

# Child Protection and Safeguarding Policy

Policy Lead	Deputy Head Pastoral and DSL
Committee	
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# This policy applies to <u>all staff</u> working and volunteering for Taunton School.

#### **Statement of intent**

Taunton School is committed to safeguarding and actively promoting the physical, mental and emotional welfare of every pupil, both inside and outside of the school premises. We understand that **safeguarding is everyone's responsibility** and we implement a whole-school preventative approach to managing safeguarding, ensuring that the wellbeing of pupils is at the forefront of all action taken.

This policy sets out a clear and consistent framework for delivering this promise, in line with safeguarding legislation and statutory guidance. It will be achieved by:

- Ensuring that members of the governing board, the Head Master and staff understand their responsibilities under safeguarding legislation and statutory guidance, are alert to the signs of child abuse, and know to refer concerns to the DSL.
- Teaching pupils how to keep safe and recognise behaviour that is unacceptable.
- Identifying and making provision for any pupil that has been subject to, or is at risk of, abuse, neglect, or exploitation.
- Creating a culture of safer recruitment by adopting procedures that help deter, reject or identify people who might pose a risk to children.
- Ensuring that any new staff and volunteers are only appointed when all the appropriate checks have been satisfactorily completed.

In the absence of the DSL, child protection matters will be dealt with by one of the deputy DSLs.

# Acronyms

This policy contains a number of acronyms used in the Education sector. These acronyms are listed below alongside their descriptions.

Acronym	Long form	Description
CCE	Child criminal exploitation	A form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity in exchange for something the victim needs or wants, for the financial advantage or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
CSCS	Children's social care services	The branch of the local authority that deals with children's social care.
CSE	Child sexual exploitation	A form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants, for the financial advantage or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.
DBS	Disclosure and Barring Service	The service that performs the statutory check of criminal records for anyone working or volunteering in a school.
DfE	Department for Education	The national government body with responsibility for children's services, policy and education, including early years, schools, higher and further education policy, apprenticeships and wider skills in England.
DSL	Designated safeguarding lead	A member of the senior leadership team who has lead responsibility for safeguarding and child protection throughout the school.
EHC plan	Education, health and care plan	A funded intervention plan which coordinates the educational, health and care needs for pupils who have significant needs that impact on their learning and access to education. The plan identifies any additional support needs or interventions and the intended impact they will have for the pupil.
FGM	Female genital mutilation	All procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences.
UK GDPR	UK General Data Protection Regulation	Legislative provision designed to strengthen the safety and security of all data held within an organisation and ensure that procedures relating to personal data are fair and consistent.

НВА	'Honour-based' abuse	So-called 'honour-based' abuse involves crimes that have been committed to defend the honour of the family and/or community.
HMCTS	HM Courts and Tribunals Service	HM Courts and Tribunals Service is responsible for the administration of criminal, civil and family courts and tribunals in England and Wales.
IICSA	Independent Inquiry into Child Sexual Abuse	The Independent Inquiry into Child Sexual Abuse was established to consider the extent to which institutions have failed in their duty of care to protect children from sexual abuse and exploitation.
KCSIE	Keeping children safe in education	Statutory guidance setting out schools and colleges' duties to safeguard and promote the welfare of children.
LA	Local authority	A local government agency responsible for the provision of a range of services in a specified local area, including education.
LAC	Looked-after children	Children who have been placed in local authority care or where children's services have looked after children for more than a period of 24 hours.
LGBTQ+	Lesbian, gay, bisexual, transgender and queer plus	Term relating to a community of people, protected by the Equality Act 2010, who identify as lesbian, gay, bisexual or transgender, or other protected sexual or gender identities.
PSHE	Personal, social and health education	A non-statutory subject in which pupils learn about themselves, other people, rights, responsibilities and relationships.
RSE	Relationships and sex education	A compulsory subject from Year 7 for all pupils. Includes the teaching of sexual health, reproduction and sexuality, as well as promoting positive relationships.
SCR	Single central record	A statutory secure record of recruitment and identity checks for all permanent and temporary staff, proprietors, contractors, external coaches and instructors, and volunteers who attend the school in a non-visitor capacity.
SENCO	Special educational needs coordinator	A statutory role within all schools maintaining oversight and coordinating the implementation of the school's special educational needs policy and provision of education to pupils with special educational needs.
VSH	Virtual school head	Virtual school heads are in charge of promoting the educational achievement of all the children looked after by the local authority they work for, and all children who currently have, or previously had, a social worker.

#### **Definitions**

The terms "children" and "child" refer to anyone under the age of 18.

As a school with pupils up to and including 19 year olds we are aware that adults (over the age of 18) would access different agencies. In this policy we assume to treat all pupils the same (based on their age) unless their age determines that the school needs to act in a specific manner.

For the purposes of this policy, "safeguarding and protecting the welfare of children" is defined as:

- Protecting pupils from maltreatment.
- Preventing the impairment of pupils' mental and physical health or development.
- Ensuring that pupils grow up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all pupils to have the best outcomes.

For the purposes of this policy, "Child protection" is defined as the actions of certain organisations such as Schools, Children's Services, the police and Health organisations, in their efforts to make sure children are safe from abuse and neglect.

- Child abuse: Children can suffer physical abuse, emotional abuse, sexual abuse, exploitation and grooming.
- Child neglect is a failure to meet a child's basic physical and / or emotional needs. Failing to make sure a child is well cared for and looked after.

All those who come into contact with children and families in their everyday work, including people who do not have a specific role in relation to child protection, have a duty to safeguard and promote the welfare of children.

For the purposes of this policy, "consent" is defined as having the freedom and capacity to choose to engage in sexual activity. Consent may be given to one sort of sexual activity but not another, and can be withdrawn at any time during sexual activity and each time activity occurs. A person only consents to a sexual activity if they agree by choice to that activity, and has the freedom and capacity to make that choice. Children under the age of 13 can never consent to any sexual activity. The age of consent is 16.

For the purposes of this policy, "sexual violence" refers to the following offences as defined under the Sexual Offences Act 2003:

- Rape: A person (A) commits an offence of rape if they intentionally penetrate the vagina, anus or mouth of another person (B) with their 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 they intentionally penetrate the vagina or anus of another person (B) with a part of their 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 they intentionally touch another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents.
- Causing someone to engage in sexual activity without consent: A person (A) commits an offence if they intentionally cause 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. This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

For the purposes of this policy, "sexual harassment" refers to unwanted conduct of a sexual nature that occurs online or offline, inside or outside of school. Sexual harassment is likely to violate a pupil's dignity, make them feel intimidated, degraded or humiliated, and create a hostile, offensive, or sexualised environment. If left unchallenged, sexual harassment can create an atmosphere that normalises inappropriate behaviour and may lead to sexual violence. Sexual harassment can include, but is not limited to:

- Sexual comments, such as sexual stories, lewd comments, sexual remarks about clothes and appearance, and sexualised name-calling.
- Sexual "jokes" and taunting.
- Physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes, and displaying images of a sexual nature.
- Online sexual harassment, which may be standalone or part of a wider pattern of sexual harassment and/or sexual violence. This includes:
  - The consensual and non-consensual sharing of nude and semi-nude images and/or videos.
  - Sharing unwanted explicit content.
  - Upskirting.
  - Sexualised online bullying.
  - Unwanted sexual comments and messages, including on social media.
  - Sexual exploitation, coercion, and threats.

For the purposes of this policy, "upskirting" refers to the act, as identified in the Voyeurism (Offences) Act 2019, of taking a picture or video under another person's clothing, without their knowledge or consent, with the intention of viewing that person's genitals or buttocks, with or without clothing, to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Upskirting is a criminal offence. Anyone, including pupils and staff, of any gender can be a victim of upskirting.

For the purposes of this policy, the "consensual and non-consensual sharing of nude and semi-nude images and/or videos", colloquially known as "sexting", is defined as the sharing between pupils of sexually explicit content, including indecent imagery. For the purposes of this policy, "indecent imagery" is defined as an image which meets one or more of the following criteria:

- Nude or semi-nude sexual posing
- A child touching themselves in a sexual way
- Any sexual activity involving a child
- Someone hurting a child sexually

#### • Sexual activity that involves animals

For the purposes of this policy, "abuse" is defined as a form of maltreatment of a child which involves inflicting harm or failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing the 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, institutional or community setting by those known to them or by others, e.g. via the internet. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by one or multiple adults or other children.

For the purposes of this policy, "physical abuse" is defined as a form of abuse which may involve actions such as hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical abuse can also be caused when a parent fabricates the symptoms of, or deliberately induces, illness in a child.

For the purposes of this policy, "emotional abuse" is defined as the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. This may involve conveying to a child that they are worthless, unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child the opportunities to express their views, deliberately silencing them, 'making fun' of what they say or how they communicate. It may feature age- or developmentally inappropriate expectations being imposed on children, such as interactions that are beyond their developmental capability, 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 the child to frequently 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, but it may also occur alone.

For the purposes of this policy, "sexual abuse" is defined as abuse that involves forcing or enticing a child to take part in sexual activities, not necessarily involving violence, and regardless of whether the child is aware of what is happening. This may involve physical contact, including assault by penetration, or non-penetrative acts, such as masturbation, kissing, rubbing, and touching outside of clothing. It may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can be perpetrated by people of any gender and age.

For the purposes of this policy, "neglect" is defined as the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of a child's health or development. This may involve a parent or carer failing to provide a child with adequate food, clothing or shelter (including exclusion from home or abandonment); failing to protect a child from physical or emotional harm or danger; failing to ensure adequate supervision (including through the use of inappropriate caregivers); or failing to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

# 1. Legal framework

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

# Legislation

- Children Act 1989
- Sexual Offences Act 2003
- Female Genital Mutilation Act 2003 (as inserted by the Serious Crime Act 2015)
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- Apprenticeships, Children and Learning Act 2009
- Equality Act 2010
- The Education (School Teachers' Appraisal) (England) Regulations 2012 (as amended)
- Anti-social Behaviour, Crime and Policing Act 2014
- Counter-Terrorism and Security Act 2015
- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018
- Voyeurism (Offences) Act 2019
- Domestic Abuse Act 2021
- Marriage and Civil Partnership (Minimum Age) Act 2022

#### Statutory guidance

- DfE (2015) 'The Prevent duty'
- DfE (2018) 'Working Together to Safeguard Children'
- DfE (2018) 'Disqualification under the Childcare Act 2006'
- DFE (2021) Relationships and sex education (RSE) and health education
- DfE (2023) 'Keeping children safe in education 2023'
- National Minimum Standards for Residential Special Schools, Boarding Schools and 14 18
   Colleges providing accommodation and Academies 16 -19 (2022)
- HM Government (2020) 'Multi-agency statutory guidance on female genital mutilation'
- HM Government (2021) 'Channel Duty Guidance: Protecting people vulnerable to being drawn into terrorism'
- Home Office and Foreign, Commonwealth and Development Office (2023) 'Multi-agency statutory guidance for dealing with forced marriage and Multi-agency practice guidelines: Handling cases of forced marriage'

#### Non-statutory guidance

- DfE (2015) 'What to do if you're worried a child is being abused'
- DfE (2017) 'Child sexual exploitation'
- DfE (2018) 'Information sharing'

- DfE (2020) 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'
- DfE (2021) 'Teachers' Standards'
- DfE (2022) 'Recruit teachers from overseas'
- DfE (2022) 'Working together to improve school attendance'
- DfE (2023) 'Meeting digital and technology standards in schools and colleges'
- Department of Health and Social Care (2022) 'Virginity testing and hymenoplasty: multiagency guidance'

# 2. Roles and responsibilities

All staff have a responsibility to:

- Consider, at all times, what is in the best interests of the pupil.
- Maintain an attitude of 'it could happen here' where safeguarding is concerned.
- Provide a safe environment in which pupils can learn.
- Be prepared to identify pupils who may benefit from early help.
- Be aware of the school's systems which support safeguarding, including any policies, procedures, information and training provided upon induction.
- Be aware of the role and identity of the DSL and deputy DSLs.
- Undertake safeguarding training, including online safety training (which, amongst other things, includes an understanding of the expectations and responsibilities relating to filtering and monitoring), during their induction – this will be regularly updated.
- Receive and understand child protection and safeguarding (including online safety) updates,
   e.g. via email, as required, and at least annually.
- Be aware of the early help process and understand their role in it.
- Be aware of, and understand, the process for making referrals to CSCS, as well as for making statutory assessments under the Children Act 1989 and their role in these assessments.
- Make a referral to CSCS and/or the police immediately, if at any point there is a risk of immediate serious harm to a child.
- Support social workers in making decisions about individual children, in collaboration with the DSL.
- Be aware of and understand the procedure to follow in the event that a child confides they
  are being abused, exploited or neglected.
- Be alert to signs of abuse, both in the School and from outside, and to protect pupils from any form of abuse, whether from an adult or another child or pupil.
- Be alert to the fact that pupils with protected characteristics (including SEND) may be more at risk of harm.
- Be aware that a pupil may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or may not recognise their experiences as harmful.
- Have a zero tolerance approach to sexual violence and sexual harassment and they know how to manage a report of child on child sexual violence and sexual harassment.
- Promote protected characteristics and inclusion as part of the school culture whether this is inside or outside the classroom.
- Maintain appropriate levels of confidentiality when dealing with individual cases.

- Reassure victims that they are being taken seriously, that they will be supported, and that they will be kept safe.
- Speak to the DSL if they are unsure about how to handle safeguarding matters.
- Be aware of safeguarding issues that can put pupils at risk of harm.
- Be aware of behaviours that could potentially be a sign that a pupil may be at risk of harm.
- Be alert to the medical needs of children with medical conditions.

Teachers, including the Heads of all parts of the School, have a responsibility to:

- Safeguard pupils' wellbeing and maintain public trust in the teaching profession as part of their professional duties, as outlined in the 'Teachers' Standards'.
- Personally report any cases to the police where it appears that an act of FGM has been carried out, also referred to as 'known' cases, as soon as possible.

#### The governing board has a duty to:

- Take strategic leadership responsibility for the school's safeguarding arrangements.
- Ensure that the school complies with its duties under the above child protection and safeguarding legislation.
- Guarantee that the policies, procedures and training opportunities in the school are effective and comply with the law at all times.
- Guarantee that the school contributes to multi-agency working in line with the statutory guidance 'Working Together to Safeguard Children'.
- Confirm that the school's safeguarding arrangements take into account the procedures and practices of the LA as part of the inter-agency safeguarding procedures.
- Understand the local criteria for action and the local protocol for assessment, and ensure these are reflected in the school's policies and procedures.
- Comply with its obligations under section 14B of the Children Act 2004 to supply the local safeguarding arrangements with information to fulfil its functions.
- Ensure that staff working directly with children read at least Part one of KCSIE.
- Ensure that staff who do not work directly with children read either Part one or Annex A of KCSIE. **NB:** Individual schools assess which guidance will be most effective for their staff to safeguard and promote the welfare of children.
- Ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities in regard to safeguarding children.
- Ensure a senior board level lead takes leadership responsibility for safeguarding arrangements.
- Appoint a member of staff from the SMT to the role of DSL as an explicit part of the roleholder's job description.
- Appoint one or more deputy DSLs to provide support to the DSL, and ensure that they are trained to the same standard as the DSL and that the role is explicit in their job descriptions.
- Facilitate a whole-school approach to safeguarding; this includes ensuring that safeguarding
  and child protection are at the forefront and underpin all relevant aspects of process and
  policy development.

