

Child Protection & Safeguarding Policy

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I. Policy Statement

This Policy applies to Luckley House School, including Day and Boarding communities. This Policy is reviewed and updated annually (as a minimum) and is available on the School website or staff share drive under LHS Policies.

This Policy has regard to the following guidance and advice:

- Keeping Children Safe In Education (September 2023) (KCSIE)
- KCSIE incorporates the additional statutory Disqualification under the Childcare Act 2006 (September 2018)
- What to do if you are worried a child is being abused: advice for practitioners (March 2015)
- Sexual Violence and Sexual Harassment between Children in Schools and Colleges advice (September 2021) (SVSH)
- Working Together to Safeguard Children (dated 2018 but updated 2020)(WT)
- Information sharing advice for practitioners providing safeguarding services to children, young people, parents and carers (July 2018)
- Prevent Duty Guidance for England and Wales (April 2021) (“Prevent”). Prevent is supplemented by non-statutory advice and a briefing note
- The Prevent Duty: Departmental Advice for Schools and Childminders (June 2015)
- The use of social media for online radicalisation (July 2015)
- Relationships and sex education (RSE) and Health Education (July 2020)
- The Charity Commission guidance: Safeguarding and protecting people for charities and trustees (June 2022)
- Relationships education, relationships, and sex education (RSE) and health education (September 2023).
- Children Missing Education (September 2016)
- Multi Agency Guidance on FGM (July 2020)
- Behaviour in schools (September 2022)
- Working together to improve school attendance (May 2022)
- Keeping children safe in out of school settings (April 2022)
- Digital and technology standards in schools and colleges (March 2023)
- The Charity Commission guidance *Safeguarding and protecting people for charities and trustees* (June 2022)

This Policy also takes into account the procedures and practice of Wokingham Borough Council as part of the inter-agency safeguarding procedures as set up by Berkshire West Safeguarding Children’s Partnership.

Safeguarding and promoting the welfare of children is defined as:

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

Child Protection is part of safeguarding and refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, harm.

Throughout this policy the term Safeguarding will be used to mean both Child Protection and Safeguarding.

2. Concerns about a Pupil

The School has a duty to consider the best interests of the pupil and take action to enable all pupils to achieve the best outcomes. Safeguarding and promoting the welfare of pupils is everyone’s

responsibility. The School adopts a whole-school approach to safeguarding, ensuring it is at the forefront and underpins all relevant aspects of process and policy development.

Parents are encouraged to raise any concerns directly with the School, making reference where appropriate to the Safeguarding Policy, about the safety and/or welfare of their children. Parents may contact the Independent Schools Inspectorate (ISI) directly if they wish.

The School has arrangements for listening to pupils and providing early help. Details of these arrangements are displayed in all classrooms. Pupils can also use Pupil Voice to report a concern.

The relevant response form can be found on the following link: [Pupil Voice](#)

Definitions of safeguarding and types and signs of abuse

Safeguarding and promoting the welfare of children is defined as protecting children from maltreatment, preventing impairment of children's health or development, ensuring that children grow up in circumstances consistent with the provision of safe and effective care, and taking action to enable all children to have the best outcomes.

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family, or in an institutional or community setting, by those known to them or, more rarely, by others (e.g. via the Internet). They may be abused by an adult or by another child. Abuse can take place wholly online, or technology may be used to facilitate offline abuse.

Abuse can be:

- physical abuse
- emotional abuse
- sexual abuse
- neglect.

All staff should be aware that abuse, neglect, and safeguarding issues are rarely stand-alone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap with one another. Staff should always be vigilant and always raise concerns with the DSL or DDSL.

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside of school and/or can occur between children outside of these environments. All staff, but especially the DSL and DDSL, should consider where pupils are at any risk of abuse or exploitation in situations outside their families. Extrafamilial harms take a variety of different forms and children can be vulnerable to multiple harms included and not limited to sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation.

All staff should be aware that technology is a significant component in many safeguarding and well-being issues and should recognise that pupils are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently online and offline. Staff should be aware that pupils can also abuse their peers online, which can take the form of abusive, harassing or misogynistic messages, the non-consensual sharing of indecent images especially around group chats, and the sharing of abusive images and pornography with those who do not want to receive such content.

In all cases, if staff are unsure, they should speak to the DSL or DDSL.

Physical abuse

Physical abuse is a form of abuse that may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a pupil. Physical harm may also

be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional abuse

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

Sexual abuse

Sexual abuse involves forcing or enticing a pupil to take part in sexual activities, not necessarily involving a high level of violence, whether or not the pupil is aware of what is happening. The activities may involve physical contact, including assault by penetration, for example rape or oral sex, or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. It may also include non-contact activities such as involving pupils in looking at, or in the production of, sexual images, watching sexual activities, encouraging pupils to behave in sexually inappropriate ways, or grooming a pupil in preparation for abuse, including *via* the Internet. Sexual abuse may be perpetrated by adult females as well as males, and by other pupils.

Sexual abuse also includes sexual violence and sexual harassment, which can occur between two pupils of either sex. It can also occur through a group of pupils sexually assaulting or sexually harassing a single pupil or group of pupils. Sexual violence comprises sexual offences under the Sexual Offences Act 2003 such as rape, sexual assault, and assault by penetration. Schools should be aware that sexual assault covers a very wide range of behaviour. A single act of kissing someone without consent, or touching someone's bottom/breasts/genitalia without consent, still constitutes sexual assault.

Sexual harassment

Sexual harassment is unwanted conduct of a sexual nature. It is likely to violate a pupil's dignity and/or make them feel intimidated, degraded or humiliated, and/or create a hostile, offensive or sexualised environment. It can include sexual comments such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names, sexual jokes or taunting, physical behaviour such as deliberately brushing against someone, interfering with someone's clothes, and displaying pictures, photos or drawings of a sexual nature. Online sexual harassment might include non-consensual sharing of sexual images and videos, often referred to as sexting, inappropriate sexual comments on social media, exploitation, coercion and threats. It may be stand-alone, or part of a wider pattern of sexual harassment and/or sexual violence.

Sexual violence

Sexual violence refers to sexual offences under the Sexual Offences Act 2003, including rape, assault by penetration, sexual assault, and/or causing someone to engage in sexual activity without consent. Consent to sexual activity may be given to one sort of sexual activity, but not another, or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time

during sexual activity and each time activity occurs. A child under the age of 13 can never consent to any sexual activity. The age of consent is 16, and sexual intercourse without consent is rape.

Child-on-child sexual violence and/or harassment

Child-on-child sexual violence and/or harassment (as defined above) can occur between two children of any age and sex, from primary through to secondary stage and into colleges. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. It is more likely that girls will be victims of sexual violence and harassment, and it is more likely that it will be perpetrated by boys. It can occur between pupils of either sex. 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. Children who are victims of sexual violence and/or sexual harassment will be likely to find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college. Further information can be found in the *SVSH* advice.

Harmful sexual behaviour

Harmful sexual behaviour is problematic, abusive and violent sexual behaviour which is developmentally inappropriate and may cause developmental damage. A useful umbrella term is “harmful sexual behaviour”. Harmful sexual behaviour can occur online and/or face-to-face and can also occur simultaneously between the two. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years’ age difference, or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature.

Sharing of nudes and/or semi nudes

This includes the sending or posting of nude or semi-nude images, videos, or live stream online by young people under the age of 18. This could be *via* social media, gaming platforms, chat apps, or forums. It could also involve sharing between devices *via* services like Apple’s AirDrop, which works offline. The sharing of nudes and semi-nudes can happen publicly online, in 1:1 messaging *via* group chats and closed social media accounts, and may include images or footage of more than one pupil.

Alternative terms may include ‘dick pics’ or ‘pics’ or may be referred to by adults or professionals as ‘youth produced/involved sexual imagery’, ‘indecent imagery’, ‘image based sexual abuse’ or ‘sexting’.

The motivations for taking and sharing nudes and semi-nude images, videos and live streams are not always sexual or criminal. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may also occur when:

- children find nudes and semi-nudes online and share them claiming to be from a peer
- children digitally manipulate an image of a young person into an existing nude online
- images created or shared are used to abuse peers e.g. by selling images online or obtaining images to share more widely without consent with the intent to publicly shame.

For this reason, incidents can either be classified as ‘aggravated’ or ‘experimental’. The DDCMS/UKIS guidance ‘sharing nudes and semi-nudes: advice for education settings working with children and young people’, sets out the classification of incidents, and how each should be handled.

Upskirting

Upskirting is a criminal offence and typically involves taking a picture under a person's clothing without their permission and/or knowledge to obtain sexual gratification, or to cause the victim humiliation, distress or alarm. A pupil of either sex can be a victim.

Neglect

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

Serious violence

Indicators that pupils are at risk from, or are involved in, serious violent crime include: increased absence from school, a change in friendships, relationships with older individuals or groups, a significant decline in performance, self-harm, a significant change in well-being, signs of assault, or unexplained injuries. Unexplained gifts or new possessions could also indicate that pupils have been approached by, or are involved with, individuals associated with criminal networks or gangs. All staff should be aware of the risks and understand the measures in place to manage them.

3. Procedures for Dealing with Concerns about a Child

If staff suspect or hear an allegation or complaint of abuse or neglect from a pupil or any third party, they must act immediately and follow the relevant procedure below. Staff should not assume that somebody else will take action and share information that might be critical in keeping pupils safe.

The guidance, 'Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers', supports staff who have to make decisions about sharing information. The Board of Governors recognises the importance of information sharing between practitioners and local agencies, including ensuring arrangements for sharing information within the School and with local authority children's social care, the safeguarding partners and other organisations, agencies, and practitioners as required. Fears regarding sharing information under the Data Protection Act 2018 and the GDPR should not be allowed to stand in the way of promoting the welfare and protecting the safety of pupils. If in doubt about what information can and should be shared, staff should speak to the DSL.

