

Safeguarding and Child Protection Policy



St Andrew's Prep
EASTBOURNE

Executive Summary

The welfare and safety of children in any school is the most important responsibility. This Charity-wide policy explains how we do our very best to ensure this at both Eastbourne College and St Andrew's Prep (including the nursery), collectively termed "The Charity". Aspects of this policy which are specific to the College, or the School (including nursery) will be made clear where necessary.

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Key Contacts

Role	Operating from	Name	Contact details
Designated Safeguarding Lead Second Master (whole-school and senior Deputy)	Eastbourne College	Cris Symes	Mobile: 07506 692 799 Email: cwsymes@eastbourne-college.co.uk
Deputy Designated Safeguarding Lead Deputy Head (Pastoral)	Eastbourne College	Gwen Taylor-Hall	Mobile: 07841 342 141 Email: getaylor-hall@eastbourne-college.co.uk

Designated Safeguarding Lead Head of Pastoral Care and Boarding	St Andrew's Prep	Mark Tomsett	Mobile : 07495 682 991 Email : mtomsett@standrewsprep.co.uk
Deputy Designated Safeguarding Lead Senior Nurse	St Andrew's Prep	Vicks Champion	Mobile : 07790 567 131 Email : vkchampion@standrewsprep.co.uk
Deputy Designated Safeguarding Lead	St Andrew's Prep	Sarah Piper	Mobile: 07555 416 306 Email: spiper@standrewsprep.co.uk
Headmaster and Charity CEO	Eastbourne College	Tom Lawson	Mobile: 07710 701 254 Email: tnmlawson@eastbourne-college.co.uk
Headmaster	St Andrew's Prep	Tom Gregory	Mobile: 07584 637 783 Email: tbgregory@standrewsprep.co.uk
Nominated governor for safeguarding and child protection	Eastbourne College	Dr Rob Wicks	via College Reception Tel. 01323 452300 Email: rmwicks@eastbourne-college.co.uk
Nominated governor for safeguarding and child protection	St Andrew's Prep	Nicky Eckert	Via Prep School Reception Tel. 01323 733203 Email: neckert@eastbourne-college.co.uk
Chair of Governors	Eastbourne College Incorporated	Philip Broadley	via College Reception (ask for Clerk to the Governors) Tel. 01323 452300 PBroadley@eastbourne-college.co.uk
Local Authority Designated Officer (LADO)	East Sussex County Council	Donna Davis	Via https://www.eastsussex.gov.uk/childrenandfamilies/professional-resources/lado/ - follow steps; LADO will respond by email / phone
Safeguarding Officer and Assistant Local Authority Designated Officer	East Sussex County Council	Sue Giles	Via https://www.eastsussex.gov.uk/childrenandfamilies/professional-resources/lado/ - follow steps; LADO will respond by email / phone
Referrals into Early Help and Social Care	East Sussex County Council	Single Point of Advice	Preferred method via online form found: https://earlyhelp.eastsussex.gov.uk/web/portal/pages/home But only submitting having first called 01323 464 222 (working hours; out of hours see below) child protection referral form via http://sussexchildprotection.procedures.org.uk/yqkypth/appendices/referral-form and email to 0-19.SPoA@eastsussex.gov.uk
	East Sussex County Council	Emergency Duty Service – after hours, weekends and public holidays	01273 335 906 01273 335 905
Police	Sussex Police	Neighbourhood Youth officer: PC Pete Clarke	Email: peter.clarke1@sussex.police.uk Tel: 01273 404535 Mobile: 07912893327
	Sussex Police	Prevent Officer: Naomi Watkinson	Mobile: 07788 566 585 Email: Naomi.Watkinson@sussex.pnn.police.uk
NSPCC		Whistleblowing helpline	0800 028 0285

1. Introduction

1.1. Our whole Charity approach to safeguarding is based upon an understanding of the local context and an attitude of *'it could happen here'*. **Safeguarding children is everyone's responsibility. Our Charity is a community and all those directly connected (staff, volunteers, governors, parents, families and pupils) has an essential role to play in making it safe and secure.**

1.2. Safeguarding is not an isolated activity which is undertaken by a select few within only certain areas of school practice. Everyone at the Charity who has contact with children and families must play an active role in keeping children safe from harm. In that respect we take a whole Charity approach to safeguarding, ensuring that it is at the forefront of all our work, that it underpins all of our policies and processes and that everything we do is always with the best interests of the children at heart.

1.3. Our pupils' welfare is our paramount concern. The Board of Governors (governing body) will ensure that our Charity will safeguard and promote the welfare of pupils and work together with other agencies to ensure that our school has robust arrangements to identify, assess and support those children who are suffering or likely to suffer harm.

1.4. Our Charity is a community and all those directly connected: staff, volunteers, governors, parents, families and pupils, have an essential role to play in making it safe and secure. Together we will provide a caring, positive and stimulating environment that promotes the social, physical, emotional and moral development of the individual child, and where children feel safe.

1.5. We always take a child centred approach to our work and ensure that we listen to the voice of the child so that all children feel heard and understood. When children talk to an adult about a concern they may have, they will always be taken seriously, they will always be supported and kept safe, they will never be given the impression that they are creating a problem or have anything to feel ashamed about.

1.6. We understand that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This will not prevent staff from having professional curiosity and speaking to the DSL if they have concerns about a child.

1.7. So that children are able and confident to raise concerns with adults we ensure that our safeguarding systems are well promoted, easily understood and easily accessible. Alongside this we expect all staff to develop positive relationships with children, which build trust and facilitate communication.

1.8. To support children who may not wish to directly speak with an adult in the Charity there are other means such as worry boxes or online help buttons, which are monitored by key staff in the safeguarding team.

1.9. To support children who may wish to seek help from beyond the school we have posters and signposting to agencies such as Child Line, the Children's Commissioner or the NSPCC, as well as reminders about more direct support provided by our medical team, school counsellors, other key staff, independent listeners and also pupil (peer) listeners.

1.10. As well as systems for individual children to raise concerns, we also gather pupil voice, to understand the experience of pupils at the school, so that this can inform the development of safeguarding practice. We always aim to capture the full breadth of the pupil demographic, including pupils with SEND and those who are known to be vulnerable.

1.11. So that children are supported to identify and manage risk in their lives we teach a range of knowledge through specific topics related to safeguarding as part of our broad and balanced preventive curriculum.

1.12. Although some curriculum areas are better placed for the delivery of teaching and learning around some areas, e.g. IT lessons can lead on online safety and PSHE can lead on healthy relationships, all teachers recognise that there are opportunities to reinforce the learning around these topics within all subject areas and will plan to do so. Non-teaching members of staff recognise that they too can support learning in these areas through broader modelling of behaviours or messages.

