth/childrenandfamilies/safeguardingchildren/onlinesafety

Links to other pages from the local authority on safeguarding can be found at https://www.hants.gov.uk/socialcareandhealth/childrenandfamilies/safeguardingchildren

The procedures of the Hampshire Safeguarding Children Partnership can be accessed at http://hipsprocedures.org.uk/page/contents

Areas of Safeguarding

Safeguarding areas can be separated into specific areas: -

- emerging or high-risk issues;
- those related to the pupils as an individual;
- other safeguarding issues affecting pupils;
- and those related to the running of the school.

Definitions

Within this document:

'***Safeguarding'*** is defined in the Children Act 2004 as protecting from maltreatment; preventing impairment of health and development; ensuring that children grow up with the provision of safe and effective care; and work in a way that gives the best life chances and transition to adult hood. Our safeguarding practice applies to every child.

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

Child refers to all young people who have not yet reached their 18th birthday. On the whole, this will apply to pupils of our school; however, the policy will extend to visiting children and students from other establishments.

Parent refers to birth parents and other adults in a parenting role for example adoptive parents, guardians, stepparents, and foster carers.

Key personnel

The designated safeguarding lead for the Senior school is: **Graham Yates**

The deputy designated safeguarding leads for the senior school are: **Alice Ludlow, Katy Barnett and Flic Lewington.**

The designated safeguarding lead for the Prep school is: **Kate Grosscurth**

The deputy designated safeguarding lead for the prep school is: **Allison Greenfield**

The designated safeguarding lead for EYFS is: **Shelly Say**

The designated safeguarding lead for the nursery and preschool is: **Sarah Lindsay**

The deputy designated safeguarding lead for the nursery and preschool is: **Izzy Richardson**

Part 1 – High risk and emerging safeguarding issues

Contextual Safeguarding

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of our school. All staff, but especially the designated and deputy safeguarding leads should consider whether children are at risk of abuse or exploitation in situations outside their families.

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

Risk and harm outside of the family can take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse including physical sexual, emotional abuse and stalking), criminal exploitation (including financial exploitation), serious youth violence, county lines and radicalisation.

As a school, we will consider the various factors that can impact the life of any pupil about whom we have concerns. We will consider the level of influence that these factors have on their ability to be protected and remain free from harm, particularly around child exploitation or criminal activity.

What life is like for a child outside the school gates, within the home, within the family and within the community are key considerations when the DSL is looking at any concerns.

Preventing Radicalisation and Extremism

The Prevent duty requires that all staff are aware of the signs that a child may be vulnerable to radicalisation. The risks include, but are not limited to, political, environmental, animal rights or faith-based extremism that may lead to a child becoming radicalised. All staff have undertaken e-learning training in order that they can identify the signs of children being radicalised.

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

As part of the preventative process resilience to radicalisation will be built through the promotion of fundamental British values through the curriculum.

Any child who is considered vulnerable to radicalisation will be referred by the DSL using the National Referral Form: Prevent | Hampshire County Council (hants.gov.uk). The Counter Terrorism Police and Children's Services through MASH will then be informed. If the Counter Terrorism Police consider the information to be indicating a level of risk, a "channel panel" will be convened and the school will attend and support this process.

We use the curriculum to ensure that children and young people understand how people with extreme views share these with others, especially using the internet.

Staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a Prevent referral.

We are committed to ensuring that our students are offered a broad and balanced curriculum that aims to prepare them for life in modern Britain. Teaching the school's core values alongside the fundamental British Values supports quality teaching and learning, whilst making a positive contribution to the development of a fair, just and civil society.

Recognising Extremism

Early indicators of radicalisation or extremism may include:

- showing sympathy for extremist causes
- glorifying violence, especially to other faiths or cultures
- making remarks or comments about being at extremist events or rallies outside school
- evidence of possessing illegal or extremist literature
- advocating messages similar to illegal organisations or other extremist groups
- out of character changes in dress, behaviour and child relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent.)
- secretive behaviour
- online searches or sharing extremist messages or social profiles
- intolerance of difference, including faith, culture, gender, race or sexuality
- graffiti, art work or writing that displays extremist themes
- attempts to impose extremist views or practices on others
- verbalising anti-Western or anti-British views
- advocating violence towards others

Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media) and settings (such as the internet). However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised.

The **Prevent duty** requires that all staff are aware of the signs that a child may be vulnerable to radicalisation. The risks will need to be considered for political; environmental; animal rights; or faith-based extremism that may lead to a child becoming radicalised. All staff have undertaken e-learning training in order that they can identify the signs of children being radicalised.

Any child who is considered vulnerable to radicalisation will be referred by the DSL to Hampshire children's social care, where the concerns will be considered in the MASH process. If the police prevent officer considers the information to be indicating a level of risk a "channel panel" will be convened and the school will attend and support this process.

Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages. Guidance on Channel is available at: Channel guidance, and the Hampshire guidance can be found here.

Educate Against Hate, a website launched by the Her Majesty's Government has been developed to support and equip school and college leaders, teachers, and parents with information, tools and resources (including on the promotion of fundamental British values) to help recognise and address extremism and radicalisation in young people. The platform provides information on and access to training resources for teachers, staff and school and college leaders, some of which are free such as Prevent e-learning, via the Prevent Training catalogue.

Gender based violence / Violence against women and girls

https://www.gov.uk/government/policies/violence-against-women-and-girls

The government has a strategy looking at specific issues faced by women and girls. Within the context of this safeguarding policy the following sections are how we respond to violence against girls: female genital mutilation, virginity testing and hymenoplasty, forced marriage, honour- or faith-based violence and teenage relationship abuse all fall under this strategy.

Female Genital Mutilation (FGM)

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

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

FGM is illegal in the UK.

On the 31 October 2015, it became mandatory for teachers to **personally** report known cases of FGM to the police. 'Known' cases are those where either a girl informs the person that an act of FGM – however described – has been carried out on her, or where the person observes physical signs on a girl appearing to show that an act of FGM has been carried out and the person has no reason to believe that the act was, or was part of, a surgical operation within section 1(2)(a) or (b) of the FGM Act. In these situations, the DSL and/or headteacher will be informed and **the member of teaching staff must call** the police to report suspicion that FGM has happened.

At no time will staff examine pupils to confirm concerns

For cases where it is believed that a girl may be vulnerable to FGM or there is a concern that she may be about to be genitally mutilated, the staff will inform the DSL who will report it as with any other child protection concern.

Risk factors for FGM include:

- low level of integration into UK society
- mother or a sister who has undergone FGM
- girls who are withdrawn from PSHE
- visiting female elder from the country of origin
- being taken on a long holiday to the country of origin
- talk about a 'special' procedure to become a woman

Symptoms of FGM

FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents wish to take their daughter out-of-school to visit an 'at-risk' country (especially before the summer holidays), or parents who wish to withdraw their children from learning about FGM. Staff should not assume that FGM only happens outside the UK.

Indications that FGM may have already taken place may include:

- difficulty walking, sitting or standing and may even look uncomfortable.
- spending longer than normal in the bathroom or toilet due to difficulties urinating.
- spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- frequent urinary, menstrual or stomach problems.
- prolonged or repeated absences from school or college, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return
- reluctance to undergo normal medical examinations.
- confiding in a professional without being explicit about the problem due to embarrassment or fear.
- talking about pain or discomfort between her legs

While FGM has a specific definition, there are other abusive cultural practices which can be considered harmful to women and girls. Breast ironing is one of five UN defined 'forgotten crimes against women.' It is a practice whereby the breasts of girls typically aged 8-16 are pounded using tools such as spatulas, grinding stones, hot stones, and hammers to delay the appearance of puberty. This practice is considered to be abusive and should be referred to children's social care.

Virginity testing and hymenoplasty

Staff should be aware that virginity testing and hymenoplasty became illegal in 2022 and that it is a criminal offence for anyone to perform or assist in the performance of FGM, virginity testing or hymenoplasty, in the UK or abroad, or to fail to protect a person under 16 for whom they are responsible. For cases where it is believed that a girl may be vulnerable to virginity testing or

hymenoplasty, the staff will inform the DSL who will report it as with any other child protection concern.

Virginity testing is any examination (with or without contact) of the female genitalia intended to establish if vaginal intercourse has taken place. This is irrespective of whether consent has been given.

Hymenoplasty is a procedure undertaken to reconstruct a hymen. The aim of the procedure is to ensure that a woman bleeds the next time she has intercourse to give the impression that she has no history of vaginal intercourse.

Forced Marriage

A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into marriage. Threats can be physical or emotional and psychological. Duress can include physical, *psychological, financial, sexual and emotional pressure.* In developing countries 11% of girls are married before the age of 15. One in 3 victims of forced marriage in the U.K. is under 18.

It is important that all members of staff recognise the presenting symptoms, how to respond if there are concerns and where to turn for advice.

Advice and help can be obtained nationally through the Forced Marriage Unit and locally through the local police safeguarding team or children's social care. Policies and practices in this school reflect the fact that while all members of staff, including teachers, have important responsibilities with regard to pupils who may be at risk of forced marriage, teachers and school leaders should not undertake roles in this regard that are most appropriately discharged by other children's services professionals such as police officers or social workers.