- Where there is a safeguarding concern, ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide.
- Ensure systems are in place, children to confidently report abuse, knowing that their concerns will be treated seriously, and they can safely express their views and give feedback; these systems will be well-promoted, easily understood, and easily accessible.
- Ensure that staff have due regard to relevant data protection principles that allow them to share and withhold personal information.
- Ensure that a member of the governing board is nominated to liaise with the LA and/or partner
  agencies on issues of child protection and in the event of allegations of abuse made against
  the Head Master or another governor.
- Guarantee that there are effective and appropriate policies and procedures in place.
- Ensure all relevant persons are aware of the school's local safeguarding arrangements, including the governing board itself, the SMT and DSL.
- Ensure pupils are taught about safeguarding, for example through use of online resources, through the curriculum and PSHEE, together with guidance on adjusting behaviour to reduce risks. This includes the safe use of electronic devices and the internet, building resilience to protect themselves and their peers, and information about who they should turn to for help.
- Make sure that pupils are taught about safeguarding, including protection against dangers online (including when they are online at home), through teaching and learning opportunities, as part of providing a broad and balanced curriculum.
- Adhere to statutory responsibilities by conducting pre-employment checks on staff who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required.
- Ensure that staff are appropriately trained to support pupils to be themselves at school, e.g.
  if they are LGBTQ+.
- Ensure the school has clear systems and processes in place for identifying possible mental
  health problems in pupils, including clear routes to escalate concerns and clear referral and
  accountability systems.
- Guarantee that volunteers are appropriately supervised.
- Make sure that at least one person on any appointment panel has undertaken safer recruitment training.
- Ensure that all staff receive safeguarding and child protection training updates, e.g. emails, as required, but at least annually.
- Ensure that all governors receive appropriate safeguarding and child protection training upon their induction and that this training is updated regularly.
- Certify that there are procedures in place to handle allegations against staff, supply staff, volunteers and contractors.
- Confirm that there are procedures in place to make a referral to the DBS and the Teaching Regulation Agency (TRA), where appropriate, if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned.
- Guarantee that there are procedures in place to handle pupils' allegations against other pupils.

- Ensure that appropriate disciplinary procedures are in place, as well as policies pertaining to the behaviour of pupils and staff.
- Ensure that procedures are in place to eliminate unlawful discrimination, harassment and victimisation, including those in relation to child-on-child abuse.
- Guarantee that there are systems in place for pupils to express their views and give feedback.
- Ensure early help procedures are effective and all staff understand the procedure and their role in it.
- Appoint a designated teacher to promote the educational achievement of LAC and ensure that this person has undergone appropriate training.
- Introduce mechanisms to assist staff in understanding and discharging their roles and responsibilities.
- Make sure that staff members have the skills, knowledge and understanding necessary to keep LAC safe, particularly with regard to the pupil's legal status, contact details and care arrangements.
- Put in place appropriate safeguarding responses for pupils who become absent from education, particularly on repeat occasions and/or for prolonged periods, to help identify any risk of abuse, neglect or exploitation, and prevent the risk of their disappearance in future.
- Ensure that all members of the governing board have been subject to an enhanced DBS check.
- Create a culture where staff are confident to challenge senior leaders over any safeguarding concerns.
- The School has regard to guidance issued by the Secretary of State for Education (DfE) in accordance with section 157 of the Education Act 2002 and associated regulations.
- Be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), the Data Protection Act 2018, the UK GDPR and the local multi-agency safeguarding arrangements.

The nominated Safeguarding Governor is Ian Kelham. The Safeguarding Governor has the following responsibilities:

- Maintain close and regular contact with the DSL over safeguarding and child protection matters.
- On behalf of the Full Governing Body, carry out detailed monitoring of the implementation of the Policy and Procedures (including termly checks of entries in the Single Central Register).
- Work with the DSL to review the Annual Audit and judge the efficiency with which procedures have been implemented and to report this to the FGB.

#### The Head Master has a duty to:

- Ensure that the policies and procedures adopted by the governing board, particularly concerning referrals of cases of suspected abuse and neglect, are followed by staff.
- Provide staff with the appropriate policies and information upon induction.

The Designated Safeguarding Lead for Taunton School is Lyndsay White, Deputy Head Pastoral. She teaches at the Senior School and can be contacted on:

Office telephone: 01823 703759Mobile telephone: 07728 821261

• Email: Lyndsay.white@tauntonschool.co.uk

#### The DSL has a duty to:

- Take lead responsibility for safeguarding and child protection, including online safety and understanding the filtering and monitoring systems and processes in place.
- Take part in strategy discussions and inter-agency meetings, and/or support other staff to do so.
- Contribute to the assessment of children, and/or support other staff to do so.
- During term time, be available (where possible, in person but if this is not possible, over the phone or on Teams) during school hours for staff to discuss any safeguarding concerns. When the DSL is not in school or unavailable, they must delegate their duties in advance to another DSL and ensure all staff are aware.
- Arrange, alongside the school, adequate and appropriate cover for any activities outside of school hours or terms.
- Refer cases:
  - To CSCS where abuse and neglect are suspected, and support staff who make referrals to CSCS.
  - To the Channel programme where radicalisation concerns arise, and support staff who make referrals to the Channel programme.
  - To the DBS where a person is dismissed or has left due to harm, or risk of harm, to a child.
  - To the police where a crime may have been committed, in line with the National Police Chiefs' Council (NPCC) guidance.
- Liaise with the Head Master to inform them of issues, especially regarding ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- Liaise with the deputy DSLs to ensure effective safeguarding outcomes.
- Liaise with the case manager and the LA designated officers (LADOs) for child protection concerns in cases concerning staff.
- Liaise with staff on matters of safety, safeguarding and welfare, including online and digital safety.
- Liaise with staff when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically.
- Liaise with the senior mental health lead and, where available, the mental health support team, where safeguarding concerns are linked to mental health.
- Promote supportive engagement with parents in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.
- Work with the Head Master and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact

that these issues might be having on their attendance, engagement and achievement at school. This includes:

- Ensuring that the school knows which pupils have or had a social worker.
- Understanding the academic progress and attainment of these pupils.
- Maintaining a culture of high aspirations for these pupils.
- Supporting teachers to provide additional academic support or reasonable adjustments to help these pupils reach their potential.
- Helping to promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues these pupils are experiencing with teachers and the SMT.
- Ensure that child protection files are kept up-to-date using CPOMS and only accessed by those who need to do so.
- Ensure that a pupil's child protection file is transferred as soon as possible, and within five days, when transferring to a new school, and consider any additional information that should be shared.
- Ensure each member of staff has access to and understands the school's Child Protection and Safeguarding Policy and procedures this will be discussed during the staff induction process.
- Work with the governing board to ensure the school's Child Protection and Safeguarding Policy is reviewed annually, and the procedures are updated and reviewed regularly.
- Ensure the school's Child Protection and Safeguarding Policy is available publicly, and parents are aware that the school may make referrals for suspected cases of abuse or neglect, as well as the role the school plays in these referrals.
- Link with safeguarding partner arrangements to make sure that staff are aware of the training opportunities available and the latest local policies on safeguarding.
- Undergo training, and update this training at least every two years.
- Obtain access to resources and attend any relevant or refresher training courses.
- Encourage a culture of listening to children and taking account of their wishes and feelings; this includes understanding the difficulties pupils may have in approaching staff about their circumstances and considering how to build trusted relationships that facilitate communication.
- Support and advise staff and help them feel confident on welfare, safeguarding and child protection matters, specifically to ensure that staff are supported during the referrals processes; and to support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.
- Understand the importance of information sharing, including within school, with other schools, and with the safeguarding partners, other agencies, organisations and practitioners.
- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK GDPR.
- Keep detailed, accurate, secure written records of concerns and referrals, and understand the purpose of this record-keeping.

The designated teacher has a responsibility for promoting the educational achievement of LAC and PLAC, and for children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales.

The School always ensures that Safeguarding duties can be carried out during holidays as well as during term time. These may not always fall to the DSL but there will always be someone with appropriate training available to support the needs of the children.

# 3. Safeguarding Management Structure and key contact information

- DSL: Lyndsay White (Lyndsay.white@tauntonschool.co.uk) / 01823 703759, 07728 821261
- Deputy DSL (Training and Administration): Nell Rosser (nell.rosser@tauntonschool.co.uk)
   01823 703703, 07940 976664
- Deputy DSL (Boarding): Emily Tait (Emily.Tait@tauntonschool.co.uk) 01823 703703, 07429 188958

The group above meets once a week to discuss wider strategic aims for TS Safeguarding and Child Protection. The Safeguarding Governor and Chair of Governors are updated regularly.

- Safeguarding Governor: Dr Ian Kelham (<u>Ian.kelham@tauntonschool.co.uk</u>)
- Chair of Governors: Henry Keeling (<a href="mailto:Henry.Keeling@tauntonschool.co.uk">Henry Keeling@tauntonschool.co.uk</a>)

Each part of the school will have a Deputy Designated Safeguarding Lead, who in consultation with the DSL, will take the lead on all Child Protection cases in their respective schools.

- Deputy DSL for TSI (ages 14-19): Laura Brayley
   Laura.Brayley@tauntonschool.co.uk / 01823 703200, 07429 188958
- Deputy DSL for Taunton Prep (Years 3-8): Joanna Hall-Tomkin
   (Joanna.hall-tomkin@tauntonschool.co.uk) 01823 703325, 07307 409369
- Deputy DSL for TSIMS (ages 8-15): Rebecca Lamb (Rebecca.Lamb@tauntonschool.co.uk)
   01823 703236
- Early Years Designated Lead for Safeguarding (EYFS) (ages 0-5) and Deputy DSL for Pre-Prep (Reception through to Year 2): Becky Lewis 01823 703300 / 07366596911
   Becky.Lewis@tauntonschool.co.uk
- DDSL (Sports Club and Swim School): Valerie.Lambert@tauntonschool.co.uk

The individuals below, together with those listed above, form part of the Safeguarding Management Structure.

- Sister in Charge of the Health Centre: Emily Kane Emily.kane@tauntonschool.co.uk, 01823 703161 / 07719 734745
- Safeguarding Officer: Julia McLean-Smith: Julia.maclean-smith@tauntonschool.co.uk, 01823
- Head of HR: Emily Chapple: Emily.chapple@tauntonschool.co.uk, 01823 703703

This group of managers meet at least once a term to discuss Safeguarding issues both inside and outside the school. Minutes for these meetings are circulated and action points assigned. Every member of the Safeguarding Management Structure is trained to the same level – Working Together to Safeguard Children.

#### Other key contacts:

- Somerset Safeguarding Children Partnership: https://somersetsafeguardingchildren.org.uk/the-sscp/
- The Early Help Advice Hub: Email: EHACoordinator@somerset.gov.uk / Tel: 01823 355803
- LADO: Anthony Goble & Stacey Davis Tel: 01823 359029
- DSL Consultation Line Tel: 0300 123 3078
- Independent Schools Advisor: Jane Weatherill– Tel: 0797 6697042
- Virtual Head: Helen Readman 0797 6691770
- Regional Police Prevent Team 01179 455536
- DfE Helpline for non-emergency extremism advice for staff Tel: 020 73407264 / Email: counter.extremism@education.go.uk

# 4. Multi-agency working

The school contributes to multi-agency working as part of its statutory duty. The school is aware of and will follow the local safeguarding arrangements.

The school will be fully engaged, involved, and included in local safeguarding arrangements. Once the school is named as a relevant agency by local safeguarding partners, it will follow its statutory duty to cooperate with the published arrangements in the same way as other relevant agencies. The school will act in accordance with the safeguarding arrangements.

The school will work with CSCS, the police, health services and other services to protect the welfare of its pupils, through the early help process and by contributing to multi-agency plans to provide additional support.

Where a need for early help is identified, the school will allow access for CSCS from the host LA and, where appropriate, a placing LA, for that LA to conduct (or consider whether to conduct) a section 17 or 47 assessment.

The school also recognises the particular importance of inter-agency working in identifying and preventing CSE.

#### **Information sharing**

The school recognises the importance of proactive information sharing between professionals and local agencies in order to effectively meet pupils' needs and identify any need for early help.

Considering the above, staff will be aware that whilst the UK GDPR and the Data Protection Act 2018 place a duty on schools to process personal information fairly and lawfully, they also allow for information to be stored and shared for safeguarding purposes – data protection regulations do not

act as a barrier to sharing information where failure to do so would result in the pupil being placed at risk of harm.

Staff members will ensure that fear of sharing information does not stand in the way of their responsibility to promote the welfare and safety of pupils. If staff members are in doubt about sharing information, they will speak to the DSL or deputy DSLs.

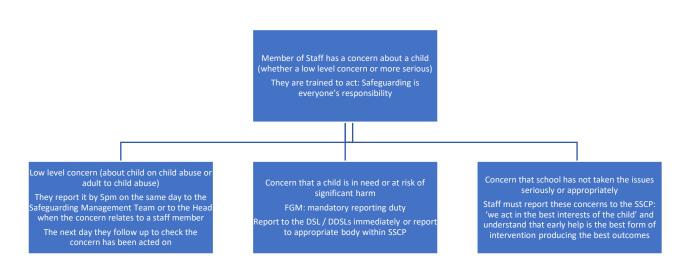
# 5. Early help

Early help means providing support as soon as a problem emerges, at any point in a child's life. Everyone who comes into contact with children and their families has a role to play in safeguarding children and being alert to behavioural changes which may indicate they need help. Below are examples of behavioural changes but they can also be more subtle or masked by the child:

- Isolation from friendship groups
- Decline in academic achievement
- Increased amount of time spent online
- Deterioration of physical health
- Irrational, aggressive and/or difficult behaviour
- Change to their attendance at school
- Change in interests with no clear reason or explanation
- They may appear with unexplained gifts

Any pupil may benefit from early help, but in particular, staff will be alert to the potential need for early help for pupils who:

- Are disabled, have certain health conditions, or have specific additional needs.
- Have SEND, regardless of whether they have a statutory EHC plan.
- Have mental health needs.
- Are young carers.
- Show signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
- Are frequently missing or going missing from care or from home.
- Are at risk of modern slavery, trafficking, or sexual or criminal exploitation.
- Are at risk of being radicalised or exploited.
- Have family members in prison, or are affected by parental offending.
- Are in a family circumstance presenting challenges for them, such as drug and alcohol misuse, adult mental health problems, or domestic abuse.
- Misuse drugs or alcohol.
- Have returned home to their family from care.
- Are at risk of HBA, such as FGM or forced marriage.
- Are privately fostered.
- Are persistently absent from education, including persistent absences for part of the school day.
- Show early signs of abuse and/or neglect in other ways.



The school has a Golden Rule: report all concerns no matter how small. Sharing any information can be vital in pulling together an effective Early Help plan. The DSL and Safeguarding Management Team will take the lead where early help is appropriate. Early help can come from within Taunton School using its own resources or it can happen in conjunction with multi-agency support as a result of an Early Help Assessment. An Early Help Assessment is an initial assessment and planning tool that facilitates and coordinates multi-agency support. It assesses the situation of the child or young person and their family and helps to identify the needs of both the children and the adults in the family. Early Help and early intervention services are part of a continuum of support and provide help to families who do not, or no longer, meet the threshold for a statutory intervention.

