



## Safeguarding and Child Protection Policy and Procedures

The Safeguarding and Child Protection Policy for Highfield and Brookham School, consists of four main documents:

- **Section A:** Key Contacts, for ease of reference
- **Section B:** The overarching **Safeguarding Policy** (statement of principles)
- **Section C:** Detailed **Child Protection Procedures**
- **Section D:** A separate **Child Protection Summary Sheet** (for visiting professionals)

In addition, a series of **appendices** are attached.

- Appendix 1:** ESSENTIAL SAFEGUARDING AGENCY CONTACT INFORMATION
- Appendix 2:** ADVICE FOR DSLs
- Appendix 3:** HIGHFIELD AND BROOKHAM CONCERNS FORM
- Appendix 4:** ACTIONS WHERE THERE ARE CONCERNS ABOUT A CHILD
- Appendix 5:** SPECIFIC ROLES IN SAFEGUARDING
- Appendix 6:** WEST SUSSEX CONTINUUM OF NEEDS
- Appendix 7:** RESPONSE TO COVID-19
- Appendix 8:** NEUTRAL NOTIFICATIONS (LOW LEVEL CONCERNS POLICY)

**Last Review:** This policy was updated in May 2022 following an external audit and updated and reviewed August 2022, in September 2023, January 2024 and September 2024. (see page 14 for full review dates).



## SECTION A: KEY CONTACTS

<p><b>Designated Safeguarding Leads (DSL)</b></p>	<p><b>Mikayla van den Berg, Director of Boarding, DSL</b>            Tel: 01428 728000  <a href="mailto:safeguarding@highfieldandbrookham.co.uk">safeguarding@highfieldandbrookham.co.uk</a>  <a href="mailto:mvandenberg@highfieldandbrookham.co.uk">mvandenberg@highfieldandbrookham.co.uk</a></p> <p>EYFS: <b>Georgie Hunter- Head of Pre-Prep, DSL EYFS</b>            Tel: 01428 722005 <a href="mailto:safeguarding@highfieldandbrookham.co.uk">safeguarding@highfieldandbrookham.co.uk</a></p>
<p><b>Deputy Designated Safeguarding Leads (DDSL)</b></p>	<p><b>Vivienne Liddell - Deputy Head Pastoral</b>            Tel: 01428 728000 <a href="mailto:vl@highfieldandbrookham.co.uk">vl@highfieldandbrookham.co.uk</a></p> <p><b>Andy Baker- Deputy Head Management and Organisation</b>            Tel: 01428 728002, 07789 363937  <a href="mailto:abaker@highfieldandbrookham.co.uk">abaker@highfieldandbrookham.co.uk</a></p> <p><b>Rosie Statham- Head of Lower Prep</b>  <a href="mailto:rsthatham@highfieldandbrookham.co.uk">rsthatham@highfieldandbrookham.co.uk</a></p> <p><b>Jo Longshaw- Head of Middle Prep</b>  <a href="mailto:jlongshaw@highfieldandbrookham.co.uk">jlongshaw@highfieldandbrookham.co.uk</a></p> <p><b>James Figgis- Head of Senior Prep</b>  <a href="mailto:jf@highfieldandbrookham.co.uk">jf@highfieldandbrookham.co.uk</a></p>
<p><b>Boarding Deputy Designated Safeguarding Leads (DDSL)</b></p>	<p><b>Elliot Hall- Head of Boys House</b>  <a href="mailto:ehall@highfieldandbrookham.co.uk">ehall@highfieldandbrookham.co.uk</a></p> <p><b>Jess Oecken- Head of Girls House</b>  <a href="mailto:joecken@highfieldandbrookham.co.uk">joecken@highfieldandbrookham.co.uk</a></p> <p><b>Oliver and Meagan May- Heads of Junior House</b>  <a href="mailto:Juniorhouseparents@highfieldschool.co.uk">Juniorhouseparents@highfieldschool.co.uk</a></p> <p><b>Henrietta Backhouse- Senior Matron</b>  <a href="mailto:Seniormatron@highfieldandbrookham.co.uk">Seniormatron@highfieldandbrookham.co.uk</a></p>
<p><b>Nominated Director responsible for Safeguarding</b></p>	<p><b>Mrs. Charlotte Lumsden</b>  <a href="mailto:CLumsden@highfieldandbrookham.co.uk">CLumsden@highfieldandbrookham.co.uk</a></p>

**Note:**

If a child is in immediate danger or is at risk of harm, a referral should be made immediately to children's social care and / or the Police (999). **Anyone can make a referral.** Where referrals are not made by the Designated Safeguarding Lead, the DSL should be informed as soon as possible that the referral has been made.

The contact numbers below can be used for making direct referrals.

<b>Local Authority Designated Officer (LADO)</b>	Miriam Williams, Donna Tomlinson, Vic Williams Tel: 0330 222 6450 <a href="mailto:LADO@westsussex.gov.uk">LADO@westsussex.gov.uk</a>
<b>West Sussex Children's Services / MASH (Integrated Front Door)</b>	Tel: 01403 229900 Out of hours for urgent child protection matters that cannot wait until the next working day: 0330 222 6664 <a href="mailto:WSChildrenServices@Westsussex.gov.uk">WSChildrenServices@Westsussex.gov.uk</a>
<b>West Sussex Safeguarding Children Partnership</b>	0330 222 7799 <a href="mailto:WSSCP@westsussex.gov.uk">WSSCP@westsussex.gov.uk</a> <a href="http://www.westsussexscp.org.uk">http://www.westsussexscp.org.uk</a>  <a href="https://www.westsussexscp.org.uk/professionals/professional-disagreements-and-concerns/ladoinformation">https://www.westsussexscp.org.uk/professionals/professional-disagreements-and-concerns/ladoinformation</a>

## SECTION B: Statement of Safeguarding Principles

Highfield and Brookham School recognises that the welfare of the child (throughout this document, 'child' refers to a young person under the age of 18) is paramount. We take extremely seriously our duty to safeguard and promote the welfare of the children and young people in our care, as well as all adults working in or visiting the school environment, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity. The Board of Directors (Directors) will act in accordance with Section 157 of the Education Act 2002 (which applies to Independent Schools) and the supporting statutory guidance '*Keeping Children Safe in Education*' (September 2024) to safeguard and promote the welfare of children in these schools.

Safeguarding and promoting the welfare of children is defined for the purposes of this policy as:

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

The Directors are responsible for ensuring that the school meets their statutory responsibilities for safeguarding and that all policies and procedures are in place and effective. It is a requirement of the Independent Schools' Standards Regulations (ISSRs) and is also a West Sussex Safeguarding Standard that the Directors receive an annual report from the Designated Safeguarding Leads (DSL) and Nominated Safeguarding Director in order to help monitor compliance with statutory responsibilities. This annual report takes place once a year, minimum, at the Directors' Meeting, and is included in the minutes thereof.

This policy and its associated procedures address the Independent Schools' Standards Requirements (ISSRs) Part 3, and are in accordance with locally agreed inter-agency procedures. The welfare of boarders while accommodated at Highfield School is ensured by having regard to the National Minimum Standards for Boarding Schools. It is reviewed and updated annually, minimum, and any changes in guidance or any deficiencies identified in the Policy and/or procedure will be rectified immediately.

### September 2024 Updates

In June 2024 the Department of Education released a new policy for suggested changes to Keeping Children Safe in Education, which came into effect on 1 September 2024.

The following updates were made in the KCSIE 2024:

The definition of safeguarding has been amended to reflect the changes made in Working Together to Safeguard Children. Paragraph 3 now states "Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing the impairment of children's mental and physical health or development

- ensuring that children grow up in circumstances consistent with the provision of safe and effective caretaking action to enable all children to have the best outcomes.”

Part five has been updated to include links to the most recent UK Council for Internet Safety guidance on ‘Sharing nudes and semi-nudes: advice for education settings working with children and young people’ (February 2024).

Paragraph 18 has been amended to add that staff should be alert to the potential need for Early Help for pupils who have “experienced multiple suspensions, [are] at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.”

In Part Five where options to manage reports of child-on-child sexual violence and/or sexual harassment are discussed, paragraph 497 has been amended to include the importance of Early Help at any stage in a child’s life. It states, “Early Help is support for children of all ages that improves a family’s resilience and outcomes or reduces the chance of a problem getting worse.”

Teachers should be alert to any child:

- Has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in alternative provision or a pupil referral unit
- Has a parent or carer in custody (previously it was 'family member in prison'), or is affected by parental offending
- Is frequently missing/goes missing from education, home or care (the word ‘education’ has been added)

#### **New wording and changes in terminology**

- When referring to ‘abuse and neglect’, the guidance now also includes ‘exploitation’ throughout (for example, see the heading at the top of page 11)
- The definition of abuse now also has 'including where they see, hear or experience its effects' in relation to domestic abuse (paragraph 24)
- ‘Unexplainable and/or persistent absences from education’ has replaced the phrase 'deliberately missing education’ when referring to safeguarding issues (paragraph 29)
- 'It is important that **when** staff have any concerns about child-on-child abuse they should speak to their DSL' – this has replaced '... **if** they have concerns ...' (paragraph 31)
- The definition of child criminal exploitation and child sexual exploitation now says CCE and CSE '**may involve** an exchange for something the victim wants, and/or for the financial advantage or increased status of the perpetrator or facilitator'. Previously the definition didn't include the word 'may' (paragraph 34)

#### **Gender-questioning Pupils:**

KCSIE 2024 has been adapted to reflect the new terminology and guidelines of the advice given by the DofE on dealing with Gender-questioning children. The CASS review identified that caution is necessary for children questioning their gender as there are still unknowns around the impact of social transition, and that children may have wider vulnerability, such as complex mental health and psychosocial needs, and in some cases, autism spectrum disorder and/or attention deficit hyperactivity disorder

Recommended that when families/carers are making decisions about support for gender questioning children, they should be encouraged to seek clinical help and advice. This should be done as early as possible when supporting pre-pubertal children. Schools must consider the broad range of the individual's needs; do this in

partnership with their parents (except in rare circumstances where involving parents would bring a significant risk of harm to the child); include any clinical advice that is available; consider how to address wider vulnerabilities, such as the risk of bullying

### **Prevent Duty:**

In the 'Preventing Radicalisation' section, changes include an updated definition of radicalisation, which is defined as 'the process of a person legitimising support for, or use of, terrorist violence'. There is a disclaimer under this section stating that it remains under review since the government published a new definition of extremism in March 2024.

In the 'Prevent Duty' section, reference is made to the revised 'Prevent Duty guidance: for England and Wales (2023)' that the designated safeguarding lead or 'DSL' and other senior leaders should familiarise themselves with. This statutory guidance came into force on 31 December 2023 and the ISBA Model Template Child Protection and Safeguarding Policy was updated with these changes earlier this year.

### **Data Protection:**

Staff, governors and trustees should use the DfE's data protection guidance in order to ensure that the school

- Complies with data protection law
- Develops data policies and processes
- Know what staff and pupil data to keep
- Follow good practices for preventing personal data breaches

This is laid out in paragraph 93.

### **Role of the DSL**

The final bullet point in the section on holding and sharing information has been updated to include that the DSL should keep written records of all concerns, discussions and decisions, including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program

The updated KCSIE guidance can be accessed via this link: [Keeping Children Safe in Education 2024](#)

In May 2022 the Department for Education published its new National Minimum Standards (NMS) for boarding schools in England. The updated NMS which has been in effect from 5<sup>th</sup> September 2022.

The NMS guidance can be accessed via this link: [National Minimum Standards for Boarding Schools 2022](#)

## Introduction

Highfield and Brookham School follows the guidance in the following publications:

- [Keeping Children Safe in Education](#) (September 2024) [KCSIE]
- [Working Together to Safeguard Children](#) (July 2018 – Last amended December 2023)
- [Working together to improve school attendance](#) (Published May 2022, active from September 2022)
- [What To Do If You Are Worried A Child Is Being Abused – Advice for Practitioners](#) (March 2015)
- [Sexual Violence and Sexual Harassment Between Children in Schools and Colleges](#) (September 2021)
- [Revised Prevent Duty guidance for England and Wales](#) (June 2015 & April 2021)
- ISBA guidance (<http://www.theisba.org.uk>)
- Advice from the West Sussex Local Safeguarding Children Partnership
- [School Coronavirus \(COVID-19\) Operational Guidance](#) (August 2021)
- [Statutory Framework for EYFS](#) (Effective from September 2021)
- [The Independent School Standards and Guidance for Independent Schools](#) (April 2019)
- [Disqualification under the Childcare Act 2006](#) (August 2018)
- [Statutory Sex and Relationships \(SRE\) Guidance](#) (Sept 2020)
- [The Use of Social Media for Online Radicalisation](#) (July 2015)
- [Keeping Children Safe in Out of School Settings](#) (October 2020)

## Rationale

It is essential that everybody working in a school or college understands their safeguarding responsibilities. KCSIE 2024 makes it clear that:

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 interest** of the child.

No single practitioner can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, **everyone** who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

'*Working Together to Safeguard Children*' (December 2020) and KCSIE (September 2022) Part 1 Section 4 define safeguarding as:

- protecting children from maltreatment;
- preventing impairment of children's mental or physical health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care;
- and taking action to enable all children to have the best outcomes.

All children have the right to be safeguarded from harm or exploitation whatever their:

- age
- health or disability
- gender or sexual orientation or identity
- race, religion, belief or first language
- political or immigration status

### **The role of school staff**

All staff have responsibility to provide a safe environment in which children can learn.

All staff should be prepared to identify children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to 18 years of age.

Any staff member who has any concerns about a child's welfare should follow the processes set out in Section C of this policy.

Staff should expect to support social workers and other agencies following any referral



## The Policy

The purpose of this policy is to:

- afford protection for all pupils, as well as adults involved in the school community; enable all staff and volunteers at the school to safeguard and promote the welfare of children;
- promote a culture which makes both school a safe place to learn and live.

This Policy applies to the entire setting, including the EYFS and after school and holiday clubs, all staff (including supply and peripatetic staff), regular volunteers (i.e. those who come into school once a week or more, or 4 times in a 30 day period), pupils, Directors, anyone working on behalf of the school and visitors to the school.

ALL staff are required to read this policy in its entirety annually, including the associated appendices, and to confirm they have done so by completing an acknowledgement form. **All staff whether they work directly with children or not are also required to read Part One of KCSiE 2024** and the Directors will ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in Part one of this guidance. **School leaders and staff who work directly with children should also read and understand Annex B of KCSiE 2024.**

All staff should be aware of systems within the school which support safeguarding and these will be explained to them as part of staff induction. This should include the:

child protection policy, which includes the policy and procedures to deal with child on child abuse;  
behaviour policy including measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying; staff code of conduct; safeguarding response to children who go missing from education; role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies).

**All** staff receive appropriate safeguarding and child protection training (including online safety) at induction. The training is regularly updated. In addition, **all** staff receive safeguarding and child protection (including online safety) updates (for example, via email, e-bulletins, and staff meetings), as required, and at least annually, to continue to provide them with relevant skills and knowledge to safeguard children effectively.

**All** staff are made aware of their local early help process and understand their role in it.

**All** staff are made aware of the process for making referrals to local authority children's social care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.

**All** staff must know what to do if a child tells them they are being abused, exploited, or neglected. Staff should know how to manage the requirement to maintain an appropriate level of confidentiality. This means only involving those who need to be involved, such as the designated safeguarding lead (or a deputy) and local authority children's social care. Staff should never promise a child that they will not tell anyone about a report of any form of abuse, as this may ultimately not be in the best interests of the child.

**ALL staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting ANY form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.**

All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

Parents are informed of the policy and procedures through the website, and a hard copy of the policy is also available on request from the School Office. The Safeguarding Policy and Children Protection Procedures is reviewed annually by the DSLs, DDSs, Director responsible for safeguarding and the Senior Leadership Teams (SLT) of the school. The policy will also be reviewed if changes in legislation mean further updates are urgently required.

### **Aims and Objectives**

Safeguarding children and young people and promoting their well-being is more than just child protection. In order to safeguard children and young people and ensure their personal development, we will have safeguarding at the heart of our ethos and purpose, striving to embed it within our practice at all times and in all areas of our community.

Directors, staff (including temporary, peripatetic and supply staff) and regular volunteers understand the importance of taking appropriate action and working in partnership with children, their parents/carers and other agencies in order to safeguard children and promote their welfare. Everyone in the school shares an objective to help keep children and young people safe by:

- creating and maintaining a safe learning environment, promoting safe practice and eliminating unsafe practice.
- preventing unsuitable people from working with children and young people.
- identifying where there are child welfare concerns, taking action to address these, in partnership with other agencies if appropriate.
- contributing to effective partnership between all those involved with providing services for children.
- developing children's understanding, awareness, and resilience.

## Framework

**All adults working with or on behalf of children have a responsibility to protect children.**

We will endeavour to safeguard children, young people and adults by:

- **acting at all times according to what is in the best interests of the child;**
- valuing children, listening to and respecting them and involving them in decisions which affect them;
- keeping an open mind at all times, and adopting an 'it could happen here' approach;
- never tolerating bullying, homophobic behaviour, racism, sexism or any other forms of discrimination, affording all individuals a sense of being valued
- ensuring the curriculum affords opportunities to learn about keeping themselves safe, particularly when using technology, in emotional and physical relationships and, where appropriate, in respect of radicalisation and extremist behaviour;
- engendering a culture of tolerance and respect between genders, in which sexist or sexualised language or behaviour is never tolerated, and where staff are confident in understanding and recognising what normal sexual development in young people is vs harmful sexual behaviour;
- exercising our duties under the Counter-Terrorism and Security Act 2015 by ensuring all staff attend 'Prevent' training in respect of radicalisation and extremist behaviour;
- keeping up to date with changes in government guidance, and in changes and evolutions in the risks that can put children at risk of harm;
- supporting attendance and taking action if a child is missing school regularly. We have a duty of care to monitor the attendance for pupils registered at our setting, identify children missing from education and take appropriate action. By monitoring and reviewing attendance at Highfield on a regular basis, it allows staff to safeguard and promote the welfare of our pupils to the best of our ability. Staff should refer to the school's 'Children Missing from Education' policy;
- holding more than one emergency contact number for each pupil (via the school's Schoolbase system) to allow the school to make contact with a responsible adult when a child missing education is identified;
- appointing a senior member of staff as the Designated Safeguarding Lead and a Designated Safeguarding lead for EYFS and creating a team of DDSL's across the school. ensuring these persons have the time, funding, support, training and resources to perform their role effectively; ensuring that there is always cover for these roles;
- making sure all staff and volunteers are aware of and committed to the Safeguarding and Child Protection Policy and Procedures and also understand their individual responsibility to take action, including an understanding of the local early help process;
- identifying any concerns early and providing appropriate help to prevent them from escalating;
- sharing information about concerns with relevant agencies, and involving children and their parents/carers appropriately;
- acknowledging and actively promoting that multi-agency working is often the best way to support children and their families;
- taking the right action, in accordance with West Sussex Safeguarding Children Partnership (WSSCP) multi-agency safeguarding procedures, if a child discloses or there are indicators of abuse;

- keeping clear, accurate and contemporaneous safeguarding and child protection records, ensuring they are kept securely and ensuring that these are transferred immediately and securely as and when a child leaves;
- recruiting staff and volunteers (including host families) safely, ensuring all necessary checks are made in accordance with statutory guidance and legal requirements. All members of the school's HR team have received safer recruitment training and in conjunction with the school's safer recruitment policy a minimum of one interview panel member will have completed safer recruitment training.
- providing effective management for the above through induction, support and regular training appropriate to role;
- adopting a Code of Conduct for all staff and volunteers which includes staff/pupil relationships and communications, including the use of social media;
- ensuring staff and volunteers understand about 'whistleblowing';
- promoting a culture in which staff feel able to report to senior leaders what they consider to be unacceptable behaviour or breaches of the school's Code of Conduct by their colleagues, having faith that they will be listened to and appropriate action taken;
- dealing appropriately with any allegations/concerns about the behaviour of staff, including supply staff and volunteers, in accordance with the process set out in statutory guidance;
- giving appropriate guidance through the school's behaviour policy, to support all pupils;
- ensuring pupils' self-awareness of safeguarding and welfare matters is developed at levels appropriate to their maturity, through curricular and extra-curricular events, where a trusting climate is established (for example, PSHE lessons, tutor time, assemblies, year group meetings and circle time);
- providing guidance on the safe use of electronic equipment, including access to the internet;
- encouraging, amongst all staff, a culture of listening to children and taking account of their wishes and feelings, as well as a knowledge of how to manage the requirement to maintain appropriate levels of confidentiality whilst never promising a child that they will not tell anyone else about a disclosure;
- developing positive partnerships and nurturing a commitment to open and honest relationships with parents and carers at all stages of a pupil's education.
- The Department has produced a one-stop page for teachers on GOV.UK, which can be accessed [here](#).