Characteristics that may indicate forced marriage
While individual cases of forced marriage, and attempted forced marriage, are often very particular, they are likely to share a number of common and important characteristics, including:

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

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

Honour or Faith-Based Abuse

So-called 'honour' or faith-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take.

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

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

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

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

All forms of honour-based abuse are abusive (regardless of the motivation) and should be handled and escalated as such. If staff believe that a pupil is at risk or has already suffered from honour-based abuse, they will report to the DSL who will follow the usual safeguarding referral process; however, if it is clear that a crime has been committed or the pupil is at immediate risk, the police will be contacted in the first instance. It is important that, if honour-based abuse is known or suspected, communities and family members are NOT spoken to prior to referral to the police or social care as this could increase risk to the child.

Teenage Relationship Abuse

Relationship abuse can take place at any age and describes unacceptable behaviour between two people who are in a relationship.

Research has shown that teenagers do not always understand what may constitute abusive and controlling behaviours, e.g. checking someone's 'phone, telling them what to wear, who they can/can't see or speak to or coercing them to engage in activities they are not comfortable with. The government campaign "disrespect nobody" provides other examples of abusive behaviour within a relationship.

This lack of understanding can lead to these abusive behaviours feeling 'normal' and therefore left unchallenged, as they are not recognised as being abusive.

In response to these research findings, the **Prep** school will provide education to help prevent teenagers from becoming victims and perpetrators of abusive relationships. In the context of our primary school, we will encourage and educate children to develop positive and respectful relationships with others and to understand consent in its broadest form. This will form part of the school's curriculum in respect of PSHE and Relationship Education and in developing this curriculum school will follow the RSHE guidance (July 2025) Relationships Education, Relationships and Sex Education and Health Education guidance

In response to these research findings, the **senior** school will provide education to help prevent teenagers from becoming victims and perpetrators of abusive relationships, by encouraging them to rethink their views of violence, abuse and controlling behaviours, and understand what consent means within their relationships. This will form part of the school's curriculum content in respect of Relationship Education and in developing this curriculum the school will follow the RSHE guidance (July 2025): Relationships Education, Relationships and Sex Education and Health Education guidance

If the school has concerns about a child in respect of relationship abuse, it will report those concerns in line with procedures to the appropriate authorities as a safeguarding concern, a crime or both.

Sexual Violence and Sexual Harassment Between Children

Sexual violence and sexual harassment (SVSH) can occur between two children of any age and sex from primary to secondary stage and into colleges. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Harmful sexual behaviour exists on a continuum and may escalate into sexual harassment or sexual violence; it can occur online or face-to-face and is never acceptable.

Within our school all staff receive training about sexual violence and sexual harassment and what to do if they have a concern or receive a report. Whilst any report of sexual violence or sexual harassment should be taken seriously, staff are aware it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys. This pattern of prevalence will not, however, be an obstacle to ALL concerns being treated seriously.

Staff are also aware that children with disabilities are three times more likely to be abused than their peers.

This school has a zero-tolerance approach to SVSH. We are clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up. It cannot be described as 'banter,' 'having a laugh' or 'boys being boys.

We will also take seriously any sharing of sexual images (photos, pictures or drawings) and videos; sexual jokes, comments or taunting either in person or on social media; or online sexual harassment.

The child protection policy above has a clear procedure for dealing with child on child SVSH.

We will follow Part five in KCSiE 2026 Child-on-child sexual violence and sexual harassment by:

- Making it clear that there is a zero-tolerance approach to sexual violence and sexual harassment, that it is never acceptable, and it will not be tolerated. It should never be passed off as "banter," "just having a laugh," "a part of growing up" or "boys being boys."
- Understanding that a failure to do so can lead to a culture of unacceptable behaviour, misogyny, an unsafe environment and in worst case scenarios a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it.
- Recognising, acknowledging, and understanding the scale of harmful sexual behaviour (HSB), sexual harassment and sexual abuse and that even if there are no reports it does not mean it is not happening, it may be the case that it is just not being reported.
- Recognising the escalatory nature of misogyny and the benefits of early identification to support the school's approach to minimising the risk of HSB, sexual harassment and sexual violence, and
- Also challenging physical behaviour (potentially criminal in nature) such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

All staff will maintain the attitude that "It could happen here."

Sexism and stereotyping

The new RSHE Guidance (July 2025) Relationships Education, Relationships and Sex Education and Health Education guidance outlines the importance of developing positive concepts of masculinity and femininity.

Both within and beyond the classroom, staff should be conscious of everyday sexism, misogyny/misandry, homophobia, biphobia and stereotypes, and should take action to build a culture where prejudice is identified and tackled. Staff have an important role in modelling positive behaviour and avoiding language that might perpetuate harmful stereotypes. Pupils should understand the importance of challenging harmful beliefs and attitudes and should understand the links between sexism and misogyny and violence against women and girls. Where misogynistic ideas are expressed at school, staff should challenge the ideas, rather than the person expressing them.

Pupils may be exposed to online content which normalises harmful or violent sexual behaviours, which might include sexist and misogynistic influencers who normalise sexual harassment and abuse. Young people may be more vulnerable to this content when they have low self-esteem, are being bullied, or have other challenges in their lives. Teachers should encourage pupils to consider how this content may be harmful to both men and women, while avoiding stigmatising or perpetuating harmful stereotypes about boys, and avoiding directly signposting to specific content and content producers.

Upskirting

In 2019 the Voyeurism Offences Act came into force and made the practice of upskirting illegal.

Upskirting is defined as someone taking a picture under another person's clothing without their knowledge, with the intention of viewing their genitals or buttocks, with or without underwear. The intent of upskirting is to gain sexual gratification or to cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim.

If staff become aware that upskirting has occurred, this will be treated as a sexual offence and reported accordingly to the DSL and onwards to the police.

Behaviours that would be considered as sexual harassment which may be pre-cursors to upskirting, such as the use of reflective surfaces or mirrors to view underwear or genitals, will not be tolerated and the school will respond to these with appropriate disciplinary action and education.

Pupils who place themselves in positions that could allow them to view underwear, genitals or buttocks, will be moved on. Repeat offenders will be disciplined. These locations could include stairwells, under upper floor walkways, outside changing areas and toilets or sitting on the floor or laying down in corridors.

If technology that is designed for covert placement and could be used to take upskirting or indecent images is discovered in the school, it will be confiscated. If the technology is in location and potentially may have captured images, this will be reported to the police and left in situ so that appropriate forensic measures may be taken to gather evidence.

Any confiscated technology will be passed to the headteacher to make a decision about what happens to the items. This will be carried out under the principles set out in the government guidance on searching, screening and confiscation.

If the image is taken on a mobile phone, the phone will be confiscated under the same principles. This may need to be passed to the police for them to investigate, if there is evidence that a crime has been committed.

The Trigger Trio

The term 'Trigger Trio' has replaced the previous phrase 'Toxic Trio' which was used to describe the issues of domestic violence, mental ill-health and substance misuse which have been identified as common features of families where harm to adults and children has occurred.

The Trigger Trio are viewed as indicators of increased risk of harm to children and young people. In an analysis of Serious Cases Reviews undertaken by Ofsted in 2011, they found that in nearly 75% of these cases two or more of the triggers were present.

These factors will have a contextual impact on the safeguarding of children and young people.

1. **Domestic Abuse**

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

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socioeconomic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

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

Controlling behaviour is a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour. Coercive behaviour is an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim.

Indicators that a child is living within a relationship with domestic abuse may include:

- being withdrawn
- suddenly behaving differently
- anxiety
- being clingy
- depression
- aggression
- problems sleeping
- eating disorders
- bed wetting
- soiling clothes
- excessive risk taking
- missing school
- changes in eating habits
- obsessive behaviour
- experiencing nightmares
- taking drugs
- use of alcohol

- self-harm
- thoughts about suicide

These behaviours themselves do not indicate that a child is living with domestic abuse but should be considered as indicators that this may be the case.

If staff believe that a child is living with domestic abuse, this will be reported to the DSL for referral, to be considered by children's social care.

2. Parental mental health

The term 'mental ill health' is used to cover a wide range of conditions, from eating disorders, mild depression and anxiety to psychotic illnesses such as schizophrenia or bipolar disorder. Parental mental illness does not necessarily have an adverse impact on a child's developmental needs, but it is essential to always assess its implications for each child in the family. It is essential that the diagnosis of a parent's/carer's mental health is not seen as defining the level of risk. Similarly, the absence of a diagnosis does not equate to there being little or no risk.

For children, the impact of poor parental mental health can include:

- The parent's/carer's needs or illnesses taking precedence over the child's needs.
- The child's physical and emotional needs being neglected.
- The child acting as a young carer for a parent or a sibling.
- The child having restricted social and recreational activities.
- The child finding it difficult to concentrate, potentially having an impact on educational achievement.
- The child missing school regularly as (s)he is being kept home as a companion for a parent/carer.
- The child adopting paranoid or suspicious behaviour as they believe their parent's delusions.
- Witnessing self-harming behaviour and suicide attempts (including attempts that involve the child)
- Obsessional compulsive behaviours involving the child.

If staff become aware of any of the above indicators, or others that suggest a child is suffering due to parental mental health, the information will be shared with the DSL to consider a referral to children's social care.

3. Parental Substance misuse

Substance misuse applies to the misuse of alcohol as well as 'problem drug use', defined by the Advisory Council on the Misuse of Drugs as drug use which has: 'serious negative consequences of a physical, psychological, social and interpersonal, financial or legal nature for users and those around them.