For an early help assessment to be effective, staff should be aware of the following:

- It should be undertaken with the agreement of the child and their parents or carers.
- It should take account of the child's wishes and feelings wherever possible, their age, family circumstances and the wider community context in which they are living.
- In cases where agreement to an early help assessment cannot be obtained, practitioners should consider how the needs of the child might be met. However, practitioners should still inform individuals that their data will be recorded and shared and the purpose explained to them.
- If at any time it is considered that the child may be a child in need, as defined in the Children Act 1989, or that the child has suffered significant harm or is likely to do so, a referral should be made immediately to local authority children's social care. This referral can be made by any practitioner.

Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Any such cases will be kept under constant review and consideration given to a referral to CSCS for assessment for statutory services if the pupil's situation is not improving or is worsening.

The Early Help Assessment may trigger a Team Around the Child (TAC) approach. The TAC is a group of people, including the child, family members and professionals, who will work together to support

the child and family. The TAC process is voluntary and is designed to bring all the relevant people together who will be able to decide what the child needs and how everyone will be able to work together to provide, monitor and evaluate this early help.

Staff must remember: a child at risk of significant harm could require your immediate referral / immediate action.

#### 6. Abuse and neglect

All staff will be aware of the indicators of abuse and neglect and understand that children can be at risk of harm inside and outside of the school, inside and outside of home, and online. All staff will be aware that abuse, neglect and other safeguarding issues are rarely standalone events that can be given a specific label, and multiple issues often overlap one another; therefore, staff will be vigilant and always raise concerns with the DSL. All staff, especially the DSL and deputy DSLs, will be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments; this includes being aware that pupils can be at risk of abuse or exploitation in situations outside their families (extra-familial harms). All staff will be aware of the appropriate action to take following a pupil being identified as at potential risk of abuse and, in all cases, will speak to the DSL if they are unsure.

All staff will be aware that technology is a significant component in many safeguarding and wellbeing issues, including online abuse, cyberbullying, and the sharing of indecent images.

# 7. Specific safeguarding issues

There are certain specific safeguarding issues that can put children at risk of harm – staff will be aware of these issues.

<u>Appendix A</u> of this policy sets out details about specific safeguarding issues that pupils may experience and outlines specific actions that would be taken in relation to individual issues.

# 8. Child-on-child abuse

For the purposes of this policy, "child-on-child abuse" is defined as abuse between children.

The school has a zero-tolerance approach to abuse, including child-on-child abuse.

All staff will be aware that child-on-child abuse can occur between pupils of any age and gender, both inside and outside of school, as well as online. All staff will be aware of the indicators of child-on-child abuse, how to identify it, and how to respond to reports. All staff will also recognise that even if no cases have been reported, this is not an indicator that child-on-child abuse is not occurring. All staff will speak to the DSL if they have any concerns about child-on-child abuse.

As a boarding school we are particularly mindful of the potential for peer abuse in residential settings. Sharing accommodation and spending greater time at school with peers can lead to a greater risk of bullying occurring and a feeling that the bullying is inescapable. Boarders may not have daily access to their parents for support and therefore trusted relationships with School staff become more important for these pupils. Boarders have access to an independent listener and are provided with a

range of helplines and contact numbers, including the office of the Children's Commissioner, to ring in case of problems or distress. These are provided in each boarding and day house. Boarders and their parents also have access to the contact details of ISI and the LADO should they have concerns about the boarder's welfare.

Consideration is given to the intake of the school to avoid a gender imbalance but training is provided to staff to help them manage a gender imbalance that maybe present in the classroom.

All staff will understand the importance of challenge inappropriate behaviour between peers, and will not tolerate abuse as "banter", "part of growing up" or "boys being boys".

Child-on-child abuse can be manifested in many different ways, including:

- Bullying, including cyberbullying and prejudice-based or discriminatory bullying.
- Abuse in intimate personal relationships between peers sometimes known as 'teenage relationship abuse'.
- Physical abuse this may include an online element which facilitates, threatens and/or encourages physical abuse.
- Sexual violence this may include an online element which facilitates, threatens and/or encourages sexual violence.
- Sexual harassment, including online sexual harassment, which may be standalone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent.
- The consensual and non-consensual sharing of nude and semi-nude images and/or videos.
- Upskirting taking a picture under a person's clothing without their permission, with the
  intention of viewing their genitals or buttocks and downblousing taking a picture from
  above with the intention of viewing their breasts; the motivation for either can be sexual
  gratification, victim humiliation, distress or alarm.
- Initiation- and hazing-type violence and rituals, which can 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.

Pupils are made aware of how to raise concerns or make a report and how any reports will be handled. This includes the process for reporting concerns about friends or peers. Pupils will also be reassured that they will be taken seriously, be supported, and kept safe. Through PSHEE (which includes the statutory RSE) and other programmes (eg Chapel, Assemblies and Tutorial Programme) pupils are updated on advice about sexting, consent and gender issues eg girls being sexually touched / assaulted (lifetime rates suggest they are more likely to be victims) or boys being subject to initiation / hazing type violence (lifetime rates suggest they are more likely to be victims).

In all circumstances Taunton School is committed to supporting the victim (whilst remembering that the alleged perpetrator may also be a victim of abuse and need support) and to working at a multiagency level around this form of abuse. Taunton School's responsibility does not end at the school gate and staff should also consider if abusive behaviour is a sign of wider issues that require addressing within the culture of the school.

If the school conducts its own internal investigation into the matter (this may be dependent on the advice given by the SSCP including the police) the staff will ensure that they follow the protocol laid down by the school when investigating a disciplinary matter and, if appropriate, will conduct an ongoing risk assessment to ensure the pupils (both victim and perpetrator) receive appropriate support.

The school recognises that female, LGBTQ+ and SEND pupils are more likely to be victims of child on child abuse and male pupils are more likely to be perpetrators, but that all child on child abuse is unacceptable and will be taken seriously.

Children's social services and the police may also be contacted should a potential crime be committed around protected characteristics as outlined the 2010 Equality Act (see Behaviour Policy for more detail). The School, as a member of the BSA, will also report the matter (on a no name basis with no specific details) to the Safeguarding officer at the BSA. The BSA will be notified when it is permissible to do so (i.e. once social services / police have agreed); when it involves current or historic cases and with any information which is in the public domain.

If pupils are involved in sexting and / or gender issues including being sexually touched / assaulted or being subject to initiation / hazing type violence, they will be subject to the school's disciplinary sanctions and may involve SSCP and the Police. In the case of Sexting, the DSL may liaise with CEOP and will call the Police for advice in the case of 'Gender issues including young people being sexually touched / assaulted or being subject to initiation / hazing type violence'. The Police will advise on whether further referrals will need to be made to child social services.

A pupil against whom an allegation of abuse has been made may be suspended from the School during the investigation and the School's behaviour policy will apply. However, until any formal outcome is agreed with other agencies, the suspension would be seen as a neutral act to protect all the children involved because whether they are the perpetrator or the victim, in this situation all children are treated as being at 'risk'.

If it is necessary for a pupil to be interviewed by the police in relation to allegations of abuse, the School will ensure that, subject to the advice of children's social care, the pupil's parents are informed as soon as possible and that the pupil is supported during the interview by an appropriate adult. In the case of pupils whose parents are abroad, the pupil's Guardian will be requested to provide support to the pupil and to accommodate him / her if it is necessary to suspend him / her during the investigation.

Staff will follow these procedures, as well as the procedures outlined in the school's Anti-bullying Policy and Suspension and Exclusion Policy, where relevant.

Steps taken by Taunton School to reduce the chances of Child-on-child abuse:

- There is a strong community system (for example in the senior school and at TSI/MS, based around their houses; in the prep school based around their form groups) which focuses on kindness and inclusion.
- Through assemblies, PSHEE, Chapel services and tutor sessions, the values of Taunton School, are communicated and pupils are educated about appropriate boundaries of behaviour, including zero tolerance for bullying.

- Rewards and sanctions clearly support this: pupils who are found to have bullied another pupil can expect a sanction.
- Pupils have clear guidance, in their houses, about who they can turn to if they are struggling
  and they have opportunity the to voice their concern through weekly tutor meetings, on-line
  surveys, school forums, peer mentoring programmes. The Health Centre is also very
  important in this area.

#### 9. Sexual violence and Sexual Harassment

The OSTED review into sexual violence in schools (2020) was clear that teachers and other stakeholders (including senior leaders, parents and governors) were often unaware of the extent of the problem. The report highlights the importance of staff being vigilant and aware that even if there are no reported cases, such abuse may still be taking place and is simply not being reported: staff must assume harmful sexual behaviour is happening in their setting.

'It could happen here'. Taunton school makes reference to this statement but goes further to say 'it does happen here' and it is everyone's responsibility to remain alert to the signs. Therefore, even if TS does not have any reports of sexual harassment, violence or bullying we assume it is happening and we should consider and challenge the school culture:

- o Do children feel safe to report it?
- o Do children understand how to report it?
- o Do children have enough suitable student voice to explain how they feel?

Sexual violence and sexual harassment can occur between two children of any age and sex and it can occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable.

#### The school's role:

- To create a safe environment in which young people feel comfortable and know how to disclose issues which worry them including sexual violence and sexual harassment.
- To ensure all staff know how to manage a disclosure around sexual violence and sexual harassment including external agencies.
- To ensure all staff are trained to be aware of the signs of abuse and neglect (including sexual violence and sexual harassment).
- To provide education (to staff, pupils and parents) around safeguarding (including sexual violence and sexual harassment) which challenges everyday sexism and other protected characteristics.

- To ensure children understand that the law is in place to protect rather than to criminalise them.
- To be proactive so that the school can work with statutory safeguarding partners.

It is possible that someone affected by sexual violence or harassment could be suffering extrafamilial harms. These take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to), sexual exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines.

#### What staff should be aware of:

- 1. They should have a zero tolerance approach towards sexual violence and sexual harassment and should never see 'banter' as 'just having a laugh' or 'boys being boys'.
- 2. They should ensure their behaviours in school set the right example so that they stand out as good role models. This means not only challenging and reporting inappropriate behaviour with pupils but also challenging and reporting inappropriate behaviour between staff (or staff to pupils). This is also explained in the staff code of conduct.
- 3. They should be aware of what child on child abuse is and that in addition causing someone to engage in sexual activity without consent, such as forcing to strip, touch themselves sexually or to engage in sexual activity with a third party is also abuse.
- 4. Children subjected to sexual violence and sexual harassment are likely to:
- a. Be less motivated and therefore attainment in class will suffer
- b. Change in mood
- c. Change in physical appearance
- d. Change in friendship groups
- e. Change in attendance at school
- f. Change in possessions
- g. NSPCC's 'how safe are our children' report 2020 found that girls are particularly vulnerable to sexual abuse, accounting for around 90% of victims of recorded rape offences against 13- to 15-year-olds in England, Wales and Scotland.
- h. Children with Special Educational Needs and Disabilities (SEND) are three times more likely to be abused than their peers.
- i. Children who are lesbian, gay, bi, or trans (LGBT) can be targeted by their peers. In some cases, a child who is perceived by their peers to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.
- 5. All staff are responsible for being alert to any safeguarding concerns, including sexual violence and sexual harassment, to act on these concerns appropriately depending on the level of need eg if a pupil is at risk of immediate then the member of staff should act in their best interests which could well mean contacting multi agency partners themselves rather than expecting the DSL or deputies to do so.

- 6. All staff should be aware that effective record keeping is essential in supporting the child and therefore in each part of the school they should understand their role and how they support this. There is a broader element to this 'a whole school approach to preventing child on child sexual violence and sexual harassment' by which the school has in place suitable systems to ensure that staff can report abuse. This is covered in training.
- 7. Older pupils: should be aware of the role they have in being good role models and in caring for others, intervening and reporting behaviour which falls below the standard expected within our behaviour and safeguarding policies.
- 8. To ensure children understand that the law is in place to protect rather than to criminalise them
- 9. Abuse (sexual as well as other forms) can be intra-familial and should this occur there will need to a family assessment to ensure siblings are also cared for.

Appendix C contains information on how a young person can confidently report abuse, sexual violence and sexual harassment.

# 10. Online safety and personal electronic devices

The school will adhere to the Online Safety and Acceptable Use of Technology Policy at all times.

As part of a broad and balanced curriculum, all pupils will be made aware of online risks and taught how to stay safe online.

Through training, all staff members will be made aware of:

- Pupil attitudes and behaviours which may indicate they are at risk of potential harm online.
- The procedure to follow when they have a concern regarding a pupil's online activity.
- How 'online life' impacts on the cultural norms in children and young people's off-line life.
- How successive lockdowns have exacerbated the influence of online life on children and young people.

The school will ensure that appropriate filtering systems are in place on school devices and school networks to prevent children accessing inappropriate material, in accordance with the school's Cybersecurity Policy. The school will, however, ensure that the use of filtering and monitoring systems does not cause "over blocking", which may lead to unreasonable restrictions as to what pupils can be taught online. The school ensures that it meets the <u>filtering and monitoring standards</u> published by the DfE. The school uses Palo Alto and Securely as filtering systems. The systems help to safeguard pupils by:

- Identifying how often a pupil accesses online material
- Limiting the type of sites a pupil can access via the school network
- If a pupil tries to access material which could place them at risk of serious harm an alert will be sent to everyone in the safeguarding management team via email and text.

The Palo Alto firewall blocks access to the following categories for pupils:

- Proxy avoidance sites
- Pornography

- Gambling
- Gaming\*
- Alcohol, tobacco, drugs, weapons
- Radicalisation or extremism
- Intimate apparel
- Streaming services (such as Netflix)\*
- Social media\*

Search engines: are set to 'safe search' mode eg pupils can access YouTube but 'safe search' will filter inappropriate content.

Our filter will allow pupils to access self-harm categories but this will send an immediate text alert to the DSL and DDSLs.

Pupil access to internet sites is filtered, logged and daily nd weekly reports are sent to the Houseparent who will report and discuss appropriate action with the DSL, in case of any unacceptable use. Any deliberate attempt to bypass security will be reported to the DSL and ICT technicians, treated very seriously and disciplined in line with the behaviour policy. Online Safety is a standing item on the Safeguarding meeting and the House Staff meeting, and concerns are regularly discussed.

The use of cellular data (e.g. GPRS, 3G, 4G, 5G etc) to access the internet while pupils are on School premises or otherwise in the care of the School is strongly discouraged, as pupils are unable to benefit from the School's filtering and anti-virus software. Pupils accessing the internet outside the School's network whilst on School premises or otherwise in the care of the School must comply with the Acceptable Use Policy and relevant Behavioural Policies. The school aims to reduce the risks caused by unfiltered access via cellular data by:

- All pupils have sufficient access to appropriate software and the internet via the school Wi-Fi
  network
- At age appropriate times, pupils are provided with a school email account and on-line learning platforms (Firefly, SOCS, Teams included 'Chat', Unifrog) which go through the school server and school filters.
- Access to social networking sites is made available to pupils of appropriate age and at appropriate times (see the Online Safety and Acceptable Use of Technology Policy).
- Mobile devices (phones) are handed in by all students (except Sixth Form) at the beginning of the day and returned at the end of the school day.
- We seek to educate our parent body in the risks of unfiltered online access and how to install
  parental controls on devices. We encourage parents to regularly check their child's devices
  and to limit the amount of data provided.
- There are strict rules around the use of mobile devices such as a ban in the dining hall and boarders in Years 9-11 hand in all devices before bedtime.