### Safer Recruitment

The school is committed to Safe Recruitment, including the selection and vetting, of all staff and volunteers. The school takes all possible steps to ensure that unsuitable people are prevented from working with children through its recruitment practices, Disclosure and Barring Service [DBS] checks and Induction procedures (Safer Recruitment Policy). This adheres to the 2009, 2012, 2013 and March 2015 legislation regarding referrals to the Disclosure and Barring Service [DBS] [formally the Independent Safeguarding Authority]. Safe Recruitment practice also includes the requirement to check that all those employed as teachers from April 2014 are not subject to any prohibition order issued by the Secretary of State. All staff who have contact with EYFS children and pupils up to the age of eight in before and after school care sign a statement confirming they are not disqualified by association with another who falls into the barred category. Individuals who are disqualified are not permitted to continue to work in early or later years provision, including school nursery and reception classes. They can apply to Ofsted for a waiver, who may grant a full or partial waiver. While an application to Ofsted is under consideration the individual must not continue to work in the setting. In the case of Highfield and Brookham pupils working with adults who are not employed by the school, e.g. through any activity programme off site, measures are in place to ensure that appropriate Child Protection checks and procedures are in place.

The school is committed to promptly report to the DBS any person (whether employed, contracted, a volunteer or student) whose services are no longer used for regulated activity and where the DBS referral criteria is met; that is, they have caused harm or posed a risk of harm to a child.

Ceasing to use a person's services includes: dismissal; non-renewal of a fixed-term contract; no longer engaging/refusing to engage a supply teacher provided by an employment agency; terminating the placement of a student teacher or other trainee; no longer using staff employed by contractors; no longer using volunteers; resignation; and voluntary withdrawal from supply teaching, contract working, a course of initial teacher training, or volunteering. Compromise agreements will not be used to prevent a referral being made to the DBS when it is legally required.

The school will respond to requests from the DBS for information they hold but will not find it from other sources.

Where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and a prohibition order may be appropriate, the school will make a referral to the Teacher Regulation Agency (replacing the National College for Teaching and Leadership (NCTL)). The reasons an order may be considered are: "unacceptable professional conduct", "conduct that may bring the profession into disrepute" or a "conviction, at any time, for a relevant offence". If the threshold for referral to the DBS is met, this is not required; if not, the School may still make the referral to the TRA.

For further details, please see the school's **Safer Recruitment Policy**.

### **Keeping Children Safe Outside of School**

The school and the Estates' Team require any outside clubs or visitors using the site to complete a formal cover letter and provide evidence ensuring that they have complied with KCSIE 2024 and in the guidance found in 'Keeping Children Safe in out-of School settings (DfE)'. As with any safeguarding allegation, the school will follow its own safeguarding policy and procedures, including informing the LADO should we receive an allegation relating to an incident when an individual or organisation is using school premises for the purposes of running an activity for children.

### **Corporal punishment**

The School does not use corporal punishment. Any form of physical punishment of pupils is unlawful as is any form of physical response to misbehaviour unless it is by way of appropriate restraint. There may be occasions where it is necessary for staff to restrain a pupil physically to prevent them from inflicting injury to others, self-injury, damaging property, or causing disruption. In such cases, only the minimum force necessary may be used and any action taken must be to restrain the pupil. If a member of staff takes action physically to restrain a pupil a written report is made, as soon as practical and sent to the Head. (Please refer to the school's **Staff Code of Conduct** and the **Policy on Physical Restraint**).

### **Note**

This Child Protection and Safeguarding Policy and Procedures forms part of a suite of policies and other documents which relate to the safeguarding responsibilities of the school. In particular, it should be read in conjunction with the:

- Behaviour Policy
- Whistleblowing Policy
- Anti-Bullying Policy, including the Cyber-bullying Policy
- Highfield and Brookham School's Preventing Radicalisation Policy
- Brookham Lost or Uncollected Child Policy
- Highfield Lost or Uncollected Child Policy
- E-Safety and Digital Communications Policy
- Brookham Physical Restraint Policy
- Code of Conduct for School Staff
- Policy for Induction of New Staff
- Policy for Dealing with allegations of abuse against members of staff and volunteers
- Pupil Absence and Children Missing from Education Policy.

Reference should also be made to:

- Appendix 1 – Useful Contacts
- Appendix 2 for DSLs – Record Keeping: Best Practice
- Appendix 3 – Record of Concern Form
- Appendix 4 – Keeping Children Safe in Education Flowchart
- Appendix 5 – Specific Roles in Safeguarding
- Appendix 6 – West Sussex Continuum of Needs
- Appendix 7 – Response to COVID 19
- Appendix 8 – Neutral Notifications (Low Level Concerns)

These policies and procedures are available on the School's website.

This policy is updated annually and whenever needed in order to keep up to date with safeguarding issues. Examples of these might include:

- \* Updates released from DfE during the year
- \* Making use of an external audit of safeguarding procedures
- \* A safeguarding issue that the school has been involved with from which lessons can be learnt

**Fully Updated:** December 2015 Phillip Evitt, Headmaster, Highfield, Sophie Baber, Headteacher, Brookham

**Reviewed and updated:** September 2018, P.Evitt, S.Baber, A.Kingsbury, E.Graham, W.Mills

**Reviewed and updated:** September 2019, A. Kingsbury and E.Graham

**Reviewed and updated:** September 2020, A. Kingsbury and E. Graham

**Reviewed and updated:** April 2021, A. Kingsbury and E. Graham

**Reviewed and updated:** September 2021 P. Evitt, S. Baber, C. Lumsden, A. Baker, G. Hunter

**Reviewed and updated:** May 2022, A.Baker following external audit

**Reviewed and updated: September 2022,** S. Cryer, S. Baber, C. Lumsden, A. Baker, G.Hunter

**Reviewed and updated: September 2023,** M. van den Berg, A. Baker, S.Cryer

Reviewed and updated September 2024, M van den Berg, S. Cryer



## SECTION C: CHILD PROTECTION PROCEDURES

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5. What is child abuse?
6. Recognising child abuse – signs and symptoms
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8. Reactions to abuse
9. Specific forms of abuse and safeguarding issues
10. Child on Child Sexual Harassment and Sexual Violence
11. Responding to safeguarding concerns
  - Immediate danger or at risk of harm
  - Early Help
  - Supporting the pupil at risk
  - Responding to the child who discloses (i.e. talks about) abuse
  - What to do if you suspect a child is being abused (without a disclosure)
  - Response from Children’s Services Family Support (Social Care) to a school referral
12. Confidentiality
13. Responding to concerns reported by parents or others in the community
14. Responding to allegations or concerns about staff or volunteers
15. Safer working practice
16. Training
17. Raising concerns about safeguarding practice at Highfield and Brookham
18. Information for parents and carers
19. Remember



## CHILD PROTECTION PROCEDURES

These procedures should be read in conjunction with ‘*Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges*’, September 2024) in particular Part 1, and *Working Together to Safeguard Children* (July 2018 – amended December 2020)

### Principles

Highfield and Brookham School seeks to promote the care, safety and welfare of its pupils by encouraging an ethos in which tolerance is fostered and in which pupils feel secure; the school will also seek to raise awareness of child protection. It will put into place robust measures to protect children and will ensure that safe recruitment practices are followed in order to check on the suitability of staff who apply to work with children.

The school has designated teachers responsible for safeguarding and child protection, who have received appropriate training for this role. In addition, there is a nominated Director who takes an active interest in all Safeguarding matters and has oversight of the school’s Safeguarding and Child Protection Policy and Procedures and receives reports from the DSLs at termly Directors’ Meetings. Appropriate training will be provided for staff at regular intervals and effective links will be developed with appropriate external agencies.

We will seek to ensure that awareness of Safeguarding and Child Protection issues is raised, with pupils, staff and parents, to make pupils aware that there is appropriate advice available from adults, and to give children the opportunities develop skills that they need in order to remain safe.

### 1. What is Child Protection?

Child protection refers to the activity, which is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

### 2. What is significant harm?

The Children Act 1989, Section 47, introduced the concept of significant harm, that the child is suffering, or is likely to suffer, significant harm, as the threshold that justifies compulsory intervention by statutory agencies in family life in the best interests of children. There are no absolute criteria on which to rely when judging what constitutes significant harm. Sometimes it might be a single traumatic event but more often, it is a compilation of significant events that damage the child’s physical and psychological development. Decisions about significant harm are complex and require discussion with the statutory agencies and safeguarding partnerships (the local authority, clinical commissioning groups and the Police).

### 3. Purpose of these Procedures

These procedures explain what action should be taken if there are concerns that a child is or might be suffering harm. A ‘child’ is a person under 18 years but the principles of these procedures apply also to vulnerable young adults over 18 years.

#### **4. Responsibilities and Roles**

**All adults in the school have a duty to safeguard and promote the welfare of children by taking appropriate action. This includes taking action where there are child protection concerns.**

We understand that no single individual at Highfield and Brookham School can have a complete picture of a child's needs and circumstances. For this reason, we encourage all members of staff to identify and share any concerns they may have, taking prompt action where necessary. This is emphasised through the safeguarding training, which is a part of every member of staff or volunteer's induction training.

The Governing Body (Directors) is accountable for ensuring that the school has an effective Safeguarding/Child Protection Policy which should be reviewed annually and which is available publicly. The Directors have nominated an individual Director to work closely with the Designated Safeguarding Leads and to provide a link between the school and the Directors to monitor whether mandatory policies, procedures and training are in place and effective (this is in line with the West Sussex Safeguarding Children Partnership (WSSCP) recommendations).

The Designated Safeguarding Director is also responsible for ensuring the appropriate safeguarding training of all staff and volunteers at the school, including taking a proportional risk-based approach to the level of information that is provided to temporary staff and volunteers. It is for this purpose that the school has a 'Child Protection Summary for all Visiting Professionals and Temporary Staff', which can be found in Section 3 of this policy.

**The nominated Safeguarding Director at Highfield and Brookham School is Mrs Charlotte Lumsden.** Details of 'The Role and Responsibilities of the Safeguarding Director' and 'The Role of the Governing Body (Directors)' are contained in Appendix 5.

The Designated Safeguarding Lead for Highfield and Brookham is Mrs Mikayla van den Berg and Mrs Georgie Hunter is the Designated Safeguarding Lead for EYFS. All issues and concerns about children should be discussed and reported to. There are also a number of Deputy Designated Safeguarding Leads, who will help support the Safeguarding Team.

#### **Designated Safeguarding Lead:**

Mikayla van den Berg- DSL and Director of Boarding, DDSL EYFS

#### **Designated Safeguarding Lead EYFS and DDSL:**

Georgie Hunter- Head of Pre-Prep

#### **Deputy Designated Safeguarding Leads:**

Vivienne Liddell - Deputy Head Pastoral

Andy Baker- Deputy Head Management and Organisation

Rosie Statham- Head of Lower Prep

Jo Longshaw- Head of Middle Prep

James Figgs- Head of Senior Prep

Elliot Hall- Head of Boys House  
Jess Oecken- Head of Girls House  
Oliver and Meagan May- Head of Junior House

The school has a Designated Safeguarding Lead (DSL). This is the person with whom concerns about children should be discussed and reported. The school has a team of DDSL's to represent every phase of the school.

In addition, the West Sussex Safeguarding Children Partnership can provide advice and guidance on safeguarding and child protection matters. See Appendix 1 for **contact details**.

All action is taken in line with the following guidance:

- *Keeping Children Safe in Education (September 2024)* - DfE guidance
- *Working Together to Safeguard Children (July 2018 – amended 2021)* – published by HM Government
- *Sexual Violence and Sexual Harassment Between Children in Schools and Colleges* (September 2021)
- West Sussex Multi-Agency Safeguarding Procedures & Guidance, accessed through the West Sussex Safeguarding Children Partnership website: <http://www.westsussexscp.org.uk>
- *What to do if you're worried a child is being abused (March 2015)* – published by HM Government

## 5. [Early Help](#)

**Any** child may benefit from early help, but all school and college staff should be particularly alert to the potential need for early help for a child who:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan)
- has a mental health need
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- Is frequently missing/goes missing from education, home or care
- is at risk of modern slavery, trafficking, sexual or criminal exploitation
- is at risk of being radicalised or exploited
- has a parent or carer in prison, 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
- has returned home to their family from care
- is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child, and
- is persistently absent from education, including persistent absences for part of the school day
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in alternative provision or a pupil referral unit

## 6. Abuse and Neglect

**All** staff should be aware of indicators of abuse and neglect (see below), understanding that children can be at risk of harm inside and outside of the school/college, inside and outside of home and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection.

**All** school and college staff should be aware that abuse, neglect 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 with one another, therefore staff should always be vigilant and always raise any concerns with their designated safeguarding lead (or deputy).

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

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

**In all cases, if staff are unsure, they should always speak to the designated safeguarding lead or deputy.**

### **Abuse**

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

It is generally accepted that there are four main forms of abuse. The following definitions are based on references in *Working Together to Safeguard Children (2023)* and *KCSiE 2024*:

#### **i) Physical abuse**

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

## **ii) Emotional abuse**

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

## **iii) Sexual abuse**

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. 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 of the school's policy and procedures for dealing with it.

## **iv) Neglect**

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

## **7. Recognising Child Abuse – Signs and Symptoms**

Child abuse can and does occur both within a child's family and in institutional or community settings.

Children may be abused by those known to them or, more rarely, by others (e.g. via the internet). All staff at school must have an entirely open mind as to the potential risk of abuse posed to all children.

Safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside the school. All staff, but especially the DSL and DDSL, should be considering the context within which such incidents and/or behaviours occur. Wider environmental factors / extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including, but not limited to, sexual

exploitation, criminal exploitation and serious youth violence. Children's social care assessments should consider such factors so it is important that the school provides as much information as possible as part of the referral process.

School staff are in contact with children all day and are in a strong position to detect possible abuse. They must not think that by voicing concern they are necessarily starting procedures. The criteria should be that they have **'reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm'** under the Children Act 1989.

*Keeping Children Safe in Education (September 2024)* is clear: **'All staff should be aware of the indicators of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection'**.

Recognising child abuse is not always easy, and it is not the responsibility of school staff to decide whether or not child abuse has definitely taken place or if a child is at significant risk. They do, however, have a clear responsibility to act if they have a concern about a child's welfare or safety or if a child talks about (discloses) abuse. **They should maintain an attitude of 'it could happen here' at all times.**

## **8. Possible Indicators of each of the four kinds of abuse**

The following information is not designed to turn school staff into experts but to help them to be more alert to the signs of possible abuse. The examples below do not form an exhaustive list; DSLs and other staff will find it helpful to refer to the inter-agency safeguarding procedures on the West Sussex Safeguarding Children Board website for more detailed information.

### **i) Physical Abuse**

Most children will collect cuts and bruises in their daily lives. These are likely to be in places where there are bony parts of the body, like elbows, knees and shins. Some children, however, will have bruising which is less likely to have been caused accidentally. An important indicator of physical abuse is where bruises or injuries are unexplained or the explanation does not fit the injury or there are differing explanations. A delay in seeking medical treatment for a child when it is obviously necessary is also a cause for concern. Bruising may be more or less noticeable on children with different skin tones or from different ethnic groups and specialist advice may need to be taken.

Patterns of bruising that are suggestive of physical child abuse can include:

- bruising in children who are not independently mobile;
- bruises that are seen away from bony prominences;
- bruises to the face, back, stomach, arms, buttocks, ears and hands;
- multiple bruises in clusters;
- multiple bruises of uniform shape;
- bruises that carry the imprint of an implement used, hand marks, fingertips or a belt buckle.

Although bruising is the commonest injury in physical abuse, fatal non-accidental head injury and non-accidental fractures can occur without bruising. Any child who has unexplained signs of pain or illness must be seen promptly by a doctor.

Other physical signs of abuse can include:

- cigarette burns;
- adult bite marks;
- broken bones;
- scalds.

Changes in behaviour, which can also indicate physical abuse:

- fear of parents being approached for an explanation;
- aggressive behaviour or severe temper outbursts;
- flinching when approached or touched;
- reluctance to get changed, for example wearing long sleeves in hot weather;
- missing school;
- running away from home.

## ii) Emotional Abuse

Emotional abuse can be difficult to measure, and often children who appear otherwise well cared for may be emotionally abused by being taunted, put down or belittled. They may receive little or no love, affection or attention from their parents or carers. *Children who live in households where there is domestic violence often suffer emotional abuse.* Emotional abuse can also take the form of children not being allowed to mix/play with other children.

The physical signs of emotional abuse can include:

- a failure to thrive or grow, particularly if the child puts on weight in other circumstances, e.g. in hospital or away from parents' care
- sudden speech disorders
- developmental delay, either in terms of physical or emotional progress.

Changes in behaviour which can also indicate emotional abuse include:

- neurotic behaviour, e.g. sulking, hair twisting, rocking, being unable to play, fear of making mistakes, self-harm
- fear of parents being approached

## iii) Sexual Abuse

Adults who use children to meet their own sexual needs abuse both girls and boys of all ages, including infants and toddlers. Children can also be sexually abused by other children (i.e. those under 18).

Usually, in cases of sexual abuse it is the child's behaviour, which may cause concern, although physical signs can also be present. In all cases, children who talk about sexual abuse do so because they want it to stop. It is important, therefore, that they are listened to, taken seriously and appropriate action taken promptly.