1.13. The use of technology has become a significant component of many safeguarding issues so as part of our whole-school approach to safeguarding, we have a separate [Online Safety Policy](#) which covers this area of work. This information includes details of how internet use at the Charity is filtered and monitored and how we teach children to stay safe online whether they are at school or at home and how we communicate with parents to reinforce the importance of children being safe online.

1.14. We recognise that abuse may occur in a range of situations: within families or households, within the community, or online or face to face. We also recognise too that it is not only adults who may abuse children but also that children can abuse other children as well.

1.15. We recognise that just because children are not raising concerns, that is not to say that there are no concerns. For example, there may be no reported cases of child-on-child abuse, but such abuse may still be taking place and is simply not being reported, this is why it is so important to listen to children, teach them about risk and safety and raise awareness around how to seek support and what the school will do.

1.16. We take a zero-tolerance approach to child-on-child abuse. Further information on this area of work is within [Appendix C](#) of this policy. This should also be read alongside the Behaviour, [Anti-Bullying](#) and [Online Safety](#) policies.

1.17. We will work with parents to build an understanding of the school's responsibilities to ensure the welfare of all children, including the need for referrals to other agencies, such as Children's Social Care, in some situations.

1.18. Safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside the school. All staff, but especially the DSL and other key pastoral staff (e.g. HSMs) will consider the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

2. Our Ethos

2.1. The Charity comprises a senior and prep school. Both are independent co-educational British boarding and day schools with an international outlook, founded upon a Christian but thoroughly inclusive tradition. The Charity is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment and to work within the current legislative framework. There are six main elements to our policy:

- Ensure we practise safe recruitment in checking the suitability of staff and volunteers to work with children.
- Establish a safe environment in which children can learn and develop.
- Raise awareness of child protection issues through staff induction procedures and regular staff training and updates to ensure consistent good practice.
- Equip children with the skills they need to know to stay safe.
- Develop and then implement procedures for identifying and reporting cases, or suspected cases, of abuse of any type.
- In accordance with an agreed child protection plan, support pupils who have been abused.

2.2. We believe that our Charity should provide a caring, positive, safe and stimulating environment that promotes the social, physical, emotional and moral development of the individual child.

2.3. We recognise the importance of providing an environment within our Charity that will help children feel safe and respected. We recognise the importance of enabling children to talk openly and to feel confident that they will be listened to.

2.4. We recognise that all adults within the school, including permanent and temporary staff, contractors, volunteers and governors, have a full and active part to play in protecting our pupils from harm. Because of the day-to-day contact with children, school staff are well placed to observe the outward signs of abuse.

2.5. We will work with parents to build an understanding of the school's responsibilities to ensure the welfare of all children, including the need for referrals to other agencies in some situations.

3. Scope

3.1. Whilst the law defines a child as anyone under the age of 18 years, **most importantly**, in line with our Code of Behaviour for staff, our interpretation of child includes all pupils at the Charity (of whatever age) **and also recent leavers**. Regarding staff behaviour in all respects **our classification of "child or children" is therefore robustly interpreted as including OEs over the age of 18 until a reasonable time has elapsed since their departure from the College; this means several years as opposed to weeks or months.**

3.2. 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 grow up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable children to have the best outcomes.

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

3.4. This policy applies to all members of staff in our school, including all permanent, temporary and support staff, governors, volunteers, contractors (whether one-off or regular) and external service or activity providers. Within this document the term 'staff' will be used to denote those adults, specified within the previous sentence.

4. The Legal Framework

4.1. Section 175 of the Education Act 2002 places a duty on governing bodies of maintained schools and further education institutions (including sixth-form colleges) to make arrangements for ensuring that their functions relating to the conduct of the school are exercised with a view to safeguarding and promoting the welfare of children who are pupils at the school. Section 157 of the same Act places a similar duty on non-maintained and independent educational establishments, including free schools and academies.

4.2. Under section 10 of the Children Act 2004, all maintained schools, further education colleges and independent schools, including free schools and academies, are required to cooperate with the local authority to improve the well-being of children in the local authority area.

4.3. Under section 14B of the Children Act 2004, East Sussex Safeguarding Children Partnership / ESSCP can require a school or college to supply information in order to perform its functions. This must be complied with.

4.4. This policy and the accompanying procedure have been developed in accordance with the following statutory guidance and local safeguarding procedures (fuller references are shown at the end of this policy):

- *Working Together to Safeguard Children: A Guide to Inter-Agency Working to Safeguard and Promote the Welfare of Children*
- *Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges*
- *Pan-Sussex Child Protection and Safeguarding Procedures*
- *Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers*
- *What to do if you're worried a child is being abused*
- *Statutory Framework for the Early Years Foundation Stage*

5. Roles and Responsibilities

5.1. The lead person with overall responsibility for child protection and safeguarding at each of the Charity schools is the Designated Safeguarding Lead (DSL). At Eastbourne College, the DSL is **Mr Cris Symes** and to ensure continuity of cover at all times we also have one deputy DSL, **Mrs Gwen Taylor-Hall**. At St Andrew's Prep (and its nursery) the DSL is **Mr Mark Tomsett** and to ensure continuity of cover at all times we also have two deputy DSLs, **Mrs Vicks Campion** and **Mrs Sarah Piper**. The DSL's responsibilities are described in [Appendix B](#). They work closely together within each school and across the Charity. In this and related policies they are referred to as "the DSL".

Two DSLs live on site at St Andrews. Sarah Piper lives close by. At the College, Cris Symes lives on site and Gwen Taylor-Hall lives close to the campus.

5.2. The DSL (*) will be on our schools leadership team and their role of DSL will be explicit in their job description. This person will have the appropriate authority and be given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings – and / or to support other staff to do so – and to contribute to the assessment of children. The DSL's lead responsibility will not be delegated.

*At St Andrew's Prep, Mark Tomsett sits on the school leadership team (but not Sarah Piper or Vicks Campion). At Eastbourne College, both Cris Symes and Gwen Taylor-Hall sit on the College leadership team. Cris Symes also sits on the strategic leadership team for the whole incorporated Charity.

5.3. Each school within the Charity has a Designated Teacher who is responsible for promoting the educational achievement of children who are looked after (LAC). At the College, the Designated Teacher is **Gwen Taylor-Hall**. At St Andrew's Prep, the Designated Teacher is **Mark Tomsett**. Each will work with staff and key personnel outside the College / Prep School as required to meet the needs identified in the child's personal education plan.

5.4. Each school within the Charity has a nominated governor responsible for safeguarding. At the College this is **Dr Rob Wicks**; at St Andrew's Prep this is **Nicky Eckert**. Both governors will champion good practice, provide critical challenge, liaise with the relevant school headmaster and provide information and reports to the governing body.

5.5. The case manager for dealing with allegations of abuse made against College staff members is the headmaster, **Mr Tom Lawson**.