The Board of Governors will ensure that staff understand the relevant data protection principles which allow them to share (and withhold) personal information, including:

- being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information, which is sensitive and personal and should be treated as 'special category personal data'
- understanding that the 'safeguarding of children and individuals at risk' is a processing condition that allows the sharing of special category personal data, including without consent where there is good reason to do so. For example, information may be shared without consent where: it is not possible to gain consent; it cannot be reasonably expected to gain consent; and, gaining consent would place a child at risk
- not providing pupils' personal data where the serious harm test is met.

All staff should:

- listen carefully
- avoid asking leading questions

- reassure the pupil that the allegation/complaint will be taken seriously and that they will be supported and kept safe
- ensure that the pupil is not made to feel ashamed for making the report or given the impression that they are creating a problem by making the report
- not guarantee absolute confidentiality and explain that the information needs to be passed to the appropriate person who will ensure that the correct action is taken
- be aware that the individual 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. Staff should exercise professional curiosity and speak to the DSL if they have concerns
- determine how best to build trusted relationships with children and young people which facilitate communication.

All concerns, discussions and decisions, together with reasons, made under these procedures should be recorded *via* the My Concern platform. If My Concern cannot be accessed, then a written record should be made including the date, time and place of the conversation and details of what was said and done by whom and in whose presence, and signed by the person making it. Where the allegation relates to harmful sexual behaviours, the disclosure should be managed, if possible, with two members of staff present, preferably one of them being the DSL or DDSL. The information should be kept confidential and stored securely, ensuring that the file is only accessible to those who need to see it, and is shared in accordance with the guidance set out in Parts one and two of KCSIE.

Where there is a safeguarding concern, the School will ensure the pupil's wishes and feelings are taken into account when determining what action to take and what services to provide. This is particularly important in the context of harmful behaviours such as sexual harassment and sexual violence. The School manages this by ensuring that all pupils have a 'go to person' of their own choice.

Contextual safeguarding

Safeguarding incidents and/or behaviours can be associated with factors outside the School and can occur between pupils outside School. All staff, but especially the DSL and DDSL, should consider the context in which safeguarding incidents and behaviours occur and how they can be associated with factors outside the School. The School will, as part of the wider assessment of pupils' welfare, consider whether environmental factors are present in a pupil's life that are a threat to their safety and/or welfare. The School will share as much information with Children's Social Care as possible, as part of the referral process to enable consideration of all the available evidence and the full context of any abuse.

Early help

Any pupil may benefit from early help, but all staff should be particularly alert to the potential need for early help for a pupil who is/has:

- disabled, or has certain health conditions and specific additional needs
- special educational needs whether or not they have a statutory EHCP
- has a mental health need
- a young carer
- showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- frequently missing/gone missing from care or from home
- misusing drugs or alcohol themselves
- at risk of modern slavery, trafficking or exploitation
- in a family circumstance presenting challenges for the pupil, such as substance abuse, adult mental health problems, or domestic abuse
- returned home to their family from care

- showing early signs of abuse and/or neglect
- has a family member in prison, or is affected by parental offending
- is experiencing, or is at risk of experiencing family ostracism
- is at risk of 'honour'-based abuse such as female genital mutilation or forced marriage
- at risk of being radicalised or exploited
- a privately fostered pupil
- is persistently absent from education, including persistent absences for part of the school day.

Early help means providing support as soon as a problem emerges at any point in a pupil's life from the foundation years through to the teenage years.

In the first instance, staff who consider that a pupil may benefit from early help should discuss this with the DSL who will consider the appropriate action to take in accordance with the Berkshire West Safeguarding Children's Partnership referral threshold document. The DSL will support staff in liaising with external agencies and professionals in an inter-agency assessment as appropriate. If early help is appropriate, the matter will be kept under review and consideration given to a referral to Children's Social Care if the pupil's situation does not appear to be improving.

What staff should do if they have concerns about a pupil

If staff, including governors, agency staff and volunteers, have any concerns about a pupil, as opposed to a pupil being in immediate danger, they should, where possible, speak with the DSL to agree a course of action, although staff can make a direct referral to Children's Social Care. Staff should not assume that somebody else will take action and share information that might be critical in keeping pupils safe. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. If a pupil's situation does not appear to be improving, the DSL should press Children's Social Care for reconsideration. Staff should challenge any inaction and follow this up with the DSL and Children's Social Care as appropriate. All concerns, discussions, and decisions made and the reasons for those decisions should be recorded in writing.

What staff should do if a pupil is in danger or at risk of harm

If staff, including governors, agency staff and volunteers, believe that a pupil is in immediate danger or at risk of harm, they should make an immediate referral to Children's Social Care and/or the Police. Anyone can make a referral. Any such referral must be made immediately and in any event within 24 hours (one working day) of staff being aware of the risk. Parental consent is not needed for referrals to statutory agencies such as the Police and Children's Social Care. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. The local authority social worker should acknowledge receipt to the referrer within 24 hours and make a decision about the next steps and type of response required. Staff should challenge any inaction and follow this up with the DSL and Children's Social Care as appropriate. All concerns, discussions, and decisions made and the reasons for them should be recorded in writing.

The School's Safeguarding Children Board is Berkshire West Safeguarding Children Partnership.

A full copy of their local procedures can be found at:

<https://www.berkshirewestsafeguardingchildrenpartnership.org.uk/scp/wokingham/concerned-about-a-child-in-wokingham>

Where pupils are engaged in one-to-one teaching, the Staff Behaviour Policy has advice for staff such as peripatetic music teachers and sports staff with regard to one-to-one contact and appropriate touch for the purposes of effective instruction. All classrooms have vision panels and teaching timetables are publicised via SIMS.

What staff should do if a pupil is seen as at risk of radicalisation

Staff should follow the School's normal referral processes when there are concerns about pupils who may be at risk of being drawn into terrorism. This may include a prevent referral or referral to Children's Social Care depending on the level of risk. However, if staff have concerns that there is an immediate/significant risk of a pupil being drawn into terrorism, they must call 999. Advice and support can also be sought from Children's Social Care.

The School, in recognition that pupils may be at risk of being drawn into terrorism or other forms of extremism, carries out appropriate risk assessments following consultation with local partners, such as the Police, of the potential risk in the local area. Such risk assessments are discussed with the Head, DSL, and DDSL and the governor responsible for safeguarding to ensure the School's safeguarding arrangements are sufficiently robust to help prevent and protect pupils from being drawn into terrorism and are regularly reviewed.

What staff should do if they discover an act of female genital mutilation (FGM)

Staff must report to the Police cases where they discover that an act of FGM appears to have been carried out. Unless the member of staff has a good reason not to, they should still consider and discuss any such case with the DSL and involve Children's Social Care as appropriate. Staff are referred to Appendix I of this policy for the procedure to be followed where they suspect that a pupil may be at risk of FGM.

What staff should do if they are concerned that pupils are at risk from or involved in serious violent crime

All staff should be aware of indicators that may signal that pupils are at risk from or are involved in serious violent crime. These may include increased absence from School, a change in friendships or relationships with older individuals or groups, a significant decline in performance, self-harm or a significant change in well-being, signs of assault or unexplained injuries.

If staff have any concerns about a pupil, as opposed to a pupil being in immediate danger, they should, where possible, speak with the DSL to agree a course of action, although staff can make a direct referral to Children's Social Care.

How staff should respond to an incident of nudes and semi-nudes being shared by pupils

All members of staff in an education setting have a duty to recognise and refer any incident involving nudes and semi-nudes and will be equipped with the necessary safeguarding training and support to enable them to recognise concerns.

For this purpose, 'sharing nudes or semi-nudes' means the sending or posting of nude or semi-nude images, videos, or live streams by children under the age of 18, online. This could be via social media (including Snapchat), gaming platforms, chat apps (including WhatsApp and iMessage) or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. The sharing of nudes and semi-nudes may happen publicly online, in 1:1 messaging or via group chats and/or via closed social media accounts. The images, videos or live streams may include more than one pupil.

Any direct disclosure by a pupil will be taken seriously and staff will ensure the pupil is feeling comfortable, and will only ask appropriate and sensitive questions, in order to minimise further distress or trauma. If staff are notified or become aware of an incident of nudes or semi-nudes being shared by a pupil or of a pupil, they should refer the incident to the DSL as soon as possible.

The DSL will follow the DDMSC/UKIS guidance 'Sharing nudes and semi-nudes: advice for education settings working with children and young people' (December 2020) when responding to a report.

This will include:

- holding an initial meeting with appropriate staff who may include the staff member(s) who heard the disclosure and the safeguarding or leadership team who deal with safeguarding concerns
- carrying out interviews with the pupil(s) involved as appropriate
- informing parents and carers at an early stage and keep them involved in the process in order to best support the pupil, unless there is good reason to believe that involving them would put the pupil at risk of harm. Any decision not to inform them should be made in conjunction with other services, such as Children's Social Care and/or the Police, who would take the lead in deciding when they should be informed
- carrying out a risk assessment to determine whether there is a concern that a pupil has been harmed or is at risk of immediate harm at any point in the process.

If not, the incident can be handled in accordance with the "sharing nudes" guidance and the school's Child Protection and Behaviour policies.

If it is determined that there is a risk of harm, the DSL must make a referral to Children's Social Care and/or the Police immediately.

All incidents relating to nudes and semi-nudes being shared need to be recorded whether or not they have been referred externally. Schools must record the reasons for not reporting incidents externally and ensure it is signed off by the Head. Records will be kept in line with statutory requirements set out in KCSIE and local safeguarding procedures. No copies of imagery will be taken or retained.

This guidance does not apply to the sharing of messages of pupils under 18 by an adult over 18 as this constitutes child sexual abuse. In the event that staff become aware of such an incident, they should notify the DSL immediately, who should always inform the Police as a matter of urgency.