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

<sup>\*</sup>Gaming, social media and streaming services are allowed at certain times, see appendix.

Further information regarding the school's approach to online safety can be found in the Online Safety and Acceptable Use of Technology Policy.

#### **Communicating with parents**

As part of the usual communication with parents, the school will reinforce the importance of pupils being safe online and inform parents that they will find it helpful to understand what systems the school uses to filter and monitor internet use.

The school will also make it clear to parents what their children are being asked to do online for school.

#### **Reviewing online safety**

The school will carry out an annual review of its approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by pupils. The effectiveness of the filtering systems will be regularly tested using the Southwest Grid for Learning tool and using in-house checking systems for all pupil user groups.

#### Personal electronic devices

The use of personal electronic devices, including mobile phones and cameras, by staff and pupils is closely monitored by the school, in accordance with the Staff and Pupil ICT Acceptable Use Policies.

Where photographs and videos will involve pupils who are LAC, adopted pupils, or pupils for whom there are security concerns, the Head Master will liaise with the DSL to determine the steps involved. The DSL will, in known cases of pupils who are LAC or who have been adopted, liaise with the pupils' social workers, carers or adoptive parents to assess the needs and risks associated with the pupils.

Staff will report any concerns about pupils' or other staff members' use of personal electronic devices to the DSL, following the appropriate procedures.

#### **Upskirting and downblousing**

Under the Voyeurism (Offences) Act 2019, it is an offence to operate equipment for the purpose of upskirting. **"Operating equipment"** includes enabling, or securing, activation by another person without that person's knowledge, e.g. a motion-activated camera.

Upskirting and/or downblousing will not be tolerated by the school. Any incidents will be reported to the DSL, who will then decide on the next steps to take, which may include police involvement.

#### 11. Consensual and non-consensual sharing of indecent images and videos

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

The term "indecent imagery" is the legal wording that refers to nude or semi-nude images or videos of anyone under the age of 18, although it can also refer to sexual posing or sexual violence.

"Sexting" is the wording used by many adults to encompass the broad array of YPSI, however many young people interpret 'sexting' as writing and sending explicit messages with another, rather than images or videos.

Staff will receive appropriate training regarding child sexual development and will understand the difference between sexual behaviour that is considered normal and expected for the age of the pupil, and sexual behaviour that is inappropriate and harmful. Staff will receive appropriate training around how to deal with instances of sharing nudes and semi-nudes in the school community, including understanding motivations, assessing risks posed to pupils depicted in the images, and how and when to report instances of this behaviour.

Staff will be aware that creating, possessing, and distributing indecent imagery of children is a criminal offence, regardless of whether the imagery is created, possessed, and distributed by the individual depicted; however, staff will ensure that pupils are not unnecessarily criminalised.

Where a member of staff becomes aware of an incidence of sharing nudes and/or semi-nudes, they will refer this to the DSL as soon as possible.

#### The DSL (or deputy) will initiate the following response:

- The DSL will hold an initial review meeting with the necessary school staff
- The DSL, and other relevant staff members (usually houseparents) if appropriate, will conduct interviews with all pupils involved
- Parents of the pupils involved will be informed as soon as possible and involved in the school's response, unless doing so would put a pupil at further risk of harm
- Where a pupil has been physically harmed, or is at risk of physical harm, the incident will be referred to children's social care and/or the police without delay
- If the incident involves child pornography the police will be informed immediately after the incident has been referred to the DSL

#### The initial review meeting

During the initial review meeting, the DSL will meet with any and all relevant staff members, and aim to establish:

- Whether there is an immediate risk to the pupil or pupils involved.
- If a referral should be made to children's social care and/or the police.
- Whether it is necessary for the DSL to view the imagery and/or message.
- What further information is needed to decide on the best course of action.
- Whether the imagery and/or message has been shared widely and via what services or platforms, e.g. on social media.
- Whether immediate action needs to be taken to delete or remove images and/or messages from devices or other platforms.
- If there are any relevant facts about the pupils involved that need to be considered when conducting assessment of risk.
- If any other schools, colleges, settings or individuals need to be contacted.
- How parents will be informed of and involved in the school's response.

#### Assessment of risk

Assessing risk will be aided by considering behaviour and the motivations involved in the incident. These can be wide-ranging and move fluidly along a continuum from normal to violent and abusive behaviours. The school will always take into account that isolated inappropriate or problematic behaviour may not always be indicative of a pupil's overall sexual behaviour. The school will also take into account that harmful sexual behaviour that does not begin as sexually motivated, may arise from this kind of behaviour being normalised within the school culture. Incidents may be described as:

- Aggravated involving abusive elements beyond the creating and sharing of youth produced sexual imagery or involving adult criminal behaviour. This could be with intention to harm such as resulting from break ups, conflict between friends, or criminal threats or blackmail; or with no intention to harm, whereby creating and sharing youth produced sexual imagery is thoughtless or reckless.
- Experimental involving no intention to harm or reckless misuse. This could be in the case of romantic partners who create and share imagery between one another and it is accidentally shared, or instances of 'sexual attention seeking'.

#### The following will be considered when assessing risk:

- Why the image and/or message was shared, and whether the pupil was coerced or put under pressure to produce it
- Who has shared the image and/or message and where it has been shared, i.e. social media platforms
- The impact on the pupils involved in the incident and whether they have any additional vulnerabilities, e.g. SEND
- Whether the pupil who produced the image had provided consent and if the image was shared beyond its intended recipient
- Whether the pupil has taken part in this kind of activity before
- How many pupils the incident involves and how old they are

# The DSL will make an immediate referral to children's social care and/or police if, at the initial review stage, it is determined that:

- The incident involves an adult.
- A pupil has been coerced, blackmailed, or groomed, or if there are concerns about their ability to provide consent.
- What the school knows about the incident suggests the content depicts sexual acts that are unusual for the pupil's developmental stage.
- The image involves sexual acts and the pupil in the imagery is under the age of 13.
- The image shows violence
- The school has reason to believe that a pupil is at immediate risk of harm as a result of the image and/or message being shared.

Where none of the criteria above apply, the DSL, in conjunction with the Head, will determine the appropriate response and may choose not to involve children's social care or the police; however, if further information comes to light, the DSL may decide to escalate the incident at any stage.

The DSL will only decide not to refer the case to children's social care and/or the police if they are confident that the risks can be managed effectively by the school. The best interests of the pupils involved, and their welfare, will be central to the DSL's decision.

If a pupil has shared an image and/or message consensually, and there is no intended malice, the school will resolve the incident directly, without involvement from other stakeholders. If a pupil has shared an image, message or video as a result of interpersonal conflict such as break-ups or fights, the incident will be managed in line with the school's Behaviour Policy.

Any incidents caused by an aggravated factor such as where an adult is involved or where there are abusive elements, or where consent has not been provided will involve children's social care and/or police.

# 12. Context of safeguarding incidents

Safeguarding incidents can occur outside of school and can be associated with outside factors. All staff, particularly the DSL and deputy DSLs, will always consider the context of safeguarding incidents. Assessment of pupils' behaviour will consider whether there are wider environmental factors that are a threat to their safety and/or welfare. The school will provide as much contextual information as possible when making referrals to CSCS.

# 13. Pupils potentially at greater risk of harm

The school recognises that some groups of pupils can face additional safeguarding challenges, both online and offline, and understands that further barriers may exist when determining abuse and neglect in these groups of pupils. Additional considerations for managing safeguarding concerns and incidents amongst these groups are outlined below.

#### Pupils who need social workers

Pupils may need social workers due to safeguarding or welfare needs. These needs can leave pupils vulnerable to further harm and educational disadvantage.

As a matter of routine, the DSL will hold and use information from the LA about whether a pupil has a social worker in order to make decisions in the best interests of the pupil's safety, welfare, and educational outcomes.

Where a pupil needs a social worker, this will inform decisions about safeguarding, e.g. responding to unauthorised absence, and promoting welfare, e.g. considering the provision pastoral or academic support.

#### Home-educated children

Parents may choose elective home education (EHE) for their children. In some cases, EHE can mean that children are less visible to the services needed to safeguard and support them.

In line with the Education (Pupil Registration) (England) Regulations 2006, the school will inform the LA of all deletions from the admissions register when a pupil is taken off roll.

Where a parent has expressed their intention to remove a pupil from school for EHE, the school, in collaboration with the LA and other key professionals, will coordinate a meeting with the parent, where possible, before the final decision has been made, particularly if the pupil has SEND, is vulnerable, and/or has a social worker.

#### Looked After Children (LAC) and Previously Looked After Children (PLAC)

Children most commonly become looked after because of abuse and/or neglect. Because of this, they can be at potentially greater risk in relation to safeguarding. PLAC, also known as care leavers, can also remain vulnerable after leaving care.

The governing board will ensure that staff have the skills, knowledge and understanding to keep LAC and PLAC safe. This includes ensuring that the appropriate staff have the information they need, such as:

- Looked after legal status, i.e. whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order.
- Contact arrangements with parents or those with parental responsibility.
- Care arrangements and the levels of authority delegated to the carer by the authority looking after the pupil.

The DSL will be provided with the necessary details of pupils' social workers and the VSH, and, for PLAC, personal advisers.

#### **Pupils with SEND**

The fact that a pupil may have SEND is not in itself an inherent risk factor for harm; however, staff will be aware that SEND pupils can be targeted by other individuals.

When managing safeguarding in relation to pupils with SEND, staff will be aware of the following:

- Certain indicators of abuse, such as behaviour, mood and injury, may relate to the pupil's
  disability without further exploration; however, it should never be assumed that a pupil's
  indicators relate only to their disability
- Pupils with SEND can be disproportionally impacted by issues such as bullying, without outwardly showing any signs
- Communication barriers may exist, as well as difficulties in overcoming these barriers

When reporting concerns or making referrals for pupils with SEND, the above factors will always be taken into consideration. When managing a safeguarding issue relating to a pupil with SEND, the DSL will liaise with the school's SENCO, as well as the pupil's parents where appropriate, to ensure that the pupil's needs are met effectively.

#### LGBTQ+ pupils

The fact that a pupil may be LGBTQ+ is not in itself an inherent risk factor for harm; however, staff will be aware that LGBTQ+ pupils can be targeted by other individuals. Staff will also be aware that, in some cases, a pupil who is perceived by others to be LGBTQ+ (whether they are or not) can be just as vulnerable as pupils who identify as LGBTQ+.

Staff will also be aware that the risks to these pupils can be compounded when they do not have a trusted adult with whom they can speak openly with. Staff will endeavour to reduce the additional barriers faced by these pupils and provide a safe space for them to speak out and share any concerns they have.

#### Pupils requiring mental health support

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

# 14. Use of the school premises for non-school activities

Where the governing board hires or rents out school facilities or the school premises to organisations or individuals, e.g. for providers to run community or extracurricular activities, it will ensure that appropriate safeguarding arrangements are in place to keep pupils safe. The school will refer to the DfE's guidance on keeping children safe in out-of-school settings in these circumstances.

Where the governing board provides the activities under the direct supervision or management of school staff, child protection arrangements will apply. Where activities are provided separately by another body, this may not be the case; therefore, the governing board will seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place, including inspecting these as needed. The governing board will also ensure that there are arrangements in place to liaise with the school on these matters where appropriate. The governing board will ensure safeguarding requirements are included in any transfer of control agreement, i.e. a lease or hire agreement, as a condition of use and occupation of the premises, and specify that failure to comply with this would lead to termination of the agreement.

#### **Extracurricular activities and clubs**

External bodies that host extracurricular activities and clubs at the school, e.g. charities or companies, will work in collaboration with the school to effectively safeguard pupils and adhere to local safeguarding arrangements.

Staff and volunteers running extracurricular activities and clubs are aware of their safeguarding responsibilities and promote the welfare of pupils. Paid and volunteer staff understand how they should respond to child protection concerns and how to make a referral to CSCS or the police, if necessary.

When responding to allegations relating to incidents taking place when a third party organisation (or individual) is using the school's premises, the Taunton School Child Protection and Safeguarding Policy should be followed, in addition to appropriate referrals to external agencies.

## 15. Work experience

When a pupil is sent on work experience, the school will request to see appropriate safeguarding policies and procedures in place. Where the school has pupils conduct work experience at the school, an enhanced DBS check will be obtained if the pupil is over the age of 16.

#### **16.Homestay visits**

#### **Privately arranged homestays**

Where a parent or pupil arranges their own homestay, this is a private arrangement and the school is not the regulated activity provider.

#### **Private fostering**

Where a period of UK homestay lasts 28 days or more for a child aged under 16, or under 18 for a child with SEND, this may amount to private fostering under the Children Act 1989. Where the school becomes aware of a pupil being privately fostered, they will notify the LA as soon as possible to allow the LA to conduct any necessary checks.

#### 17. Concerns about pupils

If a member of staff has any concern about a pupil's welfare, or a pupil has reported a safeguarding concern in relation to themselves or a peer, they will act on them immediately by speaking to the DSL or deputy DSLs.

Staff will be aware that pupils may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or they may not recognise their experiences as harmful. Staff will be aware that this must not prevent them from having professional curiosity and speaking to the DSL, or deputy DSL, if they have a concern about a pupil.

All staff members are aware of the procedure for reporting concerns and understand their responsibilities in relation to confidentiality and information sharing, as outlined in the Communication and confidentiality section of this policy.

Where the DSL is not available to discuss the concern, staff members will contact the deputy DSLs with the matter. If a referral is made about a pupil by anyone other than the DSL, the DSL will be informed as soon as possible.

The LA will make a decision regarding what action is required within one working day of the referral being made and will notify the referrer. Staff are required to monitor a referral if they do not receive information from the LA regarding what action is necessary for the pupil. If the situation does not improve after a referral, the DSL will ask for reconsideration to ensure that their concerns have been addressed and that the situation improves for the pupil.

If early help is appropriate, the case will be kept under constant review. If the pupil's situation does not improve, a referral will be considered. All concerns, discussions and decisions made, as well as the reasons for making those decisions, will be recorded in writing by the DSL and kept securely.

If a pupil is in immediate danger, a referral will be made to CSCS and/or the police immediately. If a pupil has committed a crime, such as sexual violence, the police will be notified without delay.

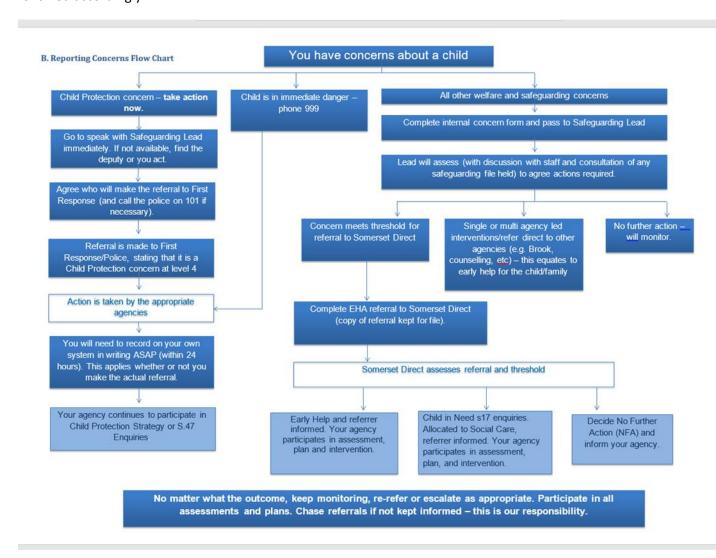
Where there are safeguarding concerns, the school will ensure that the pupil's wishes are always taken into account, and that there are systems available for pupils to provide feedback and express their

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

An inter-agency assessment will be undertaken where a child and their family could benefit from coordinated support from more than one agency. These assessments will identify what help the child and family require in preventing needs escalating to a point where intervention would be needed.