The case manager for dealing with allegations of abuse made against St Andrew's Prep staff members is the Prep headmaster, **Mr Tom Gregory**.

The case manager for dealing with allegations against either headmaster is the chair of governors. The procedure for managing allegations is detailed in [Appendix F](#).

5.6. The governing body has delegated to the College Headmaster / Charity CEO the overall responsibility for ensuring that the policies and procedures adopted by the governing body are fully implemented and sufficient resources and time are allocated to enable staff members to discharge their safeguarding responsibilities. In addition, the College Headmaster / Charity CEO will:

- ensure that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistleblowing procedures.
- ensures that pupils' safety and welfare is addressed through the curriculum.

5.7. The governing body is collectively responsible for ensuring that safeguarding arrangements are fully embedded within the school's ethos and reflected in the school's day-to-day practice as part of a whole-school approach. This includes ensuring that the school has:

- a DSL who is a member of the senior leadership team and who has undertaken level 3 training (and updated on a biennial schedule),
- child protection policy and procedures that are consistent with East Sussex Children's Partnership requirements, reviewed annually and made available to parents,
- procedures for dealing with allegations of abuse made against members of staff including allegations made against the head,
- safer recruitment procedures that include the requirement for appropriate checks,
- a training strategy that ensures all staff, including the headmasters, DSL, governors and contractors receive regular and appropriate child protection training,
- arrangements to ensure that all temporary staff and volunteers are made aware of the school's arrangements for child protection,
- remedied, without delay, any deficiencies in safeguarding and child protection policy.

5.8. All staff members, governors, volunteers and external providers have received training so that they know how to recognise signs and symptoms of abuse, how to recognise potential safeguarding concerns, how to respond to pupils who disclose concerns and what to do if they are concerned about a child.

5.9. All new staff will be provided with a copy of this policy as part of their induction. Existing staff are expected to read the policy at least annually, to familiarise themselves with any updated practice. In either circumstance staff are expected to read the document in its entirety to ensure that they are aware of not just their own role and responsibilities but also the role of other key members of staff such as the relevant headmaster and the DSL to the school(s) they work in (some staff work across both schools in the Charity).

6. Supporting Children

6.1. Our Charity will support all pupils by:

- taking a child-centred approach to all aspects of our work
- establishing and maintaining an environment where children feel secure, supported, are encouraged to talk, are listened to and have a sense of being valued.
- ensuring the content of the curriculum includes social and emotional aspects of learning in a "preventative" manner.
- ensuring a comprehensive response across the curriculum to online safety, enabling children and parents to learn about the risks of new technologies and social media and to use these responsibly at school and at home.
- ensuring high standards and codes of behaviour for all in the community.
- filtering and monitoring internet use, to safeguard from potentially harmful and inappropriate online material,
- ensuring that safeguarding is included across the curriculum to help children stay safe, recognise when they do not feel safe and identify who they might or can talk to.
- recognising that effective education will be tailored to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs or disabilities.
- providing pupils with a number of appropriate adults as well as senior pupils to approach if they are in difficulties.
- ensuring that our safeguarding systems are well promoted, easily understood and easily accessible to children.
- ensuring that when children talk to an adult about a concern they may have they will always be taken seriously, they will always be supported and kept safe, they will never be given the impression that they are creating a problem or have anything to feel ashamed about.
- Ensuring that our systems of gathering pupil voice capture the full breadth of the pupil demographic, including pupils with SEND and those who are vulnerable or have experienced challenges in their lives, to understand the experience of pupils at the school, so that this can inform the development of safeguarding practice.
- supporting the child's development in ways that will foster security, confidence and independence.
- encouraging development of self-esteem and self-assertiveness while not condoning aggression or bullying.
- liaising and working together with other support services and those agencies involved in safeguarding children.
- monitoring children who have been identified as having welfare or safeguarding concerns and providing appropriate support.
- ensuring that all staff are aware of the early help process, and understand their role in it, including acting as the lead professional where appropriate.
- Ensuring that all staff have a clear understanding of the needs of the children they are working with and understand that whilst all children need to be protected some groups of children are potentially at greater risk of harm through additional vulnerabilities or circumstances.
- helping parents in an appropriate and collegiate way to raise their awareness about certain pastoral issues pertinent to safeguarding (e.g. mental health, e-safety).

6.2. We recognise that children who are abused or witness violence may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation and some sense of blame. The Charity may represent a stable, secure and predictable element in the lives of children at risk. When at school, their behaviour may be challenging and defiant or they may

be withdrawn. Additional vulnerabilities and characteristics can include:

- Looked after children (LAC)
- Previously looked after children
- Care leavers
- Children with special educational needs, disabilities or certain health conditions (whether or not they have a statutory Education, Health and Care Plan)
- Young carers
- Children who have a mental health need
- Children showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- Children who frequently go missing from care or from home
- Children misusing drugs or alcohol themselves;
- Children at risk of modern slavery, trafficking, sexual or criminal exploitation;
- Children in a family circumstance presenting challenges for the child, such as substance / drug / alcohol abuse, adult mental health issues or domestic abuse
- Children with a close family member in prison, or who is affected by parental offending
- Children at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- Children who have returned home to their family from care;
- Children showing early signs of abuse and / or neglect;
- Children at risk of being radicalised or exploited;
- Privately fostered children
- Children who are absent from education for prolonged periods and / or on repeat occasions
- Children or a young people who identify as lesbian, gay, bi or trans (LGBT), or who are perceived by other children to be LGBT (whether they are or not)
- Being LGBT, or perceived to be, is not in itself an inherent risk factor for harm, but this group can be targeted by other children. Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open, so as a school we endeavour to reduce any additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff.

6.3. Children with special educational needs and disabilities (SEND) or certain health conditions can face additional safeguarding challenges and additional barriers can exist when recognising abuse and neglect in this group of children (whether or not they have a statutory Education, Health and Care Plan). These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- being more prone to peer group isolation or bullying / cyberbullying (including prejudice based bullying) than other children
- the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- communication barriers and difficulties in managing or reporting these challenges
- cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content / behaviours in schools or colleges without understanding the consequences of doing so.

We understand the additional vulnerabilities for young children. To address these additional challenges our schools will ensure that these children receive additional monitoring and pastoral support. At the prep school / nursery, we follow the guidance for safeguarding children up to the age of five set out in Section 3 of the Statutory Framework for the Early Years Foundation Stage.

6.4. Children who have a social worker due to safeguarding or welfare needs may be vulnerable to further harm due to experiences of adversity and trauma, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and positive mental health. Our school will identify the additional needs of these children and provide extra monitoring and academic / pastoral support to mitigate these additional barriers. We recognise that even when social care intervention has ended, these additional barriers may persist, therefore so too will our additional monitoring and support.

6.5. Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Where it is known that children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can impact on their mental health, behaviour and education. Our Charity will identify the additional needs of these children and provide extra monitoring and pastoral support to mitigate these additional barriers. Where necessary, referrals will be made to mental health professionals for further support.