What staff should do if a pupil goes missing from education

Pupils going missing from education, particularly on repeat occasions, is a potential indicator of a range of safeguarding issues including abuse, neglect, sexual abuse, and child sexual and/or criminal exploitation, particularly county lines. It is therefore important that the school's response to such absence supports identifying such abuse and helps prevent the risk of the pupils concerned going missing in the future.

The School's procedures for unauthorised absence and for dealing with pupils who go missing from education are managed in accordance with the Missing Pupil Policy & Procedures to be used for searching for and, if necessary, reporting any pupil missing from education. Further details can also be found at Appendix I of this policy.

Where possible, the School will hold more than one emergency contact number for each pupil to provide additional options to make contact with a responsible adult, particularly when a pupil missing from education is also identified as a welfare and/or safeguarding concern.

The School will report to Wokingham Borough Council when a pupil fails to attend School regularly or has been absent without permission for a continuous period of 10 days or more.

When working with local authority children's services where school absence indicates safeguarding concerns the School will have regard to the non-statutory DfE guidance '*Working together to improve school attendance*'.

What staff should do if a child needs a social worker (Children in Need and Child Protection Plans)

Pupils may need a social worker due to safeguarding or welfare needs. Pupils may need this help due to abuse, neglect or complex family circumstances. A pupils' experiences of adversity and trauma can leave them vulnerable to further harm. If a pupil has a social worker, the DSL should hold and use

this information so that decisions can be made in the best interests of the pupil's safety, welfare and educational outcomes. This should be considered as a matter of routine.

Where pupils need a social worker, this should inform decisions about safeguarding (for example responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example considering the provision of pastoral and/or academic support alongside action by statutory services).

What staff should do if a child requires mental health support

The School has an important role to play in supporting the mental health and well-being of its pupils. 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. The School aims to prevent health problems by promoting resilience as part of a whole-school approach to promoting the social and emotional well-being of pupils. Refer to the School's Mental Health Policy.

Staff can access a range of advice to help them identify pupils in need of extra mental health support including working with external agencies. More information can be found in the DfE Mental Health and Behaviour in Schools guidance. Public Health England has produced a range of resources to support staff to promote positive health, well-being and resilience among young people.

What staff should do if they have safeguarding concerns about another staff member

If staff have concerns about another staff member (including supply staff, agency staff, volunteers and contractors), they should be referred to the Head. Where there are concerns about the Head, they should be referred to the Chair of Governors.

In the event of allegations of abuse being made against the Head, staff are referred to the procedures below regarding managing allegations of abuse against staff, including volunteers, and refer the matter directly to the designated officer(s) at the Wokingham Borough Council.

What staff should do if they have concerns about safeguarding practices in the School

The School aims to ensure there is a culture of safety about raising concerns and an attitude of 'it could happen here'. Where staff have concerns about poor or unsafe practices and potential failures in the School's safeguarding systems, they should be raised in accordance with the whistleblowing procedures, which can be found in the Staff Handbook. There will be no disciplinary action taken against a member of staff for making such a report provided that it is done in good faith.

If staff and volunteers feel unable to raise an issue with the School or feel that their genuine concerns are not being addressed, they may use other whistleblowing channels such as the NSPCC whistleblowing advice line. Contact details for the NSPCC helpline can be found on the External Contacts page at Appendix 4.

4. Arrangements for Dealing with Child-On-Child Allegations

Child-on-child abuse is abuse by one or more pupils against another pupil. It can be standalone or as part of wider abuse and can happen both inside and outside of school and online. It can manifest itself in many ways and can include abuse within intimate partner relationships, bullying, including cyber bullying (including prejudice-based and discriminatory bullying), abuse with an intimate partner, relationships between peers, physical abuse (such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm), initiation/hazing violence and rituals, upskirting, sexting, consensual and non-consensual sharing of nudes and/or semi-nudes, sexual assault, gender-based issues. Sexual behaviours include pupil on pupil sexual violence and sexual harassment, causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

It is incumbent on all staff to report any concerns of child-on-child abuse, whether they have happened in school or outside of it or online. Abuse that occurs online or outside of school should not be downplayed and should be treated equally seriously.

Staff will address inappropriate behaviour (even if it appears to be relatively innocuous) to help prevent problematic, abusive or violent behaviour in the future. Abusive comments and interactions should never be passed off or dismissed as ‘banter’ or ‘part of growing up’. Nor will harmful sexual behaviours, including sexual comments, remarks or jokes, and online sexual harassment, be dismissed as just ‘having a laugh’ or ‘boys/girls being boys/girls’. Staff will also challenge physical behaviours (that are potentially criminal in nature), such as grabbing bottoms, breasts and genitals, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

The School acknowledges that even if there have been no reported cases of child-on-child abuse in relation to pupils within the school, such abuse may still be taking place and simply not being reported. The School will ensure that pupils are aware of how they can report abuse, and that they are aware of the procedures that the School will follow once a report has been made. These procedures will be well promoted and in a format that is easily accessible and easily understood by pupils.

The School recognises that a pupil is likely to disclose an allegation to someone they trust, which could be any member of staff. By making such a disclosure the pupil is likely to feel that the member of staff is in a position of trust. The School also recognises that pupils may not find it easy to tell staff about their abuse verbally and that instead they may show signs or act in ways that they hope adults will notice and react to. It is also recognised that an incident may come to a member of staff’s attention through a report of pupils’ friends, or by overhearing conversations. It is therefore important that all staff are clear on the School’s policy and procedures with regards to child-on-child abuse and can recognise the indicators and signs of peer-on-peer abuse and know how to identify it and how to respond to reports.

The School recognises that a first disclosure to trusted adults may only be the first incident reported. It is not necessarily representative of a single incident. Staff will take all reports of abuse seriously regardless of how long it has taken for a pupil to come forward. Staff will act immediately and will support the victim when they raise a concern.

The School recognises that pupils with Special Educational Needs & Disabilities or certain health conditions can be more prone to peer-on-peer group isolation than other pupils and will consider extra pastoral support for those pupils such as accessing the School Counsellor. The School also recognises that certain pupils may face additional barriers to reporting an incident of abuse because of their vulnerability, disability, sex, ethnicity or sexual orientation.

The School recognises that pupils can be particularly vulnerable in residential settings and are alert to the potential for child-on-child abuse. As a School with boarding pupils, staff need to be aware that pupils can be particularly vulnerable in a boarding setting and should be alert to pupil relationships and the potential for child-on-child abuse. Boarders are separated by sex in the boarding house with entry restricted to those living in the house. Entry systems are time limited. Staff are trained, aware and vigilant. The School will comply with its obligations as set out in the National Minimum Standards in relation to safeguarding.

The School takes steps to minimise the risk of child-on-child abuse through supervision, education in the form of PSHCE (life skills) and assemblies. This is in addition to the provision of Sixth Form mentoring and the knowledge that adults in the School can be approached with early concerns. Where an issue of pupil behaviour or bullying gives reasonable cause to suspect that a pupil is suffering, or is likely to suffer, significant harm, staff should follow the procedures below rather than the School’s Anti-Bullying and Behaviour Policies.

A pupil against whom an allegation of abuse has been made may be suspended during the investigation. The School will take advice from the WBC on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including both the alleged victim and the perpetrator. 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 WBC, parents are informed as soon as possible and that the pupils involved are supported during the interview by

an appropriate adult until the investigation is completed. Confidentiality will be an important consideration, and advice will be sought from the WBC or the Police as appropriate. The School will have regard to the procedures set out in KCSIE and the SVSH advice.

The victim may ask the School not to tell anyone about the sexual violence or sexual harassment. Advice should be sought from the DSL (or DDSL) who should consider the following: parents or carers should normally be informed unless doing so would put the victim at greater risk; the basic safeguarding principal that if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care; and whether a crime has been committed. Ultimately, the DSL (or DDSL) will balance the victim's wishes against their duty to protect the victim and other children.

The Police may be informed of any harmful sexual behaviours that are potentially criminal in nature such as grabbing bottoms, breasts or genitalia. Rape, assault by penetration, and sexual assaults will be reported to the Police. Where a report has been made to the Police, the School will consult the Police and agree what information can be disclosed to staff and others, in particular the alleged perpetrator(s) and their parents or carers. If the DSL decides to make a referral to Children's Social Care or a report to the Police against a pupil's wishes, the reasons should be explained to the pupil and appropriate specialist support offered. The School will consider intra familial harms and whether any support for siblings is necessary following an incident. The DSL may also decide that the pupils involved may benefit from early help, and may make the necessary referral in accordance with WBC procedures and Berkshire West Safeguarding Children Partnership advice.

The School's approach to YPSI

Youth Produced Sexual Imagery (YPSI), formally known as sexting, is the use of technology to generate images or videos made by pupils under the age of 18 of other pupils where images are of a sexual nature and are indecent. The content can vary from text messages to images of nudity or partial nudity to sexual images or video. These images are then shared between pupils or adults and with people they may not even know. Pupils are not always aware that their actions are illegal, and the increasing use of smart phones has made the practice much more commonplace.

Staff should confiscate the device and immediately set it to either flight mode or switch it off, report the incident, and hand the device to the DSL. They should also make a record of the incident in accordance with record keeping procedures.

The school will follow the DDMSC/UKIS guidance 'sharing nudes and semi-nudes: advice for education settings working with children and young people' (December 2020) when responding to an allegation that nudes or semi-nudes have been shared.

In the event of disclosures about child-on-child abuse, all the pupils involved, including both the victim and the perpetrator, will be treated as being at risk and the appropriate safeguarding procedures will be followed. Victims and perpetrators will be offered support, which could be from a number of different people such as the School Nurse, the School Counsellor, or a member of the School pastoral team, and will be in accordance with the best interests and, where possible, with the wishes of the pupils involved. Support from external agencies will be sought as appropriate.

When there has been a report of sexual violence, the DSL will make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. Risk and needs assessments should consider the following:

- the victim
- whether there may have been other victims
- the alleged perpetrator
- other pupils and, if appropriate, staff, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms.