The physical signs of sexual abuse can include:

- pain or itching in the genital/anal areas
- bruising or bleeding near genital/anal areas
- sexually transmitted disease

- vaginal discharge or infection
- stomach pains
- discomfort when walking or sitting down
- pregnancy

Changes in behaviour which can also indicate sexual abuse can include:

- sudden or unexplained changes in behaviour, e.g. becoming aggressive or withdrawn
- fear of being left with a specific person or group of people
- having nightmares
- missing school
- running away from home
- sexual knowledge which is beyond their age or developmental level
- sexual drawings or language
- bedwetting
- eating problems such as overeating or anorexia
- self-harm or mutilation, sometimes leading to suicide attempts
- saying they have secrets they cannot tell anyone about
- alcohol / substance / drug use
- suddenly having unexplained sources of money
- not being allowed to have friends (particularly in adolescence)
- acting in a sexually explicit and/or inappropriate way towards adults or other children

#### iv) Neglect

Neglect can be a difficult form of abuse to recognise, yet have some of the most lasting and damaging effects on children and young people.

The physical signs of neglect can include:

- constant hunger, sometimes stealing food from other children
- being constantly dirty or smelly
- loss of weight, or being constantly underweight
- inappropriate dress for the conditions

Changes in behaviour which can also indicate neglect can include:

- complaining of being tired all the time
- not requesting medical assistance and/or failing to attend appointments
- having few friends
- mentioning being left alone or unsupervised

#### Mental Health

All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.



Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

There is a range of advice to help staff identify children in need of extra mental health support, this includes working with external agencies. More information can be found in the mental health and behaviour in school's guidance, Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among children.

**It must be understood, as highlighted in KCSIE, that 'abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label'. For this reason, the school's safeguarding induction and training updates make clear the need to be vigilant for all potential signs of abuse, and to report any concerns to the DSL in order to allow complete pictures of potential abuse or neglect to be built.**

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following the child protection policy and speaking to the designated safeguarding lead or a deputy.

## **9. Reactions to Abuse**

A child may experience a range of reactions to abuse, including some or all of the following:

- A feeling of shame or guilt. 'It must have been my fault', 'I'm bad';
- A feeling that s/he is dirty - spoilt – degraded;
- Embarrassment: 'I'm sure everyone knows';
- A desire to continually talk about the abuse and to gain reassurance;
- Dislike of being touched and touching others;
- Loss of confidence;
- Trouble sleeping, nightmares;
- Hatred of self and of his or her body;
- Destructive behaviour;
- Inability to complete school work; or
- Inability to relate to other children or adults

Many of the behaviours indicated are an attempt by the child to express feelings that he/she cannot express in words and are a response/reaction to abuse. Difficulties may continue for a long time after the abuse and the child may need specialist support.

It is important that adults in school recognise that providing compensatory care might address the immediate and presenting issue but could cover up or inhibit the recognition of neglect in all aspects of a child's life. Compensatory

care is defined as 'providing a child or young person, on a regular basis, help or assistance with basic needs with the aim of redressing deficits in parental care'. This might involve, for example, providing each day a substitute set of clothing because those from home are dirty, or showering a child whose personal hygiene or presentation is such that it is affecting his/her interaction with peers. It does not include isolated or irregular support such as giving lunch money or washing a child who has had an 'accident'. If any adult in school finds s/he is regularly attending to one or more aspects of a child's basic needs then this will prompt a discussion with the DSL.

The general rule is: the younger the child, the higher the risk in terms of their immediate health. However, serious neglect of older children and adolescents is often overlooked, on the assumption that they have the ability to care for themselves and have made a 'choice' to neglect themselves. Lack of engagement with services should be seen as a potential indicator of neglect.

School staff should be mindful of the above and discuss any concerns with the DSL who will take the appropriate action in accordance with the inter-agency neglect guidance on the WSSCB website.

## **10. Specific forms of abuse and safeguarding issues**

The following overview should be read in conjunction with Part One of *Keeping Children Safe in Education* September 2021, which includes important and detailed information about specific forms of abuse and safeguarding issues.

**All** staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and/or alcohol misuse, deliberately missing education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk.

### **Child on Child (previously referred to as peer on peer)**

This section of the Policy is about managing reports of child on child sexual violence and sexual harassment and was initially reviewed and updated in April 2021, in response to the issues raised on the Everyone's Invited website concerning 'rape culture' in educational settings. It was further reviewed in September 2021 in response to KCSiE 2021 and the DfE's advice on Sexual Harassment and Violence. It was reviewed again in August 2022 to take account of KCSiE 2022.

It should be read in conjunction with *Sexual Violence and Sexual Harassment Between Children in Schools and Colleges* (September 2021) and the *Farrer & Co Peer on Peer Abuse Toolkit (2019)*. Due regard should also be taken of *Relationships Education, Relationships and Sex Education (RSE) and Health Education 2020* guidance.

#### **'Rape Culture'**

By the term 'rape culture', Highfield and Brookham School understands it to mean a culture in which sexual violence is condoned and normalised through attitudes, actions and structures. Attitudes and actions can include 'lad culture', jokes trivialising sexual violence, victim blaming, 'slut shaming' and objectification of women. Structures can include a failure to recognise the importance of sexual violence between peers within a school's safeguarding systems, a failure to respond appropriately to disclosures when received, or a lack of focus on the issue from a management or Directorship level. We also understand that these issues must be

tackled not only by ensuring correct and robust procedures are in place, but by identifying and changing any negative cultures which might exist, whilst reinforcing all that is already good.

**All** staff should be aware that children can abuse other children (often referred to as child-on-child abuse), and that it can happen both inside and outside of school or college and online. All staff should be clear as to the school's or college's policy and procedures with regard to child-on-child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

**All** staff should understand that even if there are no reports in their schools or colleges it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding child-on-child abuse they should speak to the designated safeguarding lead (or deputy).

It is essential that **all** staff understand the importance of challenging inappropriate behaviours between children, many of which are listed below, that are abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

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

- **bullying** (including cyberbullying, prejudice-based and discriminatory bullying). This should be treated as a child protection concern when there is reasonable cause to suspect that the child is suffering, or is likely to suffer, significant harm. This is addressed as an ongoing issue as outlined in the school's **Anti-Bullying Policy**;
- **abuse in intimate personal relationships** between children (sometimes known as 'teenage relationship abuse')
- **physical abuse** such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- **sexual violence**, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- **sexual harassment** such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse. Whatever the response, it should be under-pinned by the principle that sexual violence and sexual harassment is never acceptable and will not be tolerated.
- **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, underage sexual activity.
- **consensual and non-consensual sharing of nude and semi-nude images** and/or videos (also known as sexting or youth produced sexual imagery). Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive – but children still need to know it is illegal- whilst non-consensual is illegal and abusive. Significant further detail and guidance can be found in the [guidance](#) offered by UKCCIS (The UK Council for Child Internet Safety).
- **upskirting**, 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. It is a criminal offence (The Voyeurism Act (commonly known as the Upskirting Act), 12 April 2019). Anyone of any gender can be a victim.
- **initiation/hazing type violence and rituals** (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

All staff should be clear as to the school's policy and procedures with regard to child on child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

Pupils are reminded that if they have any worries or concerns or have been subject to any form of child on child abuse they are encouraged to share this with a member of staff in the knowledge that they will be taken seriously and supported appropriately to resolve matters and to their best interests. Equally that, should they wish, they can also contact the NSPCC Helpline (0800 136 663) if they have been a victim of sexual abuse or harassment for additional support and advice, including on how to contact the police if they wish to report a crime. The helpline is free and anonymous, and is open Monday to Friday from 8am – 10pm and Saturday to Sunday from 9am – 6pm.

### **Other safeguarding issues:**

Below are some safeguarding issues all staff should be aware of. **Additional information on these safeguarding issues is included in Annex B of KCSIE 2024.**

#### **Child Abduction and Community Safety Incidents**

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

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

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

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

#### **Child Criminal Exploitation (CCE)**

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

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

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however 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.

### **Child Sexual Exploitation (CSE)**

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include noncontact 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 for example through others sharing videos or images of them on social media.

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

### **County Lines**

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line". This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children are increasingly being targeted and recruited using social media. Further information about this can be found in the Prevent policy.

### **Children and the Court System**

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age-appropriate guides to support children [5-11-year olds](#) and [12-17 year olds](#). These can be accessed by the links on p.142 of KCSIE 2024.

### **Children Missing from Education**

When a child has unexplainable and/or persistent absences from education a potential indicator of abuse or neglect. More detailed information is available in the Pupil Absence and Children Missing from Education Policy.

### **Children with family members in prison**

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders, NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

## **Cybercrime**

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), will consider referring into the Cyber Choices programme.

## **Domestic Abuse**

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

All children can witness and be adversely affected by domestic abuse. It is possible the DSL may well be contacted by the Police in the event as part of Operation Encompass which operates to help police and schools work together to provide help to children who are victims or witnesses of domestic abuse.

Annex B of KCSIE 2024 provides details of support such as the National Domestic Abuse Helpline in instances of domestic abuse.

## **Gender questioning children**

The school treats all gender questioning children with caution and support and recognises that we need to take a cautious approach as there remain many unknowns about the impact of social transition, and children may have wider vulnerabilities. The school will ensure that there is a culture of safeguarding and acceptance, where children feel safe coming forward with information and worries. This clause will be under review and subject to change, with KCSIE, after the case review.

- Consider the broad range of the individual's needs
- Do this in partnership with their parents (except in rare circumstances where involving parents would bring a significant risk of harm to the child)
- Include any clinical advice that is available
- Consider how to address wider vulnerabilities, such as the risk of bullying

## **Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL and deputies are aware of contact details and referral routes in to the Local housing Authority so that they can raise /progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour as well as the family being asked to leave a property. In most cases school staff will be considering homelessness in the context of children who live with their families and intervention will be on that basis. However, it should be recognised that some 16 and 17 year olds may be living

independently for example, having being excluded from the family home and will require a different level of intervention and support. Children's services will be the lead agency for those young people and the DSL or deputy should ensure appropriate referrals are made based on the child's

In the case of Highfield and Brookham, we will be considering homelessness in the context of children who live with their families, and intervention will be on that basis.

### **Mental Health**

All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. KCSIE 2024 p.146/147 provides links to help and support such as Every Mind Matters.

### **Modern Slavery and the National Referral Mechanism**

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

Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in Statutory Guidance. Modern slavery: how to identify and support victims - GOV.UK

### **Preventing radicalisation, Channel and the Prevent Duty (extremism, radicalisation and terrorism)**

All schools and colleges are subject to a duty under Section 26 of the Counter Terrorism and Security Act 2015 (the CTSA 2015) to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty. Any concerns about pupils becoming radicalised or being drawn into extremism will be reported to the DSL who will take prompt advice from the Police by contacting the Sussex Police Prevent Team Safeguarding Referral Unit. The school is also aware of the need to set out clear protocols in ensuring that any visiting speakers, whether invited by staff or the pupils themselves, are suitable and appropriately supervised. More information on preventing radicalisation can be found in the Prevent policy and in KCSIE 2024.

### **Sexual violence and sexual harassment between children in schools**

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

It is essential that **all** victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

See section 10.1 which is based on KCSIE 2024 for procedures on this.

### **Serious violence**

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

KCSIE 2024 Annex B provides support and advice including information on the Police, Crime, Sentencing and Courts Act. They also include links for Prevent awareness, and channel guidance.

### **So-called 'honour'-based abuse (including Female Genital Mutilation (FGM) and Forced Marriage.**

So-called 'honour'-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. 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. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

### **FGM**

If staff have any concerns about HBS they should speak to the DSL. There is also a specific **legal mandatory duty on teachers** with regard to FGM. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police.

### **Forced Marriage**

Since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages. Highfield and Brookham educate children up to the age of 13 so teachers are much less likely to encounter this aspect of HBA compared to a senior school. That said, should any staff have a concern regarding forced marriage they should speak with the DSL who will contact the Forced Marriage Unit for advice and information.

### **Online abuse**

Children increasingly use electronic equipment on a daily basis to access the internet, share and view content and images via social media sites such as Facebook, twitter, Instagram, snapchat and voodoo and for online gaming. Some adults and other children use these technologies to harm children. The harm might range from sending hurtful or abusive texts or emails, to grooming and enticing children to engage in extremist or sexual behaviour such as webcam photography or face-to-face meetings. Pupils may also be distressed or harmed by accessing inappropriate material such as pornographic websites or those which promote extremist behaviour, criminal activity, suicide or



eating disorders Pupils are taught about online safety throughout the curriculum and all staff receive online safety training which is regularly updated.

**Internet Filtering** The school has in place a filtering & monitoring system called Smoothwall which checks for viruses and suspicious emails, denies access to most undesirable and inappropriate sites on the Internet, and maintains a list of banned sites which is updated on a regular basis. All devices connected to the school network, either by cable or wireless, have their internet filtered based on the user authenticated on the device.

The purpose of school web filtering is as follows:

- To protect students and staff against common online threats such as viruses and scams.
- To enable the school to meet its safeguarding duty of care to protect staff and students.
- To protect the school network from security breaches, online risks and to prevent access to services which may have a negative impact on the functioning of the school network.
- To limit access to content which may cause disruption in the classroom. While there are some restrictions in place, it is the intention of the school to provide as broad access as possible to online services.
- Internet access within the school and the use of cloud and remote services will be logged and may be monitored for inappropriate use.
- All internet sites accessed within the school network are logged with date and time of access.
- The accessing and use of inappropriate and indecent materials from the internet or via e-mail will result in disciplinary action being taken.

Children are not allowed to have mobile phones in school or 3G/4G devices. Overseas boarders may keep their mobile phones in secure storage in the Boarding Office and we recognise that they allow children to keep in touch with family far away, or are necessary for communication when travelling. These children may only use these devices in the boarding office/matrons' room and at reasonable times.

More detail can be found in the **Online Safety Policy**.

### **Children who are disabled**

Research shows that children who are disabled are especially vulnerable to abuse and adults who work with them need to be vigilant and take extra care when interpreting apparent signs of abuse or neglect.

### **Children with Special Educational Needs**

Can face additional safeguarding challenges, including additional barriers (such as communication barriers for example) when recognizing abuse and neglect. In brief, where there are concerns of a safeguarding nature, these should always be explored fully and in appropriate depth; these concerns should never be explained away nor discarded as a result of a child's SEN or disabilities.

Additional barriers can exist when recognizing abuse and neglect in this group of children. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration;
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- the potential for children with SEND or certain medical conditions being disproportionately impacted by

- behaviours such as bullying, without outwardly showing any signs;
- communication barriers and difficulties in managing or reporting these challenges.

### **Children who are 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 the unauthorised absence procedures and children missing education procedures.

## **10.1 Responding to reports of Child on Child Sexual Violence and Sexual Harassment**

Reports of sexual violence and sexual harassment are likely to be complex and require difficult professional decisions to be made, often quickly and under pressure. They may have happened outside of the school and/or online. Reports will be considered on a case by case basis with the DSL (or DDSL) taking a lead role, supported by other agencies as required. All staff should maintain an attitude of '**it could happen here**'.

In a mixed school, it is important to note that girls are most likely to be the victims, and boys the alleged perpetrators, but to also be aware that this is not always and only the case.

All members of staff have a role in:

- making clear that there is a zero-tolerance approach to sexual violence and sexual harassment, that it is never acceptable, and it will not be tolerated. It should never be passed off as "banter", "just having a laugh", "a part of growing up" or "boys being boys". Failure to do so can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it.
- recognising, acknowledging, and understanding the scale of harassment and abuse and that even if there are no reports it does not mean it is not happening, it may be the case that it is just not being reported.
- challenging physical 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.

## **What is sexual violence, sexual harassment and harmful sexual behaviour?**

### **Sexual Violence**

It is important that staff are aware of sexual violence and the fact children can, and sometimes do, abuse other children in this way and that **it can happen both inside and outside of school**. When referring to sexual violence we do so in the context of child-on-child sexual violence.

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. (NOTE- Staff should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent, or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.)

**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

### **Sexual Harassment**

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

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

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual "jokes" or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes, (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and upskirting, displaying pictures, photos or drawings of a sexual nature; and

- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
  - 1) consensual and non-consensual sharing of nude and semi-nude images and/or videos. Taking and sharing nude photographs of U18s is a criminal offence.
  - 2) sexualised online bullying
  - 3) unwanted sexual comments and messages, including, on social media
  - 4) sexual exploitation; coercion and threats, and
  - 5) coercing others into sharing images of themselves or performing acts they're not comfortable with online.

It is important that all members of the school community consider sexual harassment in broad terms. Sexual harassment (as set out above) creates a culture that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence.

### **Harmful Sexual Behaviour**

Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is "harmful sexual behaviour" (HSB). The term has been widely adopted in child protection and is used in this advice. HSB can occur online and/or face-to-face and can also occur simultaneously between the two. HSB should be considered in a child protection context.

When considering HSB, both ages and the stages of development of the children are critical factors. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' difference or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature.

HSB can, in some cases, progress on a continuum. Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Children displaying HSB have often experienced their own abuse and trauma. It is important that they are offered appropriate support.

### **The immediate response to a report**

The initial response to a report from a child is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

All staff should be trained to manage a report, with reference made to Chapter 11 of this Policy.

### **Risk and Needs Assessment**

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

- the victim, especially their protection and support
- whether there may have been other victims
- the alleged perpetrator(s)
- all the other children, (and, if appropriate, adult students and staff) at the school or college, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms, and
- The time and location of the incident, and any action required to make the location safer.

Risk assessments should be recorded (written or electronic) and should be kept under review. At all times, the school should be actively considering the risks posed to all their pupils and putting adequate measures in place to protect them and keep them safe.

The DSL (or DDSL) should ensure they are engaging with children’s social care and specialist services as required. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and/or sexual violence specialists will be required, which should be used by the DSL (or DDSL) to inform their approach.

### Action following a report of sexual violence and/or sexual harassment

**The school will refer to KCSIE 2024 Part 5 at all times for guidance.**

#### What to consider

As set out above, sexual violence and sexual abuse can happen anywhere, and all staff working with children are advised to maintain an attitude of ‘it could happen here’. Schools and colleges should be aware of and respond appropriately to all reports and concerns about sexual violence and/or sexual harassment both online and offline, including those that have happened outside of the school/college. The designated safeguarding lead (or deputy) is likely to have a complete safeguarding picture and be the most appropriate person to advise on the initial response by the school or college. Important considerations will include:

- the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. 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. This will however need to be balanced with the school’s or college’s duty and responsibilities to protect other children
- the nature of the alleged incident(s), including whether a crime may have been committed and/or whether HSB has been displayed
- the ages of the children involved • the developmental stages of the children involved
- any power imbalance between the children. For example, is/are the alleged perpetrator(s) significantly older, more mature, confident and well known social standing? Does the victim have a disability or learning difficulty?
- if the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature)
- that sexual violence and sexual harassment can take place within intimate personal relationships between children
- importance of understanding intra familial harms and any necessary support for siblings following incidents are there ongoing risks to the victim, other children, adult students or school or college staff, and

- other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

As always when concerned about the welfare of a child, all staff should act in the best interests of the child. In all cases, the school will follow general safeguarding principles as set out throughout the guidance of KCSIE 2024 Part 5. Immediate consideration should be given as to how best to support and protect the victim and the alleged perpetrator(s) (and any other children involved/impacted)

## 10.2 Children sharing a classroom: Initial considerations when the report is made

Any report of sexual violence is likely to be traumatic for the victim. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

However, reports of rape and assault by penetration are likely to be especially difficult for the victim, and close proximity to the alleged perpetrator(s) is likely to be especially distressing. Whilst the school or college establishes the facts of the case and starts the process of liaising with local authority children's social care and the police, the alleged perpetrator(s) **should** be removed from any classes they share with the victim. The school or college should also **carefully** consider how best to keep the victim and alleged perpetrator(s) a reasonable distance apart on school or college premises (including during any before or after school-based activities) and on transport to and from the school or college, where appropriate. These actions are in the best interests of all children involved and should not be perceived to be a judgement on the guilt of the alleged perpetrator(s).