Parental substance misuse of drugs or alcohol becomes relevant to child protection when substance misuse and personal circumstances indicate that their parenting capacity is likely to be

seriously impaired or that undue caring responsibilities are likely to be falling on a child in the family.

For children, the impact of parental substance misuse can include:

- Inadequate food, heat and clothing for children (family finances used to fund adult's dependency)
- Lack of engagement or interest from parents in their development, education or wellbeing
- Behavioural difficulties- inappropriate display of sexual and/or aggressive behaviour
- Bullying (including due to poor physical appearance)
- Isolation – finding it hard to socialise, make friends or invite them home
- Tiredness or lack of concentration
- Child talking of or bringing into school drugs or related paraphernalia
- Injuries /accidents (due to inadequate adult supervision)
- Taking on a caring role
- Continued poor academic performance including difficulties completing homework on time
- Poor attendance or late arrival.

These behaviours themselves do not indicate that a child's parent is misusing substances but should be considered as indicators that this may be the case.

If staff believe that a child is living with parental substance misuse, this will be reported to the designated safeguarding lead for referral to children's social care to be considered.

Young Carers

As many as 1 in 12 children and young people provide care for another person. This could be a parent, a relative or a sibling and for different reasons such as disability, chronic illness, mental health needs, or adults who are misusing drugs or alcohol.

Pupils who provide care for another are Young Carers. These young people can miss out on opportunities, and the requirement to provide care can impact on school attendance or punctuality, limit time for homework, leisure activities and social time with friends and impact upon behaviour and wellbeing. Early identification is essential to ensure young carers receive support at the time and by the appropriate services.

As a school we may refer a young carer to children's social care for a carers assessment to be carried out. We will consider support that can be offered and make use of the resources and guidance from Save the Children and Hampshire Young Carer's Alliance Hampshire Young Carers Alliance, Eastleigh in their young carers work.

Missing, Exploited and Trafficked Children (MET)

Within Hampshire, the acronym MET is used to identify all children who are missing; believed to be at risk of or are being exploited; or who are at risk of or are being trafficked. Given the close

links between all these issues, there has been a considered response to view them as potentially linked, so that cross over of risk is not missed.

Children Absent from Education

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

Knowing where children are during school hours is an extremely important aspect of Safeguarding. Missing school can be an indicator of abuse and neglect and may also raise concerns about other safeguarding issues, including the criminal exploitation of children.

We monitor attendance carefully and address poor or irregular attendance without delay. We will always follow up with parents/carers when students are not at school. This means we need to have a least two up-to-date contact numbers for parents/carers.

In response to the guidance in Keeping Children Safe in Education (2025) the school has:

1. Staff who understand what to do when children do not attend regularly
2. Appropriate policies, procedures and responses for students who go missing from education (especially on repeat occasions).
3. Staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriage.
4. Procedures to inform the local authority when we plan to take students off-roll when they:
    - leave school to be home educated
    - move away from the school's location
    - remain medically unfit beyond compulsory school age
    - are in custody for four months or more (and will not return to school afterwards); or
    - are permanently excluded

We will ensure that students who are expected to attend the school, but fail to take up the place, will be referred to the local authority.
When a student leaves the school, we will record the name of the student's new school and their expected start date.

DSL's and staff should consider:

Missing lessons: Are there patterns in the lessons that are being missed? Is this more than avoidance of a subject or a teacher? Does the child remain on the school site or are they absent from the site?

- Is the child being exploited during this time?

- Are they late because of a caring responsibility?
- Have they been directly or indirectly affected by substance misuse?
- Are other pupils routinely missing the same lessons and does this raise other risks or concerns such as SVSH between pupils, exploitation, gang behaviour or substance misuse?
- Is the lesson being missed one that would cause bruising or injuries to become visible?

Single missing days: Is there a pattern in the day missed? Is it before or after the weekend suggesting the child is away from the area? Are there specific lessons or members of staff on these days? Is the parent informing the school of the absence on the day? Are missing days reported back to parents to confirm their awareness?

- Is the child being sexually exploited during this day?
- Is the child avoiding abusive behaviour from peers or staff on this day?
- Do the parents appear to be aware and are they condoning the behaviour?
- Are the pupil's peers making comments or suggestions as to where the pupil is?
- Can the parent be contacted and made aware?

Continuous missing days: Has the school been able to make contact with the parent(s)? Is medical evidence being provided? Are siblings attending school (either our or local schools)?

- Did we have any concerns about radicalisation, FGM, forced marriage, honour- based violence, sexual exploitation?
- Have we had any concerns about physical or sexual abuse?
- Does the parent have any known medical needs? Is the child safe?

The school will view absence as both a safeguarding issue and an educational outcomes issue. The school may take steps that could result in legal action for attendance, or a referral to children's social care, or both.

Children Missing from Home or Care

It is known that children who go missing are at risk of suffering significant harm, and there are specific risks around children running away and the risk of sexual exploitation. The Hampshire Police Force, as the lead agency for investigating and finding missing children, will respond to children going missing based on on-going risk assessments in line with current guidance.

The police definition of 'missing' is: "*Anyone whose whereabouts cannot be established will be considered as missing until located, and their well-being or otherwise confirmed*."

Various categories of risk should be considered, and Hampshire Local Safeguarding Children's Partnership provides further guidance.

Local authorities have safeguarding duties in relation to children missing from home and should work with the police to risk assess and analyse data for patterns that indicate particular concerns and risks. The police will prioritise all incidents of missing children as medium or high risk. Where a child is recorded as being absent, the details will be recorded by the police, who will also agree review times and any on-going actions with person reporting.

A missing child incident would be prioritised as 'high risk' where:

- the risk posed is immediate and there are substantial grounds for believing that the child is in danger through their own vulnerability; or
- the child may have been the victim of a serious crime; or
- the risk posed is immediate and there are substantial grounds for believing that the public is in danger.

The high-risk category requires the immediate deployment of police resources.

Authorities need to be alert to the risk of sexual exploitation or involvement in drugs, gangs or criminal activity, trafficking and to be aware of local "hot spots," as well as concerns about any individuals with whom children might runaway.
Child protection procedures must be initiated in collaboration with children's social care services whenever there are concerns that a child who is missing may be suffering, or likely to suffer, significant harm.
Within any case of children who are missing both push and pull factors will need to be considered.
Push factors include:

- Conflict with parents/carers
- Feeling powerless
- Being bullied/abused
- Being unhappy/not being listened to
- The Trigger Trio (domestic abuse, parental mental ill health and parental substance misuse)

Pull factors include:

- Wanting to be with family/friends
- Drugs, money and any exchangeable item
- Peer pressure
- For those who have been trafficked into the United Kingdom as unaccompanied asylum-seeking children, there will be pressure to make contact with their trafficker.

We will inform all parents of children who are absent (unless the parent has informed us). If the parent is also unaware of the location of their child, and the definition of missing is met, we will either support the parent to contact the police to inform them or do so ourselves with urgency.

Child Sexual Exploitation (CSE)

CSE is a form of abuse that occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in sexual activity(a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or threat of violence.

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or penetration with an object) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

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

CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. This can be committed by an individual or an organised network and most sexual abuse is committed by those previously known to the victim.

Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship. (from KCSiE). As with CCE, victims are not always recognised and can be criminalised for actions they take whilst under coercion. Children are manipulated, groomed and exploited without fully understanding the abuse they are experiencing. We understand that it is not possible for a child to give informed consent to engage in exploitative activity, and they cannot give consent to be exploited, abused or trafficked.

CSE can: -

- Be committed or facilitated by an organised network or gang and the victim may identify as being part of this group.
- Be a one-off occurrence or a series of incidents over time
- Be opportunistic or complex organised abuse
- Affect both males and females – this is not gender specific.
- Be between males and females or between the same genders.
- Be perpetrated by someone much older than the victim, but children may also be exploited by other children, who themselves may be experiencing exploitation. Where this is the case, it is important that the child perpetrator is also recognised as a victim.
- Include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. This may constitute modern slavery.

Children with learning difficulties can be particularly vulnerable to exploitation as can children from particular groups, e.g. looked after children, young carers, children who have a history of physical, sexual emotional abuse or neglect or mental health problems; children who use drugs or alcohol, children who go missing from home or school, children involved in crime, children with parents/carers who have mental health problems, learning difficulties/ other issues, children who associate with other children involved in exploitation. There are a range of other factors that could make a child more vulnerable to exploitation including sexual identity, communication ability, physical strength, status and access to economic or other resources. However, it is important to recognise that any child can be targeted.

Indicators a child may be at risk of CSE include:

- going missing for periods of time or regularly coming home late.
- regularly missing school or education or not taking part in education.
- appearing with unexplained gifts or new possessions.
- associating with other young people involved in exploitation.
- having older boyfriends or girlfriends.
- suffering from sexually transmitted infections or becomes pregnant.
- mood swings or changes in emotional wellbeing.
- drug and alcohol misuse.
- displaying inappropriate sexualised behaviour.