6.6. Both schools within the Charity is a part of Sussex Police Operation Encompass (see [Appendix B](#) for further details) and we will support individual children as necessary when we receive a notification of an incident of domestic violence or abuse.

6.7. Both our schools take a trauma informed approach to supporting children, considering their lived experience, and factoring this into how we can best support them with their welfare and engage them with their learning

7. Child Protection and Safeguarding Procedure

7.1. We have developed a structured procedure in line with *Pan-Sussex Child Protection and Safeguarding Procedures* and *Keeping Children Safe in Education*, which will be followed by all members of the school community in cases where there are welfare or safeguarding concerns. This is detailed in Appendix A.

7.2. In line with the procedures, the Children's Social Care Single Point of Advice (SPoA) (see front page for contact) will be notified as soon as there is a significant concern, or where level 3 support is required, or level 2 Early Help Keywork Service support is required for children who are severely absent from school. SPoA now includes both safeguarding and medical professionals.

7.3. Where a crime may have been committed the police will be involved as necessary (using the NPCC- [when-to-call-the-police--guidance-for-schools-and-colleges.pdf](#) ([npcc.police.uk](#)) guidance to inform this decision.

7.4. Where the police speak with children formally at school then the requirement, outlined in [PACE Code C 2019](#), for children to have an Appropriate Adult will be adhered to.

7.5. The names and photographs of the relevant school DSLs will be clearly advertised in key points around the Charity, with a statement explaining each school's role in referring and monitoring welfare and safeguarding concerns. See [Appendix I](#). Pupils are regularly made aware through assemblies and house meetings, the systems in place which are there to support them, including who to talk to if they have concerns.

7.6. We will ensure all parents and carers are aware of the responsibilities of staff members to safeguard and promote the welfare of children and act in the best interests of children by publishing the policy and procedures on our website and by referring to them in our introductory school materials.

8. The Management of Safeguarding

8.1. We recognise that safeguarding is not a discrete area of work: there is a safeguarding dimension to almost every area of school practice. As part of our whole Charity approach, and to ensure an holistic view of all children, we have structures and systems in place, such as scheduled meetings and shared databases and regular communication between DSLs across the schools to ensure that the DSL in each school has oversight of areas of school organisation which may not fall within their remit, but may impact upon effective safeguarding such as behaviour, attendance, medical needs / first aid, SEND and bullying. Information from all of these areas will be factored into safeguarding decision making for individual children so that their needs are considered holistically.

8.2. We will ensure that the DSL is kept informed of any incident of physical intervention with a child and will be aware of behaviour plans for specific children. (*See staff code of conduct and [Restraints Policy](#) for further information*).

8.3. We will ensure that the DSL is kept informed of attendance patterns, and where there are concerns for individual children the response to this will be considered within the context of safeguarding. (*See [Attendance and Absentees Policy](#) for further information*).

8.4. We will ensure that the DSL is kept informed of arrangements for more significant or potentially concerning first aid interventions* and children with more significant medical conditions* and is alerted where a concern arises, such as an error with the administering of medicines or intervention, or repeated medical appointments being missed, or guidance

or treatments not being followed by the parents or the child. (See *Medical Policy suite and Appendix B* for further information).

*"Routine" medical matters and interventions are overseen by our specialist medical team.

8.5. Systems are in place to ensure that hate incidents, e.g. racist, homophobic, biphobic, transphobic gender or disability-based bullying, are reported, recorded and considered under safeguarding arrangements by the DSL. (See *Anti-Bullying Policy* for further information).

8.6. The DSL links with curriculum leads, such as PSHE and ICT, to ensure that the curriculum supports the wellbeing and resilience of pupils and teaches them about risk assessment and safeguarding issues, such as healthy relationships and online safety. (See *PSHE / SRE / Online Safety Policies* for further information).

9. Reporting Concerns and Record Keeping

9.1. All safeguarding and welfare concerns, discussions and decisions made will be recorded in writing and kept in line with the East Sussex Safeguarding Children Partnership / ESSCP guidance *Keeping Records of Child Protection and Welfare Concerns Guidance*.

9.2. The College uses a bespoke pupil database (PUPIL) which logs all key academic and pastoral concerns and achievements. It is in the process of migrating child protection data across to CPOMS. The Prep school uses Class Charts for behavioural management and CPOMS for safeguarding matters. More serious issues are escalated to a child protection file held in each school (CPOMS will be in place for all cases in both schools within 3-5 years). The DSL will ensure that child protection files are kept up to date and that information will be kept confidential and stored securely.

9.3. Records will include:

- a clear and comprehensive summary of the concern
- details of how the concern was followed up and resolved
- a note of any action taken, decisions reached and the outcome

9.4. The DSL will ensure that files are only accessed by those who need to see them and where files or content are shared, this will happen in line with information sharing advice and guidance.

9.5. Hate incidents, e.g. racist, homophobic, gender or disability-based bullying, are reported, recorded and considered under safeguarding arrangements.

9.6. Attendance patterns are reviewed and responded to under safeguarding arrangements.

9.7. We will continue to support any pupil leaving either the Prep school or the College about whom there have been concerns by ensuring that all appropriate information, including welfare and safeguarding concerns, is forwarded under confidential cover to the pupil's new school as a matter of priority, and within 5 working days.

Pupils leaving the College at the conclusion of year 13 (ie finishing schooling completely) are, if they are on the College Counsellor's register, given the option of whether they would like the College to make contact with outside organisations or agencies (eg a university counselling service). We write to all parents and provide information to pupils towards the end of Y13 to remind them of the importance of their 'children' registering themselves at university or elsewhere.

9.8. When a pupil is due to transfer to another school the DSL will consider if it would be appropriate to share any information with the new school or college in advance of the pupil leaving. For example, information that would allow the new school or college to continue supporting children, those who have had a social worker or who have been victims of abuse, so that the new school has appropriate support in place for when the child arrives. Note this decision is taken by the DSL acting in the child's best interests, without reference to the parents.

9.9. When a new pupil joins one of our schools, and there is a record of safeguarding or welfare concerns, we will ensure that this information is shared appropriately with the relevant DSL, the Special Education Needs Coordinator (SENCO) and the Designated Teacher for LAC, the Housemaster / Housemistress (Hsm) (at College), Head of Section (at Prep), Medical team, as necessary.

10. Safer Workforce and Managing Allegations Against Staff and Volunteers

10.1. Our Charity has robust safer recruitment procedures to help prevent unsuitable people from working with children. Please see the Charity Recruitment Policy for further details.

10.2. All individuals working in any capacity at our Charity will be subjected to safeguarding checks in line with the statutory guidance *Keeping Children Safe in Education*.