# **18.** Managing referrals

The reporting and referral process outlined in the Reporting Safeguarding Concerns Flowchart will be followed accordingly.



All staff members, in particular the DSL, will be aware of the LA's arrangements in place for managing referrals. The DSL will provide staff members with clarity and support where needed. When making a referral to CSCS or other external agencies, information will be shared in line with confidentiality requirements and will only be shared where necessary to do so.

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

closely with the police to ensure the school does not jeopardise any criminal proceedings, and to obtain help and support as necessary.

Where a pupil has been harmed or is in immediate danger or at risk of harm, the referrer will be notified of the action that will be taken within one working day of a referral being made. Where this information is not forthcoming, the referrer will contact the assigned social worker for more information.

The school will not wait for the start or outcome of an investigation before protecting the victim and other pupils: this applies to criminal investigations as well as those made by CSCS. Where CSCS decide that a statutory investigation is not appropriate, the school will consider referring the incident again if it is believed that the pupil is at risk of harm. Where CSCS decide that a statutory investigation is not appropriate and the school agrees with this decision, the school will consider the use of other support mechanisms, such as early help and pastoral support.

At all stages of the reporting and referral process, the pupil will be informed of the decisions made, actions taken and reasons for doing so. Discussions of concerns with parents will only take place where this would not put the pupil or others at potential risk of harm. The school will work closely with parents to ensure that the pupil, as well as their family, understands the arrangements in place, such as in-school interventions, is effectively supported, and knows where they can access additional support.

# 19. Concerns about school safeguarding practices (whistleblowing)

All staff, volunteers, contractors and agency staff should feel able to raise concerns about poor or unsafe practice and any potential failures in the safeguarding regime and know that such concerns will be taken seriously by the senior management team (SMT) and designated safeguarding leads as outlined in the Whistleblowing Policy. If a staff member feels unable to raise an issue with the SMT, they should access other whistleblowing channels such as the **NSPCC Whistleblowing helpline (0800 028 0285).** 

# 20. Safeguarding concerns and allegations of abuse against staff

All allegations against staff, supply staff, volunteers and contractors will be managed in line with this policy, a copy of which will be provided to, and understood by all staff during the induction process. The school will ensure all allegations against staff, including those who are not employees of the school, are dealt with appropriately and that the school liaises with the relevant parties.

Low-level concerns will be handled in line with the schools' Staff Code of Conduct.

# 21. Communication and confidentiality

All child protection and safeguarding concerns will be treated in the strictest of confidence in accordance with school data protection policies, however, fears about sharing information cannot be allowed to stand in the way of the need to promote welfare and protect the safety of children.

Where there is an allegation or incident of sexual abuse or sexual violence, the victim is entitled to anonymity by law; therefore, the school will consult its policy and agree on what information will be

disclosed to staff and others, in particular the alleged perpetrator and their parents. Where a report of sexual violence or sexual harassment is progressing through the criminal justice system, the school will do all it can to protect the anonymity of the pupils involved in the case.

Concerns will only be reported to those necessary for its progression and reports will only be shared amongst staff members and with external agencies on a need-to-know basis. During the disclosure of a concern by a pupil, staff members will not promise the pupil confidentiality and will ensure that they are aware of what information will be shared, with whom and why.

Where it is in the public interest, and protects pupils from harm, information can be lawfully shared without the victim's consent, e.g. if doing so would assist the prevention, detection or prosecution of a serious crime. Before doing so, the DSL will weigh the victim's wishes against their duty to protect the victim and others. Where a referral is made against the victim's wishes, it is done so carefully with the reasons for the referral explained to the victim and specialist support offered.

Depending on the nature of a concern, the DSL will discuss the concern with the parents of the pupils involved. Discussions with parents will not take place where they could potentially put a pupil at risk of harm. Discussion with the victim's parents will relate to the arrangements being put in place to safeguard the victim, with the aim of understanding their wishes in terms of support arrangements and the progression of the report. Discussion with the alleged perpetrator's parents will have regards to the arrangements that will impact their child, such as moving classes, with the reasons behind decisions being explained and the available support discussed. External agencies will be invited to these discussions where necessary.

Where confidentiality or anonymity has been breached, the school will implement the appropriate disciplinary procedures as necessary and will analyse how damage can be minimised and future breaches be prevented.

Where a pupil is leaving the school, the DSL will consider whether it is appropriate to share any information with the pupil's new provider, in addition to the child protection file, that will allow the new provider to support the pupil and arrange appropriate support for their arrival.

## 22.Safer recruitment

The school's full policy and procedures for safer recruitment are outlined in the Recruitment and Selection Policy.

An enhanced DBS check with barred list information will be undertaken for all staff members engaged in regulated activity. A person will be considered to be in 'regulated activity' if, as a result of their work, they:

- Are responsible on a daily basis for the care or supervision of children.
- Regularly work in the school at times when children are on the premises.
- Regularly come into contact with children under 18 years of age.

The DfE's <u>DBS Workforce Guides</u> will be consulted when determining whether a position fits the child workforce criteria.

The school will conduct the appropriate pre-employment checks for all prospective employees, including internal candidates and candidates who have lived or worked outside the UK. As part of due diligence, the school will consider online searches as part of the shortlisting process but only where candidates have been informed that online searches may be done as part of the process.

The appropriate DBS and suitability checks will be carried out for all governors, volunteers, and contractors.

#### Staff suitability

All centres providing care for pupils under the age of eight must ensure that staff and volunteers working in these settings are not disqualified from doing so under the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018. A person may be disqualified if they:

- Have certain orders or other restrictions placed upon them.
- Have committed certain offences.

All staff members are required to sign the Staff Disqualification Declaration Form confirming that they are not disqualified from working in a schooling environment. A disqualified person will not be permitted to continue working at the school.

#### **Ongoing suitability**

Following appointment, consideration will be given to staff and volunteers' ongoing suitability – to prevent the opportunity for harm to children or placing children at risk.

#### **Referral to the DBS**

The school will refer to the DBS anyone who has harmed a child or poses a risk of harm to a child, or if there is reason to believe the member of staff has committed an offence and has been removed from working in regulated activity. The duty will also apply in circumstances where an individual is deployed to another area of work that is not in regulated activity or they are suspended.

#### 23. Single central record (SCR)

The school keeps a SCR which records all staff, including agency and third-party supply staff, and teacher trainees on salaried routes, who work at the school.

All members of the proprietor body are also recorded on the SCR.

The following information is recorded on the SCR:

- An identity check
- A barred list check
- An enhanced DBS check
- A prohibition from teaching check
- A check of professional qualifications, where required
- A check to determine the individual's right to work in the UK

- Additional checks for those who have lived or worked outside of the UK
- A section 128 check for those in management positions

For agency and third-party supply staff, the school will also record whether written confirmation from the employment business supplying the member of staff has been received which indicates that all the necessary checks have been conducted (i.e. all the same checks the school would perform on any individual working in the school or who will be providing education on the school's behalf, including through online delivery) and the date that confirmation was received.

If any checks have been conducted for volunteers, this will also be recorded on the SCR. If risk assessments are conducted to assess whether a volunteer should be subject to an enhanced DBS check, the risk assessment will be recorded.

Written confirmation that supply agencies have completed all relevant checks will also be included.

The school is free to record any other information it deems relevant.

The details of an individual will be removed from the SCR once they no longer work at the school.

#### 24.Training

Staff members will undergo safeguarding and child protection training at induction, which will be updated on an annual basis and/or whenever there is a change in legislation.

The induction training will take place in the inset days prior to the start of the academic year and cover:

- Information about the role and identity of the DSL and deputy DSLs.
- The Child Protection and Safeguarding Policy.
- The Staff Code of Conduct.
- Part one of 'Keeping children safe in education' (KCSIE) (or Annex A, if appropriate).
- The Behaviour Policy.
- Appropriate child protection and safeguarding training, including online safety training –
  which, amongst other things, includes an understanding of expectations, applicable roles and
  responsibilities in relation to filtering and monitoring.
- The Early Help process and the process for making referrals in Somerset.

All staff members will also receive regular safeguarding and child protection updates as required, but at least annually. Training will be delivered using the Somerset Safeguarding Children's Partnership cascade pack, and will cover:

- Types of abuse 'SPEN' (sexual, physical, emotional and neglect) and who is more likely to perpetrate abuse including other children (child-on-child abuse)
- The issues surrounding sexual violence and sexual harassment.
- Contextual safeguarding.
- CCE and the need to refer cases to the National Referral Mechanism.
- Updated online safety training.

If there are changes emanating from the DfE the school provides opportunities for the Safeguarding Management team to update staff. Eg in the senior school the DSL can brief all the teaching staff at Monday break; a meeting which is also minuted for staff who are absent. The support staff have meetings on the first Friday of every month which the DSL can attend.

Staff will receive opportunities to contribute towards and inform the safeguarding arrangements in the school.

The Head and CEO, and all Heads of each section of the School, all members of the Safeguarding Management Team and the nominated Governor will have undertaken appropriate SSCP child protection training and training in inter-agency working, and will attend refresher training at two-yearly intervals. The DSL and deputy DSLs will also obtain access to resources and attend any relevant or refresher training courses, ensuring they keep up-to-date with any developments relevant to their role. This will include training to understand:

- The assessment process for providing early help and statutory intervention, including local criteria for action and CSCS referral arrangements.
- How LAs conduct child protection case conferences and a child protection review conferences, to enable the DSL to attend and contribute to these effectively when required.
- The importance of providing information and support to CSCS.
- The lasting impact that adversity and trauma can have.
- How to be alert to the specific needs of children in need, pupils with SEND and/or relevant health conditions, and young carers.
- The importance of internal and external information sharing.
- The Prevent duty.
- The risks associated with online safety, including the additional risks faced online by pupils with SEND.

The School makes provision for teaching pupils about safeguarding via assemblies at the beginning of the academic year, PSHEE and other SMSC activities. Pupils with positions of responsibility in the Senior School such as Peer Mentors, Prefects and Heads of School receive more formal training and must pass a test on Safeguarding. In other parts of the school, pupils with responsibilities are given training for their roles.

# 25. Procedures following any form of disclosure

Receive Res	espond	Reassure	Record	Report
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#### Receive:

- Listen sympathetically and with an open mind
- Stay calm, conveying this through word and action
- Do not look at any potentially concerning electronic images. Pass all devices on to the DSL.
- Never promise confidentiality, only discretion. It is important that the pupil understands from the outset that if they choose to disclose information that indicates actual or

potential harm to themselves or others, then certain actions will need to be taken. If necessary, pause a child before he/she has begun what you anticipate might be a disclosure and remind them

- Allow the child to talk and finish their story. Let them tell you what they want and no more
- Do not ask any leading questions

#### Respond:

- Where necessary clarify what has been said
- Ensure that you have a full understanding of the facts as related by the pupil, perhaps by reporting back to the pupil for his/her confirmation
- Never ask leading questions
- When the pupil has finished make sure they feel secure. Explain what you will do next and (where appropriate) the referral process
- · Action must be taken immediately if the pupil is in imminent danger

#### Reassure:

- Acknowledge their courage in talking to you and reassure them that what they have said will be taken seriously
- Remind them that the abuse is not their fault
- Reassure them but do not promise what you may not be able to deliver 'Everything will be alright now' – it may not be.

#### Record:

Record as much as you can remember as soon as possible (preferably immediately)
 afterwards, using the pupil's own words as far as possible. Include who was present and the
 date, time and location of the incident or disclosure

#### Report:

Refer the matter before the end of the school day or sooner and immediately if any pupil is
in danger to the DSL. Do not discuss with parents/carers. The DSL will agree with the
Safeguarding management Team when parents/carers should be contacted and by whom. If
the DSL is not available, staff should go via the DDSL, or SMT, or take advice from the local
children's social care.

You have now fulfilled your duty and you should **not take any further action** or reveal this information to anyone else. The DSL will be aware that you may need support following a disclosure.

26.Action to be taken by the DSL / DDSL in case of an allegation of abuse and/or concerns raised (not involving a member of staff)

- Following the receipt of a report, the DSL and Heads will seek advice from the LADO Service, who will then liaise with Somerset Children's Social Care and /or Avon & Somerset Police (depending on who the allegation is made against).
- This may be done without giving names at first, and then follow the advice given. Taunton School will not investigate allegations of abuse, but will instead always refer to the appropriate authority. In cases of serious harm, the Police would be informed from the outset.
- Agree with Somerset Children's Social Care any necessary next steps in relation to:
  - informing a pupil's parents when appropriate
  - medical examination or treatment
  - immediate protection for the victim or a pupil who has given information about an abuser or a pupil against whom an allegation has been made.
- Inform the pupil or adult who made the initial allegation of what the next steps are to be.
- Inform the relevant Heads of the allegation and action taken.
- Ensure long term protection support for all pupils involved.
- If unhappy with the action of Somerset Safeguarding Children Partnership (SSCP) then use the Escalation Policy of Somerset Safeguarding Children Partnership (SSCP).
- Any advice given will be clearly recorded as a file note.

When there are reports of abuse involving a number of pupils against a pupil or other pupils or any specific safeguarding issues the DSL will meet with appropriate staff following advice from Somerset Children's Social Care and coordinate the matters in line with guidance from Somerset Safeguarding Partnership (SSP) and ISI. The DSL will:

- Follow procedure and refer to the Somerset Children's Social Care team
- Ensure secure supervised spaces for all involved
- Involve the Deputy DSLs and members of SMT trained to Level 2 as appropriate
- Follow guidance above with respect to each pupil in a secure supervised environment.
- If a pupil appears injured and/or distressed in anyway then medical attention may need to be received
- Practical and up to date support and information can also be found on www.nspcc.org.uk or via the www.gov.uk website

If there is an allegation against a person outside the school community, the DSL will seek advice from external agencies and contact the parents as and when appropriate.

Taunton School will always undertake to share their intention to refer a child to Somerset Children's Social Care with their parents/carers unless to do so could put the child at greater risk or harm or impede a criminal investigation.

#### Support for victims/perpetrators/other children affected by abuse e.g. child-on-child abuse

- Counselling
- Referral to specialist support services if needed e.g. rape counselling/ CAMHS etc.
- Support from a trusted adult
- Safety plan devised by DSL and child (plus other adults if required)

For further information see: SSCP's Allegations Management or contact Somerset Direct for a referral to the LADO Somerset Direct 0300 123 2224.

#### 27.Low level concerns

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

Creating a culture in which all concerns about adults are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. If implemented correctly, this should encourage an open and transparent culture; enable schools and colleges to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the school or college are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.

#### What is a low level concern?

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold set out at paragraph 355, of KCSiE September 2023.

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 allegations threshold or is otherwise not considered 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 personal mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating or offensive language
- humiliating pupils.

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

It is crucial that any such concerns, including those which do not meet the harm threshold, are shared responsibly with the Head. Advice can be sought from the DSL but the concern must be reported to the Head of each school. Concerns can be reported verbally but the individual making the report will be asked to follow this up by email. The Head will seek to deal with the low level

concern appropriately whilst ensuring those working in or on behalf of schools and colleges are protected from potential false allegations or misunderstandings.