CSE can happen to a child of any age, gender, ability or social status. Often the victim of CSE is not aware that they are being exploited and do not see themselves as a victim.
We educate all staff in the signs and indicators of sexual exploitation. Children who have been exploited will need additional support to help maintain them in education. We use the child exploitation risk assessment form (CERAF) and associated guidance from the Hampshire Safeguarding Children Partnership to identify pupils who are at risk; the DSL will share this information as appropriate with children's social care.

We recognise that we may have information or intelligence that could be used to both protect children and prevent risk. Any relevant information that we have will be shared on the community partnership information (CPI) form which can be downloaded from https://www.safe4me.co.uk/portfolio/sharing-information/

Child Criminal Exploitation (including County Lines)

Child Criminal Exploitation (CCE) is defined as: - '*where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18 into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or threat of violence. The victim may have been criminally exploited even if the activity appears consensual. Child Criminal Exploitation does not always involve physical contact; it can occur through the use of technology*'.

The exploitation of children and young people for crime is not a new phenomenon as evidenced by Fagan's gang in Charles Dickens book, Oliver Twist. Children under the age of criminal responsibility, or young people who have increased vulnerability due to push: pull factors who are manipulated, coerced or forced into criminal activity provide opportunity for criminals to distance themselves from crime.

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

Some specific forms of CCE can include children being forced or manipulated into working in cannabis factories, shoplifting or pickpocketing, committing vehicle crime, threatening or committing serious violence to others, or transporting drugs or money through county lines.

'**County lines'** refers to a 'phone line through which drug deals can be made. An order is placed on the number and typically a young person will deliver the drugs to the specified address and collect the money for the deal. These lines are owned and managed by organised crime gangs, often from larger cities, who are expanding their markets into rural areas. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection.

Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, children's homes and care homes. They are also increasingly being targeted and recruited online using social media.

Children can easily become trapped by this type of exploitation, as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into drug debts which need to be worked off.

Indicators that a child may be criminally exploited include:

- Increase in **missing episodes** – particular key as children can be missing for days and drug run in other counties.
- Having unexplained amounts of money, **new high-cost items** and multiple mobile phones
- Increased social media and phone/text use, almost always secretly.
- **Older males** in particular seen to be hanging around and driving.
- Having injuries that are unexplained and being unwilling to have them looked at.
- Increase in aggression, violence and fighting.
- Carrying **weapons** – knives, baseball bats, hammers, acid
- Travel receipts that are unexplained
- **Significant missing** from education and disengaging from previous positive peer groups.
- Association with other young people involved in exploitation.
- Children who misuse drugs and alcohol
- Parent concerns and significant changes in behaviour that affect emotional wellbeing.

We understand that children who are criminally exploited should have their vulnerabilities recognised by adults and professions and we will treat any child who may be criminally exploited as a victim. We understand that it is not possible for a child to give informed consent to engage in criminal or other exploitative activity, and they cannot give consent to be exploited, abused or trafficked.

In cases of suspected CCE, we will use the CERAF form and guidance in our referral to children's social care (New version of the Child Exploitation Risk Assessment Framework (CERAF) - Hampshire SCP). If a referral to the police is also required, as crimes have been committed on the school premises, these will also be made. Children who have been exploited will need additional support to help maintain them in education.

If there is information or intelligence about child criminal exploitation, we will report this to the police via the community partnership information form.
https://www.safe4me.co.uk/portfolio/sharing-information/

Serious Violence

Serious violence is a continuing safeguarding concern. It may involve physical assault, carrying, threatening with or using weapons, often in the context of peer conflict or bullying and it can also be associated with criminal exploitation. Concerns about a child carrying or using a weapon (or expressing an intent to do so) should be reported and actions taken, which may include any action needed to de-escalate peer conflict.

Schools play a key role in protecting children from violence, safeguarding victims, as well as those who may be at risk or, or involved in violence (who are victims themselves). All staff will be made

aware of indicators, which may signal that pupils, or members of their families, are at risk from or involved with serious violent crime.

These indications can include but are not limited to;

- increased absence from school;
- a change in friendships or relationships with older individuals or groups;
- a significant decline in performance;
- signs of self-harm; significant change in wellbeing; signs of assault;
- unexplained injuries;
- unexplained gifts and/or new possessions; possession of weapons;

A fuller list of risk factors can be round in the Home Office's Home Office – Serious Violence Strategy, April 2018

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

Advice for staff can be found in in the Home Office's Preventing youth violence and gang involvement , Criminal exploitation of children and vulnerable adults: county lines - GOV.UK and the Youth Endowments Fund's Education, Children and Violence | Youth Endowment Fund

We have a duty to not only prevent the individual from engaging in criminal activity, but also to safeguard others who may be harmed by their actions. Early evidence-based support for those considered at risk, as well as in 'teachable moments' when issues emerge is vital. This includes access to trusted to adults, social and emotional skill support, and where available, targeted interventions such as mentoring or therapeutic support.

All staff will be made aware that violence can peak in the hours just before and just after school, when pupils are travelling to and from school and can concentrate in particular places. These times can be particularly risky for young people involved in serious violence and it is important that schools/colleges try to understand where these places are, with a view to working with partners to promote safety for children. Listening to children can also help build understanding of the local context and where and when they feel unsafe.

We will report concerns of serious violence to police and social care. If there is information or intelligence about potential serious violence, we will report this to the police via the community partnership information form. https://www.safe4me.co.uk/portfolio/sharing-information/

Trafficked Children and modern slavery

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

Human trafficking is defined by the UNHCR in respect of children as a process that is a combination of:

- Movement (including within the UK)
- Control, through harm / threat of harm or fraud
- For the purpose of exploitation

Any child transported for exploitative reasons is considered to be a trafficking victim.
There is significant evidence that children (both of UK and other citizenship) are being trafficked internally within the UK and this is regarded as a more common form of trafficking in the UK.

There are a number of indicators which suggest that a child may have been.
trafficked into the UK and may still be controlled by the traffickers or receiving.
adults. These are as follows:

- Shows signs of physical or sexual abuse, and/or has contracted a sexually transmitted infection or has an unwanted pregnancy.
- Has a history of going missing and unexplained moves?
- Is required to earn a minimum amount of money every day.
- Works in various locations
- Has limited freedom of movement.
- Appears to be missing for periods.
- Is known to beg for money.
- Is being cared for by adult/s who are not their parents and the quality of the relationship between the child and their adult carers is not good.
- Is one among a number of unrelated children found at one address.
- Has not been registered with or attended a GP practice.
- Is excessively afraid of being deported.

For those children who are internally trafficked within the UK indicators include:

- Physical symptoms (bruising indicating either physical or sexual assault)
- Prevalence of a sexually transmitted infection or unwanted pregnancy
- Reports from reliable sources suggesting the likelihood of involvement in sexual exploitation/the child has been seen in places known to be used for sexual exploitation.
- Evidence of drug, alcohol or substance misuse
- Being in the community in clothing unusual for a child i.e. inappropriate for age, or borrowing clothing from older people
- Relationship with a significantly older partner
- Accounts of social activities, expensive clothes, mobile phones or other possessions with no plausible explanation of the source of necessary funding
- Persistently missing, staying out overnight or returning late with no plausible explanation.
- Returning after having been missing, looking well cared for despite having not been at home.
- Having keys to premises other than those known about
- Low self- image, low self-esteem, self-harming behaviour including cutting, overdosing, eating disorder, promiscuity.
- Truancy / disengagement with education
- Entering or leaving vehicles driven by unknown adults
- Going missing and being found in areas where the child or young person has no known links; and/or

- Possible inappropriate use of the internet and forming online relationships, particularly with adults.

These behaviours themselves do not indicate that a child is being trafficked but should be considered as indicators that this may be the case.

When considering modern slavery, there is a perception that this is taking place overseas. The government estimates that tens of thousands of slaves are in the UK today.

Young people being forced to work in restaurants, nail bars, car washes and harvesting fruit, vegetables or other foods may have all been slaves 'hiding in plain sight' within the U.K and rescued from slavery. Other forms of slavery such as sex slaves or household slaves are more hidden but have also been rescued within the UK.

If staff believe that a child is being trafficked or is a slave, this will be reported to the designated safeguarding lead for referral to be considered to children's social care.

Child abduction

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

When we consider who is abducted and who abducts

- Nearly three-quarters of children abducted abroad by a parent are aged between 0 and 6 years-old
- Roughly equal numbers are boys and girls
- Two-thirds of children are from minority ethnic groups.
- 70% of abductors are mothers. The vast majority have primary care or joint primary care for the child abducted.
- Many abductions occur during school holidays when a child is not returned following a visit to the parent's home country (so-called 'wrongful retentions')

If we become aware of an abduction, we will follow the HIPS procedure and contact the police and children's social care (if they are not already aware).

If we are made aware of a potential risk of abduction, we will seek advice and support from police and children's social care to confirm that they are aware and seek clarity on what actions we are able to take.

Returning home from care

When children are taken into care, consideration may be given in the future to those children being returned to the care of their parents, or one of their parents. Other children are placed in care on a voluntary basis by the parents and they are able to remove their voluntary consent.

While this is a positive experience for many children who have returned to their families, for some there are different challenges and stresses in this process.

As a school, if we are aware of one of our children who is looked after is returning to their home, we will consider what support we can offer and ensure as a minimum that the child has a person, that they trust, who they can talk to or share their concerns with.