For other reports of sexual violence and sexual harassment, the proximity of the victim and alleged perpetrator(s) and considerations regarding shared classes, sharing school or college premises and school or college transport, should be considered immediately. In all cases, the initial report should be carefully evaluated, reflecting the considerations set out at paragraph

The wishes of the 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.

## 10.3 Options to manage the report

Every report will be considered on a case-by-case basis.

When to inform the alleged perpetrator should be carefully considered. Where a report is going to be made to children's social care and/or the police, then, as a general rule, the school should speak to the relevant agency and discuss next steps and how the alleged perpetrator will be informed of the allegations. **However, as per general safeguarding principles, this does not and should not stop the school or college taking immediate action to safeguard their children, where required.**

There are four likely scenarios for schools and colleges to consider when managing any reports of sexual violence and/or sexual harassment.

### 1. Manage internally

In some cases of **sexual harassment**, for example, one-off incidents, the view may be taken 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, providing pastoral support and utilising the school's Behaviour Policy as guidance.

It should be underpinned by the principle that there is a zero-tolerance approach to sexual violence/harassment and will not be tolerated.

**All** concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).

## 2. Early help

The school may decide that the children involved do not require statutory interventions, but may benefit from early help, which can be particularly useful to address non-violent harmful sexual behaviour and may prevent escalation of sexual violence. KCSIE 2024 provides assistance and guidance for the early help process. **All** concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).

## 3. Referrals to local authority children's social care

Where a child has been harmed, is at risk of harm, or is in immediate danger, the school should make a referral to local authority children's social care.

At the point of referral to local authority children's social care the school will 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 local authority children's social care.

If a referral is made, local authority children's social care will then make enquiries to determine whether any of the children involved are in need of protection or other services.

Where statutory assessments are appropriate, the school (especially the designated safeguarding lead or a deputy) should be working alongside, and cooperating with, the relevant lead social worker. Collaborative working will help ensure the best possible package of coordinated support is implemented for the victim and, where appropriate, the alleged perpetrator(s) and any other children that require support.

The school should not wait for the outcome (or even the start) of a local authority children's social care investigation before protecting the victim and other children in the school or college. It will be important for the designated safeguarding lead (or deputy) to work closely with local authority 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 mentioned previously will help inform any decision. Consideration of safeguarding the victim, alleged perpetrator(s), any other children directly involved in the safeguarding report, and all children at the school or college should be immediate.

In some cases, local authority children's social care will review the evidence and decide that a statutory intervention is not appropriate. The school or college (led by the designated safeguarding lead or a deputy) should be prepared to refer again if they believe the child remains in immediate danger or at risk of harm or if circumstances change. If a statutory assessment is not appropriate, the designated safeguarding lead (or deputy) should consider other support mechanisms such as early help, specialist support and pastoral support.

Whatever the response, it should be under-pinned by the principle that there is a zero-tolerance approach to sexual violence and sexual harassment and it is never acceptable and will not be tolerated.

All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).

## 4. Reporting to the Police

Any report to the police will generally be in parallel with a referral to children's social care (as above) and the DSL (or DDSL) should be clear about the local procedures.

The DSL will liaise with the Headteacher or principal to inform them of issues under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the statutory guidance - PACE Code C 2019: <https://www.gov.uk/government/publications/pace-code-c-2019/pace-code-c-2019-accessible>

**Where a report of rape, assault by penetration or sexual assault is made, the starting point should always be 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. KCSIE 2024 provides a link for advice on when to call the police. 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(s) and their parents or carers. They should also discuss the best way to protect the victim and their anonymity. Parents or carers will be informed of this referral, unless there are compelling reasons not to (if informing a parent or carer is going to put the child at additional risk). In circumstances where parents or carers have not been informed, the school will support the child in any decision they take, with the support of children's social care and any appropriate specialist agencies.

If the police do not take further action, the school will continue to engage with specialist support for the victim as required. All concerns discussions, decisions and reasons for decisions should be recorded (written or electronic).

Whatever the response, it should be under-pinned by the principle that sexual violence and sexual harassment is never acceptable and will not be tolerated.

All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).

KCIE 2023 paragraphs 504-514 provides detailed guidance on reporting to the Police.

#### 10.4 Considering bail conditions

Where bail is deemed proportionate and necessary, the school will work with children's social care and the police to manage any implications and safeguard their children. An important consideration will be to ensure that the victim can continue in their normal routine, including continuing to receive a suitable education.

#### 10.5 Managing any delays in the criminal process

The school should not wait for the outcome (or even the start) of a police investigation before protecting the victim, alleged perpetrator and other children/staff in the school. **Working alongside the police and other agencies**, the school will put appropriate risk assessments in place and ensure that no disciplinary actions taken jeopardise the police investigation.

#### 10.6 The end of the criminal process

If a child is convicted or receives a caution for a sexual offence, the school will update its risk assessment, ensure relevant protections are in place for all pupils and, if it has not already, consider any suitable action in light of the Behaviour Policy. If the perpetrator remains at the school, the school's expectations regarding the



perpetrator will be made very clear. It will be important that the school or college ensure both the victim and perpetrator remain protected, especially from any bullying or harassment (including online).

Where cases are classified as “no further action” (NFA’d) by the police or CPS, or where there is a not guilty verdict, the school will continue to offer support to the victim and the alleged perpetrator for as long as is necessary.

**A not guilty verdict or a decision not to progress with their case will likely be traumatic for the victim. The fact that an allegation cannot be substantiated does not necessarily mean that it was unfounded.** The school will discuss any decisions with the victim in this light and continue to offer support. The alleged perpetrator is also likely to require ongoing support for what will have likely been a difficult experience.

## 10.7 Ongoing response

To safeguarding and support the victim, the school will:

- Consider the age and the developmental stage of the victim, the nature of the allegations and the potential risk of further abuse, noting 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.
- Along with protecting the child, the needs and wishes of the victim should be paramount in any response. Overall, the priority should be to involve the victim in any decisions and to make their daily experience as normal as possible, so that the school or college is a safe space for them.
- 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 can include:

- **Children and Young People’s Independent Sexual Violence Advisors (ChISVAs)** provide emotional and practical support for victims of sexual violence and work in partnership with schools and colleges to ensure the best possible outcomes for the victim. Police and social care agencies can signpost to ChISVA services (where available) or referrals can be made directly to the ChISVA service by the young person or school. Contact details for ChISVAs can be found at Rape Crisis and The Survivors Trust.
- **CAMHS**
- **Rape Crisis Centres** can provide therapeutic support for children who have experienced sexual violence.
- **Internet Watch Foundation** (to potentially remove illegal images).

KCSIE 2024 provides links to more organisations that are able to offer support.

It is important to note that victims may not disclose the whole picture immediately so it is essential that dialogue is kept open and encouraged. When it is clear that ongoing support will be required, the school will ask the victim if they would find it helpful to have a designated trusted adult (for example, their Form Tutor, Class Teacher, Head of Year or DSL) to talk to about their needs. The choice of any such adult should be the victim’s, and the school will 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 the school should avoid any action would have the effect of isolating the victim, in particular from supportive peer 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, the school will provide a physical space for victims to withdraw.

It may be necessary for the school to maintain arrangements to protect and support the victim for a long time. The school will do everything reasonably possible to protect the victim from bullying and harassment as a result of any report they have made. It is important that if the victim does move to another educational institution (for any reason), that the new educational institution is made aware via the DSL of any ongoing support needs.

### 10.8 Ongoing Considerations: Victim and alleged perpetrator sharing classes

Once the DSL (or DDSL) has decided what the next steps will be, they should consider again the question of the victim and alleged perpetrator sharing classes and sharing space at school. It is important each report is considered on a case-by-case basis and risk assessments are updated as appropriate. As always when concerned about the welfare of a child, the best interests of the child should come first.

Where there is a criminal investigation into a rape, assault by penetration or sexual assault, the alleged perpetrator will 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 premises, on school transport and wherever 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 will take suitable action in light of the Behaviour Policy, including consideration of permanent exclusion. 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 at the school would seriously harm the education or welfare of the victim (and potentially other pupils or staff).

Where the perpetrator is going to remain at the school, the principle would be to continue keeping the victim and perpetrator separate classes. The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases. In all cases, the school should record and be able to justify their decision-making.

Reports of sexual assault and sexual harassment will, in some cases, not lead to a report to the police. 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, the school 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.**

### 10.9 Safeguarding and supporting the alleged perpetrator(s)

The school must consider carefully how best to manage the balance. On one hand, the school must safeguard the victim (and the wider pupil/student body) and on the other hand, provide the alleged perpetrator with an education, safeguarding support as appropriate and implement any disciplinary sanctions.

The following should help shape any decisions regarding safeguarding and supporting the alleged perpetrator:

- 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;
- 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 will be taken, as appropriate, from children's social care, specialist sexual violence services and the police.

KCSIE 2024 provides links for specific support.

- 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 by the DSL of any ongoing support needs and where appropriate, potential risks to other children and staff.

### 10.10 Discipline and the alleged perpetrator

With regard to the alleged perpetrator(s), advice on behaviour and discipline in schools is clear that teachers can discipline pupils whose conduct falls below the standard which could be reasonably expected of them. Disciplinary action can be taken whilst other investigations by the police and/or local authority children's social care are ongoing. The fact that another body is investigating or has investigated an incident does not in itself prevent a school from coming to its own conclusion, on the balance of probabilities, about what happened, and imposing a penalty accordingly. This is a matter for the school and should be carefully considered on a case-by-case basis. The designated safeguarding lead (or a deputy) should take a leading role. The school should consider if, by taking any action, it would prejudice an investigation and/or any subsequent prosecution. Careful liaison with the police and/or local authority children's social care should help the school make a determination. It will also be important to consider whether there are circumstances that make it unreasonable or irrational for the school to reach its own view about what happened while an independent investigation is considering the same facts.

#### Discipline and support

Taking disciplinary action and still providing appropriate support are not mutually exclusive actions. They can, and should, occur at the same time if necessary. The school will be very clear as to what its approach is. On the one hand there is preventative or forward-looking action to safeguard the victim and/or the perpetrator(s), especially where there are concerns that a perpetrator themselves may have been a victim of abuse; and, on the other, there is disciplinary action to punish a perpetrator for their past conduct. The school will be very clear as to which category any action they are taking falls or whether it is really both and should ensure that the action complies with the law relating to each relevant category.

### 10.11 Working with Parents

#### Working with parents and carers

The school will, in most instances, engage with both the victim's and the alleged perpetrator's parents or carers when there has been a report of sexual violence (this **might** not be necessary or proportionate in the case of sexual harassment and should be considered on a case-by-case basis). The exception to this rule is if there is a reason to believe informing a parent or carer will put a child at additional risk. Schools and colleges should

carefully consider what information they provide to the respective parents or carers about the other child involved and when they do so. In some cases, local authority children's social care and/or the police will have a very clear view and it will be important for the school or college to work with relevant agencies to ensure a consistent approach is taken to information sharing.

It is good practice for the school to meet the victim's parents or carers with the victim present to discuss what arrangements are being put in place to safeguard the victim and understand their wishes in terms of support they may need and how the report will be progressed.

It is also good practice for the school or college to meet with alleged perpetrator's parents or carers to discuss any arrangements that are being put into place that impact an alleged perpetrator, such as, for example, moving them out of classes with the victim and what this means for their education. The reason behind any decisions should be explained. Support for the alleged perpetrator should be discussed.

The designated safeguarding lead (or a deputy) would generally attend any such meetings. Consideration to the attendance of other agencies should be considered on a case-by-case basis.

Clear behaviour policies and child protection policies, especially policies that set out the principles of how reports of sexual violence will be managed and how victims and alleged perpetrators are likely to be supported, that parents and carers have access to, will, in some cases, help manage what are inevitably very difficult conversations.

Parents and carers may well struggle to cope with a report that their child has been the victim of a sexual assault or is alleged to have sexually assaulted another child. Details of organisations that support parents are provided in KCSIE 2024 Annex B and the school will signpost the parents to these.

## **10.12 Safeguarding other Children**

Consideration should be given to supporting children (and adult students) who have witnessed sexual violence, especially rape and assault by penetration. Witnessing such an event is likely to be traumatic and support may be required.

Following any report of sexual violence or sexual harassment, it is likely that some children will take "sides". The school will do all it can to ensure both the victim and alleged perpetrator(s), and any witnesses, are not being bullied or harassed.

Social media is very likely to play a central role in the fall out from any incident or alleged incident. There is the potential for contact between victim and alleged perpetrator(s) and a very high likelihood that friends from either side could harass the victim or alleged perpetrator(s) online and/or become victims of harassment themselves. Specialist online safety support is discussed at page 109 of KCSIE 2024.

School transport is a potentially vulnerable place for a victim or alleged perpetrator(s) following any incident or alleged incident. The school, as part of its risk assessment, should consider any additional potential support needs to keep all of their children safe.

## **Additional advice and support**

Additional Advice and support and toolkits can be found in [KCSIE 2024](#)

## Additional advice and support for parents and carers

National Crime Agency's [CEOP Education Programme](#) provides information for parents and carers to help protect their child from online child sexual abuse, including #AskTheAwkward, guidance on how to talk to their children about online relationships

## 11. RESPONDING TO SAFEGUARDING CONCERNS

Staff working with children must maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff should always act in the best interests of the child. If staff have any concerns about a child's welfare, they should act on them immediately. Staff should not assume a colleague, or another professional will take action and share information that might be critical in keeping children safe.

The designated safeguarding lead or a deputy will always be available to discuss safeguarding concerns. If in exceptional circumstances, the designated safeguarding lead (or deputy) is not available this should not delay appropriate action being taken. Staff should speak to a member of the senior leadership team and/or take advice from local children's social care. In these circumstances, any action taken should be shared with the designated safeguarding lead (or deputy) as soon as is practically possible.

Fears about sharing information and GDPR concerns must not be allowed to stand in the way of the need to safeguard and promote the welfare of children. If in any doubt about sharing information, staff should speak to the designated safeguarding lead or deputy.

[Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers](#) (DfE 2018) provides advice and guidance on this matter.

### 11.1 Immediate danger or at risk of significant harm

**If any member of staff believes a child to be in immediate danger or at risk of harm, they should refer this to children's social care and/or the police immediately. They do not need to liaise with the DSL before making the referral. The safety and wellbeing of the child is paramount.**

Anyone can make a referral to Social Care and/or the Police, not just the Designated Safeguarding Leads. Having made a referral directly, the member of staff must then inform the DSL that the referral has been made at the earliest opportunity.

### 11.2 Early Help

Effective use of early help is the most effective way of promoting the welfare of children and reducing the risk of problems escalating.

All staff must be aware of children who are at increased risk and where early help may be required. This includes children in the following circumstances, as indicated in *Working Together to Safeguard Children*, accessible [here](#), pages 13-15:

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;
- has unexplained or frequent absences from school
- Are in danger of exclusion from school
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- is frequently missing/goes missing from care or from home;
- is at risk of modern slavery, trafficking, sexual or criminal exploitation;
- is at risk of being radicalised or exploited;
- has a family member in prison, 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 drugs or alcohol themselves;
- has returned home to their family from care;
- is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage;
- is a privately fostered child;
- is persistently absent from education, including persistent absences for part of the school day.

All staff may have a role to play in the early help process. This includes:

- Identifying emerging problems;
- Liaising with the Designated Safeguarding Lead;
- Sharing information with other professionals to support early identification and assessment;
- In some cases, acting as the lead professional in undertaking an early help assessment.

Where the school assesses that early help might be necessary, contact will be made with the Local Safeguarding Children Partnership in order to seek further guidance and for an early help assessment to be carried out.

In order to be most effective, this early help assessment should take place with the agreement of the child and their parents or carers, and with all relevant professionals.

Local authority children's social care should set out the process for how this assessment will happen.

The school refers to the Local Safeguarding Children Partnership's threshold / Continuum of Needs document, which includes the process for early help assessments and the type and level of early help services available (Appendix 6).

During the early help process, the DSL will support the staff member acting as lead professional in liaising with other agencies and setting up an inter-agency assessment, as appropriate. When early help support is in place, this will be kept under constant review by the lead professional and DSL. If the child's situation does not appear to be improving a referral to children's social care must be given consideration.

Further detail about the process of Early Help is on the West Sussex website [here](#). The West Sussex 'Continuum of Needs' and 'Threshold Chart' can be found in Appendix 6.

### **11.3 Supporting the Pupil at Risk**

We recognize that children who are abused or witness violence may find it difficult to develop a sense of self-worth and to view the world as benevolent and meaningful. They may feel helplessness, humiliation and some sense of self-blame.

Highfield and Brookham may be the only stable, secure and predictable element in the lives of children at risk. Nevertheless, when at school their behaviour may be challenging and defiant or they may be withdrawn.

The School will endeavour to support the pupil through:

- The content of the curriculum.
- The school ethos, which promotes a positive, supportive and secure environment and gives pupils a sense of being valued.
- The school's Behaviour Policy, which is aimed at supporting vulnerable pupils in the school. All staff will agree on a consistent approach which focuses on the behaviour of any offence committed by the child but does not damage the pupil's sense of self-worth. The school will endeavour to ensure that the pupil knows that some behaviour is unacceptable but they are valued and not to be blamed for any abuse, which has occurred.
- The Anti-Bullying Policy because a bullying incident will be treated as a child protection concern when there is reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm.
- Appropriate Risk Assessments should the abuse be child-on-child and the victim and alleged perpetrator be in the same school.
- Liaison with other agencies who support the children such as Children's Services, the Multi Agency Support Hub, Child and Adolescent Mental Health Services, the School Counsellor, the Educational Psychology Service, Behaviour Support Services and the Education Welfare Service.
- Keeping records and notifying Children's Services as soon as there is a recurrence of a concern.

### **11.4 Responding to the child who discloses (i.e. talks about) abuse**

It can take a good deal of courage for a child to talk to an adult about abuse. The child may have to betray a person who is close to them and loved by them and they are risking a great deal in the hope you will believe what they say.

#### **Helpful responses:**

- Remain calm, approachable and receptive; make it clear that you are taking them seriously; avoid showing shock or disbelief.
- Listen carefully to what is said, without interrupting. Best practice is to wait until the end of the disclosure and immediately write up a thorough summary. There is no need to find a 'witness', as this could inhibit the

child from saying more. However, it is recognised that this is acceptable and a preferred approach for some colleagues, allowing the second member of staff to take notes. If making notes, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking.