Risk assessments will be recorded and kept under review. In relation to a report of sexual violence or sexual harassment, the DSL will reassure any victim that they are being taken seriously and that they will be supported and kept safe. The victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment, nor will a victim ever be made to feel ashamed for making a report or have their experience minimised.

The DSL will consider the age and developmental stage of the victim, the nature of the allegations, and the potential risk of further abuse. The School acknowledges that, by the very nature of sexual violence and sexual harassment, a power imbalance is likely to have been created between the victim and the alleged perpetrator(s).

The DSL will consider the risks posed to pupils and put adequate measures in place to protect them and keep them safe. This may include consideration of the proximity of the victim and the alleged perpetrator and considerations regarding shared classes, sharing school premises and school transport. The School will also consider the risks posed to the victim from other health needs, including physical, mental, and sexual health problems, as well as unwanted pregnancy, which may arise as a result of the incident, and will consider recommending additional support.

The School will keep a written record of all concerns, discussions, and decisions made. The School will reflect on reported concerns, including decisions made and actions taken, in order to identify any patterns of concerning, problematic or inappropriate behaviour, which indicate an unacceptable culture, or any weaknesses in the School's safeguarding system which require additional training or amendments to relevant policies. Where a pattern is identified, the School will decide on an appropriate course of action.

In the event that a report is proven to be false, unsubstantiated, unfounded or malicious, the DSL will consider whether the pupil or person who made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to Children's Social Care may be appropriate. If a report is shown to be deliberately invented or malicious, the Head will consider whether any disciplinary action is appropriate against the individual who made it, in accordance with the School's Behaviour Policy.

5. Arrangements for Dealing with Safeguarding Concerns or Allegations of Abuse Regarding School Staff

Staff include supply staff, support staff, the Head, Governors, volunteers, and contractors.

The procedures for managing allegations against adults who are currently working in the School follows Department for Education statutory guidance and the Berkshire West Safeguarding Children Partnership arrangements and applies when adults have, or are alleged to have:

- behaved in a way that has harmed a pupil, or may have harmed a pupil
- possibly committed a criminal offence against or related to a pupil
- behaved towards a pupil in a way that indicates that they may pose a risk of harm if they were to work regularly or closely with pupils
- behaved or may have behaved in a way that indicates they may not be suitable to work with children, including behaviour that may have happened outside of school.

Allegations that do not meet the above harms test should be dealt with using the School's procedures for handling low level concerns set out below.

Allegations against a teacher who is no longer teaching should be referred to the Police. Historical allegations of abuse should also be referred to the Police and LADO. Non-recent allegations made by a pupil will be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations. The LADO will coordinate with Children's Social Care and the Police.

If an allegation is made against anyone working with pupils in the School, before contacting the LADO, the School should conduct a preliminary enquiry, in line with local procedures, to establish the facts in order to determine whether there appears to be any foundation for the allegation. The School should not undertake their own investigation without prior consultation with the Local

Authority Designated Officer or, in the most serious cases, the Police, so as not to jeopardise statutory investigations. In borderline cases, the School may discuss informally with the LADO on a no-names basis.

When dealing with allegations about a staff member, the School will deal with allegations quickly, fairly, and consistently and will support the person subject to the allegation.

All allegations which appear to meet the above reporting criteria are to be reported straightaway to the Case Manager, who is the Head, or to the DSL. If an allegation is reported to the DSL, the DSL will keep the Head informed. Where the Head or the DSL is absent or is the subject of the allegation or concern, reports should be made to the Chair of Governors. Where the Head or DSL is the subject of the allegation or concern, the Head or DSL must not be informed of the allegation prior to contact with the Chair of Governors and the LADO. However, staff may consider discussing any concerns with the DSL and make any referral *via* the DSL.

The case manager should immediately discuss the allegation with the LADO and consider the nature, content, and context of the allegation and agree a course of action including any involvement of the Police. Where the Case Manager deems there to be an immediate risk to pupils or there is evidence of a possible criminal offence, then they may involve the Police immediately. All discussions should be recorded in writing and any communication with both the individual and the parents of the pupil or pupils, agreed. The LADO should be informed within one working day of all allegations that come to the School's attention and appear to meet the criteria, or that are made directly to the Police or Children's Social Care. The DSL is responsible for ensuring the pupil is not at risk.

Where the Case Manager is concerned about the welfare of other pupils in the community or the member of staff's family, they will discuss these concerns with the Designated Officer and make a risk assessment of the situation, it may be necessary for the Designated Officer to make a referral to Children's Social Care.

When to inform the individual who is the subject of the allegation, will be considered on a case-by-case basis and the guidance from the Designated Officer and, if appropriate, with the Police or Children's Social Care. Subject to any objection, the Case Manager will ensure the individual who is subject to the allegation is informed as soon as possible and given an explanation of the likely course of action. The Case Manager will appoint a named representative to keep the individual informed of the progress of the case and will consider what other support is appropriate for the individual.

The Case Manager should give careful consideration as to whether the circumstances of the case warrant suspension or whether alternative arrangements should be put in place until the allegation is resolved. The following alternative arrangements should be considered before suspending the member of staff:

- redeployment within the School so that the individual does not have direct contact with the pupils concerned or access to pupils in any circumstance as appropriate
- providing an assistant to be present when the individual has contact with pupils
- moving the pupils to classes where they will not come into contact with the individual, but this decision should only be made if it is in the best interests of the pupils concerned and takes accounts of their views; it should be made clear that this is not a punishment
- temporarily redeploying the individual to another role in a different location.

These alternatives allow time for an informed decision regarding the suspension, but will depend on the nature of the allegation.

Suspension should not be an automatic response when an allegation is reported. It should be considered only on cases where there is cause to suspect pupils are at risk of harm, or the case is so serious that it might be grounds for dismissal.

The Case Manager will give due weight to the views of the Designated Officer and KCSIE when making a decision about suspension (including with respect to considering the alternatives). Where the individual is suspended, the Case Manager will confirm the decision within one working day, and ensure they know who their point of contact is in the School and provide them with their contact details. The Case Manager will also record the reason for the suspension, including what alternatives were considered and why they were rejected.

Where a member of the boarding staff is suspended pending an investigation, the Case Manager will consider whether arrangements for alternative accommodation away from pupils should be made.

Where further enquiries are required to enable a decision about how to proceed, the Designated Officer and Case Manager should discuss how and by whom the investigation will be undertaken. In straightforward cases, the investigation should usually be undertaken by a senior member of staff. Where there is a lack of resource, or the nature or complexity of the allegation requires it, an independent investigator may be appointed.

The Case Manager will ensure that parents are informed as soon as possible and kept informed about the progress of the case subject to any advice from Children's Social Care or the Police. Parents and others will be made aware that there are restrictions on publishing information which may lead to the identification of the member of staff subject to the allegation.

The Case Manager will monitor the progress of cases to ensure they are dealt with as quickly as possible in a thorough and fair process. The outcome of the investigation of an allegation will record whether it is substantiated (sufficient evidence to prove it), unsubstantiated (insufficient evidence to prove or disprove), false (sufficient evidence to disprove it), malicious (sufficient evidence to disprove it and that there has been a deliberate act to deceive or cause harm to the person subject of the allegation) or unfounded (to reflect cases where there is no evidence or proper basis which supports the allegation being made).

Reviews are conducted at fortnightly or monthly intervals depending on the complexity of the case. The first review will take place no later than four weeks after the initial assessment and subsequent review dates will be set at the review meeting

The Case Manager will discuss with the Designated Officer whether a referral to the Disclosure and Barring Service or National College for Teaching and Learning should be made where an allegation is substantiated and the individual is dismissed, or the School ceases to use their services, or the individual resigns or otherwise ceases to provide their services.

The School has a legal obligation to report promptly to the Disclosure and Barring Service any individual, whether employed, contracted, a volunteer or a student, who has harmed, or poses a risk of harm, to a pupil, or if there is reason to believe the individual concerned has committed one or more of a number of listed offences and who has been removed from working, paid or unpaid, in regulated activity, or would have been removed had they not left. Further, if an investigation leads to the dismissal or resignation prior to dismissal of such an individual, the School must consider making a referral to the Teaching Regulation Agency. A prohibition order may be appropriate because that teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute, or a conviction at any time for a relevant offence.

On conclusion of the case, the Case Manager should review the circumstances of the case with the Designated Officer to determine whether there are any improvements to be made to the School's safeguarding procedures or practices to help prevent similar events in the future. Where the allegation is concluded to be either, unfounded, false, malicious or unsubstantiated, the Case Manager (and if they have been involved, the LADO) should consider the facts and determine whether any lessons can be learned and if improvements can be made.

Where an individual is removed from regulated activity, or would have been removed had the individual not left, including when they are suspended, redeployed to work that is not regulated activity, are dismissed, or have resigned, and the individual has engaged in relevant conduct in relation to children and/or adults, and/or satisfied the harm test in relation to children and/or vulnerable adults, and/or been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence, the School will make a referral to the DBS.

The School has a duty of care to its staff. Whilst the welfare of a pupil is paramount, the School must offer appropriate welfare support to the individual subject to the investigation and, potentially, their family.

The School will make every reasonable effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered. Information will also not ordinarily be shared with other staff or with pupils or parents who are not directly involved in the investigation.

Where initial discussions lead to no further action, the Case Manager and Designated Officer should record the decision and reasons for it and agree on what information should be put in writing to the individual concerned and by whom.

Allegations found to be malicious will be removed from the individual's personnel file unless the individual gives consent for retention of the information. In all other circumstances a written record will be made of the decision and retained on the individual's personnel file in accordance with KCSIE and a copy will be provided only to the individual concerned.

Schools have an obligation to preserve records that contain information about allegations of sexual abuse for the duration of the inquiry in accordance with the guidelines of the Independent Inquiry into Child Sexual Abuse (IICSA). All other records should be retained until the individual concerned has reached pension age, or for a period of 10 years from the date of the allegation, whichever is longer.