Technologies

Technological hardware and software is developing continuously with an increase in functionality of devices that people use. The majority of children use online tools to communicate with others locally, nationally and internationally. Access to the Internet and other tools that technology provides is an invaluable way of finding, sharing and communicating information. While technology itself is not harmful, it can be used by others to make children vulnerable and to abuse them.

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

• **Content**: being exposed to illegal, inappropriate or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories.

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

• **Conduct**: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography) including those generated using AI, and online bullying; and

• **Commerce** - risks such as online gambling, inappropriate advertising, phishing and or financial scams. If we feel pupils, students or staff are at risk, we will report it to the Anti-Phishing Working Group (https://apwg.org/).

Online Safety and Social Media

With the current speed of online change, some parents and carers have only a limited understanding of online risks and issues. Parents may underestimate how often their children come across potentially harmful and inappropriate material on the internet and may be unsure about how to respond. Some of the risks could be:

- unwanted contact
- grooming

- online bullying including sexting
- digital footprint
- accessing and generating inappropriate content
- misinformation, disinformation (including fake news), conspiracy theories
- generative artificial intelligence
- gambling
- child sexual exploitation
- child criminal exploitation
- radicalisation, including the emerging threat of Com groups
- cyber-crime, including 'cyber enabled' and 'cyber dependent'

The school will therefore seek to provide information and awareness to both pupils and their parents through:

- Acceptable use agreements for children, teachers, parents/carers and governors
- Curriculum activities involving raising awareness around staying safe online
- Information included in letters, newsletters, web site
- Parents evenings / sessions
- High profile events / campaigns e.g. Safer Internet Day
- Building awareness around information that is held on relevant web sites and or publications
- Social media policy
- Parent portal

The school will ensure that there are appropriate filtering and monitoring in place on all school devices and school networks. Staff training will include understanding of roles and responsibilities in relation to filtering and monitoring. The DfE has produced guidance to support schools with filtering and monitoring which we refer to: Meeting digital and technology standards in schools and colleges - Filtering and monitoring standards for schools and colleges - Guidance - GOV.UK (www.gov.uk) and the department's Plan technology for your school - GOV.UK to carry out a self-assessment against the filtering and monitoring standards.

We recognise that AI in education affords both opportunities and challenges in schools. In developing our approach to AI, we will refer to DfE guidance Generative artificial intelligence (AI) in education - GOV.UK and Using AI in education settings: support materials - GOV.UK.

We understand that education settings are directly responsible for ensuring they have the appropriate level of cyber security protection procedures in place in order to safeguard their systems, staff and learners and review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies. Guidance on e-security is available from the National Education Network.

Cyberbullying

Central to the school's anti-bullying policy is the principle that '*bullying is always unacceptable'* and that '*all pupils have a right not to be bullied*'.

The school also recognises that it must take note of bullying perpetrated outside school which has an impact within the school; therefore, once aware we will respond to any cyber-bullying carried out by pupils when they are away from the site.

Cyber-bullying is defined as '*an aggressive, intentional act carried out by a group or individual using electronic forms of contact repeatedly over time against a victim who cannot easily defend himself/herself*.'

By cyber-bullying, we mean bullying by electronic media:

- Bullying by texts or messages or calls on mobile 'phones.
- The use of mobile 'phone cameras to cause distress, fear or humiliation.
- Posting threatening, abusive, defamatory or humiliating material on websites, to include blogs, personal websites, social networking sites.
- Using e-mail to message others
- Hijacking/cloning e-mail accounts
- Making threatening, abusive, defamatory or humiliating remarks in online forums

Cyber-bullying may be at a level where it is criminal in character. It is unlawful to disseminate defamatory information in any media including internet sites.
Section 127 of the Communications Act 2003 makes it an offence to send, by public means of a public electronic communications network, a message or other matter that is grossly offensive or one of an indecent, obscene or menacing character.
The Protection from Harassment Act 1997 makes it an offence to knowingly pursue any course of conduct amounting to harassment.

If we become aware of any incidents of cyberbullying, we will need to consider each case individually as to any criminal act that may have been committed. The school will pass on information to the police if it feels that it is appropriate or is required to do so.

Making or sharing of nudes or semi-nudes (previously Sexting)

'Sexting' often refers to the sharing of naked or 'nude' or 'semi-nude' pictures or video through mobile phones and/or the internet. It also includes underwear shots, sexual poses and explicit text messaging and has previously been referred to as sexting or youth produced sexual imagery.

While sharing of nudes or semi-nudes often takes place in a consensual relationship between two young people, the use of sexted images (known as sextortion) in revenge following a relationship breakdown is becoming more commonplace. This can also be used as a form of sexual exploitation and take place between strangers.

As the average age of first smartphone or camera enabled tablet usage for a child is 6 years old, this is an issue that requires awareness raising across all ages.

The school will use age-appropriate educational material to raise awareness, to promote safety and deal with pressure. Parents should be aware that they can come to the school for advice.

In cases where nudes or semi-nudes have been shared, we follow guidance given to schools and colleges by the UK Council for Internet Safety (UKCIS): Sharing nudes and semi-nudes (December 2020). This is broadly as follows:

Handling incidents

- Refer to the designated safeguarding lead
- DSL meets with the young people involved
- Do not view the image unless it is unavoidable
- Discuss with parents, unless there is an issue where that's not possible
- Any concern the young person is at risk of harm, contact social care or the police

Always refer to the police or social care if incident involves:

- an adult
- coercion, blackmail, or grooming
- concerns about capacity to consent, [e.g., SEN]
- images show atypical sexual behaviour for the child's developmental stage
- violent acts are depicted
- image shows sex acts and includes a child under 13
- a young person at risk of immediate harm as a result of the disclosure (for example, self-harm or suicide)

Once DSL has enough information, the decision should be made to deal with the matter in school, refer it to the police or to social care. All information and decision-making should be recorded in line with school policy. If the incident has been dealt within school, a further review should be held to assess risks.

Assessing the risks once the images have been shared

- Has it been shared with the knowledge of the young person?
- Are adults involved in the sharing?
- Was there pressure to make the image?
- What is the impact on those involved?
- Does the child or children have additional vulnerabilities?
- Has the child taken part in producing sexual imagery before?

Viewing images

- Avoid viewing youth-produced sexual imagery. Instead, respond to what you have been told the image contains.
- If it is felt necessary to view, discuss with the head teacher first.
- Never copy, print, or share the image (it's illegal)
- View with another member of staff present
- Record the fact that the images were videoed along with reasons and who was present. Sign and date.

Deleting images (from devices and social media)

If the school has decided that involving other agencies is not necessary, consideration should be given to deleting the images. It is recommended that students are asked to delete the images themselves and confirm they have done so. This should be recorded, signed, and dated. Any

refusal to delete the images should be treated seriously, reminding the student that possession is unlawful.

Online sexual abuse

As a school we will:

- **Report** to the police, CEOP or any other relevant body any online sexual abuse or harmful content we are made aware of. This could include sending abusive, harassing and misogynistic messages; sharing nude and semi-nude images and videos; and coercing others to make and share sexual imagery. We will seek guidance from the NPCC 'when to call the police' document and the internet watch foundations 'report harmful content' website
- **Educate** to raise awareness of what online sexual abuse is, how it can happen, how to limit the impact and what to do if you become aware of it.
- **Support** victims of online abuse within the school community.

Gaming

Online gaming is an activity in which the majority of children and many adults get involved. The school will raise awareness:

- By talking to parents and carers about the games their children play and help them identify whether they are appropriate
- By supporting parents in identifying the most effective way to safeguard their children by using parental controls and child safety mode
- By talking to parents about setting boundaries and time limits when games are played
- By highlighting relevant resources.
- By highlighting the link between gaming and gambling.

Online reputation

Online reputation is the opinion others get of a person when they encounter them online. It is formed by posts, photos that have been uploaded and comments made by others on people's profiles. It is important that children and staff are aware that anything that is posted could influence their future professional reputation. The majority of organisations and work establishments now check digital footprint before considering applications for positions or places on courses.

Grooming

Online grooming is the process by which one person with an inappropriate sexual interest in children will approach a child online, with the intention of developing a relationship with that child, to be able to meet them in person and intentionally cause harm.

The school will build awareness amongst children and parents about ensuring that the child:

- Only has friends online that they know in real life.

- Is aware that if they communicate with somebody that they have met online, that relationship should stay online.

That the school will support parents to:

- Recognise the signs of grooming.
- Have regular conversations with their children about online activity and how to stay safe online.

The school will raise awareness by:

- Running sessions for parents
- Including awareness of grooming as part of their curriculum
- Identifying with parents and children how they can be safeguarded against grooming.

Additionally, to being targeted for sexual motivations, some young people are also groomed online for exploitation or radicalisation. While the drivers and objectives are different, the actual process is broadly similar to radicalisation, with the exploitation of a person's vulnerability usually being the critical factor. Those who are targeted are often offered something ideological, such as an eternal spiritual reward, or sometimes something physical, such as an economic incentive, that will make them 'feel better' about themselves or their situation.

Anyone can be at risk. Age, social standing and education do not necessarily matter as much as we previously thought, and we have seen all kinds of people become radicalised, from young men and women with learning difficulties to adults in well-respected professions. What is clear is that the more vulnerable the person, the easier it is to influence their way of thinking.