- Ask questions for the purposes of clarification only, and avoid asking leading questions or pressing for more information. Questions should be asked in an open manner (remember TED: Tell me, Explain, Describe). It is important to bear in mind that an allegation of child abuse or neglect may lead to a criminal investigation so it is essential that staff do not ask a child leading questions or attempt to investigate the abuse.
- Reassure them that they are right to tell you and that they should not feel guilty.
- Find an appropriate opportunity to explain that it is likely that the information will need to be shared with others, i.e. do not promise to keep the matter confidential or a 'secret'.

#### **What not to do:**

- Do not make assumptions.
- Do not make negative comments about the alleged perpetrator.
- Do not make any promises you cannot keep including keeping the information secret.
- Do not share concerns with the parents; if appropriate, this will be done by the DSL after a discussion with Children's Services.
- Where physical injuries have been observed, note these carefully but they should not be photographed. The type and location of the injury can be noted in CPOMS on the body map function at a later stage. The staff member will not ask to see injuries that are said to be on an intimate part of the child's body; if appropriate, draw a diagram to indicate the position of any bruising or injury, to help the child explain.

#### **What to do next:**

- **Ensure the child is safe;** if you feel that the child is suffering or likely to suffer significant harm, contact social services and / or the Police immediately.
- Make an immediate, careful record of what was said using the child's words, in handwritten format, or directly on CPOMS. Record facts not opinions or interpretations, as well as any noticeable non-verbal behaviour, noting the date, time, any names mentioned, and to whom the information was given. Ensure that the record is signed and dated. See Appendix 3 below for detailed record keeping guidance.
- Report the disclosure or indicators of abuse to the DSL or DDSL immediately and **without delay**, who will then contact social services or other external agencies. Staff at schools with boarding provision can seek advice in the first instance from local Family Support teams. (See Appendix 1 for contact numbers). Please note, a child protection referral from a professional cannot be treated as anonymous.
- Pass all hand-written records to the DSL (or DDSL) immediately. If you are able to, please also enter the record on CPOMS in a timely manner – NO copies should be retained by the member of staff or volunteer. This includes the original notes as these constitute prima facie evidence and may be needed by a court. Records should be kept by the DSL in a secure, designated file separate from the child's academic records. An electronic file will also be maintained on CPOMS.

#### **What happens next:**

The advice of the LADO will be sought by the DSL about when communication with the individual involved and the parents/carers involved should take place and by whom. The DSL will decide whether to contact parents at this stage, judging whether doing so is likely to place the child at risk of harm from their actions or reactions - for example



in circumstances where there are concerns that a serious crime such as sexual abuse, domestic violence or induced illness has taken place. The reason for the decision not to contact parents first will be recorded in the child's school child protection file.

Where there is no disclosure by a child but concerns are accumulating, such as in relation to neglect or emotional abuse, the DSL will ensure that all information is brought together and that s/he makes a professional judgement about whether to refer to outside agencies.

It is important to remember that the person who first encounters a case of alleged abuse is not responsible for deciding whether abuse has occurred. That is a task for the DSL and Child Protection Agencies, following a referral from the DSL.

A member of staff who reports concerns to the DSL should expect some feedback, although confidentiality might mean in some cases that this is not detailed. If the member of staff is not happy with the outcome s/he can press for reconsideration and if following this, s/he still believes the correct action has not been taken, can refer the concerns directly to social workers.

Dealing with a disclosure from a child, and a child protection case in general, is likely to be a stressful experience. The member of staff/volunteer should, therefore, consider seeking support for him/herself and discuss this with the DSL.

### **11.5 What to do if you suspect a child is being abused (without a disclosure)**

- Discuss your concerns immediately and without delay with the DSL.
- Do not share concerns with parents. This will be done by the DSL after a discussion with Children's Services if so advised.

Further advice for all staff dealing with children can be found in the government guidance document, [\*What to do if you are worried a child is being abused \(March 2015\)\*](#).

### **11.6 Response from Children's Services Family Support (Social Care) to a school referral**

- **Referral**

Once a referral is received by the relevant team, a manager will decide on the next course of action within one working day. When there is concern that a child is suffering, or likely to suffer significant harm, this will be decided more quickly and a strategy discussion held with the Police and Health professionals and other agencies as appropriate (section 47 Children Act 1989). The DSL should be told within three working days of the outcome of the referral. If this does not happen s/he will contact the duty worker again.
- **Assessment**

All assessments should be planned and co-ordinated by a qualified social worker. They should be holistic, involving other professionals, parents/carers and the children themselves as far as practicable. Assessments should show analysis, be focused on outcomes and usually take no longer than 45 working days from the

point of referral. School staff have a responsibility to contribute fully to the assessment.

- **Section 47 Enquiries (regarding significant harm)**

The process of the investigation is determined by the needs of the case, but the child/young person will always be seen as part of that process and sometimes without parents' knowledge or permission. On occasions, this will mean the child/young person is jointly interviewed by the Police and social workers, sometimes at a special suite where a video-recording of the interview is made.

- **The Child Protection Conference**

If, following the Section 47 enquiries, the concerns are substantiated and the child is judged to be at risk of significant harm, a Child Protection Conference (CPC) will normally be convened. The CPC must be held within 15 days of the first strategy discussion and school staff will be invited to attend - normally the Head or DSL. This person will produce a written report in the correct format (a pro forma is available on the WSSCB website). This will be shared with the child/young person and his/her family before the conference is held. A copy will also be sent to the person chairing the initial CPC at least 24 hours in advance.

More information is in the inter-agency safeguarding procedures ('Child Protection Conferences') on the WSSCP website. If the DSL disagrees with the decisions made by social workers regarding the outcome of the referral and/or the conclusions of the assessment senior managers (under the escalation policy available on the WSSCP website), *particularly* if the child's situation does not appear to be improving, they must raise their concerns **immediately**.

## **12. Confidentiality**

Child Protection raises issues of **confidentiality** that must be clearly understood by all staff/volunteers in schools.

- If a child confides in a member of staff/volunteer and requests that the information is kept secret, it is important that the member of staff/volunteer tells the child in a manner appropriate to the child's age/stage of development that they cannot promise complete confidentiality – instead they must explain that they may need to pass information to other professionals to help keep the child or other children safe.
- Staff/volunteers who receive information about children and their families in the course of their work should share that information only within appropriate professional contexts.
- All staff, both teaching, supply and support, have a responsibility to share relevant information about the protection of children with other professionals, particularly the investigative agencies (WSSCB and the Police), when appropriate.

## **13. Responding to concerns reported by parents or others in the community**

Occasionally parents or other people in the local community tell school staff about an incident or accumulation of concerns they have about the family life of a child who is also a pupil at the school.

If the incident or concern relates to *child protection*, the information cannot be ignored, even if there are suspicions about the motives for making the report. Members of staff will therefore pass the information to the DSL in the usual way and without delay.

It is preferable if the parent / community member who witnessed or knows about the concerns or incident makes a call to Family Support (Social Care) themselves as they will be better able to answer any questions. They can ask for their name not to be divulged if a visit is made to the family. The DSL will advise accordingly and later confirm that this referral has been made.

If the parent / community member refuses to make the referral, the DSL will clarify that s/he has a responsibility to do so and will also need to pass on to social workers how s/he is aware of the information.

This process also applies to parents / community members who are also school staff. As professionals who work with children, they cannot be anonymous when making the referral but can ask for the situation to be managed sensitively and, if necessary, for their identity to be withheld from the family if it will cause difficulties in their private life.

#### **14. Responding to allegations or concerns about staff or volunteers**

All children and adults have a fundamental right to be protected from harm.

The Directors of Highfield and Brookham School has a duty to safeguard and promote the welfare of children and create and maintain a safe learning environment (Section 157 of the Education Act 2002). Schools should identify where there are child welfare concerns and take action to address them, in partnership with other organisations where appropriate, and in accordance with local inter-agency procedures.

Rigorous recruitment and selection procedures and adhering to the school's Code of Conduct and safer practice guidance will mean that there are relatively few allegations against or concerns about staff or volunteers in schools and colleges.

However, if a member of staff has any reason to believe that another adult in school has acted inappropriately or abused a child or young person, they must take immediate action by reporting to the Head. Where there may be a conflict of interest for the Head than the member of staff should contact the Local Authority Designated Officer (LADO) in the Local Authority Safeguarding and Standards Team. Please refer to Appendix 1 below for LADO contact details.

**Even though it may seem difficult to believe that a colleague may be unsuitable to work with children, the risk is far too serious for any member of staff to dismiss such a suspicion without taking action.**

If the allegation/concern is about the Head, the person with concerns will contact the Chairman of Directors (Mr Bill Mills, [bill@explorelarning.co.uk](mailto:bill@explorelarning.co.uk)) or the Local Authority Designated Officer (LADO) in the Local Authority Safeguarding and Standards Team. Please refer to Appendix 1 below for LADO contact details. The Head must not be informed that the allegation has been made.

In all cases of allegations against staff or volunteers, the Head and Chair of Directors will contact the LADO and follow the correct procedures as set out in the separate school policy. This must comply with Part Four of *Keeping Children Safe in Education* (September 2024).

Where an allegation relates to a member of supply staff provided by an agency, the agency should be fully involved.

The procedure aims to ensure that all allegations are dealt with fairly, consistently and quickly and in a way that provides protection for the child, whilst supporting the person who is the subject of the allegation.

In the event that a member of staff does not wish to report an allegation directly, or s/he has a general concern about malpractice within the school, reference can also be made to the school's **Whistleblowing Policy**.

This policy should therefore be read in conjunction with the **Whistleblowing Policy** and **Code of Conduct for School Staff**.

### **Low Level Concerns (Neutral Notifications)**

It may be possible that a member of staff acts in a way that does not cause risk to children, but is however inappropriate. Keeping Children Safe in Education 2023 refers to this as a 'Low Level Concern'. It might also be possible that a member of staff wishes to inform the Head of a situation which has the potential to be misconstrued or misinterpreted by others. In these situations the school uses the Neutral Notifications Policy

A member of staff who has a concern about another member of staff should inform the Head Teacher about their concern using the Neutral Notification Process. The Neutral Notifications Policy (including how to make a notification) and more detailed information can be found in Appendix 8.

## **15. Safer Working Practice**

All adults who come into contact with children at the school will behave at all times in a professional manner which secures the best outcomes for children and also prevents allegations being made. Advice on safer working practice can be found in the **Code of Conduct for School Staff**.

In Highfield and Brookham (including EYFS), staff may not use personal devices (such as mobile phones, cameras and iPads etc.) to record any information or photographic images of children. All photos of children must be taken either on the school camera or the school tablets provided to all staff.

Staff are not permitted to use or carry their personal mobile phones and electronic devices in the Brookham building in the presence of children (including EYFS). The only times when they may use their use their personal devices is during break and lunchtimes, in an area not used by children, such as the staff room or an office. All staff (including EYFS) are advised to give the school telephone number to their next of kin, in case it is necessary for the staff member to be contacted in an emergency. All staff in the Brookham building (including EYFS) must store their devices in an area which is not able to be accessed by children.

## **16. Training**

### **All staff**

Safeguarding and Child protection will be part of induction for all staff and volunteers new to the schools; they will also be given a copy of this policy, the Staff Code of Conduct, details about the role of the DSL and Part 1 of *Keeping*

*Children Safe in Education: statutory guidance for schools and colleges (September 2024, including 'Annex B: Further Information' for those who work directly with children and school leaders.*

The safeguarding training takes the format of an online training package, followed by a training session with a Level 3 (enhanced level) trained member of staff, thus allowing the opportunity to check the full understanding of the trainee and afford them the opportunity to ask questions throughout the training.

The induction training includes basic information on.

- Their responsibilities regarding safeguarding children: how to recognise the signs of abuse, the school's procedures for recording and referring any concerns to the DSL.
- The school's Child Protection and Safeguarding Policy and Procedures.
- Code of Conduct for Highfield and Brookham School Staff
- Whistleblowing Procedure
- School Policies and Procedures (this includes online safety and the acceptable use of IT in school)
- The name and pictures of the DSLs and Deputy DSLs.
- KCSiE (September 2024)
- Where to find all school policies on the website.

All staff, including new appointees, sign to indicate they have received and read the document 'Keeping Children Safe in Education' [KCSiE] September 2024, Part 1 and Annex B for those who work directly with children and school leaders.

All members of academic and pastoral staff complete specific Prevent training, using the online Channel training course.

Staff who do not have designated responsibility for safeguarding and child protection, including the Head and qualified teachers, will undertake suitable refresher training at appropriate intervals. The WSSP recommends this is at least every three years.

All staff will be updated of changes in safeguarding requirements, as and when they arise, by the DSL. Ongoing safeguarding training updates occur for all staff at least once a year. The DSLs deliver a safeguarding update as part of the start of year staff INSET programme, which is also emailed to all colleagues. Further updates are communicated, as necessary, through staff meetings, newsletters or emails. Staff, particularly those in key pastoral roles, are also encouraged to sign up to regular external newsletters to help keep themselves up to date with safeguarding and child protection issues and all staff are invited to respond and offer contributions and ideas that can help to shape the school's safeguarding policies and procedures.

The school's HR Coordinator keeps an up-to-date register of safeguarding induction and further training for all staff at the school, including DSLs, Deputy DSLs and the Designated Safeguarding Director.

This register is regularly reviewed with the DSLs of the school and further training, beyond the minimum requirement, organized for groups when this is deemed to be beneficial.

## DSLs and Deputy DSLs

When DSLs and Deputies take up the role they will attend enhanced (Level 3) training – provided through the WSSCP multi-agency course. The training will be repeated at least every two years and in order to meet current statutory requirements and its objectives will be that the DSL:

- Understands the assessment process for providing early help and intervention.
- Has a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference.
- Is skilled in contributing to inter-agency procedures.
- Is able to attend and contribute to the above effectively when required to
- Knows how to contact a range of local agencies and how to work with them in resolving issues.
- Is alert to the specific needs of children in need, those with special educational needs and young carers.
- Understands how to maintain detailed, accurate, secure written records of concerns and referrals.
- Knows how to access a range of resources.
- Attends any relevant or refresher training courses.
- Encourages staff to increase their skill in listening to children and taking account of their wishes and feelings.
- Ensures that all who work with children, undertake appropriate training to equip them to carry out their responsibilities for child protection effectively and that training is updated at least every three years.
- Ensures that newly appointed staff receive child protection training as part of their induction prior to the commencement of their work with pupils.
- Ensures that all staff and volunteers are aware of the Local Authority Safeguarding Children Board Child Protection Procedures.
- Keep written records of all concerns, discussions and decisions, including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program
- Ensures that, should the school have a pupil placed in it who is looked after by a local authority, staff have the skills, knowledge and understanding to keep such a child safe.
- Ensures that induction training for all staff, including temporary staff and volunteers includes:
  - The school's Child Protection and Safeguarding Policy and Procedures
  - The Code of Conduct for Highfield and Brookham School Staff
  - Behaviour Policy
  - Whistleblowing Procedure
  - The identity of the Designated Safeguarding Lead (and Deputy DSL)
  - A copy of Part 1 of KCSiE (September 2024) and Annex B for those who work directly with children and school leaders.
  - Supports the work and training of the Deputy DSLs.

It is recommended by the WSSCP that all members of the Governing Body (Directors) attend training, briefings or other input which equips them to understand fully and comply with their safeguarding duties *as directors* as set out in *Keeping Children safe in Education* September 2024. Attendance includes those who also work with children and have attended other child protection training in that role.

## 17. Raising concerns about safeguarding practice at Highfield and Brookham School

We promote a culture where any staff or volunteers feel able to raise with the Head or the DSL any concerns about safeguarding or child protection practice.

Any issues which they have not been able to resolve with the Head or DSL should be reported to the *directors* in the first instance. If they are still not satisfied, they should approach the Director for Children’s Services or, if the issue relates to the conduct of or allegation against a member of staff, should contact the LADO.

Staff should refer to the school’s Whistleblowing Policy for more information.

The [NSPCC’s what you can do to report abuse dedicated helpline](#) is available for staff who do not feel able to raise concerns regarding child protection failures internally, or have concerns about the way a concern is being handled by their school or college. Staff can call 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

## 18. Information for Parents and Carers

The DSL will ensure that parents or carers of pupils understand the responsibilities placed on the school and staff for safeguarding children. This will generally be carried out through publication of information on the school’s website.

In addition, at Brookham, all parents are reminded at school events (such as swimming galas and assemblies) that if they take photographs that include any children other than their own, these images must NOT be shared with a third party (for example: through social media or by email). Furthermore, this is explained in the Parent Handbook.

We are committed to keeping pupils safe. Our first priority is our pupils’ welfare and we will usually discuss with parents any concerns we have about their child. There might be rare occasions, however, when we have to provide information to or consult other agencies, such as Children’s Services Social Care, before we contact parents. This will include situations where we judge that to tell parents first will or might put the child at risk of significant harm.

Where a strategy discussion is required, or police or children’s social care services need to be involved, the DSL or Head will not contact parents until all agencies have been consulted and have agreed what information can be disclosed. Parental consent is **not** required for a referral where the DSL believes a pupil is at risk of significant harm.

Parents or carers will be informed about the progress of the case, and told the outcome where there is not a criminal prosecution, including the outcome of any disciplinary process.

Our responsibilities are set out in this policy. It reflects statutory guidance and the Multi-Agency Safeguarding Procedures, which can be found on the West Sussex Safeguarding Children Partnership website.

**If you have any questions about this please speak to the Designated Safeguarding Lead: Mikayla van den Berg;  
EYFS: Georgie Hunter**

**KEY ADVICE FOR STAFF**

Any suspicion or concern that a child or young person may be suffering or at risk of suffering significant harm, **MUST** be acted on **immediately**. **Doing nothing is not an option.**

Any suspicion or concerns will be reported without delay to the DSL or Deputy. If they are not available, the staff member will discuss their concerns as soon as possible with either:

- another senior member of staff or;
- the duty worker in the Family Support (Social Care) Team *responsible for the area where the child lives* (boarding school can call the local team for advice):

Miriam Williams, Donna Tomlinson, Tel: 0330 222 6450, [LADO@westsussex.gov.uk](mailto:LADO@westsussex.gov.uk))

**If your concern is about a member of staff you must contact the Head. If your concern is about the Head you should contact the Proprietor, Mr. Bill Mills**

**Anyone can make a referral to Social Care or to the Police, not just the Designated Safeguarding Leads.** Having made a referral directly, the member of staff must then inform the DSL at the earliest opportunity that the referral has been made.

It is important that all members of staff in the school is aware that the person who first encounters a case of alleged or suspected abuse is not responsible for making a judgement about whether or not abuse has occurred and should not conduct an 'investigation' to establish whether the child is telling the truth. That is a task for social workers and the Police following a referral to them of concern about a child. The role of school staff is to act promptly on the information received.

## **PGSE/SB**

**January 2016**

**Reviewed and updated:** September 2018, P.Evitt, S.Baber, A.Kingsbury, E.Graham, W.Mills

**Reviewed and Amended:** September 2019, A.Kingsbury, E.Graham

**Reviewed and Amended:** September 2020, A.Kingsbury, E.Graham

**Reviewed and Amended:** April 2021, A.Kingsbury, E.Graham

**Reviewed and Amended:** September 2021, A. Baker, G. Hunter

**Reviewed and Amended:** September 2022 A. Baker, G. Hunter

**Reviewed and Amended:** September 2023 M. van den Berg, A. Baker, S.Cryer

**Reviewed and Amended:** September 2024 M van den Berg, A Baker, S Cryer





## SECTION D

**Please note that all such visiting professionals will be supervised by an appropriate staff member of Highfield and Brookham school at all times**

### CHILD PROTECTION SUMMARY FOR ALL VISITING PROFESSIONALS WITH DIRECT CONTACT WITH CHILDREN

As an adult working directly with children at Highfield and Brookham School (including children in the Early Years Foundation Stage) you have a duty of care towards all pupils. This means you must act at all times in a way that is consistent with their safety and welfare.