Allegations proven to be false, unsubstantiated, unfounded or malicious will not be included in employer references. If an allegation is shown to be deliberately invented or malicious, the DSL will consider whether the pupil or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to Children's Social Care may be appropriate.

If a report is shown to be deliberately invented or malicious, the Head will consider whether any disciplinary action is appropriate against a pupil who made it in accordance with the Behaviour Policy, or whether the Police should be asked to consider if action might be appropriate against the person responsible if they are not a pupil.

In all cases where there are concerns or allegations of abuse, the School will make a serious incident report to the Charity Commission in accordance with the appropriate guidelines.

6. Arrangements for Dealing with Safeguarding Concerns or Allegations or Abuse about Supply Teachers and Contracted Staff

The School's procedures for managing allegations against staff also apply to staff not directly employed by the School, for example, supply teachers provided by an employment agency or business. The school will usually take the lead, but agencies should be fully involved (because they

have their own policies and procedures) and co-operate with any inquiries from the LADO, Police or Children's Social Care.

In no circumstances will the School cease to use a supply teacher due to safeguarding concerns without finding out the facts and liaising with the LADO to determine a suitable outcome. The School will discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation.

The School will advise the supply teacher being investigated to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting, which is often arranged by the LADO, should address issues such as information sharing to ensure that any previous concerns or allegations known to the agency are taken into account by the school during the investigation.

When using an agency, the school should inform the agency of its procedures for managing allegations, but also take account of the agency's policies and their duty to refer to the DBS as personal suppliers. This should include inviting the agency's human resource manager, or equivalent, to meetings and keeping them up to date with information about its policies.

Where the agency dismisses or ceases to use the services of a supply teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left first, the School must consider whether they refer the case to the Secretary of State *via* the Teaching Regulation Agency.

7 Dealing with Safeguarding Concerns and Allegations about Organisations or Individuals using School Premises

The School may receive an allegation or concern relating to an incident that happened when an individual or organisation was using the school premises for the purposes of running activities for children and/or vulnerable adults (for example community groups, sports associations, or service providers that run extra-curricular activities). As with any safeguarding allegation, the School will follow their safeguarding policy and procedures, including informing the LADO.

When services or activities at the School are provided under the direct supervision or management of school staff, this Policy will apply in relation to any safeguarding concerns or allegations. Where services or activities are not under the direct supervision or management of the School, the School will seek assurance that any individual or organisation has appropriate safeguarding and child protection policies and procedures in place (and the School will inspect these as needed); and ensure that there are arrangements in place for the provider to liaise with the School on these matters where appropriate.

The School has arrangements in place for the use of school premises for non-school activities including the availability of the DSL or DDSL and how they can be contacted. The following email address should be used cp.records@luckleyhouseschool.org or this number 07931 468 339. If a child is in immediate danger, then the Police should be contacted.

7. Arrangements for Dealing with Low-Level Concerns or Allegations

Where there are low-level concerns or allegations that do not meet the harms test in relation to teachers and other staff including the Head, Governors, supply staff, volunteers and contractors, the School has a separate Low-Level Concerns Policy which enables all staff to share concerns – no matter how small – about their own or another member of staff's behaviour.

A low-level concern is any concern that an adult working in or on behalf of a school may have acted in a way that:

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

However, a low-level concern does not mean that it is insignificant. A concern may be low-level, no matter how small, even if it does no more than give a sense of unease or raise a 'nagging doubt'. 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 (for example, grooming behaviours).

The School takes all concerns about safeguarding seriously and recognises that addressing even low-level concerns is important to create and embed a culture of openness, trust, and transparency in which the School's values and expected behaviour of its staff are consistently lived, monitored, and reinforced.

If the School is in any doubt as to whether a low-level concern in fact meets the harm threshold, the Head will consult with the LADO and take a more collaborative decision-making approach.

8. Staff Behaviour Policy

The Staff Behaviour Policy can be found in the Staff Handbook. The aim of the policy is to provide clear guidance about the standards of appropriate behaviour and actions so as to not place pupils at risk of harm or staff at risk of allegation of harm to pupils. All staff are expected to comply with the standards contained within this policy.

Staff must share all concerns with the Head without delay so that they can be recorded and dealt with appropriately, sensitively, and proportionately, and in a timely manner. Where a low-level concern is raised about the Head, it should be referred to the Chair of Governors.

Staff are also encouraged to self-refer in the event they have found themselves in a situation which may be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in a way that may be considered to fall below the expected professional standard. All concerns will be dealt with appropriately and proportionately.

If a concern is raised by a third party, the Head, will collect as much evidence as possible by speaking to the person who has raised the concern (if known), to the individual involved, and any witnesses. The concerns will be recorded in accordance with this policy.

The School will address unprofessional behaviours at an early stage and will support the individual to correct it.

All low-level concerns will be recorded in writing, which will include details of the concern, the context within which the concern arose, and details of the action taken. The name of the reporting individual should also be included unless they have asked to remain anonymous, which will be respected as far as reasonably possible. Records will be kept confidential and will be held securely and in compliance with the Data Protection Act 2018 and the UK GDPR. The information will be retained until the individual has left employment.

Low-level concerns should not be included in references unless they relate to issues that would normally be disclosed, for example, misconduct or poor performance.

The School will reflect on reported concerns in order to identify patterns of concerning, problematic or inappropriate behaviours, which may indicate an unacceptable culture, or any weaknesses in the School's safeguarding system which may require additional training or modified policies. Where a pattern is identified, the School will decide on a course of action, either through its disciplinary procedures, or, where the pattern moved from a concern to meetings the harms threshold, following the above procedures and referring the matter to the Designated Officer.

Where a low-level concern relates to a person employed by a supply agency or contractor the individual's employer will be notified of the concern so that any potential patterns of inappropriate behaviour can be identified.

9. Safer Recruitment

The School is committed to safer recruitment procedures. Members of the teaching and non-teaching staff including part-time staff, temporary and supply staff, and visiting staff, such as musicians and sports coaches, are subject to statutory child protection checks before starting work. These include, for example, right-to-work checks, additional overseas checks, verifying identity, taking up references, checking work history, and confirming medical fitness for the role. For most appointments an enhanced DBS check with barred list information will be appropriate. A DBS certificate will be obtained from the candidate before, or as soon as practicable after appointment. Alternatively, if the applicant has subscribed to it and gives permission, the School may undertake an online check through the DBS Update Service.

Full details of the School's safer recruitment procedures for checking the suitability of staff, Governors and volunteers to work with pupils are set out in the Recruitment & Selection Policy.

The School's protocols for ensuring that any visiting speakers, whether invited by staff or pupils, are suitable and appropriately supervised are set out in the Visiting Speaker Policy.

10. Management of Safeguarding

The DSL is Mrs Claire Gilding-Brant who is a member of the leadership team. The DDSL is Mr David Rose.

The DSL and DDSL's contact details can be found on the School Contacts page in Appendix 8.

The DSL's role is to take the lead for safeguarding matters in the School. Their responsibilities are to maintain an overview of safeguarding within the School, open channels of communication with local statutory agencies, support staff in carrying out their safeguarding duties, and monitor the effectiveness of the School's policies, procedures and practices.

The DSL works with Governors to review and update the Child Protection & Safeguarding Policy. When a pupil leaves the School, the DSL will also ensure their child protection file is transferred to their new school separately from the main pupil file, within five days or as soon as possible. The DSL will ensure secure transit and obtain confirmation of receipt. In addition to the child protection file, the DSL should also consider if it would be appropriate to share any additional information with the new school in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school.

The DSL regularly reviews the School's and their own practices, and records of concerns about welfare and safeguarding matters. This includes the personal and professional duty of all staff to report welfare and safeguarding concerns to the DSL, or in the absence of action, directly to local children's services. In addition, interim update training takes place for all staff at the start of every term taking into account emerging concerns including online safety. All teaching staff are required to complete online safety training.

During term time, either the DSL or the DDSL will always be available, during school hours, for staff to discuss any safeguarding concerns. For out of hours/term activities, the contact details of the DSL and DDSL are supplied to supervising staff.

The DSL or DDSL should liaise with the three safeguarding partners and work with other agencies in line with WT. "[NPCC – when to call the Police](#)" can assist the DSL or DDSL to understand when they should consider calling the Police and what to expect when they do so. If the School has questions about any Police investigation, it will ask the Police. The DSL or DDSL will also be responsible for liaising with the senior mental health lead and, where available, the Mental Health Support Team where safeguarding concerns are linked to mental health.

Whilst the Head should ensure that the policies and procedures adopted are understood and followed by staff, the Governors are ultimately responsible for ensuring staff are competent, supported, and regularly reviewed in relation to safeguarding.

In the School, the lead responsibility for safeguarding lies with the DSL and cannot not be delegated.

Full details of the DSL's role can be found at Annex C of KCSIE.

11. Training

Induction and training are in line with advice from Berkshire West Safeguarding Children Partnership.

All staff

All new staff will be provided with induction training that includes:

- the Child Protection and Safeguarding Policy
- the role and identity of the DSLs
- the Pupil Behaviour Policy
- the Staff Code of Conduct including the School's whistleblowing procedure and Acceptable User Policy, Staff & Pupil Relationships and Communications Policy including the use of social media
- the response to children who go missing from education
- A copy of Part one and ANNEX B of KCSIE at least, or for staff that do not work directly with pupils, Annex A
- the online safety policy, including an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring
- School leaders and staff who work directly with children will also be required to read Annex B of KCSIE158 (and Part five of KCSIE)
- Temporary staff and volunteers are provided with a summary leaflet with the key aspects of this policy explained along with photos of the DSL and the DDSL. Any individuals working directly with pupils and not under constant supervision, will have undergone all the recruitment checks applicable to permanent staff. They will also have completed safeguarding training.