Signs of grooming can include:

- isolating themselves from family and friends.
- becoming secretive and not wanting to talk or discuss their views.
- closing computers down when others are around.
- refusing to say who they are talking to; using technology such as anonymous browsing to hide their activity; and
- sudden changes in mood, such as becoming angry or disrespectful.

Of course, none of these behaviours necessarily mean someone is being radicalised and, when displayed, could be a symptom of bullying or other emotional issues.

Cyber crime

Cyber crime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and speed online), or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crime represents one of the most significant and rapidly evolving threats within the UK. Children and young people may experiment with illegal online activity, often without understanding the legal or ethical implications. The impact of cybercrime extends well beyond immediate financial losses, with potential to cause disruption to national infrastructure.

Children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cybercrime which may include cyber-dependent crime, money muling (moving, hiding or laundering stolen money and cryptocurrency), sextortion and blackmail, and social engineering (using children to phish for data, distribute scams or harass others on social media. Children are often highly skilled with technology but lack maturity and awareness of the law. They are therefore seen as highly valuable and easily manipulated 'assets' by criminal organizations, hacking networks, and online predators who will target, groom, and coerce young people into performing illegal digital activities.

Cyber-dependent crimes include:

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

If there are concerns about a child in this area, they can be referred into the Cyber Choices program. Cyber Choices - National Crime Agency

Part 2 – Safeguarding issues relating to individual pupil needs

Homelessness

We recognise that being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The impact of losing a place of safety and security can affect a child's behaviour and attachments.

In line with the Homelessness Reduction Act 2017, this school will promote links into the Local Housing Authority for the parent or care giver in order to raise/progress concerns at the earliest opportunity.

We recognise that whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

Children and the Court System

We recognise that children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. We know that this can be a stressful experience and therefore the school will aim to support children through this process and use materials published by Gov.UK: Young witness booklet for 5- to 11-year-olds - GOV.UK, Young witness booklet for 12- to 17-year-olds - GOV.UK

Along with pastoral support, the school will use age-appropriate materials published by HM Courts and Tribunals Services (2017) that explain to children what it means to be a witness, how to give evidence and the help they can access. Improving support for children going to court as well as witnesses

We recognise that making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. This school will support children going through this process.

Alongside pastoral support this school will use online materials published by The Ministry of Justice (2018) which offers children information & advice on the dispute resolution service

These materials will also be offered to parents and carers if appropriate.

Children with family members in prison

Children who have a family member in prison are at greater risk of poor outcomes including poverty, stigma, isolation, and poor mental health. They are more likely to be absent or excluded, less likely to be in education, training or employment later in life and at higher risk of experiencing drug and alcohol misuse.

This school aims to:

- understand and respect the child's wishes. We will respect the child's wishes about sharing information. If other children become aware, the school will be vigilant to potential bullying or harassment.
- keep as much contact as possible with the parent/caregiver. We will maintain good links with the remaining caregiver in order to foresee and manage any developing problems. Following discussions, we will develop appropriate systems for keeping the imprisoned caregiver updates about their child's education.

- be sensitive in lessons. This school will consider the needs of any child with an imprisoned parent/caregiver during lesson planning.

- Provide extra support. We recognise that having a parent in prison can attach a real stigma to a child, particularly if the crime is known and serious. We will provide support and mentoring to help a child work through their feelings on the issue.

Alongside pastoral care the school will use the resources provided by the National Information Centre on Children of Offender in order to support and mentor children in these circumstances (NICCO).

Pupils with medical conditions (in school)

There are separate policies and procedure outlining the school's position on this:
Senior school First aid policy and Administration of medicines policy
Prep school First aid and administration of medicines policy

We will make ensure that sufficient staff are trained to support any pupil with a medical condition and all relevant staff will be made aware of the condition to support the child and be aware of medical needs and risks to the child. An individual healthcare plan may be put in place to support the child and their medical needs.

An incident relating to the management of a child's medical condition, including allergies, would not automatically indicate a cause for concern. However, staff will be trained to consider if an incident highlights that a child may be at increased risk of being neglected, abused or exploited by those in or outside of the family because of their medical condition. This may be where relevant information about a child's medical condition is not shared with the setting or where they are repeatedly sent without essential medication, thereby putting them at risk. The school is aware of the statutory guidance and refers to this: Supporting pupils with medical conditions at school - GOV.UK, Allergy safety in schools - GOV.UK

Pupils with medical conditions (out of school)

There will be occasions when children are temporarily unable to attend our school on a full-time basis because of their medical needs. These children and young people are likely to be:

- children and young people suffering from long-term illnesses.
- children and young people with long-term post-operative or post-injury recovery periods
- children and young people with long-term mental health problems (emotionally vulnerable).

Where it is clear that an absence will be for more than 15 continuous school days, the Education and Inclusion branch of Children Services will be contacted to advise on the pupil's education.

Special educational needs and disabilities

Children who have special educational needs and/or disabilities can have additional vulnerabilities when recognising abuse and neglect. These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- The potential for a disproportionate impact on children with SEND, for example by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in overcoming these barriers
- Having fewer outside contacts than other children
- Receiving intimate care from a considerable number of carers, which may increase the risk of exposure to abusive behaviour and make it more difficult to set and maintain physical boundaries
- Having an impaired capacity to resist or avoid abuse
- Having communication difficulties that may make it difficult to tell others what is happening
- Being inhibited about complaining for fear of losing services
- Being more vulnerable online – having difficulty understanding the difference between fact and fiction, repeating the content/behaviours in school/college
- Being more vulnerable than other children to abuse by their peers, including peer group isolation or bullying (including prejudice-based bullying) and intimidation.

We will respond to this by:

- Making it common practice to enable children with SEND to make their wishes and feelings known in respect of their care and treatment
- Ensuring that children with SEND receive appropriate personal, health and social education (including sex education)
- Ensuring children with SEND know how to raise concerns and give them access to a range of adults with whom they can communicate. This could mean using interpreters and facilitators who are skilled in using the child's preferred method of communication.
- Recognising and utilising key sources of support including staff in schools, friends and family members where appropriate
- Developing the safe support services that families want, and a culture of openness and joint working with parents and carers on the part of services
- Ensuring that guidance on good practice is in place and being followed in relation to: intimate care; working with children of the opposite sex; managing behaviour that challenges families and services; issues around consent to treatment; anti-bullying and inclusion strategies; sexuality and safe sexual behaviour among young people; monitoring and challenging placement arrangements for young people living away from home.

Intimate and personal care

'Intimate Care' can be defined as *care tasks of an intimate nature, associated with bodily functions, bodily products and personal hygiene, which demand direct or indirect contact with, or exposure of, the sexual parts of the body*.

The Intimate Care tasks specifically identified as relevant include:

- Dressing and undressing (underwear)
- Helping someone use the toilet.
- Changing continence pads (faeces/urine)
- Bathing / showering
- Washing intimate parts of the body
- Changing sanitary wear
- Inserting suppositories
- Giving enemas
- Inserting and monitoring pessaries.

'Personal Care' involves touching another person, although the nature of this touching is more socially acceptable. These tasks do not invade conventional personal, private or social space to the same extent as Intimate Care.

Those Personal Care tasks specifically identified as relevant here include:

- Skin care/applying external medication.
- Feeding
- Administering oral medication
- Hair care
- Dressing and undressing (clothing)
- Washing non-intimate body parts
- Prompting to go to the toilet.

Personal Care encompasses those areas of physical and medical care that most people carry out for themselves but which some are unable to do because of disability or medical need. Children and young people may require help with eating, drinking, washing, dressing and toileting.

Where Intimate Care is required, we will follow the following principles:

1. **Involve the child in the intimate care**
   Try to encourage a child's independence as far as possible in his or her intimate care. Where a situation renders a child fully dependent, talk about what is going to be done and give choices where possible. Check your practice by asking the child or parent about any preferences while carrying out the intimate care.

2. **Treat every child with dignity and respect and ensure privacy appropriate to the child's age and situation.**
   Staff can administer intimate care alone however we will be aware of the potential safeguarding issues for the child and member of staff. Care should be taken to ensure adequate supervision primarily to safeguard the child but also to protect the staff member from potential risk.

3. **Be aware of your own limitations**
   Only carry out activities you understand and with which you feel competent. If in doubt, ASK. Some procedures must only be carried out by members of staff who have been formally trained and assessed.

4. **Promote positive self-esteem and body image**
   Confident, self-assured children who feel their body belongs to them are less vulnerable to sexual abuse. The approach you take to intimate care can convey lots of messages to a child about their body worth. Your attitude to a child's intimate care is important. Keeping in mind the child's age, routine care can be both efficient and relaxed.

5. **If you have any concerns, you must report them.**
   If you observe any unusual markings, discolouration or swelling, report it immediately to the designated practitioner for child protection.

   If a child is accidentally hurt during the intimate care or misunderstands or misinterprets something, reassure the child, ensure their safety and report the incident immediately to the DSL. Report and record any unusual emotional or behavioural response by the child. A written record of concerns must be made available to parents and kept in the child's child protection record.

6. **Helping through communication**
   There is careful communication with each child who needs help with intimate care in line with their preferred means of communication (verbal, symbolic, etc.) to discuss the child's needs and preferences. The child is aware of each procedure that is carried out and the reasons for it.