10.3. We will ensure that agencies and third parties supplying staff provide us with written confirmation that they have made the appropriate level of safeguarding checks on individuals working in our school. We will also ensure that any agency worker presenting for work is the same person on whom the checks have been made

10.4. Professional visitors, such as Educational Psychologists, Social Workers or Local Authority Officers, will be expected to provide a professional proof of identity. Where necessary we will seek further reassurances from their employers that these persons have suitable DBS clearance etc.

10.5. External organisations can provide a varied and useful range of information, resources and speakers that can help our school to enrich children's education, but we will always give careful consideration to the suitability of any external organisations. This may include an assessment of the education value, the age appropriateness of what is going to be delivered and whether relevant checks will be required.

10.6 Parents or other relatives of children or other visitors attending activities such as a parents evening or sports day will not be expected to provide any DBS or barred list checks. The headmaster and DSL will decide case by case or event by event the level of supervision, if any, required for such persons. See Access to Premises Policy for the relevant school.

10.7. We will ensure that alternative provision providers provide written reassurance that they have made the appropriate level of safeguarding checks on individuals working for their organisation.

10.8. Every job description and person specification will have a clear statement about the safeguarding responsibilities of the post holder.

10.9. We will ensure that at least one member of every interview panel has completed safer recruitment training and that this qualification is current within the last 5 years.

10.10. The head and the DSL (for each of the schools) are responsible for ensuring that our single central record is accurate and up to date. At ECi we additionally ensure that the two nominated safeguarding governors check the SCR on a termly basis and the chair of governors does so annually.

10.11. We have a procedure in place to handle allegations against members of staff and volunteers, and any individual or organisation using the school premises for the purposes of running activities for children, including low-level concerns, no matter how small, in line with *Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges*. This procedure is detailed in [Appendix A](#).

10.12. Charity staff should ensure that their behaviour and actions do not place pupils or themselves at risk of harm or allegations of harm to a pupil. All staff are expected to adhere to the standards and disciplines for staff laid out in *Staff Code of Conduct / Behaviour Policy*. Special care should be taken to be highly professional at all times and mindful of the duty of care responsibility when dealing with pupils and particularly so during, for example:

- one-to-one tuition
- PE lessons and sports coaching
- performing arts lessons, rehearsals and performances
- conveying a pupil by car
- all forms of electronic communication.

11. Staff Induction, Training and Development

11.1. All new members of staff, including newly-qualified teachers, teaching assistants and volunteers, will be given an induction which, depending on their role, includes the points as listed in [appendix I](#).

11.2 The safeguarding induction and ongoing safeguarding training of staff will be integrated, aligned and considered as part of the whole school safeguarding approach and wider staff training and curriculum planning. In particular it will include: (see [appendix I](#)):

- Staff understand the difference between a safeguarding concern and a child in immediate danger or at risk of significant harm.
- Staff are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned.
- When concerned about the welfare of a child, staff should always act in the best interests of the child.
- Staff understand that children's poor behaviour may be a sign that they are suffering harm or that they have been traumatised by abuse.
- Staff understand that children who have a social worker may be educationally disadvantaged and face barriers to attendance, learning, behaviour and positive mental health and that these barriers may persist even when the social care intervention ceases.
- Staff understand that mental health issues for children may be an indicator of harm or abuse, or where it is known that a child has suffered harm or abuse this may impact on their mental health, behaviour and education.
- Staff understand that safeguarding incidents and / or behaviours can be associated with factors outside the school and / or can occur between children outside of these environments. All staff, but especially the DSL (and deputies), should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines.
- Staff understand that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently via online channels and in daily life. Children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic / misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.
- Staff to be aware that children can abuse other children (often referred to as child on child abuse) and that it can happen both inside and outside of school and online.
- Staff to understand, that even if there are no reports in the schools of child on child abuse it does not mean it is not happening, it may be the case that it is just not being reported.
- Staff to understand the importance of challenging inappropriate behaviours between peers, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.
- Staff know how best to respond to a child who makes a disclosure of abuse or harm.
- If staff are unsure, they should always speak to the DSL.
- If staff have any concerns about a child's welfare, they should act on them immediately.
- Staff should not assume a colleague or another professional will take action.
- A clear understanding of key related policies such as ICT Acceptable Use and Whistleblowing.
- The DSL or a deputy should always be available to discuss safeguarding concerns. If in exceptional circumstances, the DSL (or deputy) is not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the senior leadership team and / or take advice from SPoA. In these circumstances, any action taken should be shared with the DSL (or deputy) as soon as is practically possible.
- Teaching staff in all subject areas to understand that there will be various opportunities, planned and unplanned, to reference, reinforce or develop aspects of the safeguarding agenda within their lessons such as online safety, healthy relationships, challenging hate or prejudice and critical thinking.

11.3. The DSL and any deputies will undergo specific DSL level 3 updated safeguarding and child protection training every two years. In addition to this their knowledge and skills will be updated regularly, and at least annually, to keep up with developments relevant to the role.

11.4. All staff members of each school will receive appropriate safeguarding and child protection training (whole-school training) which is regularly updated. Staff who work across both sites will not be required to attend two lots of training, as the policy is cross-Charity. But they must be made aware of any specific points, differences and personnel. The DSL will provide briefings to the school on any changes to safeguarding and child protection legislation and procedures and relevant learning from local and national serious case reviews as required, at key points throughout the year including at the start of every term. Both updates and training are recorded. Formal training for all staff to level 1 standard is recommended at least every three years.

11.5. Staff members who miss whole school training will be required to undertake other relevant training to make up for it, e.g. by completing an online course and / or receiving 1:1 training from the DSL. The DSL will be responsible for arranging this.

11.6. The nominated governor for safeguarding and child protection at each school will attend specific and appropriate governor and safeguarding training prior to or soon after appointment to the role; this training will be updated every four years.

11.7. We will ensure that staff members provided by other agencies and third parties, e.g. contractors, have received appropriate safeguarding and child protection training commensurate with their roles before starting work. They will be given the opportunity to take part in whole-school training if it takes place during their period of work for the school.

11.8. On the first occasion with staff members provided by other agencies and third parties, e.g. contractors come to the Charity to work; they will be provided with details of the safeguarding arrangements at the school or schools they will operate from, which will include identifying the DSL and the process for reporting welfare concerns. They will be briefed regarding our expectations for keeping children and themselves safe and this will include being provided with and having access to relevant policies most relevant to their role.

11.9. Each school will maintain accurate records of staff induction and training. Note that having undertaken safeguarding training to commence work at the College or School, staff are not required to have additional safeguarding training if they have a role (or commence a new role) at the other Charity setting. However, their line manager must point out the following practicalities for the other / new setting in which they are required to work:

- fire procedures
- critical incident procedures
- medical / first aid procedures
 - a reminder of who the DSLs are and that any safeguarding issue must be referred to the DSL of the school in which the pupil normally attends

11.10. [Appendix II](#) contains recommended and mandated renewal frequencies for training.