All staff are also required to:

- read Part One and ANNEX B of KCSIE and confirm that they have done so; each time Part One of KCSIE is updated by the Department for Education, staff will be updated on the changes through briefings, by email, and by specially convened meetings as appropriate
- understand key information contained in Part One and ANNEX B of KCSIE; the School will ensure staff understanding by targeted INSET, spot quizzes in briefings, and individual interviews with the Governor with responsibility for safeguarding
- receive regular training in safeguarding in line with advice from Berkshire West Safeguarding Children Partnership; training will include online safety and harmful sexual behaviours including child-on-child, sexual violence, and harassment; it will also include Prevent awareness training to equip staff to raise concerns appropriately by ensuring all staff have the knowledge and confidence to identify pupils at risk of being drawn into terrorism, are able to challenge extremist ideas, and know how to refer pupils for further help; all staff are required to complete the Prevent Duty training module provided by Educare
- undertake regular informal update training at least annually to provide them with relevant skills and knowledge; the School provides these *via* emails, e-bulletins, and staff meetings.

All staff attend focused safeguarding training at the start of each term in addition to the informal updates.

The Board of Governors will ensure that all governors receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in the School are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated.

The Board of Governors are aware of their obligations under the Human Rights Act 1998 (HRA), the Equality Act 2010, and their local multi-agency safeguarding arrangements. Under the Human Rights Act 1998, it is unlawful for the School to act in a way that is incompatible with the European Convention on Human Rights (ECHR). Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach conventions set out in the European Convention on Human Rights (ECHR).

DSL

The DSL and DDSL receive updated safeguarding training at least every two years to provide them with the knowledge and skills required to carry out their roles. This includes local inter-agency working protocols, participation in child protection case conferences, supporting children in need, identifying children at risk of radicalisation, record keeping and promoting a culture of listening to children and training in the Berkshire West Safeguarding Children Partnership approach to Prevent duties. Further details of the required training content for the DSL and DDSL are set out in Annex C of KCSIE.

The School will support the DSL and DDSL in developing their knowledge and skills to understand the views of pupils including to encourage a culture of listening to pupils and taking account of their wishes, as well as having an awareness of the difficulties pupils may face in approaching staff with a disclosure.

The DDSL is trained to the same level as the DSL.

12. Oversight of Safeguarding, Including Arrangements for Reviewing Policies and Procedures

The Revd George Curry is the Board of Governors' Designated Safeguarding Governor and takes the lead in relation to safeguarding arrangements in the School on behalf of the Board.

A review of the Child Protection & Safeguarding Policy takes place at least annually including a review of the effectiveness of procedures and practices and their implementation. This policy, and any amendments, is circulated to all members of the Board of Governors. It is first scrutinised by the Education Committee which then recommends it for approval. The School draws on the expertise of staff, including the DSL, in shaping the School's safeguarding arrangements, policies, procedures and practices.

If there has been a substantiated allegation against a member of staff, the School will work with the LADO to determine whether there are any improvements to be made to procedures or practices to help prevent similar events occurring in the future.

13. Arrangements to Fulfil Other Safeguarding Responsibilities

Teaching pupils how to keep safe

The Board of Governors ensures that all pupils are taught about safeguarding, including online safety, through the curriculum and PSHCE (Life Skills) to help pupils adjust their behaviours in order to reduce risks and build resilience, including the risk of radicalisation. This includes teaching pupils about the safe use of digital equipment and the Internet, and the risks posed by adults or young people who use the Internet and social media to bully, groom, abuse or radicalise other people, especially children, young people and vulnerable adults.

The School recognises that a 'one size fits all' approach may not be appropriate for all pupils and that a more personalised or contextualised approach for more vulnerable pupils, victims of abuse and some SEND children might be needed.

Internet safety is an integral part of the School's ICT curriculum and is also embedded in PSHCE and RSE.

The School has appropriate filters and monitoring systems in place to safeguard pupils from potentially harmful and inappropriate material online. The School's systems are a Smoothwall UTM device with Guardian Content Filtering. Such systems aim to reduce the risk of pupils being exposed to illegal, inappropriate or harmful materials online (content risk), reduce the risk of pupils being subjected to harmful online interaction with others including commercial advertising and grooming (contact risk), restrict access to online risks such as online gambling, phishing or financial scams (commerce risk) and help manage online behaviour that can increase pupils' likelihood of, or causes, harm for example making, sending, and receiving explicit images. The School recognises, however, that pupils often have unlimited and unrestricted access to the internet *via* mobile networks, which means they may consensually or non-consensually share indecent images, sexually harass their peers *via* mobile and smart technology, and view and share pornography and other harmful content whilst at school, undetected.

The School ensures compliance with the DfE's 'filtering and monitoring standards for schools' by;

- Identifying and assigning roles and responsibilities to manage filtering and monitoring systems.
- Reviewing the filtering and monitoring provision at least annually.
- Blocking harmful and inappropriate content without unreasonably impacting teaching and learning.
- Having effective monitoring strategies in place that meet our safeguarding needs.

Further detail of the School's approach to online safety can be found in the E-Safety Policy. This includes rules about the use of mobile technology in School and accessing the Internet and other digital services on School premises, and information about the arrangements to ensure that pupils are kept safe from terrorist and extremist material when accessing the Internet through the School's systems.

The School will liaise with parents to reinforce the importance of children being safe online and the systems the School uses to filter and monitor online use. Parents and carers will be made aware of what their children are being asked to do online when undertaking remote learning, including the sites they will be asked to access and who from the School their child is going to be interacting with online.

Relationships Education and/or Relationships and Sex Education (RSE)

The School understands that preventative education is most effective in the context of a whole-school approach that prepares children for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic, and sexual violence/harassment. The School will have regard to the DfE's statutory guidance Relationships Education, Relationships and Sex Education (RSE) and Health Education when making arrangements for and teaching RSE. RSE will form part of the Life skills Programme as well as some aspects being delivered in RS lessons for Year 10 and 11.

Looked after children

The Board of Governors ensures that staff have the skills, knowledge, and understanding necessary to keep safe any pupils who are looked after by a local authority.

At present, the School has no 'looked after children', but should any join the School, Mrs Claire Gilding-Brant is the designated member of staff who has responsibility for their welfare and progress.

The School ensures that the designated member of staff receives appropriate training in order to carry out their role.

Arrangements for visiting speakers and 1:1 tuition

The School has clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable. The School's responsibility to pupils is to ensure that they can critically assess the

information they receive as to its value, and that the information is aligned to the ethos and values of the School and to the Government's British values.

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

Visiting speakers will be expected to understand that, where appropriate, their session should actively promote, and at no point undermine, the British values of democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs. In some cases, the School may request a copy of the visiting speaker's presentation in advance of the session being provided.

Visiting speakers will be supervised by a School employee whilst on site. Visiting speakers will be required to show original current identification documents including a photograph such as a passport or photocard driving licence. The School will also keep a formal register of visiting speakers retained in line with its Privacy Notice.

For arrangements for 1:1 tuition, staff should ensure that they are teaching in a room with either a viewing panel on the door, the door left open, or a window which sees into the classroom.

Use of mobile devices and other Internet and camera enabled devices

The School's policy on the use of mobile devices can be found in the Behaviour Management Policy, Staff Code of Conduct and ICT Acceptable Use Policy. The Head of Marketing has a list of pupils who can and cannot have their photo shared on a public forum. Staff who wish to use or take photographs or video of pupils, which must be on a school device only, must first check to see if parental permission has been given before taking any image of a pupil.

Whilst supervising, teaching, or in any contact situation with pupils, staff are not permitted to be using their personal phones. This includes teaching time, duties and the enriched day.

Arrangements for use of school premises for non-school activities

When services or activities at the School are provided under the direct supervision or management of school staff, this Policy will apply in relation to any safeguarding concerns or allegations.

Where services or activities are not under the direct supervision or management of the School, the School will seek assurance that any individual or organisation has appropriate safeguarding and child protection policies and procedures in place (and the School will inspect these as needed); and ensure that there are arrangements in place for the provider to liaise with the School on these matters where appropriate. This applies regardless of whether or not the children who attend any of these services or activities are children on the school roll.

The School will ensure that the DSL or DDSL can be contacted and/or is available at all times the school premises is in use, whether that activity is a school or non-school activity and regardless as to whether the children attending are on the school roll.

CP.records@luckleyhouseschool.org

The School will ensure that safeguarding requirements are included in any agreement for use of the school premises (such as a lease or hire agreement) as a condition of use and occupation of the premises and that failure to do so by the provider to comply with this will lead to termination of the agreement.

Appendix I: Signs and Symptoms of Abuse

Signs of physical abuse include:

- unexplained injuries or burns, particularly if they are recurrent
- improbable excuses given to explain injuries
- untreated injuries
- admitting to punishment that appears to be excessive
- bald patches
- withdrawal from physical contact
- arms and legs covered during hot weather
- fear of returning home
- self-destructive tendencies
- aggression towards others
- running away.

Signs of emotional and verbal abuse include:

- physical, mental and emotional development lags behind that of others of a similar age
- admitting to punishment that appears excessive
- over-reaction to mistakes
- continued self-deprecation
- sudden speech disorders
- inappropriate emotional responses to painful situations
- neurotic behaviour (rocking, hair twisting, thumb sucking)
- self-mutilation
- fear of parents being contacted
- extremes of passivity or aggression
- running away
- compulsive stealing, scavenging.

Signs of neglect include:

- constant hunger
- poor personal hygiene
- constant tiredness
- poor state of clothing
- emaciation
- frequent lateness or non-attendance at school
- untreated medical problems
- destructive tendencies
- low self-esteem
- no social relationships
- running away
- compulsive stealing or scavenging.