7. **Support to achieve the highest level of autonomy**
   As a basic principle, children will be supported to achieve the highest level of autonomy

that is possible given their age and abilities. Staff will encourage each child to do as much for themselves as they can. This may mean, for example, giving the child responsibility for washing themselves. Individual intimate care plans will be drawn up for particular children as appropriate to suit the circumstances of the child. These plans include a full risk assessment to address issues such as moving and handling, personal safety of the child and the carer and health.

For the prep school and EYFS please refer to the Intimate Care procedures policy.

Further information from the DfE can be found:
SEND code of practice: 0 to 25 years - GOV.UK (www.gov.uk)
Supporting pupils with medical conditions at school - GOV.UK (www.gov.uk)
Hampshire SENDIASS: Hampshire (councilfordisabledchildren.org.uk)
Mencap - Represents people with learning disabilities, with specific advice and information for people who work with children and young people.

Perplexing presentations (PP) / Fabricated or induced illness (FII)

The Royal College of Paediatrics and Child Health have added the term “Perplexing presentations” to the guidance around FII.

Perplexing Presentations (PP) has been introduced to describe those situations where there are indicators of possible FII which have not caused or brought on any actual significant harm.
It is important to highlight any potential discrepancies between reports, presentations of the child and independent observations of the child. What is key to note are implausible descriptions and/or unexplained findings and/or parental behaviour.

There are three main ways that a parent/carer could fabricate or induce illness in a child. These are not mutually exclusive and include:

- fabrication of signs and symptoms. This may include fabrication of past medical history.
- fabrication of signs and symptoms and falsification of hospital charts and records, and specimens of bodily fluids. This may also include falsification of letters and documents.
- induction of illness by a variety of means.

If we are concerned that a child may be suffering from fabricated or induced illness, we will follow the HIPS protocol and inform children’s social care.

Mental Health

Form tutors and class teachers see their pupils day in, day out. They know them well and are well placed to spot changes in behaviour that might indicate an emerging problem with the mental health and emotional wellbeing of pupils. All staff should also be aware that mental health problems can, in some cases, develop into safeguarding concerns. This could include self-harm, signs of an eating disorder, suicidal ideation or suicide. They could be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

The balance between the risk and protective factors is most likely to be disrupted when difficult events happen in pupils’ lives. These include:

- **loss or separation** – resulting from death, parental separation, divorce, hospitalisation, loss of friendships (especially in adolescence), family conflict or breakdown that results in the child having to live elsewhere, being taken into care or adopted.
- **life changes** – such as the birth of a sibling, moving house or changing schools or during transition from primary to secondary school, or secondary school to sixth form.
- **traumatic events** such as abuse, domestic violence, bullying, violence, accidents, injuries or natural disaster.

When concerns are identified, school staff will provide opportunities for the child to talk or receive support within the school environment. Parents will be informed of the concerns and a shared way to support the child will be discussed.

We recognise schools have an important role to play in supporting children with mental health problems. We will support through:

- promoting good mental wellbeing and preventing the onset of mental illness
- observing pupils and identifying early those who may be experiencing mental health problems or being at risk of developing one
- ensuring early targeted support is provided and
- liaison with/referral to specialist services where needed.

Where the needs require additional professional support, referrals will be made to the appropriate team or service with the appropriate agreement.

If staff have a mental health concern about a child that is also a safeguarding concern, they will take immediate action, raising the issue with the designated safeguarding lead or a deputy.

Children who are lesbian, gay or bisexual

A child or young person being lesbian, gay or bisexual is not in itself a risk factor for harm, however, they can sometimes be vulnerable to discriminatory bullying. In some cases, a child who is perceived by other children to be lesbian, gay or bisexual (whether they are or not) can be just as vulnerable as children who are. We will consider how to address vulnerabilities such as the risk of bullying and take steps to prevent it, including putting appropriate sanctions in place.

Children who are questioning their gender

Children may question the way they feel about being a boy or a girl, including the physical attributes of their sex and the related ways in which they fit into society. Sometimes young children go though a period of questioning their gender, but for the majority this will not continue into adulthood, while a small proportion may continue to question their gender and this feeling may intensify into puberty.

All staff will have training to ensure they understand that it is not for the school to initiate any action in this area and that members of staff should not adopt any changes relating to social transition unless a decision has been made by the school in consultation with parents or carers.

When responding to a request relating to social transition from a child or their parents, the school will;

- take time to understand the thoughts and feelings of children who are questioning their gender
- be professionally curious about the full range of the child's experiences
- remain aware of the potential vulnerabilities of children who are questioning their gender, including the possibility of complex mental health and psychological needs, for example relating to relationships with family, peers or their broader social environment, including discriminatory bullying
- consider the best interests of the child
- consider everything that could be affecting a child, including whether they have any wider health issues or neurodiversity

In making decisions about supporting social transition, the school will comply with the obligations under safeguarding legislation and human rights law, ensuring that any assessment of discrimination is informed by an evaluation of the welfare and best interests of the child and other children. In responding to any request relating to social transition or detransition, the school will follow the guidance in KCSIE 2026 and liaise with parents and carers and external agencies as appropriate.

Part 3 – Other safeguarding issues that may potentially have an impact on pupils.

Anti-Bullying

The senior school has a prevention of bullying policy that can be found on the school website and here
The prep school also has a prevention of bullying policy that can be found on the school website and here

Prejudice-based abuse

Prejudice-based abuse or hate crime is any criminal offence which is perceived by the victim or any other person to be motivated by a hostility or prejudice-based on a person's real or perceived:

- Disability
- Race
- Religion
- Gender identity
- Sexual orientation

Racism, faith targeted abuse and other forms of discriminatory behaviour may have a significant impact on a child's welfare, wellbeing and sense of safety.

Although this sort of crime is collectively known as 'Hate Crime' the offender does not have to go as far as being motivated by 'hate', they only have to exhibit 'hostility'.

This can be evidenced by:

- threatened or actual physical assault
- derogatory name calling, insults, for example racist jokes or homophobic language.
- hate graffiti (e.g. on school furniture, walls or books)
- provocative behaviour e.g. wearing of badges or symbols belonging to known right wing, or extremist organisations
- distributing literature that may be offensive in relation to a protected characteristic.
- verbal abuse
- inciting hatred or bullying against pupils who share a protected characteristic.
- prejudiced or hostile comments in the course of discussions within lessons
- teasing in relation to any protected characteristic e.g. sexuality, language, religion or cultural background

- refusal to co-operate with others because of their protected characteristic, whether real or perceived.
- expressions of prejudice calculated to offend or influence the behaviour of others.
- attempts to recruit other pupils to organisations and groups that sanction violence, terrorism or hatred.

We will respond by:

- clearly identifying prejudice-based incidents and hate crimes and monitor the frequency and nature of them within the school.
- taking preventative action to reduce the likelihood of such incidents occurring.
- recognising the wider implications of such incidents for the school and local community
- providing regular reports of these incidents to School Council
- ensuring that staff are familiar with formal procedures for recording and dealing with prejudice-based incidents.
- dealing with perpetrators of prejudice-based abuse effectively
- supporting victims of prejudice-based incidents and hate crimes.
- ensuring that staff are familiar with a range of restorative practices to address bullying and prevent it happening again.

Drugs and substance misuse

The school has a separate drug policy that can be found here

Faith Abuse

The number of known cases of child abuse linked to accusations of 'possession' or 'witchcraft' is small, but children involved can suffer damage to their physical and mental health, their capacity to learn, their ability to form relationships and to their self-esteem.

Such abuse generally occurs when a carer views a child as being 'different', attributes this difference to the child being 'possessed' or involved in 'witchcraft' and attempts to exorcise him or her.

A child could be viewed as 'different' for a variety of reasons such as, disobedience; independence; bed-wetting; nightmares; illness; or disability. There is often a weak bond of attachment between the carer and the child.

There are various social reasons that make a child more vulnerable to an accusation of 'possession' or 'witchcraft'. These include family stress and/or a change in the family structure.

The attempt to 'exorcise' may involve severe beating, burning, starvation, cutting or stabbing and isolation, and usually occurs in the household where the child lives.

If the school becomes aware of a child who is being abused in this context, the DSL will follow the normal referral route to children's social care.

Gangs and Youth Violence

The majority of young people will not be affected by serious violence or gangs. However, where these problems do occur, even at low levels there will almost certainly be a significant impact.

We have a duty and a responsibility to protect our pupils. It is also well established that success in learning is one of the most powerful indicators in the prevention of youth crime. Dealing with violence also helps attainment. While pupils generally see educational establishments as safe places, even low levels of youth violence can have a disproportionate impact on any education.

Primary schools are also increasingly recognised as places where early warning signs that younger children may be at risk of getting involved in gangs can be spotted. Crucial preventive work can be done within school to prevent negative behaviour from escalating and becoming entrenched.

We will:

- develop skills and knowledge to resolve conflict as part of the curriculum
- challenge aggressive behaviour in ways that prevent the recurrence of such behaviour
- understand risks for specific groups, including those that are gender-based, and target interventions
- safeguard, and specifically organise child protection, when needed
- make referrals to appropriate external agencies
- carefully manage individual transitions between educational establishments especially into Pupil Referral Units (PRUs) or alternative provision
- work with local partners to prevent anti-social behaviour or crime.

Private fostering

Private fostering is an arrangement by a child's parents for their child (under 16 or 18 if disabled) to be cared for by another adult who is not closely related and is not a legal guardian with parental responsibility, for 28 days or more.