You must follow the principles of safer working practice, which includes use of technology – on no account should you make contact with or take images of pupils on personal equipment, including your mobile phone. No personal devices (mobile phones, cameras etc.) should be used while there are children present during the school day in Brookham, including the Early Years Foundation Stage. **If the behaviour of another adult in the school gives rise to concern you must report it to the Head.**

**If you have a concern about a child, particularly if you think s/he may be suffering or at risk of suffering harm, it is your responsibility to share the information promptly with the Designated Safeguarding Leads (DSL), Mikayla Van Den Berg [mvandenberg@highfieldandbrookham.co.uk](mailto:mvandenberg@highfieldandbrookham.co.uk) or Georgie Hunter, Brookham Tel: 01428 722005, email: [safeguarding@highfieldandbrookham.co.uk](mailto:safeguarding@highfieldandbrookham.co.uk)**

The following is not an exhaustive list but you might become concerned as a result of:

- seeing a physical injury which you believe to be non-accidental;
- observing something in the appearance of a pupil which leads you to think his/her needs are being neglected;
- a pupil telling you that s/he has been subjected to some form of abuse.

In any of these circumstances, you must write down what you observed or heard, date and sign the account and give it to the appropriate DSL or Deputy DSL.

If a pupil talks to you about (discloses) sexual or physical abuse you:

- listen carefully without interruption, particularly if s/he is freely recalling significant events;
- only ask sufficient questions to clarify what you have heard. You might not need to ask anything but, if you do, you must not 'lead' the pupil in any way so should only ask 'open' questions;
- make it clear you are obliged to pass the information on, but only to those who need to know;

- tell the DSL or Deputy DSL without delay;
- write an account of the disclosure as soon as you are able (definitely the same day), date and sign it and give it to the DSL.

**Do not** ask the pupil to repeat the disclosure to anyone else in school, ask him/her or any other pupil to write a 'statement', or inform parents. You are not expected to make a judgement about whether the child is telling the truth.

**Remember** – share any concerns, don't keep them to yourself. Highfield and Brookham School has documents: "Safeguarding Policy and Child Protection Procedures", and a "Staff Code of Conduct" - available from the DSLs; please familiarize yourselves with these.

## **PGSE/SB**

### **January 2016**

**Reviewed and updated:** September 2018, P.Evitt, S.Baber, C.Searson, E.Graham, W.Mills

**Reviewed and updated:** May 2018, P.Evitt, S.Baber, C.Searson, E.Graham, W.Mills

**Reviewed and updated:** September 2018, P.Evitt, S.Baber, A.Kingsbury, E.Graham, W.Mills

**Reviewed: September 2019,** A. Kingsbury and E. Graham

**Reviewed: September 2020,** A. Kingsbury and E. Graham

**Reviewed: April 2021,** A. Kingsbury and E. Graham

**Reviewed and Amended September 2021:** A. Baker, G. Hunter

**Reviewed and Amended September 2022:** A. Baker, G. Hunter

**Reviewed and amended September 2023:** M van den Berg, A Baker, S.Cryer

**Reviewed and amended September 2024:** M van den Berg, A Baker, S.Cryer

**APPENDIX 1**

**ESSENTIAL SAFEGUARDING AGENCY CONTACT INFORMATION**

<p><b>Designated Safeguarding Leads (DSL)</b></p>	<p>Mikayla van den Berg, Director of Boarding, DSL            Tel: 01428 728000 <a href="mailto:mvandenberg@highfieldandbrookham.co.uk">mvandenberg@highfieldandbrookham.co.uk</a>  <a href="mailto:safeguarding@highfieldandbrookham.co.uk">safeguarding@highfieldandbrookham.co.uk</a></p> <p>EYFS: Georgie Hunter- Head of Pre Prep            Tel: 01428 722005 <a href="mailto:safeguarding@highfieldandbrookham.co.uk">safeguarding@highfieldandbrookham.co.uk</a></p>
<p><b>Deputy Designated Safeguarding Leads (DDSL)</b></p>	<p>Vivienne Liddell - Deputy Head Pastoral            Tel: 01428 728000 <a href="mailto:vl@highfieldandbrookham.co.uk">vl@highfieldandbrookham.co.uk</a></p> <p>Andy Baker- Deputy Head Management and Organisation            Tel: 01428 728002, 07789 363937  <a href="mailto:hfdeputyhead@highfieldandbrookham.co.uk">hfdeputyhead@highfieldandbrookham.co.uk</a></p> <p>Rosie Statham- Head of Lower Prep  <a href="mailto:rstatham@highfieldandbrookham.co.uk">rstatham@highfieldandbrookham.co.uk</a></p> <p>Jo Longshaw- Head of Middle Prep  <a href="mailto:jlongshaw@highfieldandbrookham.co.uk">jlongshaw@highfieldandbrookham.co.uk</a></p> <p>James Figgs- Head of Senior Prep  <a href="mailto:jf@highfieldandbrookham.co.uk">jf@highfieldandbrookham.co.uk</a></p>
<p><b>Boarding Deputy Designated Safeguarding Leads (DDSL)</b></p>	<p>Elliot Hall- Head of Boys House  <a href="mailto:ehall@highfieldandbrookham.co.uk">ehall@highfieldandbrookham.co.uk</a></p> <p>Jess Oecken- Head of Girls House  <a href="mailto:joecken@highfieldandbrookham.co.uk">joecken@highfieldandbrookham.co.uk</a></p> <p>Meagan and Oliver May- Heads of Junior House  <a href="mailto:Juniorhouseparents@highfieldschool.co.uk">Juniorhouseparents@highfieldschool.co.uk</a></p>

The following contact details are correct as of September 2024

<p><b>Local Authority Designated Officer (LADO)</b></p>	<p>Miriam Williams, Donna Tomlinson,            Tel: 0330 222 6450  <a href="mailto:LADO@westsussex.gov.uk">LADO@westsussex.gov.uk</a></p>
<p><b>West Sussex Children’s Services / MASH (Integrated Front Door)</b></p>	<p>Tel: 01403 229900            Out of hours for urgent child protection matters that cannot wait until the next working day: 0330 222 6664  <a href="mailto:WSChildrenServices@Westsussex.gov.uk">WSChildrenServices@Westsussex.gov.uk</a></p>
<p><b>West Sussex Safeguarding Children Partnership</b></p>	<p>0330 222 7799  <a href="mailto:WSSCP@Westsussex.gov.uk">WSSCP@Westsussex.gov.uk</a></p>

<a href="http://www.westsussexscp.org.uk">http://www.westsussexscp.org.uk</a>
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Sussex Police Prevent Team Safeguarding Referral Unit:

Tel: 101 Ext 531355 Email: [prevent@sussex.pnn.police.uk](mailto:prevent@sussex.pnn.police.uk)

The Local Panel Chair for West Sussex,

Beverly Knight Telephone 0330 222 4223 Mobile 0789 458 9071

Email: [Beverly.knight@westsussex.gov.uk](mailto:Beverly.knight@westsussex.gov.uk)

OFSTED

Piccadilly Gate, Store Street, Manchester. M1 2WD

0300 123 3155

[whistleblowing@ofsted.gov.uk](mailto:whistleblowing@ofsted.gov.uk)

NSPCC

NSPCC Report Abuse in Education hotline

Telephone: 0800 136 663

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

Disclosure and Barring Service

PO Box 3961, Royal Wootton Bassett, SN4 4HF

Telephone: 03000 200 190

Department for Education Teaching Regulation Agency

Teacher Misconduct Telephone: 0207 593 5393

Email: [misconduct.teacher@education.gov.uk](mailto:misconduct.teacher@education.gov.uk)

NSPCC

NSPCC National Whistleblowing Advice Line

Telephone: 0800 028 0285

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

## APPENDIX 2 for DSLs

### RECORD KEEPING: BEST PRACTICE

#### 1. Introduction

- 1.1 The importance of good, clear child welfare and child protection record keeping has been highlighted repeatedly in national and local Serious Case Reviews.
- 1.2 It is the DSL's responsibility to ensure that child protection files, access, storage and transfer meet the required professional standards as detailed in this document.
- 1.3 The DSL will keep written records of all concerns, discussions and decisions, including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program
- 1.4 The common law of confidentiality, Data Protection and Human Rights principles must be adhered to when obtaining, processing or sharing personal or sensitive information or records. In summary, the Data Protection Act requires that records should be securely kept, accurate, relevant, up to date and kept for no longer than is necessary for the purpose for which they were made.

#### 2. Record to be made by an adult receiving a disclosure of abuse (when a child talks about abuse)

- 2.1 This record should be made as soon as possible **after** the individual hearing the disclosure has reported it verbally to the DSL. The facts, not opinions (unless of particular relevance), should be accurately recorded in a non-judgmental way. It is important to remember that expressing an opinion as to whether the child is telling the truth is not helpful and can prejudice how a case proceeds.
- 2.2 The record should ideally be on a standard 'concerns' form (which is based on a Local Authority model produced by the Safeguarding and Standards Team) but if this is not used, should include:
  - The child's name, gender and date of birth
  - Date and time of the conversation
  - What was the context and who was present during the disclosure?
  - What did the child say? – verbatim if possible
  - What questions were asked? – verbatim
  - Responses to questions –verbatim
  - Any observations concerning child's demeanour and any injuries
  - The name of the person to whom the disclosure was reported
  - Printed name and job title of the author, followed by signature and date
- 2.3 The record about a disclosure of abuse should be passed to the DSL and retained in the pupil's child protection file in its original and contemporaneous form (as it could be used as evidence in court proceedings), even if later typed or if the information is incorporated into a report. The record should also be scanned and uploaded onto the child's CPOMS record. Where appropriate, the location and type of injuries a child has sustained can be highlighted on the body map function on CPOMS.

2.4 Schools should never ask pupils, regardless of their involvement in a child protection matter (i.e. the subject of an allegation, a witness or the alleged 'perpetrator'), to write out their 'statements' of what has happened. In some cases, this could have the unintended consequence of jeopardising a child protection investigation. This applies regardless of whether the incident(s) took place within or outside school.

### **3. Records kept by the Designated Safeguarding Lead**

- 3.1 As stated at 2.2 above, it is useful and recommended practice for school staff to have a standard pro forma for recording all 'welfare' and child protection concerns.
- 3.2 The concern form should be passed to the DSL who will make a judgement about what action needs to be taken, in accordance with local inter-agency safeguarding procedures. The decision about any action, whether or not a referral is made to Social Care, will be recorded clearly by the DSL.
- 3.3 Concerns which initially seem trivial may turn out to be vital pieces of information later, so it is important to give as much detail as possible. A concern raised may not progress further than a conversation by the DSL with the parent, or, at the other end of the scale, could lead to matters being heard in a court.
- 3.4 All 'lower level' concerns about a child's welfare, which will generally have been discussed with parents/carers, are kept in the child's main file on CPOMS. Alternatively, some schools have adopted their own systems of collating such welfare concerns, but whichever system is in place, these records should not be labelled 'child protection'.
- 3.5 It is never good practice to keep pupil welfare records in a diary or day-book system. Often it is only when a number of seemingly minor issues relating to an individual pupil over a period of time are seen as a whole that a pattern can be identified indicating a child protection concern.

### **4. Starting a School Child Protection File**

- 4.1 A school child protection file does not necessarily mean that the pupil is or has been the subject of a child protection conference or plan. 'Child protection file' denotes a high level of school concern which has warranted the involvement of, and in most cases an assessment by, child care social workers.
- 4.2 It is the responsibility of the DSL to start a school child protection file when a social worker is or was involved, e.g.:-
  - a) A formal referral is made by the school to Children's Social Care on an inter-agency referral form or
  - b) Social Care inform the school they have commenced an assessment in relation to a pupil resulting from information from another source or
  - c) A child protection file is forwarded to the school by a previous school or pre-school attended by the pupil or
  - d) A child who is in care/looked after transfers into the school or
  - e) A pupil is privately fostered
- 4.3 It is not good practice to make 'family files'; each child should have his/her own record which includes

information specific to him/her and which will be sent to the next school at the time of transfer. The names of siblings and/or other children who live in the household who also attend the school should be clearly noted on individual files.

- 4.4 If two (or more) pupils at the school are referred to Social Care for the same concern (for example, an allegation of sexually harmful behaviour), then child protection files will be started on both/all pupils.
- 4.5 'Document wallet' - type files are not ideal as the papers therein can easily fall out or get 'out of order'.
- 4.6 School child protection files are never 'closed' or de-categorised. Once a school has started a child protection file, it is always a school child protection file and the chronology is maintained so that any future concerns can be considered in the context of past events.
- 4.7 Note - If there is an allocated social worker because a child is disabled or a young carer and there are no child protection concerns then a child protection file should not be started.

## 5. Adopted children

- 5.1 When a pupil is admitted to a school in Reception class and parents provide the information that s/he was adopted prior to commencing education, this should be recorded with their permission on the main school file in order that appropriate support can be provided in future if necessary. In these situations, it is not necessary to start a child protection file **unless** the criteria described above (at 4.2a and 4.2b) also apply.
- 5.2 Some older adopted children will have school child protection files because they were initially in care/looked after and were subsequently adopted. During the period when the child is 'placed for adoption' (prior to an adoption order being made) any file that contains information that identifies both the birth family and the adoptive family must be classed as highly sensitive and this information should only be shared on a strictly 'need to know' basis.
- 5.3 Once the adoption order has been made the DSL in the school that holds the child protection file must overhaul the file. The principle is that there must be nothing that identifies the child's birth name or the birth family. In sifting the file it is acceptable to destroy documents that will continue to be held by other agencies: for example, child protection conference minutes and LAC review minutes which will be in Social Care records.
- 5.4 A chronology should be prepared that gives an overview of the information previously held in the file but **without giving the child's birth name or any details which would identify the birth family.**
- 5.5 The overhauled file should only contain the new chronology and any information that has originated from within school (for example concern forms). This file should now be in the child's new name, contain no information which identifies the birth name or birth family, will be held in the school as long as the child remains or sent onto a new school as described (at 9) below.
- 5.6 Please note that once a child is adopted, all school records, not just child protection files, must be amended so that there is nothing which gives the birth name or identifies the birth family.



## 6. The Format of Child Protection Files

- 6.1 It is helpful if individual files have a front sheet with key information about the pupil and contact details of parents/carers, social worker and any other relevant professionals.
- 6.2 If a pupil is or was subject of a child protection plan or in care/looked after, this should be highlighted in some way to make it immediately obvious to anyone accessing the record.
- 6.3 It is a multi-agency standard that children's child protection files must have at the front an up to date chronology of *significant* incidents or events *and* subsequent actions/outcomes.
- 6.4 Maintaining the chronology is an important part of the DSL role; it aids the DSL, Deputy and others to see the central issues 'at a glance' and helps to identify patterns of events and behaviours.
- 6.5 It should make sense as a 'stand-alone' document: anyone else reading the chronology should be able to follow easily what the concerns are/have been, whether the concerns have escalated and the actions taken by the school to support and protect the child. This will be particularly useful for DSLs in receiving schools when pupils transfer, for professionals involved in collating information for Serious Case Reviews and for parents/pupils/ex-pupils if they view the record.
- 6.6 Once a chronology is started it should be updated as appropriate even if Social Care later cease involvement (see 4.6 above).
- 6.7 The file should be well organised and include, as appropriate, school 'concern forms', copies of correspondence, school reports to and minutes of child protection conferences, documents relating to children in care/'looked after' etc. The DSL will decide which relevant information which pre-dates the starting of the child protection file, such as CAF or other pastoral care documentation, will also be included.

## 7. Storage

All records relating to child protection concerns are sensitive and confidential so will be kept in a secure (i.e. locked at all times) filing cabinet, separate from other school files, and accessible through the DSL or the Deputy DSL.

## 8. Sharing of and access to Child Protection Records

- 8.1 It is highly unlikely that all members of staff need to know the details of a child's situation, or that there should be widespread access to the records. Access to, and sharing of, information should be on a need-to-know basis, decided case by case. The DSL is the best person to decide this. Consideration must also be given to *what* needs to be shared. The closer the day-to-day contact with the child, the more likely the need to have some information.
- 8.2 The child who is the subject of a child protection record has the right to access the file, *unless* to do so would affect his/her health or well-being or that of another person, or would be likely to prejudice a criminal investigation or a Section 47 assessment (which relates to significant harm) under the Children Act

1989.

- 8.3 Parents (i.e. those with parental responsibility in law) are entitled to see their child's child protection file, with the same exemptions as apply to the child's right to access the record. Note that an older pupil may be entitled to refuse access to the record by his/her parents. As a guide, this applies to pupils who are 12 years of age or above, if they are of normal development or maturity.
- 8.4 References by name to children other than the pupil who is the subject of the file should be removed when disclosing records, unless consent is obtained from the individual/s concerned (or their parents/carer on their behalf). Care must be taken to ensure all identifying information is removed from the copy of the record to be shared.
- 8.5 It is good practice to share information held unless there is a valid reason to withhold it, e.g. to do so would place the child or any other person at risk of harm. Any requests to see the child's record should be made in writing to give time for confidential information, such as any details of other pupils, to be removed.
- 8.6 In respect of requests from pupils or parents for information which wholly or partly consists of an educational record, access should be granted within 15 school days. This might be relevant to 'welfare' concerns in a main school file, for example. Viewing-only access to these records is free but it is reasonable to charge for copies on a sliding scale from £1 - £50 (maximum) depending on the number of pages.
- 8.7 However, should the request only seek access to a child protection file (which is not classed as an educational record), access should be granted within 40 calendar days. A discretionary maximum fee of £10 can be charged for viewing access to or a copy of a child protection record.
- 8.8 If the record to be disclosed contains information about an adult professional, that information can be disclosed if it relates to the performance by that person of their job or other official duties e.g. a reference to a teacher in their teaching role or a school nurse in their nursing role. However, if the reference refers to that individual's private life, it should be removed (unless this relates to a child protection matter which is relevant to the record to be disclosed).
- 8.9 Child protection information should not normally be shared with professionals other than those from Social Care, the Police, Health or the Local Authority. OfSTED and other school inspectors can view individual child protection files. Information should not be released to parents' solicitors on request; advice should be sought from the school's legal advisor in such cases.
- 8.10 The Directors, including the Nominated Director, should not access the records.
- 8.11 Further advice about disclosure of information held in child protection records can be sought from the WSSCP Data Protection Officer.

## **9. Transfer of Child Protection Records**

- 9.1 Where children leave the school or college, the designated safeguarding lead should ensure their child

protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term to allow the new school or college to have support in place for when the child arrives. The designated safeguarding lead should ensure secure transit, and confirmation of receipt should be obtained. For schools, this should be transferred separately from the main pupil file.