Signs of sexual abuse include:

- sudden changes in behaviour or school performance
- displays of affection in a sexual way inappropriate to age
- tendency to cling or need constant reassurance
- tendency to cry easily
- regression to younger behaviour (thumb-sucking, acting like a baby)
- complaints of genital itching or pain
- distrust of familiar adults
- unexplained gifts (money or kind)
- depression or withdrawal or apparent secrecy
- setting, day or night
- sleep disturbances/nightmares
- anorexia/bulimia
- unexplained pregnancy
- fear of undressing for PE, Games and in the boarding house
- phobias or panic attacks.

Appendix 2: Specific Safeguarding Issues

Behaviours linked to drug taking, alcohol abuse, truanting, and sexting put pupils in danger. Safeguarding issues can also manifest themselves via child-on-child abuse such as bullying including cyberbullying, gender-based violence/sexual assaults, sexting, and upskirting. They can also be linked to pupils missing education, sexual exploitation, domestic violence, fabricated or induced illness, faith abuse, FGM, forced marriage, gang and youth violence, gender-based violence, violence against women and girls, hate, mental health, radicalisation, relationship abuse, and trafficking.

Child Sexual Exploitation (CSE)

Child sexual exploitation is a form of sexual abuse, which occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a pupil into sexual activity either in exchange for something the victim needs and wants (for example money, gifts or affection) or for financial advantages or increased status of the perpetrator or facilitator. Whilst age may be the most obvious, the power imbalance can also be due to a range of other factors including sex, gender identity, cognitive ability, physical strength, status, or access to economic or other resources.

The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. It can affect any pupil under the age of 18 years (including 16 and 17 year olds who legally consent to have sex) who has been coerced into engaging in sexual activities. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity, and may occur without the pupil's immediate knowledge (for example through others copying videos or images they have created and posted on social media). Some pupils may not realise they are being exploited (for example they believe they are in a genuine romantic relationship).

CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

The following indicators can also be indicators of CSE:

- pupils who have older boyfriends or girlfriends
- pupils who suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development, or become pregnant.

The DfE has published guidance on this entitled 'Child sexual exploitation: guide for practitioners' CSE may occur alongside, or may overlap with CCE (see below), or County Lines, as well as other forms of abuse.

Child Criminal Exploitation (CCE)

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a pupil into any criminal activity in exchange for something the victim needs or wants (for example money, gifts or affection), or for the financial or other advantage (such as increased status) of the perpetrator or facilitator, or through violence or the threat of violence.

Whilst age may be the most obvious, this power imbalance can also be due to a range of factors including sex, gender identity, cognitive ability, physical strength, status, and access to economic or other resources. The victim may have been criminally exploited even if the activity appears consensual. CCE does not necessarily involve physical contact; it can occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (County Lines), being forced to shoplift or pickpocket. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced with carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. Children can be exploited by adult males and females either as individual or in groups. They may also be exploited by other pupils whom themselves may be experiencing exploitation. Where this is the case, their vulnerability as victims is not always recognised by adults and professionals (especially when they are older pupils). It is important, in these circumstances, that the perpetrator is also recognised as a victim.

Some of the following can be indicators of CCE:

- appearing with unexplained gifts or new possessions
- associating with other young people involved in exploitation
- suffering from changes in emotional well-being
- misusing drugs and alcohol
- going missing for periods of time or regularly coming home late
- regularly missing school or education or not taking part in education.

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

CCE may occur alone, or may overlap with CSE, and/or County Lines, as well as other forms of abuse.

Pupils who have been exploited will need additional support or help maintain them in education.

County Lines

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

Children can be targeted and recruited into County Lines from a number of locations including schools. Children are increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap of victims (and their families) if they attempt to leave the network.

Additional indicators (similar to CSE and CCE above) of County Lines may include children:

- who go missing and are subsequently found in areas away from home
- who have been the victim or perpetrator of serious violence, for example knife crime
- are involved in receiving requests for drugs *via* a phone line, moving drugs or handing over and collecting money for drugs
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection
- are found in accommodation with which they have no connection, often called a 'trap house' or 'cuckooing' or 'hotel room' where there is drug activity
- owe a 'debt bond' to their exploiters
- have their bank accounts used to facilitate drug dealing.

Further information on the signs of a child's involvement in County Lines is available in guidance published by the Home Office.

Modern slavery

Modern slavery encompasses human trafficking and slavery, servitude, and forced or compulsory labour. Exploitation can take many forms including sexual exploitation, forced labour, slavery, servitude, forced criminality, and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims, and how to refer them to the National Referral Mechanism is available in the statutory guidance [Modern slavery: how to identify and support victims \(May 2022\)](#).

Cybercrime

This is criminal activity committed using computers and/or the Internet. It is broadly categorised as either ‘cyber-enabled’ (crimes that can happen offline but are enabled at scale and at speed online) or ‘cyber dependent’ (crimes that can be committed only by using a computer).

Cyber-dependent crimes include:

- unauthorised access to computers (illegal hacking), for example accessing a school’s computer network to look for test paper answers or change grades awarded
- denial of Service (DoS or DDoS) attacks or ‘booting’; these are attempts to make a computer, network, or website unavailable by overwhelming it with internet traffic from multiple sources
- making, supplying, or obtaining malware such as viruses, spyware, ransomware, botnets, and Remote Access Trojans with the intent to commit further offences.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a pupil in this respect, the DSL or DDSL should consider referring pupils to the Cyber Choices programme. This is a nationwide Police programme supported by the Home Office and led by the National Crime Agency working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low-level cyber-dependent offences and divert them to a more positive use of their skills and interests. Cyber Choices does not currently cover cyber-enabled crime such as fraud, purchasing of illegal drugs online and child sexual abuse and exploitation, nor other areas of concern such as online bullying or general online safety.

Additional advice can be found at: Cyber Choices, ‘NPCC- When to call the Police’ and the National Cyber Security Centre - NCSC.gov.uk

Mental health

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

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

Where pupils have suffered abuse and neglect, or potentially traumatic adverse childhood experiences, they can have a lasting impact throughout childhood, adolescence, and into adulthood. It is important that staff are aware of how these pupils’ experiences can impact their mental health, behaviour, and education.

If staff have a mental health concern about a pupil that is also a safeguarding concern, immediate action should be taken by following this policy and speaking to the DSL or DDSL.

The DfE has published advice and guidance on ‘Preventing and Tackling Bullying’, and ‘Mental Health and Behaviour in Schools’. In addition, Public Health England has produced a range of resources to support secondary school teachers to promote positive health, well-being and resilience among

young people including its guidance: 'Promoting Children and Young People's Emotional Health and Well-Being'. Its resources include social media, forming positive relationships, smoking and alcohol.

Honour-based violence

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

FGM comprises all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs. Guidance on the signs that FGM may be about to take place, or may have already taken place, can be found on pages 38-41 of the multi-agency statutory guidance on FGM. Indications that a girl has already been subjected to FGM include:

- difficulty walking, sitting or standing or even simply looking uncomfortable.
- frequent urinary, menstrual or stomach problems or spending longer than normal in the bathroom due to difficulties urinating
- prolonged or repeated absences from School or noticeable behaviour changes such as withdrawal or depression
- reluctance to undergo medical examination.

If staff have a concern that a pupil may be at risk of FGM, they should activate local safeguarding procedures using existing national and local protocols for multi-agency liaison with Police and Children's Social Care. If in doubt, staff should speak to the DSL.

There is a statutory duty on teachers to report to the Police where they discover, either through disclosure by the victim or other evidence, that FGM appears to have been carried out on a girl under 18. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve Children's Social Care as appropriate. If the teacher is unsure whether this reporting duty applies, they should discuss their concerns with the DSL. Where a teacher suspects that a pupil is at risk or it involves a pupil over 18, they should follow the School's safeguarding procedures.

Further information can be found in the *Multi-agency statutory guidance on female genital mutilation and the FGM resource pack*, particularly section 13.]

Forced marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional, and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent, for example if they have learning disabilities. Some communities use religion and culture as a way to coerce a person into marriage. Since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their 18th birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

Schools can play an important role in safeguarding young people from forced marriage. There is a range of potential indicators that a pupil may be at risk of forced marriage, details of which can be found on pages 13-14 of the multi-agency guidelines, *Handling cases of Forced Marriage*. Staff can also contact the Forced Marriage Unit if they need advice or information (020 7008 0151 or email fmufco.gov.uk)

Radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Extremism is vocal or active opposition to fundamental British values including democracy, the rule of law, individual liberty, mutual respect, and tolerance of different faiths and beliefs. It can also call for the death of members of the Armed Forces in the UK or abroad. Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious, or ideological cause.

There is no single way of identifying an individual who is susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability that are often combined with the influence of family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer.

The Internet, and the use of social media in particular, have become major factors in the radicalisation of young people. As with other safeguarding risks, staff should be alert to changes in pupils' behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying pupils who might be at risk of radicalisation and act proportionately, which may include making a Prevent referral.

In the event of a child leaving, the DSL should consider if it would be appropriate to share any information with the new school or college. For example, information that would allow the new school or college to continue supporting victims of abuse or those who are currently receiving support through the 'Channel' programme and have that support in place for when the child arrives at the new school.

Special Educational Needs and/or Disabilities (SEND)

Pupils with SEND or certain health conditions can face additional safeguarding challenges. These pupils may not outwardly show signs of abuse or may have difficulties in communication about abuse or neglect, or bullying.

These can include:

- assumptions that indicators of possible abuse such as behaviour, mood, and injury relate to the pupil's disability without further exploration
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- pupils being disproportionately impacted by behaviours such as bullying without outwardly showing any signs
- communication barriers and difficulties in overcoming them
- being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in School or the consequences of doing so.

Staff will support such pupils in expressing any concerns they may have and will be particularly vigilant with respect to any signs or indicators of abuse, discussing these with the DSL as appropriate.

Discrimination

It is illegal to discriminate against any child on the basis of a Protected Characteristic. In particular, pupils who are in the minority may be targeted by their peers. In some cases, a pupil who is simply perceived by their peers to be different in these respects can be vulnerable.