12. Confidentiality

12.1. We recognise that all matters relating to safeguarding and child protection are confidential.

12.2. The headmaster or the DSL of the relevant school will disclose any information about a pupil to other members of staff on a need-to-know basis, and in the best interests of the child.

12.3. All staff members are aware that they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing.

12.4. All staff members have a professional responsibility to share information with other agencies in order to safeguard children.

12.5. All staff have a professional duty to report concerns about the conduct of staff towards children to the relevant school headmaster.

12.6. All our staff members who come into contact with children will be given appropriate training to understand the purpose of information sharing in order to safeguard and promote children's welfare.

12.7. We will ensure that staff members are confident about what they can and should do under the law, including how to obtain consent to share information and when information can be shared without consent. This is covered in greater detail in [Appendix A](#).

13. Inter-Agency Working

13.1. We will develop and promote effective working relationships with other agencies, including agencies providing early help services to children, the police and Children's Social Care.

13.2. We will ensure that relevant staff members participate in multi-agency meetings and forums, including child protection conferences and core groups, to consider individual children.

13.3. We will participate in safeguarding practice reviews (previously known as serious case reviews), other reviews and file audits as and when required to do so by the East Sussex Safeguarding Children Partnership (ESSCP). We will ensure that we have a clear process for gathering the evidence required for reviews and audits, embedding recommendations into practice and completing required actions within agreed timescales.

14. Contractors, Service and Activity Providers and Work Placement Providers

14.1. We will ensure that contractors and providers are aware of our school safeguarding and child protection policy and procedures. We will require that employees and volunteers provided by these organisations use our procedure to report concerns.

14.2. We will seek written confirmation that employees and volunteers provided by these organisations and working with our children have been subjected to the appropriate level of safeguarding check in line with *Keeping Children Safe in Education*. If assurance is not obtained, permission to work with our children or use our school premises may be refused.

14.3. When we commission services from other organisations, we will ensure that compliance with our policy and procedures is a contractual requirement.

14.4. When the Charity places a pupil with an alternative provision provider, the relevant school continues to be responsible for the safeguarding of that pupil. If deemed to be a "regulated activity" setting the school will obtain written confirmation from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at the establishment, ie those checks that the school would otherwise perform in respect of its own staff. We will also ensure that the alternative provision provider is aware of any risk factors or safeguarding concerns for any pupil placed with them by us and that they can meet their needs. In respect of us being responsible for the safeguarding of that pupil we will establish agreements and protocols with the alternative provision provider for the sharing of information such as daily attendance or emerging concerns, and that they are adhered to. See *internal College policy 'Safeguarding and Child Protection during Offsite Pupil Placements'*.

14.5. When and before sending pupils on a work placement, as part of work experience, we will seek reassurances from the organisation / company about their policies and procedures to protect children from harm, and request checks on supervising adults, where necessary, as outlined in *Keeping Children Safe in Education September*. See also *internal College policy - Safeguarding and Child Protection during Offsite Pupil Placements' (Note - St Andrew's Prep does not send pupils on placements)*.

15. Senior Pupils

15.1. Senior pupils can be the first to identify symptoms of abuse and child protection concerns. With this in mind, key senior pupils at each school, such as school prefects and peer listeners, are given age-appropriate safeguarding / child protection training.

16. Whistleblowing and Complaints

16.1. We recognise that children cannot be expected to raise concerns in an environment where staff members fail to do so.

16.2. We aim to ensure that all staff members are aware of their duty to raise concerns, where they exist, about the management of safeguarding and child protection, which may include the attitude or actions of colleagues, including low level concerns. This is detailed within this policy in relation to children but is also stated more generally, in our Whistleblowing policy. If necessary, staff will speak with the relevant headmaster, the chair of the governing body or with the Local Authority Designated Officer (LADO). Should staff not feel able to raise concerns they can call the NSPCC "What you can do to report abuse" dedicated helpline on [0800 028 0285](tel:08000280285) or via help@nspcc.org.uk or via [Whistleblowing Advice Line | NSPCC](#).

16.3. We have a clear reporting procedure for children, parents and other people to report concerns or complaints, including abusive or poor practice. This is outlined in the cross-Charity Complaints Policy.

17. Site Security

17.1. All staff members have a responsibility to ensure our buildings and grounds are secure and for reporting concerns that may come to light. This is especially important given the open nature of parts of the site (e.g. College campus and playing fields), although all building entry points have security systems in place.

17.2. We check the identity of all 'scheduled and / or formal' visitors and volunteers coming into each school. Visitors are expected to sign in and out in the relevant Reception visitors' log and to display a visitor's badge / red lanyard while on the school site. Any individual who is not known or identifiable will be challenged for clarification and reassurance. *More specific information is contained within each school's Access to Premises policy, detailing for example, how arrangements work for informal parent visits to fixtures and community events, etc.*

17.3. The Charity of both schools expects all visitors to share our commitment to the safeguarding and protection of young people. Each school operates a visitor / Access to Premises policy in accordance with this commitment. On arrival, all visitors are provided with information which provides the most salient points regarding:

- emergency / accident procedures
- key contacts, including the DSLs
- our commitment to safeguarding and promoting the welfare of children
- how this commitment is expected of all visitors

See appendix L. and also Access to Premises Policy for relevant school.

17.4. The Charity will not accept the behaviour of any individual, parent or anyone else, that threatens site security or leads others, child or adult, to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse the person access to the relevant school or whole Charity site.

18. Use of School Premises for Non-School Activities

18.1. When we hire or rent out Charity facilities / premises to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) we always ensure that appropriate arrangements are in place to keep children safe.

18.2. When the services or activities being provided are under the direct supervision or management of the school, then arrangements for child protection outlined within this policy will apply.

18.3. Where services or activities are being provided separately by another body this will not necessarily be the case. The school will seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and that they follow the safeguarding arrangements in *Keeping Children Safe in Out-of-School settings*; and ensure that there are arrangements in place to liaise with the school on these matters where appropriate.

18.4. The school will also ensure safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.

Please see the hire and lettings and the access to premises policies for further detail.

19. Quality Assurance

19.1. We will ensure that systems are in place to monitor the implementation of and compliance with this policy and accompanying procedures. This will include periodic audits of welfare concern and safeguarding files and records by the DSL.

19.2. We will complete a self-assessment audit of the school's safeguarding arrangements at frequencies specified by the East Sussex Safeguarding Children Partnership and using the audit tool provided by the Education Division for this purpose. Currently, although the Charity has one overarching Safeguarding policy, each completes its own audit.

19.3. The school's senior management and the governing body will ensure that action is taken to remedy without delay any deficiencies and weaknesses identified in safeguarding and child protection arrangements.