In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse.

- 9.2 If the records are to be posted, they should be copied and these copies retained until there has been confirmation in writing that the originals have arrived at the new school. They can then be shredded.
- 9.3 Whether child protection files are passed on by hand or posted, there should be written evidence of the transfer (such as a form or slip of paper signed and dated by a member of staff at the receiving school.) This receipt should be retained by the originating school for 6 years (in line with guidance from the Records Management Society).
- 9.4 If the pupil is removed from the roll to be home educated, the school should pass the child protection file to the LA EHE Administrator and a receipt obtained as described above.
- 9.5 If a pupil with a child protection record leaves the school without a forwarding address and no contact is received from a new school the DSL should follow the school's Child Missing Education (CME) procedures. If there is reason to suspect the pupil is suffering harm then the DSL will refer to Social Care in the usual way.
- 9.6 If a child arrives in the school in an unplanned way and / or there are concerns about them from the outset, it is worth contacting the previous school for a discussion with the DSL. There might be a CP file that has not been passed on.

## **10. 'Dual registered' pupils**

- 10.1 Where a pupil is on roll at the school and starts to attend a Learning Centre (LC), the chronology and other relevant information in the child protection file should be copied and passed to the DSL at the LC at the earliest opportunity. Because of the nature of such 'bespoke' arrangements for individual pupils, the two DSLs should agree on which one of them will keep the chronology updated and how best to communicate to each other significant events and issues in relation to that pupil.

## **11. Retention of records**

- 11.1 The school should retain the record for as long as the pupil remains in school and then transferred as described above.
- 11.2 Guidance from the Records Management Society is that when a pupil with a child protection record reaches statutory school leaving age (or where the pupil completed 6<sup>th</sup> form studies), the last school attended should keep the child protection file until the pupil's 25<sup>th</sup> birthday. It should then be shredded (and a record

kept of this having been done, date, and why).

## **12. Electronic Child Protection Records**

- 12.1 Electronic records must be password protected with access strictly controlled in the same way as paper records.
- 12.2 They should be in the same format as paper records (i.e. with well-maintained chronologies etc.) so that they are up to date if/when printed, if necessary.
- 12.3 Electronic files must not be transferred electronically to other schools unless there is a secure system in place (such as cjsm, GCSX or IronPort) but should be printed in their entirety, linked with paper documentation such as conference minutes and transferred as described in section 9 above. When the receipt has been returned to confirm that the file has been received at the new school, the computer record should be deleted.

**APPENDIX 3**

**HIGHFIELD AND BROOKHAM SCHOOL CONCERN FORM**

<b>Pupil's details</b>	<b>Details of those with parental responsibility</b>
Full name	Name(s)
Address	Address
Telephone	Telephone
Date of Birth	Relationship to pupil
Gender	
Is the pupil looked-after by the local authority or are there any other legal family arrangements?	Ethnicity, culture and religion of those with parental responsibility if known
When was the pupil first admitted to this school?	Preferred language of those with parental responsibility
Ethnicity and culture	
Religion	Is any language support required?
Does the pupil have any disability or special need? Yes " No "	Do those with parental responsibility have any disability or special need?
Please specify	How does this affect the pupil?
Preferred language of pupil	Details of any siblings
Is any type of language support required to converse with the pupil? Yes " No "	
Please Specify	Does the pupil regularly spend time with other carers, for example, after-school care
Does the pupil know this form has been completed? Yes " No "	Has a Common Assessment Framework (CAF) been completed for this pupil? Yes " No "
If not, Why not?	Please give date and reason for CAF
If yes, what did the pupil say?	

<p><b>Why are you concerned about this pupil?</b> Please provide a description of any incidents/conversations and the dates they occurred. You must make clear what is fact and what is opinion or hearsay. You must not ask the</p>	<p>Do those with parental responsibility know this form has been completed?</p> <p>Yes " No "</p>
<p>pupil leading questions or try to investigate the concern yourself.</p>	<p>If not, why not?</p> <p>If yes, what did they say?</p> <p><b>Note that those with parental responsibility should not be contacted if this could place the pupil at risk. Speak to the DSL first.</b></p>
<p>What have you observed and when? (This relates to anything you have personally witnessed)</p>	
<p>What have you been told and when? (Write here anything you have been told by the pupil or any other person. Be clear about who has said what)</p>	<p>Does the pupil have any visible injury, or have you been told they have been injured?</p> <p>Yes " No "</p> <p>If yes, has medical advice been sought?</p>
<p>What have you heard and when? (this may be third-party information that is relevant but as yet unsubstantiated)</p>	<p>Has action any already been taken in relation to this concern? (for example, pupil taken out of class, first aid)</p>
<p>If an allegation has been made, give any details you have about the alleged abuser</p>	<p>Name and position of the person this record was handed to:</p>
<p>Date and time of this record</p>	
<p><b>Your details</b> Full name Position</p>	<p>If this record was handed to anyone other than the DSL or Headmaster, please explain why</p>

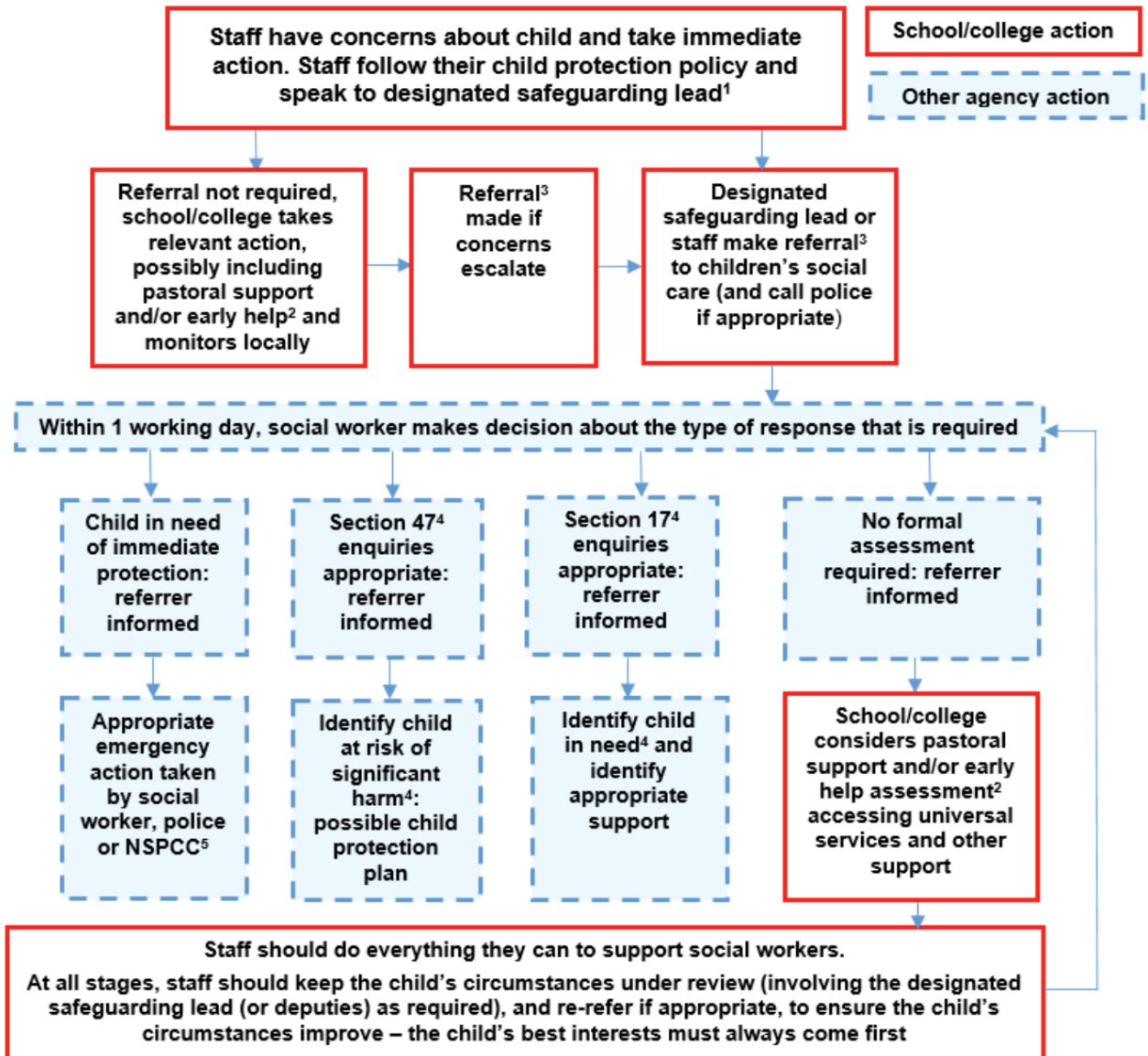
If you have used additional sheets to complete this record of concern please staple them to this form and write the number of additional sheets here \_\_\_\_\_

If the pupil has a visible injury, please indicate the location on the body map and staple the body map to this form. Please note that children should not be asked to strip to show injuries and care should be taken to protect their privacy.

Hand this form to the DSL

APPENDIX 4

ACTIONS WHERE THERE ARE CONCERNS ABOUT A CHILD (KCSiE 2024)



APPENDIX 5



## SPECIFIC ROLES IN SAFEGUARDING

### The Role and Responsibilities of the Designated Safeguarding Lead

- Take lead responsibility and maintain an overview of safeguarding and child protection (including online safety) of pupils.
- Open channels and communicate effectively with local statutory agencies.
- Communicate well both verbally and in writing, to a high standard both in school and as a representative of the school at external agency meetings.
- Present a calm and efficient disposition in a crisis.
- Follow procedures accurately and make informed decisions.
- Adapt swiftly to changing regulations.
- Lead a staff team and monitor, evaluate and record their effectiveness in implementing safeguarding procedures.
- Be an effective member of a multi-agency, local authority team.
- Listen objectively, actively and non-judgmentally.
- Write clear, full and informative reports for external agencies, senior managers, directors and external agencies.
- Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required.
- Undergo training to provide them with the knowledge and skills required to carry out the role effectively; this training should be updated every two years.
- Refresh their knowledge and skills at regular intervals, as required, at least annually, to allow them to understand and keep up with any developments relevant to their role.
- The Designated Safeguarding Lead will refer all cases of suspected abuse to either/or:
  - The local authority children’s social care unit
  - The local authority designated officer (LADO) for child protection concerns (particularly all cases which concern a staff member)
  - The Disclosure and Barring Service (cases where a person is dismissed or left due to risk/harm to a child)
  - In consultation with the Head, and informing the safeguarding director, consider making a referral to the Teacher Regulation Agency (TRA) (replacing the National College for Teaching and Leadership) where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and a prohibition order may be appropriate in circumstances such as “unacceptable professional conduct”, “conduct that may bring the profession into disrepute” or a “conviction, at any time, for a relevant offence”. Where a referral has been made to the DBS, it is unnecessary to contact TRA, as information is shared between the two bodies. Where a dismissal does not reach the threshold for DBS referral, separate consideration must be given to a TRA referral.
  - The police (cases where a crime may have been committed).
- Ensure that the school operates within legislative frameworks and recommended guidance.

- Ensure each member of staff and parents have access to, and understand, the School's child protection policy, especially new and part time staff; and that these policies are regularly reviewed.
- Liaise with the Head regarding:
  - ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
  - referring of cases of suspected abuse regarding children in need to the local authority children's social care unit.
  - referring of cases to the Channel Programme where there is a radicalisation concern as required.
  - referring child protection concerns (all cases involving a staff member) to the local authority designated officer (LADO).
  - referring cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service.
  - referring cases where a crime may have been committed to the police.
- Liaise with parents, informing the Head (and if appropriate the LADO, children's social care unit or police) of all meetings and discussions.
- Ensure records of all meetings are clear, comprehensive and dated.
- Act as a source of advice and expertise to staff on matters of safety and safeguarding.
- In deciding whether to make a referral always liaise with relevant agencies for advice.
- Support staff who make referrals to the Channel Programme.
- Cooperate with the Safeguarding Director in the annual check of the safeguarding policy and procedures to ensure they are in line with statutory regulations and implemented correctly.
- Be aware of any changes in statutory requirements and alter school documentation accordingly, informing Directors and staff of any changes.
- Ensure school records in relation to Safeguarding are comprehensive, updated and accessible.
- Ensure children receive the right help at the right time by the right people, in order to address risks and prevent issues escalating.
- Be alert to the specific needs of children in need, those with special educational needs and young carers, and can recognize the additional risks that children with SEN and disabilities (SEND) face, as well as online as well as not.
- Understand and support the School with regards to the requirements of the Prevent duty.
- Understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college.
- Understand the importance of acting on and referring the early signs of abuse and neglect, keeping clear records, listening to views of the child and reassessing concerns when situations do not improve.
- Monitor the effectiveness of policies and procedures, and the implementation of such, annually in cooperation with the Directors' safeguarding representative.
- Understand and monitor the effectiveness of the school's filtering and monitoring system and ensure that all staff are aware of and know how to implement these system.
- Act as a support to pupils and staff, follow up and document progress in relation to all concerns regularly.
- Ensure the records of any pupil who leaves the school and has a child protection file are copied for the new school and the child protection file is transferred separately from the main pupil file.

- Consider if it would be appropriate to share any information with new schools in advance of a child leaving, for example information which would allow the new school to further support victims of abuse and have support in place on the child's arrival.
- Ensure child protection files are full, informative and contain all the information (duly dated) appertaining to the child in question, plus details of all communications with external agencies, parents and carers.
- Ensure that accurate safeguarding records are kept in a secure location, separate from pupils' academic files, and marked 'Strictly Confidential'.
- Submit reports to, and ensure the school's attendance at, child protection conferences or case reviews. Contribute to decision making and commit to the delivery of actions planned to safeguard the child at such conferences or case reviews.
- Ensure any actions to be taken in relation to children on the register are performed efficiently and the results monitored, recorded and evaluated.
- Maintain an overview of safeguarding within the school.
- Ensure Safeguarding maintains a high profile at staff meetings.
- Record in writing all concerns, discussions and decisions, and the reasons for those decisions.
- Be available during working hours to discuss any safeguarding concerns.

### **The Role and Responsibilities of the Deputy Designated Safeguarding Lead**

- i) The Deputy DSL will be fully conversant with the role and expectations of the DSL.
- ii) The Deputy DSL will be available to support the DSL in whatever capacity is required.
- iii) The Deputy DSL will have the knowledge and skill to perform the duties of the DSL when requested.
- iv) The Deputy DSL will assume the role of DSL whenever requested and when the DSL is not on the premises.
- v) The Deputy DSL will attend training in line with local authority requirements at least every two years, preferably the same training as the DSL.
- vi) The Deputy DSL will support the DSL in ensuring all staff and volunteers understand their responsibilities in being alert to the signs of abuse.
- vii) The Deputy DSL will assist the DSL in producing reports for senior managers and directors, as appropriate.
- viii) The Deputy DSL will understand the organisation and functioning of external agencies, including child protection cases and case conferences.
- ix) The Deputy DSL will support the DSL in attending child protection and case conferences, as appropriate
- x) In the absence of the DSL the Deputy DSL will be responsible for dealing with all matters relating to safeguarding and will follow the school procedures accurately.
- xi) The Deputy DSL will share information on all matters brought to her notice with the Head and, should matters involve child protection, with the Local Authority Designated Officer (LADO) immediately, for advice.
- xii) If relevant, the Deputy DSL will share any concerns that are reported and involve the Head with the Chair of Directors as well as the LADO.
- xiii) The Deputy DSL will support staff at all levels in their implementation of the school's child protection procedures.
- xiv) The Deputy DSL should be observant and a good communicator.

**NOTE: While the Designated Safeguarding Lead may delegate some responsibilities to the Deputy DSL, ultimate lead responsibility for safeguarding lies with the Designated Safeguarding Lead.**

### **The Role and Responsibilities of the Safeguarding Director**

While Mrs Charlotte Lumsden is the Designated Safeguarding Director, safeguarding duties remain the responsibility of the Directors as a whole. When ensuring school provision meets requirements the Safeguarding Director will:

- Be familiar with Local Authority and policy relating to Safeguarding and Child Protection and associated issues.
- Attend training for nominated Safeguarding Directors.
- Ensure a correct record of all safeguarding training, including that of Directors' training is maintained by the DSLs.
- Ensure that the safeguarding policies and procedures that are in place are appropriate in order for action to be taken in a timely manner to safeguard and promote children's welfare.
- Ensure that the school's safeguarding arrangements reflect local protocols for assessment and the WSSCB's threshold document. The school's child protection policies should include a link to this document.
- Be familiar with the most recent ISI regulations regarding safeguarding, including safe recruitment of staff and the requirements re the Central Register of Staff.
- Be aware that the school must report to the DBS any person (whether employed, contracted, a volunteer or student) whose services are no longer used and who meets the DBS referral criteria and ensure this is done promptly.
- Be aware of occasions when a referral to the Teacher Regulation Agency (TRA) (replaces the National College for Teaching and Leadership) is required when a teacher has been dismissed (or would have been dismissed had he/she not resigned) and a prohibition order may be appropriate in circumstances such as "unacceptable professional conduct", "conduct that may bring the profession into disrepute" or a "conviction, at any time, for a relevant offence".
- Know that where a referral has been made to the DBS, it is unnecessary to contact TRA, as information is shared between the two bodies. Where a dismissal does not reach the threshold for DBS referral, separate consideration must be given to a TRA referral.
- Ensure that the appropriate systems and procedures are in place to cover all aspects of the safeguarding agenda and all statutory governing body responsibilities are met.
- Monitor appropriate policies, including the safeguarding and all attached policies, ensuring they are in line with locally agreed inter-agency procedures.

- Ensure the school meets requirements advised by Keeping Children Safe in Education (Sept 2018) and the ISI regulations regarding safeguarding.
- Regularly check the school's arrangements for handling allegations of abuse against members of staff, volunteers and the Heads.
- Ensure the school has up-to-date information on how to recognise abuse.
- Monitor the Code of Conduct for Highfield and Brookham School Staff and recruitment procedures.
- Review the management of safeguarding including the appointment of the DSLs and the job description of the designated personnel.
- Monitor the training of the designated person, staff, volunteers and the Head.
- Make arrangements for reviewing the school's Child Protection and Safeguarding Policy and Procedures annually.
- Check the school's arrangements to fulfil all safeguarding and welfare responsibilities.
- Ensure the DSL who has responsibility for responding to and overseeing safeguarding issues is suitably qualified and trained.
- Ensure there is at least one Deputy DSL who has responsibility for responding to and overseeing safeguarding issues as delegated by the DSL, and who is also suitably qualified and trained.
- Ensure that the DSL supervises and supports the work, development and training of the Deputy DSL.
- Ensure that there are clear lines of accountability regarding safeguarding procedures.
- Ensure that procedures are in place so that all staff know:
  - who are the Designated Safeguarding personnel.
  - what the Safeguarding Policy and Child Protection Procedures contain.
  - how to identify a child protection concern.
  - what they do if they have any child protection concern.
- Ensure the system for recording, storing and reviewing child welfare concerns is robust and secure.
- Liaise with the Heads about general child protection and broader safeguarding issues within the school.
- Meet regularly with the DSLs in order to monitor the effectiveness of the implementation of the school's Child Protection and Safeguarding Policy Procedures.
- Provide reports to the Directors in respect of issues within the school to enable adequate oversight, understanding and development of solutions.
- Ensure that the training of all staff is up to date and regularly updated in line with advice from WSSCB, and that all staff receive safeguarding training at induction.
- Recommend Directors attend appropriate safeguarding training either arranged by the school or externally to include, for relevant Directors, training in respect of allegations against staff.
- Ensure interview panels are convened appropriately and safer recruitment practices are followed.
- Have oversight of the single central record, inspect it regularly and ensure it is up to date and maintained in line with guidance.
- Take account of how safe pupils feel when in school.
- Ensure the school regularly review and consider their curriculum in order that key safeguarding 'messages and lessons' are implemented across all their work and embedded into the school ethos.
- Ensure that children are taught about safeguarding, including online safety.
- Ensure the school maintains regular communication and good relationships with external agencies available to support children and families.