Domestic abuse

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right if they see, hear or experience the effects of abuse.

The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional, and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed must be aged 16 or over and they must be “personally connected” (as defined in section 2 of the 2021 Act).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse, and child/adolescent to parent violence and abuse.

Anyone can be a victim of domestic abuse, regardless of sex, gender, age, ethnicity, socio-economic group, sexuality or background, and domestic abuse can take place in or outside of the home. The government will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

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

Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as ‘teenage relationship abuse’. Depending on the age of the young people, this may not be recognised in law under the statutory definition of domestic abuse (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both the victims and the perpetrators should be offered support.

Domestic abuse may lead to other safeguarding concerns and should therefore be managed under this policy.

School staff can contact Operation Encompass on 0204 513 9990 (8 am to 1pm, Monday to Friday) for advice in respect of children who have experienced domestic abuse.

Homelessness

Being homeless, or at risk of homelessness, presents a real risk to a pupil’s welfare. The School should be aware of potential indicators of homelessness including household debt, rent arrears, domestic abuse and anti-social behaviour as well as a family being asked to leave a property. If staff are made aware, or suspect, that a pupil may be at risk of homelessness, they should talk to the DSL in the first instance. Whilst referrals to the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not and should not replace a referral to the LADO when a pupil has been harmed or is at risk of harm.

Children who go missing from School

A child going missing from School is a potential indicator of abuse, neglect, sexual abuse, CSE, or CCE. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM, so called honour-based abuse or risk of forced marriage. Staff must follow the procedures for dealing with pupils who go missing particularly on repeat occasions. All unexplained absences will be followed up in accordance with this policy.

The School will inform the local authority of any pupil who is going to be added to or deleted from the School’s register at non-standard transition points in accordance with the requirements of the Education (Pupil Registration) (England) Regulations 2006 (as amended).

This will assist the local authority to:

- fulfil its duty to identify pupils of compulsory school age who are missing from education
- follow up any pupil who might be in danger of not receiving an education and who might be at risk of abuse, neglect or radicalisation.

School attendance registers are carefully monitored to identify any trends. The School will inform the local authority of any pupil who fails to attend School regularly, or has been absent without the School's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the School and the local authority. These intervals are termly or following a period of more than 20 consecutive days.

Action should be taken in accordance with this policy if any absence of a pupil from the School gives rise to a concern about their welfare. The School's policy supports identification of abuse and provides preventative measures against the risk of the pupil going missing in the future. This applies when issues are first emerging as well as where pupils are already known to the local authority Children's Social Care and need a social worker.

Child abduction and community safety incidents

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

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

As children get older and gain more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by the local Police.

It is important that lessons focus on building pupils' confidence and abilities rather than simply warning them about all strangers. Further information is available at: www.actionagainstabduction.org and www.clevernevergoes.org.

Children and the court system

Pupils are sometimes required to give evidence in criminal courts either for crimes committed against them or for crimes they have witnessed. There are two age-appropriate guides to support 5-11 year olds and 12-17 year olds available on the gov.uk website. These guides explain each step of the process and the support and special measures that are available.

Making pupil arrangements *via* the family courts, following separation, can be stressful and entrench conflict in families. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. The School may refer some parents and carers to this service where appropriate.

Children with family members in prison

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

Appendix 3: Job Description for the Designated Safeguarding Governor

The Board of Governors is ultimately responsible for the effective management of safeguarding in the School. As part of discharging this responsibility, they nominate a Designated Safeguarding Governor to work with the Designated Safeguarding Leads and other senior staff to review the School's safeguarding policy, procedures and practices.

Key Responsibilities include to:

- maintain regular contact with the Designated Leads for safeguarding
- champion the promotion of well-being and safeguarding issues at the highest level
- ensure that the Governing Body puts in place a suitable Child Protection & Safeguarding Policy and associated procedures which have proper regard to prevailing regulations, guidance, standards, and advice
- conduct an annual review of safeguarding procedures and practices
- report regularly to the Board of Governors on safeguarding matters
- ensure that child safeguarding training is in place for all staff and relevant additional training is undertaken as required
- undertake appropriate safeguarding training and maintain an up-to-date knowledge of safeguarding requirements
- maintain and develop the understanding of the whole governing body on safeguarding issues
- ensure any deficiencies in safeguarding practices brought to the Board's attention are properly investigated and addressed
- ensure that Governors receive appropriate training.

Appendix 4: Termly Safeguarding Check

Term _____

Date _____

- ☐ General discussion with DSL
- ☐ Overview of the INSET Safeguarding update (Insert topic: _____)
 - ☐ Informed of number and type of referrals made and with which Local Authority
 - ☐ Informed of any concerns regarding radicalisation
 - ☐ Informed of any allegations of child-on-child abuse
 - ☐ Brief conversation with a member of staff to ensure his/her knowledge of safeguarding policy, procedures and practices is adequate, including Prevent Duty
 - ☐ Updated on any contact made with the LADO
 - ☐ Checked with Head whether there have been any concerns made against staff
 - ☐ SCR check with the HR office, 3 files as a minimum

Signed _____

Date _____

The Revd George Curry

Date _____

Claire Gilding-Brant, Senior Deputy Head, DSL

Appendix 5: External Contacts

Berkshire West Safeguarding Children's Partnership (BWSCP)	<p>Tel: 01635 519982</p> <p>Email: BWSCP@westberks.gov.uk</p> <p>Web: https://www.berkshirewestsafeguardingchildrenpartnership.org.uk/scp/west-berks/west-berkshire</p>
Wokingham Borough Council (WBC) Children's Safeguarding and Social Care Team	<p>LADO: Nicola Vines</p> <p>Tel: 0118 974 6141</p> <p>Email: lado@wokingham.gov.uk</p> <p>WBC Referral and Assessment Team:</p> <p>Tel: 0118 908 8002</p> <p>Email: triage@wokingham.gov.uk</p> <p>Out of hours emergency duty team Tel: 01344 351999</p> <p><u>MARF:</u> https://www.berkshirewestsafeguardingchildrenpartnership.org.uk/assets/1/new_marf.docx</p>
Support and Advice about Extremism	<p>Police</p> <p>Tel: 0845 850505</p> <p>Anti-terrorism hotline: 0800 789321</p> <p>Emergency: 999</p> <p>Non-emergency: 101</p> <p>Information: www.thamesvalleypolice.uk</p> <p>Wokingham Borough Council</p> <p>Tel: 0118 974 6000</p> <p>Email: BWSCP@westberks.gov.uk</p> <p>Department for Education</p> <p>Non-emergency number: 020 7340 7264</p> <p>Email: counter.extremism@education.gsi.gov.uk</p>
NSPCC Whistleblowing Advice Line	<p>Address: Weston House, 42 Curtain Road, London EC2A 3NH</p> <p>Tel: 0800 028 0285</p> <p>Email: help@nspcc.org.uk</p>

Disclosure and Barring Service	Address: PO Box 3963, Royal Wootton Bassett, SN4 4HH Tel: 03000 200 190 Email: dbsdspatch@db.s.gsi.gov.uk
Teaching Regulation Agency	Address: 53-55 Butts Road, Earlsdon Park, Coventry, CV1 3BH Tel: 0207 593 5393 Email: misconduct.teacher@education.gov.uk
OFSTED Safeguarding Children	Tel: 0300 123 4666 (Monday to Friday from 8am to 6pm) Email: whistleblowing@ofsted.gov.uk
Independent Schools Inspectorate	Tel: 0207 600 0100 Email: concerns@isi.net

Appendix 6: School Contacts

Governors	<p>Chair of Governors</p> <p>Mrs Claire Tao</p> <p>Nominated Safeguarding Governor</p> <p>Revd George Curry</p> <p>The Chair and Safeguarding Governor can both be contacted through the Bursar</p> <p>Email: bursar@luckleyhouseschool.org</p>
DSL and DDSL	<p>DSL: Mrs Claire Gilding-Brant</p> <p>Tel: 01189743231 or 07931 468 339</p> <p>Email: cp.records@luckleyhouseschool.org</p> <p>DDSL: Mr David Rose (from 12.10.23)</p> <p>Tel: 0118 9784175</p> <p>Email: david.rose@luckleyhouseschool.org</p> <p>In the absence of Claire Gilding-Brant please reach out to Esther Brown or Matt Humphrey</p>
Designated Teacher for Looked After Children	<p>Mrs Claire Gilding-Brant</p> <p>Tel: 0118 974 3231</p> <p>Email: cp.records@luckleyhouseschool.org</p>
Head	<p>Mrs Areti Bizior</p> <p>Tel: 0118 974 3209</p> <p>Email: LHShead@luckleyhouseschool.org</p>

Appendix 7: Glossary of Abbreviations

BWSCP	Berkshire West Safeguarding Children's Partnership
Channel	The duty set out in the Counter-Terrorism and Security Act 2015 to provide support for people vulnerable to being drawn into terrorism.
CSE	Child Sexual Exploitation
DBS	Disclosure and Barring Service
DDSL	Deputy Designated Safeguarding Lead
DfE	Department for Education
DSL	Designated Safeguarding Lead
EHCP	Education, Health and Care Plan
FGM	Female Genital Mutilation
GDPR	General Data Protection Regulations
IICSA	Independent Inquiry into Child Sexual Abuse
INSET	In-Service Training
ISI	Independent Schools Inspectorate
KCSIE	Keeping Children Safe in Education
LADO	Local Authority Designated Officer
NICCO	National Information Centre on Children of Offenders
NSPCC	National Society for the Prevention of Cruelty to Children
PSHE	Personal, Social and Health Education
SEND	Special Educational Needs and/or Disabilities
SRE	Sex and Relationships Education
SVSH	Sexual Violence and Sexual Harassment
TRA	Teaching Regulation Agency
WBC	Wokingham Borough Council
WT	Working Together to Safeguard Children
YPSI	Youth Produced Sexual Imagery