# 28.Procedures Following an Allegation of Abuse by a Member of Staff (including volunteers and supply teachers)

It is important to draw a distinction between complaints and allegations against staff. In other words, the difference between behaviours that suggest misconduct or unprofessionalism, and those which specifically raise child protection concerns.

An allegation should be made if a teacher or other member of staff has:

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

Please note, these four categories are taken verbatim from KCSIE 2023, paragraph 355. At Taunton School we use the definition 'young person' i.e. staff should consider all pupils and not their age when considering any and all concerns.

There are two aspects to consider when an allegation is made:

- Looking after the welfare of the child the designated safeguarding lead is responsible for
  ensuring that the child is not at risk and referring cases of suspected abuse to the local
  authority children's social care.
- Investigating and supporting the person subject to the allegation the case manager should discuss with the LADO, the nature, content and context of the allegation, and agree a course of action.

When dealing with allegations, Taunton School will:

- apply common sense and judgement;
- deal with allegations quickly, fairly and consistently; and
- provide effective protection for the child and support the person subject to the allegation.

If an allegation is made against a teacher or member of staff, then the quick resolution of that allegation will be a clear priority as this is a benefit to all concerned. Any unnecessary delays should be eradicated. The Head should be informed of the allegation at the earliest opportunity and at the latest by the end of the school day.

Any concern which involves the possibility of physical, emotional or sexual abuse will always be referred within 24 hours to the Local Authority Designated Officer (LADO) and their advice taken prior to any investigation. If child protection procedures are needed, an investigation will be carried out by Children's Social Care and the Police.

The Designated Safeguarding Lead (and /or DDSL), the Heads and Governors must not carry out investigations themselves.

If an allegation is made against a member of staff it must be responded to immediately and with the utmost discretion to ensure protection for the child and support for the person who is the subject of the allegation. The informant should be told that the matter will be referred in confidence to the appropriate people. This must be done and the written record passed on the same day to the Designated Safeguarding Lead and the relevant Head. The circumstances should be kept strictly confidential until the relevant Head has been able to judge whether or not an allegation or concern indicates possible abuse. The concerns will be discussed with the LADO for allegations management http://sscb.safeguardingsomerset.org.uk/working-with-children/allegations-management/.

If it is decided by the appropriate LADO that an investigation is called for, it is the responsibility of the Somerset Children's Social Care manager to arrange a Strategy Meeting. This would normally involve the Police, Somerset Children's Social Care, the DSL, the relevant Head and preferably a member of the Governing Body of Taunton School. The arrangements agreed upon will include informing the parents and seeking their consent for any immediate medical examination. Where a member of Boarding Staff is suspended pending an investigation of a child protection nature, alternative accommodation (away from children) will be arranged.

If the allegation made to a member of staff concerns a Head, the person receiving the allegation will immediately inform the Chairman of the Board of Governors, without prior notification to the Head. If the allegation concerns the DSL and/or DDSL, then the relevant Head must be informed.

If the allegation is made against a volunteer, a supply teacher, contractor etc, an investigation will necessarily involve the organisation or agency of employment. For those who are self-employed the allegation will be passed directly to Somerset Safeguarding Children Partnership (SSCP) or LADO for advice or action, dependent upon whom the allegation is made against.

The person who is the subject of the allegation will normally be informed as soon as possible after the result of the initial investigation is known.

If it is established that the allegation is not well founded, either on the basis of the medical evidence or further statements, then the person against whom the allegation has been made would normally be informed that the matter is closed and any notes will be removed from their personnel file and will not be referred to in any references. If it is decided that the allegation does not meet the threshold for safeguarding, it will be handed back to the employer for consideration via the school's internal procedures.

Pupils that are found to have made malicious allegations are likely to have breached school behaviour policies. The school will then determine what, if any, sanctions are appropriate. Police may well be informed if there are grounds to believe that a criminal offence may have been committed. Also, Children's Social Care may need to be involved with any follow up work with the pupil.

If the police decide to take the case further, the member of staff implicated would normally be suspended or, where the circumstances are considered to warrant it, dismissed. It is reasonable to ask the police to give some indication of their timescale.

The school will report to the DBS within one month of leaving any person (whether employed, contracted, a volunteer or pupil) whose services are no longer used because he or she is considered unsuitable to work with children, and the school has a duty to consider referral to Teaching Regulation Agency (TRA) this will be in line with the criteria by TRA. Advice about whether an allegation against a teacher is sufficiently serious to refer to TRA can be found at: Teacher Misconduct The Prohibition of Teachers - October 2015 Or the TRA website: https://www.gov.uk/government/organisations/teaching-regulation-agency

Staff and volunteers should also follow the School's separate Employment Policies and Procedures Policy Booklet which contains the Whistleblowing Policy to raise concerns about poor or unsafe safeguarding practices at the School, potential failures by the School or its staff to properly safeguard the welfare of pupils or other wrongdoing in the workplace that does not involve the safeguarding and welfare of children.

**Record Keeping:** All concerns, discussions and the decisions made a clear and the reasons for those decisions, should be recorded in writing. A comprehensive summary of any allegations made against a member of staff, and all details leading to and including a resolution, will be kept on the confidential personnel file and will be retained securely until the member of staff reaches retirement age, or for a period of 10 years after the allegation has been made. The school will provide information regarding an allegation for the purposes of future references and DBS disclosures.

The school is aware that among other obligations, the Data Protection Act 2018, and the UK General Data Protection Regulation (UK GDPR) place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure. See ICO guidance <u>'For Organisations'</u> which includes information about your obligations and how to comply, including protecting personal information, and providing access to official information.

The data Protection Act 2018 and the UK GDPR do not prevent the sharing of information for the purposes of keeping children safe.

#### Good Practice Recommendations for Record Keeping will involve;

- Ensuring that a proper record is kept of any Child Protection referral and action taken, and that this is kept securely and in confidence
- Child Protection records should be kept for the approved timescale for the various
   Authorities we are in conjunction with and then shredded on the basis that this information
   has been shared with Children's Social Care who will continue to hold copies
- When notes are dispatched to another school ensure that the original copies are held and that photocopies are despatched with notes and records of delivery i.e. special delivery / recorded delivery
- Ensuring that Child Protection files are monitored every term.
- New children have their old school approached to transfer any child protection files securely
  and also a proactive approach to ensuring sufficient support and cascading of information in
  place for key staff.

#### 29.Self-reporting

On occasion, a member of staff may feel as though they have acted in a way that:

- Could be misinterpreted.
- Could appear compromising to others.
- They realise, upon reflection, their behaviour falls below the expected professional standards set out in the Staff Code of Conduct or their behaviour was not aligned with the school's safeguarding culture.

The school will ensure that an environment is maintained that encourages staff members to self-report if they feel as though they have construed as inappropriate upon reflection. The Head and DSL will, to the best of their abilities, maintain a culture of approachability for staff members, and will be understanding and sensitive towards those who self-report.

Staff members who self-report will not be treated more favourably during any resulting investigations than staff members who were reported by someone else; however, their self-awareness and intentions will be taken into consideration.

The LADO would be receptive to any member of staff calling them to talk through any self-reporting. Contact details: Somerset LADO: Anthony Goble / Stacey Davis: 01823 359029

### 30. Security on the school site

The School will take all practicable steps to ensure that School premises are as secure as circumstances permit.

The School will make *reasonable* effort to provide a secure, healthy, hazard-free environment for everyone at and visiting our site. Consequently, all staff will:

- Maintain suitable and reasonable physical boundaries and barriers such as fencing, gates, key card access and locks on doors eg if a teacher finds a boundary is unsuitable or broken then they must inform site services immediately.
- Provide appropriate supervision for children at all times and ensure they are never permitted to enter hazardous or insecure areas.
- To challenge any strangers on site.
- Take all reasonable steps to monitor contractors, visitors and volunteers using the premises, requiring them to report to Reception and be issued with lanyards.
- Ensure visitors must sign in on arrival and sign out on departure and are given a copy of the School's pamphlet 'Safeguarding: Advice for Staff, Volunteers and Visitors. If they are allowed to be unattended on the school site (for example, a tradesman) they will be given a Visitors badge. They are supervised whilst on site through regular checks from school staff. Sometimes visitors such as prospective parents are escorted whilst on School premises by a member of staff or a Senior pupil. When this occurs the visitor may choose not to wear a visitors badge because of the constant supervision afforded.

All visitors to buildings away from Reception (for example, Houses) must report to a member of staff immediately on arrival and must observe the necessity to be kept under sufficient staff supervision during their visit.

If a visitor is going to a House in the Senior School they must, during the day, report to the House Keeper and during the evening, the Housemaster / Mistress or Tutor on Duty.

We have due consideration to the Boarding Schools National Minimum Standards (September 2022) which sets down the national minimum standards (standards) to safeguard and promote the welfare of children for whom accommodation is provided by boarding schools. The standards do not override the need for schools to comply with other legislation which sets the standards for independent schools, and legislation covering health and safety, fire or planning regulations. However, Taunton School should 'have regard to' the standards and can demonstrate that it either complies with the guidance or has considered the guidance and has good reason for departing from it.

#### 31.Reasonable Force

The term 'reasonable force' covers the broad range of actions used by most teachers at some point in their career that involve a degree of physical contact with pupils. If a member of staff has potentially used reasonable force they must report it using the form found on the school intranet:

Reasonable Force — TS & TPS Intranet (tauntonschool.co.uk)

The school does not have a no touch policy i.e. there may be pastoral reasons why a member of staff may feel the need to touch a pupil such as an arm around a shoulder to offer support: this is not 'reasonable force' but it is advised that the member of staff still reports this.

Force is usually used either to control or restrain. This can range from guiding a pupil to safety by the arm through to more extreme circumstances such as breaking up a fight or where a pupil needs to be restrained to prevent violence or injury.

'Reasonable in the circumstances' means using no more force than is needed.

Control means either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of a classroom.

Restraint means to hold back physically or to bring a pupil under control. It is typically used in more extreme circumstances, for example when two pupils are fighting and refuse to separate without physical intervention.

School staff should always try to avoid acting in a way that might cause injury, but in extreme cases it may not always be possible to avoid injuring the pupil.

Further guidance can be found in the Use of Reasonable Force Policy.

# 32. Monitoring and review

This policy and its procedures are reviewed at least annually by the DSL and the Head Master. This policy will be updated as needed to ensure it is up-to-date with safeguarding issues as they emerge and evolve, including any lessons learnt.

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

### Appendix A: Specific safeguarding issues

This appendix sets out details about specific safeguarding issues that pupils may experience and outlines specific actions that would be taken in relation to individual issues.

#### Here are the issues covered:

- 1. Domestic abuse
- 2. Homelessness
- 3. Children absent from education
- 4. Child abduction and community safety incidents
- 5. Child criminal exploitation (CCE)
- 6. Cyber-crime
- 7. Child sexual exploitation (CSE)
- 8. Modern slavery
- 9. <u>FGM</u>
- 10. Virginity testing and hymenoplasty
- 11. Forced marriage
- 12. Radicalisation
- 13. Pupils with family members in prison
- 14. Pupils required to give evidence in court
- 15. Mental health
- 16. Serious violence

#### **Domestic abuse**

For the purposes of this policy, and in line with the Domestic Abuse Act 2021, "domestic abuse" is defined as abusive behaviour of a person towards another person (including conduct directed at someone else, e.g. the person's child) where both are aged 16 or over and are personally connected. "Abusive behaviour" includes physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse, psychological or emotional abuse, or another form of abuse. "Personally connected" includes people who:

- Are, have been, or have agreed to be married to each other.
- Are, have been, or have agreed to be in a civil partnership with each other.
- Are, or have been, in an intimate personal relationship with each other.
- Each have, or had, a parental relationship towards the same child.
- Are relatives.

The school will recognise the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of domestic abuse. All staff will be aware of the signs of domestic abuse and follow the appropriate safeguarding procedures where concerns arise.

Behaviour of a person ("A") towards another person ("B") is "domestic abuse" if A and B are each aged 16 or over and are personally connected to each other, and the behaviour is abusive.

Behaviour is "abusive" if it consists of any of the following—

- physical or sexual abuse;
- violent or threatening behaviour;
- controlling or coercive behaviour;
- economic abuse
- psychological, emotional or other abuse; and it does not matter whether the behaviour consists of a single incident or a course of conduct.

Experiencing domestic abuse can have a serious, long lasting impact and in some cases children will blame themselves.

Young people can also experience domestic abuse in intimate relationships. This form of child on child abuse is also referred to as teenage relationship abuse.

Operation Encompass operates in all police forces in the UK and it helps schools and the police to support victims of domestic abuse. Home: Operation Encompass

# **Homelessness**

The DSL and deputy DSLs will be aware of the contact details and referral routes into the Local Housing Authority so that concerns over homelessness can be raised as early as possible.

Indicators that a family may be at risk of homelessness include:

- Household debt.
- · Rent arrears.
- Domestic abuse.
- Anti-social behaviour.
- Any mention of a family moving home because "they have to".

Referrals to the Local Housing Authority do not replace referrals to CSCS where a child is being harmed or at risk of harm. For 16- and 17-year-olds, homelessness may not be family-based and referrals to CSCS will be made as necessary where concerns are raised.

#### Children absent from education

A child who is absent from school can be a vital warning sign of a range of safeguarding issues, including neglect, CSE and CCE, particularly county lines. The school will ensure that the response to children persistently being absent from education supports identifying such abuse and helps prevent the risk of pupils becoming absent from education in the future. Staff will monitor pupils that are absent from the school, particularly on repeat occasions and/or prolonged periods, and report them to the DSL following normal safeguarding procedures, in accordance with the Children Absent from Education Policy. The school will inform the LA of any pupil who fails to attend regularly or has been absent without the school's permission for a continuous period of 10 school days or more.

The school will follow the DfE's <u>guidance</u> on improving attendance where there is a need to work with children's services due to school absences indicating safeguarding concerns.

#### **Admissions register**

Pupils are placed on the admissions register at the beginning of the first day that is agreed by the school, or when the school has been notified that the pupil will first be attending. The school will notify the LA within 5 days of when a pupil's name is added to the admissions register.

The school will ensure that the admissions register is kept up-to-date and accurate at all times and will inform parents when any changes occur. Two emergency contacts will be held for each pupil where possible. Staff will monitor pupils who do not attend the school on the agreed date and will notify the LA at the earliest opportunity.

If a parent notifies the school that their child will live at a different address, the school will record the following information on the admissions register:

- The full name of the parent with whom the pupil will live
- The new address
- The date from when the pupil will live at that address

If a parent notifies the school that their child will be attending a different school, or is already registered at a different school, the following information will be recorded on the admissions register:

- The name of the new school
- The date on which the pupil first attended, or is due to attend, that school

Where a pupil moves to a new school, the school will use a secure internet system to securely transfer pupils' data.

To ensure accurate data is collected to allow effective safeguarding, the school will inform the LA of any pupil who is going to be deleted from the admission register, in accordance with the Education (Pupil Registration) (England) Regulations 2006 (as amended), where they:

- Have been taken out of the school by their parents, and are being educated outside the national education system, e.g. home education.
- Have ceased to attend the school, and no longer live within a reasonable distance of the premises.
- Have been certified by the school's medical officer as unlikely to be in a fit state of health to attend, before ceasing to be of compulsory school age, and their parent has not indicated the intention to the pupil continuing to attend school after ceasing to be of compulsory school age.
- Have been in custody for a period of more than four months due to a final court order and the school does not reasonably believe they will be returning to the school at the end of that period.
- Have been permanently excluded.