- Recognise the importance of information sharing between professionals and local agencies, actively encouraging those responsible for the welfare and protection of children to feel comfortable and without fear when required to share information.
- Monitor progress against any outstanding actions required that have been decided upon following any safeguarding audit.
- Following an annual audit of provision, the Safeguarding Director should ensure that the Directors receive a report on the implementation of the school's Child Protection and Safeguarding Policy and Procedures, including:
  - The date and manner in which the annual audit was completed;
  - The arrangements that are in place for ensuring that the school's Safeguarding Policy and Child Protection Procedures is communicated to, understood and implemented by, all staff and how effective they are in practice.
  - Judgement upon the time and resources allocated by the school to the designated members of staff with lead responsibility for Child Protection.
  - Information on the training attended by the DSLs and Deputy DSLs over the year.
  - Information on the training in safeguarding undertaken by all staff (covering teaching staff, support staff and temporary staff).
  - Information on the effectiveness of the child protection procedures in the induction programme for all new staff and volunteers in the school.
  - The effectiveness of the arrangements for ensuring safe recruitment procedures and appropriate checks on new staff and volunteers are completed in the required time.
  - The number of pupils currently on the Child Protection Register.
  - How effectively any issues linked to Safeguarding and Child Protection have been dealt with.
  - Information on how well child protection issues are addressed through the curriculum.
  - The accuracy of the Central Register with regard to the most recent regulation.

### **The Role and Responsibilities of the Governing Body (Directors)**

The Directors have a strategic leadership responsibility for their school's or college's safeguarding arrangements and ensure that they comply with their duties under legislation. They have regard to this guidance, ensuring policies, procedures and training are effective and comply with the law at all times. The Headteacher ensures that that the policies and procedures, adopted by their governing bodies and proprietors (particularly those concerning referrals of cases of suspected abuse and neglect), are understood, and followed by all staff.

The Directors ensure that:

- Effective "Child Protection and Safeguarding Policy Procedures" are in place and such arrangements are implemented fully in practice.
- The school follows safe recruitment procedures (see Safer Recruitment Policy) and the single central register of staff is in order, ensuring provision meets statutory requirements and advice.

- School child protection and safeguarding policies are up to date and risks assessed at regular intervals. Areas requiring action are dealt with immediately and any deficiencies or weaknesses are remedied without delay.
- The DSL is of suitable 'status and authority' to take responsibility and carry out the role.
- Staff /volunteers attend relevant child protection training that is in line with local authority procedures.
- Allegations are managed swiftly, correctly and safely.
- Any information required by the local authority regarding safeguarding is passed to them swiftly.
- A member of the Governing Body (the Chairman of Directors) is responsible in the event of an allegation of abuse being made against the Head.
- Safeguarding matters are placed on the Directors' agendas to ensure they are constantly informed of changes and concerns by the Head, the DSLs and the nominated Director.
- The Safeguarding Director meets regularly with the DSLs and conducts an annual review of staff knowledge and the efficiency and implementation of safeguarding procedures. This review involves the scrutiny of the training records of staff, safeguarding issues dealt with over the year, how they have been handled and the contribution the school has made to multi-agency working. Directors' Meeting Minutes record the form and findings of the review fully.
- Staff follow the requirements of the Code of Conduct for Highfield and Brookham School Staff.

#### **January 2016**

**Reviewed and updated:** September 2018, P.Evitt, S.Baber, A.Kingsbury, E.Graham, W.Mills

**Reviewed:** September 2019, A.Kingsbury and E.Graham

**Reviewed:** September 2020, A.Kingsbury and E.Graham

**Reviewed:** April 2021, A. Kingsbury and E. Graham

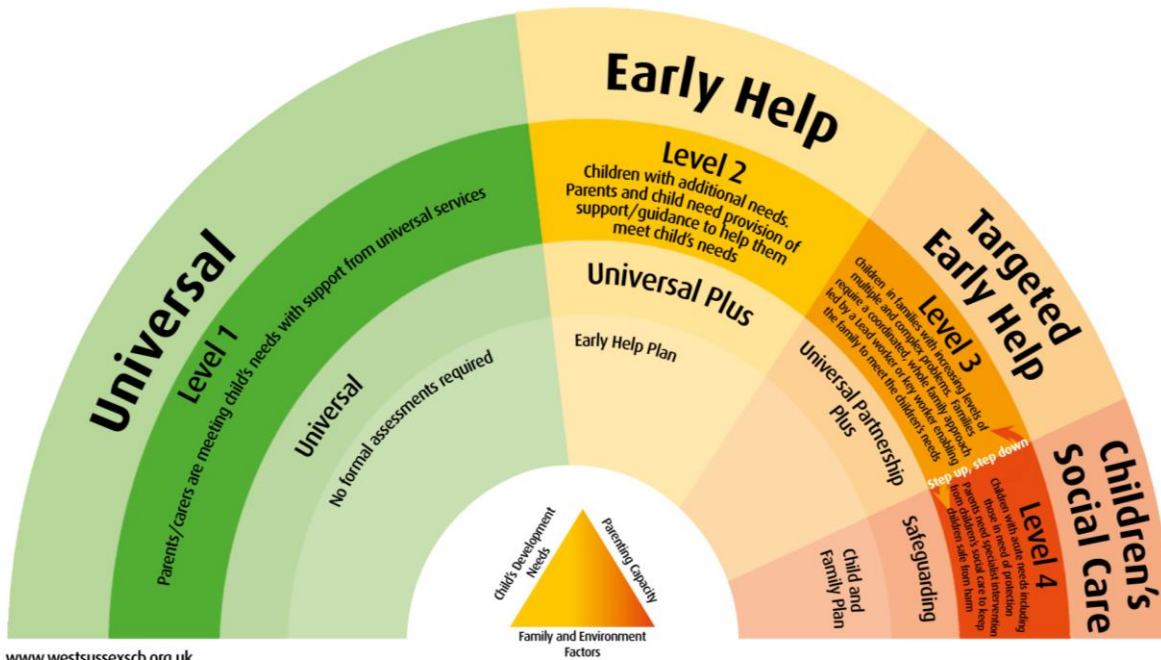
**Reviewed:** September 2021: A. Baker, G.Hunter

**Reviewed:** September 2022: A. Baker, G. Hunter

**Reviewed : September 2023:** A.Baker, Van-den-Berg, S.Cryer

**Reviewed : September 2024:** A.Baker, Van-den-Berg, S.Cryer

# West Sussex Continuum of Needs



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## West Sussex Safeguarding Children Board and Think Family Partnership Threshold Chart



Threshold level for intervention and support	Universal, Level 1	Early Help, Level 2	Targeted Early Help, Level 3	Children's Social Care, Level 4
<b>Key worries &amp; complicating factors</b>	<p><b>Developmental needs</b></p> <ul style="list-style-type: none"> <li>Achieving learning targets</li> <li>Good attendance</li> <li>Meeting developmental milestones</li> <li>Has psychological well-being</li> <li>Socially interactive and skilled</li> <li>Ability to protect self and be protected</li> </ul> <p><b>Family and environment</b></p> <ul style="list-style-type: none"> <li>Supportive relationships</li> <li>Housed, good diet and kept healthy</li> <li>Supportive networks</li> <li>Access to positive activities</li> <li>Access to sufficient income</li> </ul> <p><b>Parents and carers</b></p> <ul style="list-style-type: none"> <li>Protected by carers secure and caring home</li> <li>Receive and act on information, advice and guidance</li> <li>Appropriate boundaries maintained</li> </ul>	<p><b>Developmental Needs</b></p> <ul style="list-style-type: none"> <li>Absence / truancy from school</li> <li>Incidence of absence / missing from home</li> <li>Use of internal exclusion/seclusion or alternative provision in school</li> <li>Risk of social exclusion</li> <li>Poor attachments</li> <li>Language and communication difficulties</li> <li>Reduced access to core services</li> <li>Disability or additional special need</li> <li>Potential for disengaging in education training and learning</li> <li>Potential not to attain</li> <li>Slow in meeting developmental milestones</li> <li>Missing health checks/immunisations</li> <li>Minor health problems</li> <li>Early signs of offending / anti-social behaviour</li> <li>Underage sexual activity</li> <li>Early signs of drug/alcohol misuse</li> <li>Poor self-esteem</li> <li>Low level emotional/mental health issues</li> </ul> <p><b>Family and environment</b></p> <ul style="list-style-type: none"> <li>Young carers</li> <li>Poor parent/child relationships</li> <li>Children of prisoners / parents subject to community orders</li> <li>Bullying/racist incident</li> <li>Poor housing and poor home environment impacting on child's health</li> <li>Community harassment / discrimination</li> <li>Low income affects achievement/ Pupil Premium</li> <li>Parenting advice needed to prevent needs escalating</li> <li>Poor access to core services</li> <li>Risk of relationship breakdown</li> <li>Concerns about possible domestic abuse</li> </ul> <p><b>Parents and carers</b></p> <ul style="list-style-type: none"> <li>Inconsistent care arrangements Poor supervision by parent/carer Inconsistent parenting</li> <li>Poor response to emerging needs</li> <li>Historic context of parents/carers own childhood</li> <li>Parents need advice and help to meet needs of child with disability</li> </ul>	<p><b>Despite intervention at 2, evidence of continuing...</b></p> <p><b>Developmental Needs</b></p> <ul style="list-style-type: none"> <li>Persistent absence from school</li> <li>Emerging pattern of being missing from home</li> <li>Use of fixed term / permanent exclusion</li> <li>Social exclusion</li> <li>Poor attachments</li> <li>No access to core services</li> <li>Has disengaged from education employment or training</li> <li>Young person is NEEET</li> <li>Developmental milestones not being met due to persistent parental failure/incapability</li> <li>Chronic/recurring health problems</li> <li>Regular missed appointments affecting developmental progress</li> <li>Teenage pregnancy</li> <li>Drug/alcohol misuse impacting negatively</li> <li>Risky sexual behaviour (e.g. unprotected sex)</li> <li>Offending/anti-social behaviour resulting in risk of entering youth</li> <li>Emotional/mental health issues</li> </ul> <p><b>Family and Environment</b></p> <ul style="list-style-type: none"> <li>Housing tenancy at risk/intentionally homeless.</li> <li>Community harassment / discrimination</li> <li>Domestic abuse</li> <li>Relationship breakdown</li> <li>Transient families</li> <li>Risk of exposure to extreme or violent political or religious groups</li> </ul> <p><b>Parents and Carers</b></p> <ul style="list-style-type: none"> <li>Parental learning or physical disability, substance misuse or mental health impacts on parenting</li> <li>Inconsistent care arrangements</li> <li>Poor supervision by parent/carer</li> <li>Inconsistent parenting</li> <li>Poor response to identified needs</li> <li>Historic context of parents/carers own childhood</li> <li>Parents are struggling and meet the needs of a child with disability</li> </ul>	<p><b>Persistent/continued/severe... Developmental Needs</b></p> <ul style="list-style-type: none"> <li>Chronic persistent absence, permanent exclusions or no school place that risks entry to the care system</li> <li>Persistent social exclusion</li> <li>Poor attachments</li> <li>Complex / multiple disabilities</li> <li>Complex mental health issues affecting developmental needs, including self-harm</li> <li>High level emotional health issues and very low self-esteem</li> <li>Non-organic failure to thrive</li> <li>Sexually inappropriate behaviour Young person placing themselves at risk.</li> <li>Sexually aggressive behaviour</li> <li>Teenage parent/pregnancy under the age of 13</li> <li>Sexual exploitation/ abuse/ trafficking</li> <li>Drug/alcohol use severely impairing development</li> <li>Frequently missing from home, resulting in self-neglect</li> <li>Relationship breakdown</li> <li>Offending and in the criminal justice system</li> <li>Unaccompanied minors</li> </ul> <p><b>Family and environment</b></p> <ul style="list-style-type: none"> <li>Suspicion of physical, emotional or sexual abuse or neglect</li> <li>Domestic abuse resulting in child being at risk of significant harm</li> <li>Homeless child/young person</li> <li>Family intentionally homeless</li> <li>Community harassment/discrimination</li> <li>Extreme poverty affecting child well-being</li> <li>Forced marriage, Honour Based Violence, Female Genital Mutilation</li> <li>Exposure to extreme or violent political or religious groups</li> </ul> <p><b>Parents and carers</b></p> <ul style="list-style-type: none"> <li>Edge of care</li> <li>Parental encouragement of abusive/offending behaviour</li> <li>Continuing poor supervision in the home</li> <li>Parental non-compliance/disputed non-compliance or co-operation</li> <li>Inconsistent parenting affects child's developmental progress</li> <li>Private fostering</li> <li>Parents are consistently unable to meet the needs of their disabled child</li> <li>Disabled children in receipt of overnight short breaks</li> </ul>
<b>Level of assessment</b>	No formal assessment required	Early Help Plan	Child and Family Assessment and Plan	Child and Family Assessment and Plan
<b>What do I do next?</b>	Link directly to universal service or search websites for further information e.g. 0-5 yrs <a href="http://www.westsussex.gov.uk/lis">www.westsussex.gov.uk/lis</a> Local Offer <a href="https://westsussex-local-offer.org/">https://westsussex-local-offer.org/</a> <a href="http://www.youngspacewestsussex.co.uk/">http://www.youngspacewestsussex.co.uk/</a>	Consider using an Early Help Plan coordinate support. Refer family to key services that can provide additional support. For further advice or guidance contact your local Integrated Support Team.	Use the Early Help Plan to coordinate support to family. If you require advice or guidance in respect of the child or young person's needs or using the Early Help assessment contact your local Integrated Support Team or book into a children & YP forum in your area.	If you are concerned that a child or young person is at risk of harm contact: <b>Children's Access Point on 01403 229 900</b> <b>Police 999 if at immediate risk</b> <b>Out of Hours Emergencies, 03302226644</b>

<http://www.westsussexcb.org.uk>

<http://www.westsussex.gov.uk/integratedtools>

01/2016 16/11/2014







## Neutral Notifications Policy

### 1. Introduction

At Highfield and Brookham, we take safeguarding very seriously. This includes ensuring that adults who work with children do so in a way that is in accordance with the ethos and policies set out by the school, including the staff code of conduct. It may be possible that a member of staff acts in a way that does not cause risk to children, but is however inappropriate. Keeping Children Safe in Education 2023 refers to this as a 'Low Level Concern'.

It might also be possible that a member of staff wishes to inform the Head of a situation which has the potential to be misconstrued or misinterpreted by others.

This policy sets out the detail and processes for these two situations.

**At Highfield and Brookham School, the procedure for both situations is called 'Neutral Notifications'.**

### 2. Keeping Children Safe in Education 2023

The following is taken from Keeping Children Safe in Education September 2024:

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

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

- encourage an open and transparent culture
- enable schools and colleges to identify inappropriate, problematic or concerning behaviour early

- minimise the risk of abuse, and
- ensure that adults working in or on behalf of the school or college are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.

### **What is a low level concern?**

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

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

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

- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone, contrary to school policy
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
- humiliating pupils.

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

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

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

### 3. Clarity around Allegation vs Low Level concern vs Appropriate Conduct

<p>Allegation</p> <p>Behaviour which indicates that an adult who works with children has:</p> <ul style="list-style-type: none"><li>• Behaved in a way that has harmed a child, or may have harmed a child;</li><li>• Possibly committed a criminal offence against or related to a child;</li><li>• Behaved towards a child or children in a way that indicates they may pose a risk of harm to children.</li></ul>
<p>Low Level concern</p> <p>Any concern – no matter how small, even if no more than a ‘nagging doubt’ – that an adult may have acted in a manner which:</p> <ul style="list-style-type: none"><li>• Is not consistent with an organisation’s Code of conduct, and/or</li><li>• Relates to their conduct outside of work which even if not linked to a particular act or omission, has caused a sense of unease about that adult’s suitability to work with children.</li></ul>
<p>Appropriate conduct</p> <p>Behaviour which is entirely consistent with the school’s Code of conduct and the law.</p>

### 4. Procedure for Neutral Notifications

A member of staff who has a concern about another member of staff should inform the Head Teacher about their concern using the Neutral Notification link on the staff home page:

- [Neutral Notifications Link](#)
- If the Head Teacher cannot be contacted, the Deputy Head or DSL should be contacted.
- For any concerns about the Head, please do NOT use this form, but send an email directly to the proprietor Bill Mills.
- For any concerns about the proprietor please do NOT use this form, but contact the LADO (see contact details at front of safeguarding policy)

Reports of Neutral Notifications should be recorded in writing, with details of the concern, the context in which it arose and action taken.

The name of the person reporting should be noted, respecting wishes to remain anonymous as far as reasonably possible.

It should also set out how, when a Neutral Notification has been raised by a third party, the Head should collect as much evidence as possible by speaking where possible with the person who raised the concern, to the individual involved and to any witnesses.

Records of Neutral Notifications should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and responded to.

Where a pattern of behaviour is identified, the school should decide on a course of action. This might be internal disciplinary procedures, or referral to the LADO if the harms threshold is met. The school must consider if any wider cultural issues in school that enabled the behaviour to occur and if appropriate policies could be revised or extra training delivered to minimise the risk of recurrence.

The rationale for all decisions and actions taken must be recorded.

## **5. Storing and use of Neutral Notification Forms**

Neutral Notification forms and follow-up information will be stored securely within the school's safeguarding systems, with access only by the leadership team. This will be stored in accordance with the School's GDPR and data protection policies.

The staff member(s) reporting the concern must keep the information confidential and not share the concern with others apart from the Head Teacher or those aware in the senior leadership team.

Reports about supply staff and contractors should be notified to their employers so any potential patterns of inappropriate behaviour can be identified

Neutral Notifications will not be referred to in references unless they have been formalized into more significant concerns resulting in disciplinary or misconduct procedures.

Whenever staff leave Highfield or Brookham, any record of Neutral Notifications which are stored about them will be reviewed as to whether or not that information needs to be kept. Consideration will be given to:

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

## **6. Neutral Notifications Form**

This form will be available to staff via:

An electronic link on the staff home page:

- [Neutral Notifications Link](#)
- Staff can also approach their line manager, Head Teacher or DSL for this link.

#### **7. Key Reference Document:**

Read this document for further information about Low Level Concerns, which is referenced in KCSIE 2024:

<https://www.farrer.co.uk/globalassets/clients-and-sectors/safeguarding/low-level-concerns-guidance-2020.pdf>

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