20. Policy Review

20.1. This policy and the procedures will be reviewed every academic year. Additional reviews / changes will be made as required by law. All other linked policies will be reviewed in line with the specific policy review cycle.

20.2. The DSL will ensure that staff members are made aware of any amendments to policies and procedures.

21. Linked Policies and Procedures

21.1. Listed below are the key references and associated policies which provide further detail in key areas.

Internal – cross Charity:

- Admissions Policy
- Complaints Policy
- Data Protection Policy
- Disciplinary Policy for staff
- Health and Safety Policy suite
- Online Safety Policy
- Recruitment and staff selection Policy
- Staff Code of Conduct / Behaviour Policy
- Whistleblowing Policy

Internal - College

- Access to school premises by visitors and others outside the school Policy
- Attendance, Registration and Absentees Policy
- Anti-bullying Policy
- Boarding staff guidance Policy
- Curriculum Policy
- Disability Equality Policy
- Drug and substances Policy
- Discipline and Exclusions Policy
- Equality and Diversity Policy
- First Aid Policy
- Female Genital Mutilation Policy and Risk assessment
- Medical Centre Policy suite
- Mental Health Policy
- Offsite Activities and Educational Visits Policy and risk assessments
- Pastoral Care Policy
- Photography Policy
- Physical Education and Sports Guidance
- Preventing Extremism and Radicalisation Risk assessment (Prevent)
- Protocol for a Missing Boarder Policy
- Provision for pupils with particular Religious etc. needs
- PSHE / Sex and Relationships Education Policy
- Residential Accommodation with access to Pupil Areas Policy
- Resident Adult Agreement and Code of Conduct Policy
- Restraints Policy
- Risk Assessment Policy
- Risk Assessment Policy for Pupil Welfare
- Safety and Supervision on School Journeys Policy
- Safeguarding and child protection during offsite pupil placements Policy
- Safeguarding and Remote Working Policy (e.g. during school closure)
- School behaviour policy suite
- Special Educational Needs and Disabilities Policy
- Spiritual, Moral, Social and Cultural Development Policy
- Staff Driving Policy
- Supervision of Boarders (and pupils)

Internal - Prep school

- Administration of Medicines Policy
- Anti-Bullying Policy
- Attendance Policy
- Rewards and Sanctions (Behaviour Policy)
- Children Missing from Education Procedures
- Complaints procedure
- Drug and Alcohol Education Policy
- Equalities Policy
- ICT Acceptable Use Policy
- Educational Visits Policy and risk assessments
- Mobile Devices and Digital Content Policy
- Physical Education and Sports Guidance
- Positive Handling and Physical Intervention Policy and Guidance
- Premises Inspection Checklist
- Preventing Extremism and Radicalisation Safeguarding Policy

- PSHE Policy
- Pupil Images Policy
- School pupil behaviour policy suite
- Sex and Relationship Education Policy
- Special Educational Needs and Disabilities Policy
- Spiritual, Moral, Social and Cultural Development Policy
- Work Experience Handbook

Further detailed information can be obtained from either of the Designated Safeguarding Leads.

External:

Sources of useful advice on safeguarding and promoting the welfare of children are:

- [Keeping Children Safe in Education \(KCSIE\)](#)
- [Working together to Safeguard Children](#)
- [The Children Act 1989 and 2004](#)
- The Assessment Framework (DOH, DfE, HO 2000)
- [Female Genital Mutilation UK Government papers](#)
- [Multi-agency statutory guidance on female genital mutilation](#)
- **Prevent resources:**
 - The Prevent Duty: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/439598/prevent-duty-departmental-advice-v6.pdf
 - [Prevent duty: Educate Against Hate](#)
 - [The Prevent duty: Safeguarding Learners Vulnerable to Radicalisation](#)
 - [Prevent duty example of nationally published risk assessment](#) (we use one based on East Sussex)
 - [Prevent national referral form](#) (we use East Sussex version)
- [Political impartiality in schools](#)
- [What to do if you are worried a child is being abused: Advice for practitioners \(DOH, DfE, HO\)](#)
- [Pan-Sussex Child Protection and Safeguarding Procedures](#)
- [East Sussex Safeguarding Children's Partnership](#)
- [CZone](#): East Sussex County Council website hub supporting the work of education providers in East Sussex
- Protocol for Managing Child on child Harmful Sexual Behaviour in Schools under [Harmful sexual behaviour \(CZone\)](#)
- [Sexual behaviours Brook Traffic Light tool](#). East Sussex schools now use their own system annexed in this policy
- [SEN Code of Practice](#)
- The [NSPCC website](#) is a very useful source of information on symptoms of abuse
- [National Minimum Standards \(Boarding\) Handbook for the Inspection of Schools](#)
- [The BSA Commitment to Care Charter](#)
- [Charity Commission Guidance: How to report a serious incident in your charity](#)
- [Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers](#)
- [Mental Health and behaviour in schools](#)
- [Supporting Pupils at School with Medical Conditions](#)
- [Preventing youth violence and gang involvement; practical advice for schools and colleges](#)
- [Criminal exploitation of children and vulnerable adults: County Lines guidance, September 2018](#)
- [Teaching online safety in school: guidance supporting schools to teach their pupils how to stay safe online, within new and existing school subjects](#)
- [UKCIS - Education for a connected world: a framework to equip children and young people for digital life](#)
- [The designated teacher for looked-after and previously looked-after children: statutory guidance on their roles and responsibilities](#)
- [Use of reasonable force: advice for headteachers, staff and governing bodies](#)
- [Searching, screening and confiscation: advice for headteachers, school staff and governing bodies](#)
- [Making barring referrals to the DBS](#)
- [Suspension and Permanent Exclusion from maintained schools, academies and pupil referral units in England, including pupil movement - Guidance for maintained schools, academies, and pupil referral units in England](#)
- [Regulated Activity Guidance](#)
- [Statutory Framework for the Early Years Foundation Stage](#)
- [Keeping children safe in out of school settings](#)
- [Working Together to Improve School Attendance](#)

Appendices

- A: [Child Protection and Safeguarding Procedure](#)
- B: [Specific safeguarding issues](#)
- C: [Child-on-Child abuse](#)
- D: [Preventing Extremism and Radicalisation](#)
- E: [The role of the Designated Safeguarding Lead](#)
- F: [Managing allegations flowchart](#)
- G: [Hackett Continuum Model](#)
- H: [ESSCP RAG guide for Harmful Sexual Behaviours](#)
- I: [Safeguarding Induction checklist for teaching staff](#)
- II: [Renewal frequencies for training course](#)
- J: [Child Protection Incident / Welfare concern form](#)
- K: [Child Protection and Safeguarding DSL Display posters](#)
- L: [Visitor Information leaflets](#)
- M: [Safeguarding risk reduction plan](#)
- N: [Prevent Referral Form](#)

Appendix A: Children Protection and Safeguarding Procedure

1. Introduction And Definitions

1.1. **Children** are any people who have not yet reached their 18th birthday; a 16-year-old, whether living independently, in further education, in the armed forces or in hospital, is a child and is entitled to the same protection and services as anyone younger. *Very importantly, the Charity and specifically Eastbourne College includes in this definition recent school leavers who are over the age of 18; such persons remain classified as children until several years (as opposed to weeks or months) of having left school.*

1.2. **Child protection** is part of safeguarding and promoting the welfare of children and refers to activity undertaken to protect specific children who are suffering, or likely to suffer, significant harm.