It is not private fostering if the carer is a close relative to the child such as grandparent, brother, sister, uncle or aunt.

The Law requires that the carers and parents must notify the Children's Services Department of any private fostering arrangement.

If the school becomes aware that a pupil is being privately fostered, we will inform the Children's Services Department and inform both the parents and carers that we have done so.

Parenting

All parents will struggle with the behaviour of their child(ren) at some point. This does not make them poor parents or generate safeguarding concerns. Rather it provides them with opportunities to learn and develop new skills and approaches to support with their child(ren)'s behaviour.

Some children have medical conditions and/or needs e.g. Tourette's Syndrome, some conditions associated with autism or ADHD that have a direct impact on behaviour and can cause challenges for parents in dealing with behaviours. This does not highlight poor parenting either.

Children may also cause harm to other family members, often referred to as child-to-parent or carer abuse. Support for this can be found at: CAPVA | Respect

Parenting becomes a safeguarding concern when the repeated lack of supervision, boundaries, basic care or medical treatment places the child(ren) in situations of risk or harm.

In situations where parents struggle with tasks such as setting boundaries and providing appropriate supervision, timely interventions can make drastic changes to the wellbeing and life experiences of the child(ren) without the requirement for a social work assessment or plan being in place.

We will support parents in understanding the parenting role and providing them with strategies that may assist:

- providing details of community-based parenting courses
- linking to web-based parenting resources
- discussing the issue with the parent and supporting them in making their own plans of how to respond differently (using evidence-based parenting programmes)
- signposting to support services
- Considering appropriate early help services

Part 4 –Safeguarding processes

Alternative provision

If the school commissions a place for a pupil with an alternative provision provider, it continues to be responsible for the safeguarding of that pupil and will undertake all checks and ensure that the placement meets the pupil's needs. Checks would include, for example, suitability of provision and provision type, safeguarding, health and safety, arrangements for attendance and reporting progress, and information sharing.

The school will follow the statutory guidance for commissioning Alternative Provision:
Education for children with health needs who cannot attend school - GOV.UK
Alternative provision - GOV.UK
Keeping children safe in education 2026 (comes into force from 1 September 2026)
Hampshire County Council Alternative Provision Guidance June 2025

The DfE has also published voluntary national standards for non-school alternative provision, alongside guidance to support schools and local authority commissioners in quality assuring providers. Local authorities may use the standards to develop a register of approved settings for use by schools. However, schools remain ultimately responsible for the provision they commission. This means we will continue to carry out safeguarding checks and conduct our own due diligence to ensure that the provision is appropriate for meeting each child's individual needs.

Holding and Sharing Information

The DSL and DDSLs keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions. These include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program etc. This rationale should be recorded on CPOMs.

Staff will be proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children. Where children leave the setting, the DSL will ensure their safeguarding file is transferred to the new school or college as soon as possible and within 5 days of an in-year transfer or the start of a new term. In addition, the DSL will consider if it would be appropriate to share any information with the new setting in advance of the child leaving to enable the setting to put appropriate support in place and particularly when the information would support an assessment of risk to the individual pupil or others.

Safer Recruitment

The school operates a separate safer recruitment process as part of its Recruitment Policy. On all recruitment panels there is at least one member who has undertaken safer recruitment training.

The recruitment process checks the identity, criminal record (enhanced DBS), mental and physical capacity, right to work in the U.K., professional qualification and seeks confirmation of the applicant's experience and history through references.

Staff Induction

The DSL or one of their deputies will provide all new staff with training to enable them to both fulfil their role and also to understand the child protection policy, the safeguarding policy, the staff behaviour policy/code of conduct, and part one of Keeping Children Safe in Education.
This induction may be covered within the annual training if this falls at the same time; otherwise, it will be carried out separately during the initial starting period.

Health and Safety

There is a requirement that all schools must have a Health and Safety Policy that details the organisation, roles and responsibilities and arrangements in place at the premises onfor the managing and promoting of Health and Safety in accordance with the Health and Safety at Work act 1974 and regulations made under the act.

Schools must assess all their hazards and record any significant findings along with what control measures are required. The plans should wherever possible take a common sense and proportionate approach with the aim to allow activities to continue rather than preventing them from taking place. The School H&S policy can be accessed on the staff portal and here.

Site Security

We aim to provide a secure site but recognise that the site is only as secure as the people who use it. Therefore, all people on the site have to adhere to the rules which govern it. These are:

- Access to the school for students and staff is by key codes
- Visitors and volunteers enter at the reception and must sign in
- Visitors and volunteers are identified by means of a lanyard
- Children are only allowed home during the school day with adults/carers with parental responsibility or permission being given.
- All children leaving or returning during the school day have to sign out and in
- Empty classrooms have windows closed.

Off site visits

A particular strand of health and safety is looking at risks when undertaking off site visits. Some activities, especially those happening away from the school and residential visits, can involve higher levels of risk. If these are annual or infrequent activities, a review of an existing assessment may be all that is needed. If it is a new activity, a visit involving adventure activities, residential, overseas or an 'Open Country' visit, a specific assessment of significant risks must be carried out. The school has an educational visits co-ordinator (EVC) who helps colleagues in schools to manage risks and support with off site visits and provides training in the management of groups during off site visits, as well as First Aid in an outdoor context. The Off site activity policy can be found here. Please refer to the off-site activity policy/procedures.

First Aid

The senior school's first aid arrangements/policy can be found here and the prep school's: Prep first aid and administration of medicines policy

Physical Intervention (use of reasonable force)

We have a statement outlining how we will use physical intervention in our behaviour, rewards and sanctions policy which can be found here. The prep school policy is here: Prep behaviour, rewards and sanctions policy

Taking and the use and storage of images

We will seek consent from the parent/carer of a pupil and from teachers and other adults before taking and publishing photographs or videos that contain images that are sufficiently detailed to identify the individual in school publications, printed media or on electronic publications.

We will not seek consent for photos where you would not be able to identify the individual.

We will seek consent for the period the pupil remains registered with us and, unless we have specific written permission, we will remove photographs after a child (or teacher) appearing in them leaves the school or if consent is withdrawn.

Photographs will only be taken on school owned equipment and stored on the school network. No images of pupils will be taken or stored on privately owned equipment by staff members.

We will be mindful of imagery published on public facing platforms such as the school website and are aware of potential risks associated with this. In making decisions about information shared on the website and via social media, we will refer to Hampshire guidance and Safer Internet guidance on image sharing. Image guidance for education settings - UK Safer Internet Centre.

Transporting pupils

On occasions parents and volunteers support with the task of transporting children to visits and off-site activities arranged by the school; this is in addition to any informal arrangements made directly between parents for after school clubs etc.
In managing these arrangements, the school will put in place measures to ensure the safety and welfare of young people carried in parents' and volunteers' cars. This is based on guidance from the local authority and follows similar procedures for school staff using their cars on school business.

Where parents'/volunteers' cars are used on school activities the school will notify parents/volunteers of their responsibilities for the safety of pupils, to maintain suitable insurance cover and to ensure their vehicle is roadworthy. Please see the section on transporting pupils in our health and safety policy.

Disqualification under the childcare act

The Childcare Act of 2006 was put in place to prevent adults who have been cautioned or convicted of a number of specific offences from working within childcare.

We will check for disqualification under the Childcare Act as part of our safer recruitment processes for any offences committed by staff members or volunteers.

Community Safety Incidents

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

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff. It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: www.clevernevergoes.org.

Use of school or college premises for non-school / college activities

Where governing bodies hire or rent out college or school facilities / premises to organisations or individuals for example sports associations, they should ensure that appropriate arrangements are in place to keep children safe.
When services or activities are provided by the governing body or proprietor, under the direct supervision or management of their school or college staff, their arrangements for child protection will apply.

Where a safeguarding incident occurs involving other providers who are using the school premises, the school is expected to follow their safeguarding policies and procedures including informing the LADO. The governing body or proprietor should also seek assurance that the provider concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place for the provider to liaise with the school or college on these matters where appropriate. This applies regardless of whether or not the children who attend any of these services or activities are children on the school roll or attend the college.

External speakers

At times, external organisations will be invited in to deliver input with pupils as it is acknowledged that they can provide a varied and useful range of information, resources, and speakers which enrich education. Careful consideration will be given to the suitability of external organisations and checks carried out to ensure the content of information delivered is consistent with the school's ethos, values and curriculum.

The school has clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable. The school's responsibility to students is to ensure that they can critically assess the information they receive as to its value to themselves, and that the information is aligned to the ethos and values of the School and British values.

The school is required to undertake a risk assessment before agreeing to a Visiting Speaker being allowed to attend the school. This will take into account any vetting requirements considered appropriate in the circumstances and may include a DBS check if relevant.

Visiting speakers will be expected to understand that, where appropriate, their session should actively promote the British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs and at no point undermine these. In some cases, the school may request a copy of the Visiting Speaker's presentation and/or footage in advance of the session being provided. If, at any point, during a visiting speakers talk the supervising staff member feels the content is inappropriate they should step in and stop the presentation immediately.

Visiting Speakers, whilst on the school site, will be supervised by a school employee. On attending the School, Visiting Speakers will be required to show original current identification documents including a photograph such as a passport or photo card driving licence.