The school will also remove a pupil from the admissions register where the school and LA has been unable to establish the pupil's whereabouts after making reasonable enquiries into their attendance.

If a pupil is to be removed from the admissions register, the school will provide the LA with the following information:

- The full name of the pupil
- The full name and address of any parent with whom the pupil lives
- At least one telephone number of the parent with whom the pupil lives
- The full name and address of the parent with whom the pupil is going to live, and the date that the pupil will start living there, if applicable
- The name of the pupil's new school and the pupil's expected start date there, if applicable
- The grounds for removal from the admissions register under regulation 8 of the Education (Pupil Registration) (England) Regulations 2006 (as amended)

The school will work with the LA to establish methods of making returns for pupils back into the school. The school will highlight to the LA where they have been unable to obtain necessary information from parents, e.g. where an address is unknown. The school will also highlight any other necessary contextual information, including safeguarding concerns.

# Child abduction and community safety incidents

For the purposes of this policy, "child abduction" is defined as the unauthorised removal or retention of a child from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents and other relatives, other people known to the victim, and strangers.

All staff will be alert to community safety incidents taking place in the vicinity of the school that may raise concerns regarding child abduction, e.g. people loitering nearby or unknown adults conversing with pupils.

Pupils will be provided with practical advice and lessons to ensure they can keep themselves safe outdoors.

#### Child criminal exploitation (CCE)

For the purposes of this policy, "child criminal exploitation" is defined as a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity, for any of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage or other advantage of the perpetrator or facilitator
- Through violence or the threat of violence

Specific forms of CCE can include:

- Being forced or manipulated into transporting drugs or money through county lines.
- Working in cannabis factories.
- Shoplifting or pickpocketing.
- Committing vehicle crime.
- Committing, or threatening to commit, serious violence to others.

The school will recognise that pupils involved in CCE are victims themselves, regardless of whether they have committed crimes, and even if the criminal activity appears consensual. The school will also recognise that pupils of any gender are at risk of CCE.

School staff will be aware of the indicators that a pupil is the victim of CCE, including:

- Appearing with unexplained gifts, money or new possessions.
- Associating with other children involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs or alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly becoming absent from school or education or not taking part.

#### **County lines**

For the purposes of this policy, "county lines" refers to gangs and organised criminal networks exploiting children to move, store or sell drugs and money into one or more areas, locally and/or across the UK.

As well as the general indicators for CCE, school staff will be aware of the specific indicators that a pupil may be involved in county lines, including:

- Going missing and subsequently being found in areas away from their home.
- Having been the victim or perpetrator of serious violence, e.g. knife crime.
- Receiving requests for drugs via a phone line.
- Moving drugs.
- Handing over and collecting money for drugs.
- Being exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection.
- Being found in accommodation they have no connection with or a hotel room where there is drug activity.
- Owing a 'debt bond' to their exploiters.
- Having their bank account used to facilitate drug dealing.

Staff will be made aware of pupils with missing episodes who may have been trafficked for the purpose of transporting drugs. Staff members who suspect a pupil may be vulnerable to, or involved in, county lines activity will immediately report all concerns to the DSL.

The DSL will consider referral to the National Referral Mechanism on a case-by-case basis and consider involving local services and providers who offer support to victims of county lines exploitation.

#### **Cyber-crime**

For the purposes of this policy, "cyber-crime" is defined as criminal activity committed using computers and/or the internet. This includes 'cyber-enabled' crimes, i.e. crimes that can happen offline but are enabled at scale and at speed online, and 'cyber-dependent' crimes, i.e. crimes that can be committed only by using a computer. Crimes include:

- Unauthorised access to computers, known as 'hacking'.
- Denial of Service attacks, known as 'booting'.

• Making, supplying or obtaining malicious software, or 'malware', e.g. viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence.

All staff will be aware of the signs of cyber-crime and follow the appropriate safeguarding procedures where concerns arise. This may include the DSL referring pupils to the National Crime Agency's Cyber Choices programme.

# Child sexual exploitation (CSE)

For the purposes of this policy, "child sexual exploitation" is defined as a form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, for any of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage, increased status or other advantage of the perpetrator or facilitator
- Through violence or the threat of violence

The school will recognise that CSE can occur over time or be a one-off occurrence, and may happen without the pupil's immediate knowledge, e.g. through others sharing videos or images of them on social media. The school will recognise that CSE can affect any pupil who has been coerced into engaging in sexual activities, even if the activity appears consensual; this includes pupils aged 16 and above who can legally consent to sexual activity. The school will also recognise that pupils may not realise they are being exploited, e.g. they believe they are in a genuine romantic relationship.

School staff will be aware of the key indicators that a pupil is the victim of CSE, including:

- Appearing with unexplained gifts, money or new possessions.
- Associating with other children involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs or alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly becoming absent from school or education or not taking part.
- Having older partners.
- Suffering from sexually transmitted infections.
- Displaying sexual behaviours beyond expected sexual development.
- Becoming pregnant.

All concerns related to CSE will be managed in line with the school's Child Sexual Exploitation (CSE) Policy.

Where CSE, or the risk of it, is suspected, staff will discuss the case with the DSL. If after discussion a concern remains, local safeguarding procedures will be triggered, including referral to the LA. The LA and all other necessary authorities will then handle the matter to conclusion. The school will cooperate as needed.

#### **Modern slavery**

For the purposes of this policy, "modern slavery" encompasses human trafficking and slavery, servitude, and forced or compulsory labour. This can include CCE, CSE, and other forms of exploitation.

All staff will be aware of and alert to the signs that a pupil may be the victim of modern slavery. Staff will also be aware of the support available to victims of modern slavery and how to refer them to the National Referral Mechanism.

#### **FGM**

For the purposes of this policy, "FGM" is defined as all procedures involving the partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

All staff will be alert to the possibility of a pupil being at risk of FGM, or already having suffered FGM. If staff are worried about someone who is at risk of FGM or who has been a victim of FGM, they are required to share this information with CSCS and/or the police. The school's procedures relating to managing cases of FGM and protecting pupils will reflect multi-agency working arrangements.

As outlined in Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015), teachers are **legally required** to report to the police any discovery, whether through disclosure by the victim or visual evidence, of FGM on a pupil under the age of 18. Teachers failing to report such cases may face disciplinary action. Teachers will not examine pupils, and so it is rare that they will see any visual evidence, but they must personally report to the police where an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should also consider and discuss any such case with the DSL and involve CSCS as appropriate. **NB:** This does not apply to any suspected or at-risk cases, nor if the individual is over the age of 18. In such cases, local safeguarding procedures will be followed.

All staff will be aware of the indicators that pupils may be at risk of FGM. While some individual indicators they may not indicate risk, the presence of two or more indicators could signal a risk to the pupil. It is important to note that the pupil may not yet be aware of the practice or that it may be conducted on them, so staff will be sensitive when broaching the subject.

Indicators that a pupil may be at heightened risk of undergoing FGM include:

- The socio-economic position of the family and their level of integration into UK society.
- The pupil coming from a community known to adopt FGM.
- Any girl with a mother or sister who has been subjected to FGM.
- Any girl withdrawn from PSHE.

Indicators that FGM may take place soon include:

- When a female family elder is visiting from a country of origin.
- A girl confiding that she is to have a 'special procedure' or a ceremony to 'become a woman'.
- A girl requesting help from a teacher if she is aware or suspects that she is at immediate risk.
- A girl, or her family member, talking about a long holiday to her country of origin or another country where FGM is prevalent.

All staff will be vigilant to the signs that FGM has already taken place so that help can be offered, enquiries can be made to protect others, and criminal investigations can begin. Indicators that FGM may have already taken place include the pupil:

- Having difficulty walking, sitting or standing.
- Spending longer than normal in the bathroom or toilet.
- Spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- Having prolonged or repeated absences from school, followed by withdrawal or depression.
- Being reluctant to undergo normal medical examinations.
- Asking for help, but not being explicit about the problem due to embarrassment or fear.

FGM is included in the definition of so-called "'honour-based' abuse (HBA)", which involves crimes that have been committed to defend the honour of the family and/or community. All forms of HBA are forms of abuse and will be treated and escalated as such. Staff will be alert to the signs of HBA, including concerns that a child is at risk of HBA, or has already suffered from HBA, and will consult with the DSL who will activate local safeguarding procedures if concerns arise.

# Virginity testing and hymenoplasty

Under the Health and Care Act 2022, it is illegal to carry out, offer or aid and abet virginity testing or hymenoplasty in any part of the UK. It is also illegal for UK nationals and residents to do these things outside the UK.

**Virginity testing** - Also known as hymen, '2-finger' or vaginal examination, this is defined as any examination (with or without contact) of the female genitalia intended to establish if vaginal intercourse has taken place. This is irrespective of whether consent has been given. Vaginal examination has no established scientific merit or clinical indication.

**Hymenoplasty** - A procedure which can involve a number of different techniques, but typically involving stitching or surgery, undertaken to reconstruct a hymen with the intent that the person bleeds the next time they have vaginal intercourse. Hymenoplasty is different to procedures that may be performed for clinical reasons, e.g. surgery to address discomfort or menstrual complications.

Virginity testing and hymenoplasty are forms of violence against women and girls and are part of the cycle of HBA, and can be precursors to child or forced marriage and other forms of family and/or community coercive behaviours, including physical and emotional control. Victims are pressurised into undergoing these procedures, often by family members or their intended husbands' family to fulfil the requirement that a woman remains 'pure' before marriage. Those who 'fail' to meet this requirement are likely to suffer further abuse, including emotional and physical abuse, disownment and even honour killings. The procedures are degrading and intrusive, and can result in extreme psychological trauma, provoking conditions such as anxiety, depression and PTSD, as well as physical harm and medical complications.

Victims face barriers in coming forward, e.g. they may not know that the abuse was abnormal or wrong at the time, and may feel shameful, having been taught that speaking out against family and/or the community is wrong, or being scared about the repercussions of speaking out. The school will educate

pupils about the harms of these practices and dispel myths, e.g. the belief that virginity determines the worth of a woman, and establish an environment where pupils feel safe enough to make a disclosure.

Pupils aged 13 and older are considered to be most at risk, but it can affect those as young as 8, and anyone with female genitalia can be a victim regardless of age, gender identity, ethnicity, sexuality, religion, disability or socioeconomic status. All staff will be aware of the following indicators that a pupil is at risk of or has been subjected to a virginity test and/or hymenoplasty:

- A pupil is known to have requested either procedure or asks for help
- Family members disclose that the pupil has already undergone the practices
- Pain and discomfort after the procedures, e.g. difficulty in walking or sitting for a long period of time which was not a problem previously
- Concern from family members that the pupil is in a relationship, or plans for them to be married
- A close relative has been threatened with either procedure or has already been subjected to one
- A pupil has already experienced or is at risk of other forms of HBA
- A pupil is already known to social services in relation to other safeguarding issues
- A pupil discloses other concerns that could be an indication of abuse, e.g they may state that they do not feel safe at home or that family members are controlling
- A pupil displays signs of trauma and an increase in emotional and psychological needs, e.g. withdrawal, anxiety, depression, or significant change in behaviour
- A pupil appears fearful of their family or a particular family member
- Unexplained absence from school, potentially to go abroad
- Changes in behaviour, e.g. a deterioration in schoolwork, attendance, or attainment

The above list is not exhaustive, but if any of these indicators are identified, staff members will immediately raise concerns with the DSL. An assessment of the risk they face will be undertaken. If there is believed to be immediate danger, the police will be contacted without delay.

The school will not involve families and community members in cases involving virginity testing and hymenoplasty, including trying to mediate with family or using a community member as an interpreter, as this may increase the risk of harm to the pupil, including expediting arrangements for the procedure.

#### **Forced marriage**

Forced marriage is a crime. It is a form of abuse directed towards a child or vulnerable adult, including adults who are forced into marriage against their free will.

Forced marriage is a marriage where one or both spouses do not consent to the marriage but are coerced into it. Force can be physical, psychological, financial, sexual and emotional pressure. Forced marriage can be committed if a person lacks capacity, whether or not coercion plays a part.

Under the Anti-social Behaviour, Crime and Policing Act 2014 a person commits an offence if he or she uses violence, threats or any other form of coercion for the purpose of causing another person to

enter into a marriage and believes, or ought reasonably to believe, that the conduct may cause the other person to enter into the marriage without free and full consent.

It is an offence to do anything intended to cause a child to marry before the child's eighteenth birthday, whether or not the conduct amounts to violence, threats, or any other form of coercion or deception. This applies to non-binding, unofficial 'marriages' as well as legal marriages.

All staff will be alert to the indicators that a pupil is at risk of, or has undergone, forced marriage, including, but not limited to, the pupil:

- Being absent from school particularly where this is persistent or being withdrawn by parents
- Requesting for extended leave of absence and failure to return from visits to country of origin.
- Being fearful about forthcoming school holidays.
- Being subjected to surveillance by siblings or cousins at school.
- Demonstrating a decline in behaviour, engagement, educational performance or motivation.
- Not being allowed to attend extracurricular activities.
- Suddenly announcing that they are engaged to a stranger, e.g. to friends or on social media.
- Having a family history of forced marriage, e.g. their older siblings have been forced to marry.
- Being prevented from going on to further or higher education.
- Showing signs of mental health disorders and behaviours, e.g. depression, self-harm, anorexia.

Staff who have any concerns regarding a pupil who may have undergone, is currently undergoing, or is at risk of forced marriage will speak to the DSL or Head Master and safeguarding procedures will be followed – this could include referral to CSCS, the police or the Forced Marriage Unit. The DSL or Head will ensure the pupil is spoken to privately about these concerns and further action taken as appropriate. Pupils will always be listened to and have their comments taken seriously.

It will be made clear to staff members that they should not approach the pupil's family or those with influence in the community, without the express consent of the pupil, as this will alert them to the concerns and may place the pupil in further danger.

Advice will be sought from the Forced Marriage Unit following any suspicion of forced marriage among pupils.

If a pupil is being forced to marry, or is fearful of being forced to, the school will be especially vigilant for signs of mental health disorders and self-harm. The pupil will be supported by the DSL and senior mental health lead and referrals will be made on a case-by-case basis.

Staff members will make themselves aware of how they can support victims of forced marriage in order to respond to the victims needs at an early stage, and be aware of the practical help they can offer, e.g. referral to social services and local and national support groups.

Local child safeguarding procedures will be activated following concerns regarding forced marriage – the school will use existing national and local protocols for multi-agency liaison with police and children's social care.

The school will support any victims to seek help by:

- Making them aware of their rights and choices to seek legal advice and representation.
- Recording injuries and making referrals for medical examination where necessary.
- Providing personal safety advice.
- Developing a safety plan in case they are seen, e.g. by preparing another reason for why the victim is seeking help.

The school will establish where possible whether pupils at risk of forced marriage have a dual nationality or two passports.

The school will aim to create an open environment where pupils feel comfortable and safe to discuss the problems they are facing – this means creating an environment where forced marriage is discussed openly within the curriculum and support and counselling are provided routinely.

The school will take a whole school approach towards educating on forced marriage in the school curriculum and environment – in particular, the school's RSE curriculum will incorporate teaching about the signs of forced marriage and how to obtain help. Appropriate materials and sources of further support will be signposted to pupils. Pupils will be encouraged to access appropriate advice, information and support.

#### **Radicalisation**

For the purposes of this policy, "radicalisation" refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

For the purposes of this policy, "extremism" refers to the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, and the mutual respect and tolerance of different faiths and beliefs. Extremism also includes calling for the death of members of the armed forces.

For the purposes of this policy, "terrorism" refers to an action that endangers or causes serious violence to a person or people, serious damage to property, or seriously interferes with or disrupts an electronic system. The use or threat of these actions must be designed to influence the government or intimidate the public, and be made for the purpose of advancing a political, religious or ideological cause.

Protecting pupils from the risk of radicalisation is part of the school's wider safeguarding duties. The school will actively assess the risk of pupils being radicalised and drawn into extremism and/or terrorism. Staff will be alert to changes in pupils' behaviour which could indicate that they may need help or protection. Staff will use their professional judgement to identify pupils who may be susceptible to extremist ideologies and radicalisation and act appropriately, which may include contacting the DSL or making a Prevent referral. The school will work with local safeguarding arrangements as appropriate.

The school will ensure that they engage with parents and families, as they are in a key position to spot signs of radicalisation. In doing so, the school will assist and advise family members who raise concerns and provide information for support mechanisms. Any concerns over radicalisation will be discussed with the pupil's parents, unless the school has reason to believe that the child would be placed at risk as a result.

The DSL will undertake Prevent awareness training to be able to provide advice and support to other staff on how to protect pupils against the risk of radicalisation. The DSL will hold formal training sessions with all members of staff to ensure they are aware of the risk indicators and their duties regarding preventing radicalisation.

#### The Prevent duty

Under section 26 of the Counter-Terrorism and Security Act 2015, all schools are subject to a duty to have "due regard to the need to prevent people from being drawn into terrorism", known as "the Prevent duty". The Prevent duty will form part of the school's wider safeguarding obligations.

The school's procedures for carrying out the Prevent duty, including how it will engage and implement the Channel programme, are outline in the Prevent Duty Policy.

### Pupils with family members in prison

Pupils with a family member in prison will be offered pastoral support as necessary.

### Pupils required to give evidence in court

Pupils required to give evidence in criminal courts, either for crimes committed against them or crimes they have witnessed, will be offered appropriate pastoral support.

Pupils will be provided with the booklet 'Going to Court' from HMCTS where appropriate and allowed the opportunity to discuss questions and concerns.

Pupils will be provided with the booklet 'Going to Court and being a witness' from HMCTS where appropriate and allowed the opportunity to discuss questions and concerns.

#### Mental health

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

Staff will not attempt to make a diagnosis of mental health problems – the school will ensure this is done by a trained mental health professional. Staff will, however, be encouraged to identify pupils whose behaviour suggests they may be experiencing a mental health problem or may be at risk of developing one. Staff will also be aware of how pupils' experiences can impact on their mental health, behaviour, and education.

Staff who have a mental health concern about a pupil that is also a safeguarding concern will act in line with this policy and speak to the DSL or deputy DSLs.

The school will access a range of advice to help them identify pupils in need of additional mental health support, including working with external agencies.

In all cases of mental health difficulties, the school's Social, Emotional and Mental Health (SEMH) Policy will be consulted and adhered to at all times.

#### Serious violence

Through training, all staff will be made aware of the indicators which may signal a pupil is at risk from, or is involved with, serious violent crime. These indicators include, but are not limited to:

- Increased absence from school.
- A change in friendships.
- Relationships with older individuals or groups.
- A significant decline in academic performance.
- Signs of self-harm.
- A significant change in wellbeing.
- Signs of assault.
- Unexplained injuries.
- Unexplained gifts or new possessions.

Staff will be made aware of some of the most significant risk factors that could increase a pupil's vulnerability to becoming involved in serious violence. These risk factors include, but are not limited to:

- Being male.
- Having been frequently absent from school.
- Having been permanently excluded from school.
- Having experienced child maltreatment.
- Having been involved in offending, such as theft or robbery.

Staff members who suspect a pupil may be vulnerable to, or involved in, serious violent crime will immediately report their concerns to the DSL.

The school will be aware that the Police, Crime, Sentencing and Courts Act allows specified authorities, such as the police, to share data and information, and put plans in place to prevent and reduce serious violence within their local communities. Schools will be under a separate duty to cooperate with core duty holders when asked – the school will ensure arrangements are in place to do so.

# **Appendix B: Multi-Agency Contacts**

If a child is at immediate risk call the POLICE	POLICE 999	
To make an URGENT referral, i.e., a child is likely to suffer or is suffering significant harm, call Somerset Direct.	Somerset Direct 0300 122 2224	
To make a NON-URGENT referral, complete an Early Help Assessment and send to	SD inputters	
To raise concerns and ask for advice about radicalisation (also contact Somerset Direct).	PREVENT DUTY - 01278 647466  PreventSW@avonandsomerset.police.uk	
To liaise with the specialist Safeguarding Police unit	Lighthouse Safeguarding Unit – Avon and Somerset police 01278 649228	
DSL Consultation Line 0300 123 3078	<b>Early Help Hub</b> 01823 3555803	Critical Incident Support EPS SSE 01823 357000

# If you have concerns about a professional working with a child...

To raise concerns and ask for		
guidance in relation to the conduct	1	Local Authority Designated Officer - (LADO)
of someone who works with		, ,
children	2	Anthony Goble / Stacey Davis 0300 122 2224

# For information, advice, and guidance in relation to safeguarding policy and procedures.

Education Safeguarding Service ESS@somerset.gov.uk			
Service Manager Toby Jenkins	Team Manager East Jane Weatherill	Team Manager West Jane Weatherill	
Child sexual exploitation & child criminal exploitation	Operation Topaz (Avon and Somers https://www.avonandsomerset.po		
Child Missing from Education	Somerset County Council		
Children affected by Forced Marriage	Forced Marriage Unit T: (0) 20 7008 0151 E: fmu@fco.gov.uk		
Online Safety Advice	Professional Online Safeguarding H T: 0344 381 4772 E: helpline@saferinternet.org.uk	elpline	

Reporting online sexual abuse and	Child Exploitation and Online Protection command	
grooming	https://www.ceop.police.uk/ceop-reporting/	
	NSPCC FGM Helpline	
FGM advice	T: 0800 028 3550	
	E: fgmhelp@nspcc.org.uk	
Domestic Abuse Helpline	0800 6949999	
Young Carers – advice and support.	0300 123 2224 YoungCarersmailbox@somerset.gov.uk	
Milesofishing the conference of the Pro-	NSPCC Whistleblowing hotline	
Whistleblowing professional policy	T: 0800 028 0285	
	E: help@nspcc.org.uk	
Primary Mental Health Specialists (advice) Child and Adolescent Mental Health Cyp@somerset.org		
	DSL consultation line 0300 123 3078	
Advice around harmful sexualised	sexualised Brook Traffic Light Tool	
behaviour.	https://legacy.brook.org.uk/brook_tools/traffic/index.html?syn_part	
	<u>ner=</u>	

# Appendix C: How a pupil can confidently report abuse, sexual violence and sexual harassment

YOUNG PERSON HAS A SAFEGUARDING CONCERN Report the concern:
Pupils have access to
internal
communication and
external
communication

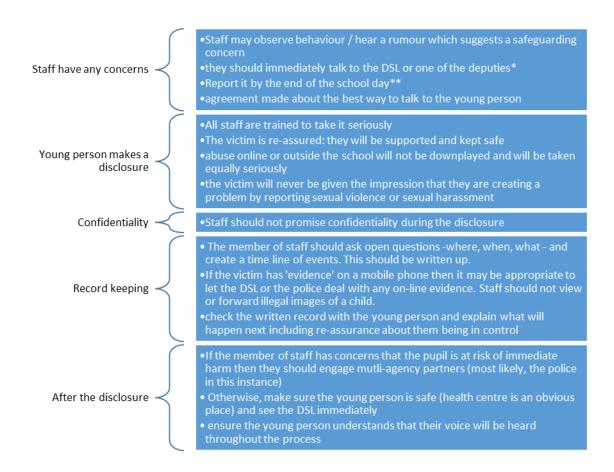
Young people will have control over how the safeguarding report will be managed (whilst being aware of the rules around confidentiality)

Internally: every child has a tutor who the see regularly + there are many others who are available

Young person makes a disclosure to anyone they feel comfortable talking to including older pupils pupils can report their concerns face to face or via email, TEAMS or they can contact support externally

Every pupil has regular Chapel, timetabled PSHEE lessons and assemblies. They know they will be taken seriously

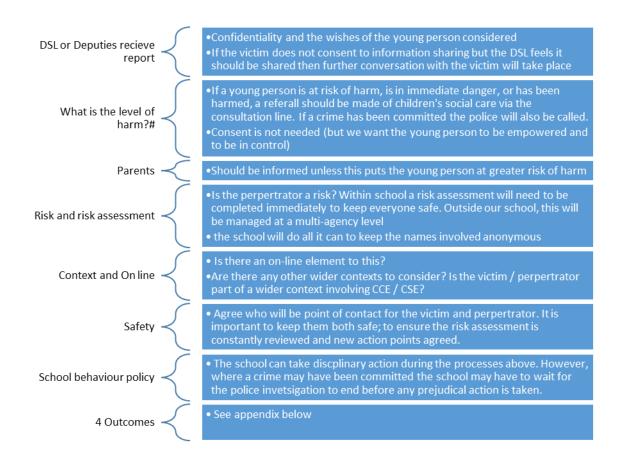
# Appendix D: How staff deal with a disclosure around sexual violence or sexual harassment



\*if it is more than a low level concern then it should be reported immediately, face to face (or via a phone call) to either the DSL, DDSLs, Head, Head's PA or Office Staff, or Child Protection Leads in the school.

\*\*if it is a low level concern about a child or young person (see specific guidance in the safeguarding policy) then they should report it to the Tutor and Housemaster / Housemistress NO LATER than the end of the day via email or TEAMS.

# Appendix E: How the DSL or Deputies will deal with a disclosure around sexual violence and sexual harassment



All staff are expected to formally report all concerns. These concerns will be kept on a database (CPOMS) which is separate from their school record. Only those who need to know have access to CPOMS including the DSL and Deputies.

The DSL therefore has the whole picture and will work collaboratively within the school, via the safeguarding safety hub which meets weekly, and externally with agency partners to agree the best steps forward.

The DSL will consider the following:

- 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 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 Harmful Sexual Behaviour 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 an alleged perpetrator significantly older, more mature or more confident? Does the victim have a disability or learning difficulty or health concerns
- 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 peers
- Are there ongoing risks to the victim, other children, adult students or school or college staff
- Other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation

### Appendix F: Risk assessment

The risk assessment will need to include information around the following.

Taunton School, through the safeguarding management team (who are all trained to use the tool) will use the Brook Tool to help inform the assessment of risk <u>Sexual Behaviours Traffic Light Tool –</u>
Brook

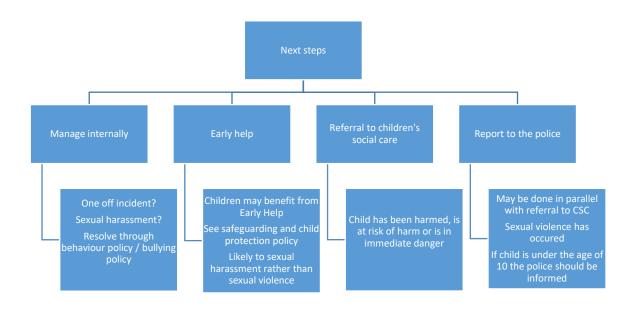
If the report around sexual violence or sexual harassment includes an online element then the school will refer to <u>Searching</u>, <u>screening and confiscation at school - GOV.UK (www.gov.uk)</u> and <u>Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK (www.gov.uk)</u>

- 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 an alleged perpetrator significantly older, more mature or more confident? 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 peers
- are there ongoing risks to the victim, other children, adult students or school or college staff?
- other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

Risk	Detail	Control measures
Victim loses	Vital that the wishes and	They can be involved in the creation of the risk
control	voice of the victim are	assessment. The issue of control v confidentiality and the
	heard	need to safeguarding the wider community to be
		discussed.
Has a crime	The questions above will	This will inform which external agencies will be involved
been	help to assess whether a	eg a one off incident involving sexual harassment is
committed?	crime has been committed	unlikely to lead to external agency involvement
Are there	Is the victim vulnerable in	Harmful sexual behaviours need to be assessed within a
wider issues to	other ways? Have they	broader context.
consider?	been subjected to other	The Lucy Faithful Foundation provide specialist support to
	abuse? Is the perpetrator	help assess HSB
	vulnerable? Why have they	https://www.lucyfaithfull.org.uk/
	behaved in this way?	
Online	Has the victim suffered any	The school has filters which monitor wi-fi use in school
element?	online abuse?	and the use of the internet via devices which are linked to
		the school network.
		Are the filters adequate?
		The school has strict rules around when devices and
		which devices can be used in school.
		Are these rules sufficient?
Victim sees	Are they in the same year?	Move the perpetrator out of their house and re-locate
perpetrator in	Are they in the same house	them in a different pastoral structure.
school	/ houses located near to	Check their timetables and move the perpetrator into
	one another?	different classes. Reduce the risk of face to face contact
	In the same classes?	by agreeing movement on site, supervision at break
		times, lunch times etc.
Victim has	Perpetrator contacts victim	Regular one-to-one conversations about online life.
communication	on-line.	Agreement about boundaries and consequences.
with the	Victim contacts perpetrator	Potential 'ban' on certain technology (no phone in
perpetrator	on-line.	school?). Support from parents?
Victim and	These cases can take a long	Each pupil should have agreed support which could be
perpetrator	time to resolve.	specialist in nature such as mental health nurse
suffered		intervention.

decline in		
welfare		
Anonymity	Rumours which can spread	Talk to social services for advice from specialists
	off-line and online.	Refer
	Impact on social media and	to:https://www.childnet.com/resources/cyberbullying-
	on the fairness of the	guidance-for-schools
	investigation.	Talk through the risk assessment with victim and
		perpetrator (if appropriate, parents) to get 'buy in'.
		Make sure that only 'need to know' staff are informed
Effect on any	Risk that anonymity is	Regular liaison with the appropriate external authorities
criminal	affected by School actions	to agree what the school can and cannot do
investigation	such as disciplinary	
	procedures which prejudice	
	any criminal investigation.	
Risks to wider	Is the behaviour of the	Contact children social services and agree the best way to
school	perpetrator a risk to other	support all children. Check their wider school behaviour
community	children, staff?	record and cross reference any previous school records.
and		Refer the issue to the wider SMT body for their input into
community		the risk assessment. Involvement of parents unless there
outside school		is a risk that their involvement increases the risk to any
		children.
Review	Danger that the risk	Agreed review points on the risk assessment. These will
	assessment is not a living	be agreed in a collegial manner with the input from the
	document.	bodies outlined the report above.
Parents	If parents are to be	Signpost external organisations that may help with
	informed, then it will be	understanding and supporting to parents.
	very stressful for them.	
	This will work best with	
	their support and buy in to	
	the risk assessment.	

# Appendix G: Next steps for determining action to be taken following a report of harmful sexual behaviour



# **Appendix H: Supporting the victim**