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

1.4. **Harm** is ill treatment or impairment of health and development, including impairment suffered from seeing or hearing the ill treatment of another.

1.5. **Safeguarding children** is the action we take to promote the welfare of children and protect them from harm. **Safeguarding and promoting the welfare of children** is defined in *Working Together to Safeguard Children: A Guide to Inter-Agency Working to Safeguard and Promote the Welfare of Children: July 2018*

- protecting children from maltreatment;
- preventing impairment of children's mental or physical health and 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.

1.6. The Charity recognises the importance of distinguishing between safeguarding children who have suffered or are at risk of suffering serious harm and those who are in need of additional support from one or more agencies. The first requires the school to report the child to children's social care and / or the Police immediately; the latter leads to inter-agency assessment using local processes.

1.7. Pupils are encouraged to have healthy relationships across the community. The Charity has a "SPEAK UP culture" where all pupils are actively encouraged to speak out and seek help / advice / report anything that makes them feel uncomfortable or unhappy. Staff and senior pupils are given clear instruction on the need to look out for any form of abuse between pupils. This is closely aligned to the Charity anti-bullying policy.

1.8. Good practice in safeguarding includes:

- treating all pupils with respect,
- setting a good example by conducting ourselves appropriately,
- involving pupils in decisions that affect them,
- encouraging positive and safe behaviour among pupils,
- being a good listener,
- being alert to changes in pupils' behaviour,
- recognising that challenging behaviour may be an indicator of abuse,
- reading and understanding the school's child protection policy and guidance documents on wider safeguarding issues, for example bullying, physical contact and information-sharing,
- asking a pupil's permission before doing anything for them of a physical nature, such as physical support during games or administering first aid,
- maintaining appropriate standards of conversation and interaction with and between pupils and avoiding the use of sexualised or derogatory language,
- being aware that the personal and family circumstances and lifestyles of some pupils lead to an increased risk of abuse.

2. Categories of Abuse

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

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

Some of the following signs may be indicators of physical abuse:

- Children with frequent injuries
- Children with unexplained or unusual fractures or broken bones; and
- Children with unexplained bruises or cuts; burns or scalds; or bite marks, especially where in odd positions, occur repeatedly and / or the explanation provided seems unconvincing.

2.3. **Emotional abuse** is the persistent emotional maltreatment of a child such that it causes severe and persistent adverse effects on the child's emotional development. It may involve:

- making a child feel worthless, unloved or inadequate
- only there to meet another's needs
- not giving the child opportunities to express their views, deliberately silencing them or "making fun" of what they say and how they communicate
- inappropriate age or developmental expectations; these may include interactions that are beyond a child's developmental capability
- causing children frequently to feel frightened or in danger
- the exploitation or corruption of children
- overprotection and limitation of exploration, learning and social interaction
- seeing or hearing the ill treatment of another, e.g. domestic abuse
- making the child feel worthless and unloved - high criticism and low warmth
- serious bullying (including cyberbullying)
- exploitation or corruption
- locking the child away
- excessive shouting, teasing or humiliation
- denial of love, affection, interest or friendship
- over-protection so as to deny the child the normal experiences of life

Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone. Some of the following signs may be indicators of emotional abuse:

- Children who are excessively withdrawn, fearful, or anxious about doing something wrong;
- Parents or carers who withdraw their attention from their child, giving the child the 'cold shoulder';
- Parents or carers blaming their problems on their child; and
- Parents or carers who humiliate their child, for example, by name-calling or making negative comparisons.
 - It can manifest in a child having difficulty with relationships and socialising or showing rebellious, aggressive or anti-social behaviour.
 - They may also seem to not care what happens to them.

2.4. **Sexual abuse** involves forcing or enticing a child or young person to take part in sexual activities, including prostitution, not necessarily involving violence and whether or not the child is aware of what is happening. Activities may involve:

- physical contact, including penetration of any part of the body
- non-penetrative acts such as masturbation, kissing, rubbing and touching outside clothing.
- non-contact activities, such as involving children looking at or in the production of sexual images, including on the internet, watching sexual activities
- encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse.

The child may not be aware of what is happening. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue (which is classed within a broader range of issues known as child-on-child abuse) in education and all staff should be aware of it and of the school policy and procedures for dealing with it. The Charity response to child-on-child abuse is detailed within [Appendix C](#) of this policy.

Some of the following signs may be indicators of sexual abuse:

- Children who display knowledge or interest in sexual acts inappropriate to their age;
- Children who use sexual language or have sexual knowledge that you wouldn't expect them to have;
- Children who ask others to behave sexually or play sexual games; and
- Children with physical sexual health problems, including soreness in the genital and anal areas, sexually transmitted infections or underage pregnancy.

2.5. Child sexual exploitation is also sexual abuse; it involves children and young people receiving something, for example accommodation, drugs, gifts or affection, as a result of them performing sexual activities, or having others perform sexual activities on them. It could take the form of grooming of children, e.g. to take part in sexual activities or to post sexual images of themselves on the internet.

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

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

Depending on the age and capacity of the child, staff should be aware of possible self-neglect, where a child may not be following medical guidance or taking medication as prescribed. Where this is the case this should be raised as a safeguarding concern.

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

Some of the following signs may be indicators of neglect:

- Children who are living in a home that is indisputably dirty or unsafe;
- Children who are left hungry or dirty;
- Children who are left without adequate clothing, e.g. not having a winter coat;
- Children who are living in dangerous conditions, i.e. around drugs, alcohol or violence;
- Children who are often angry, aggressive or self-harm;
- Children who fail to receive basic health care; and
- Parents who fail to seek medical treatment when their children are ill or are injured.

3. Recognition - What To Look For

3.1. Staff members should refer to the detailed information about the categories of abuse and risk indicators in the <https://sussexchildprotection.procedures.org.uk/page/contents> for further guidance.

3.2. All members of the Charity staff are responsible for promoting the welfare of pupils and should be alert to the possible signs of abuse of a pupil by any person(s).

Some of the following signs might be indicators of abuse or neglect:

- Children whose behaviour changes – they may become aggressive, challenging, disruptive, withdrawn or clingy, or they might have difficulty sleeping or start wetting the bed;
- Children with clothes which are ill-fitting and / or dirty;
- Children with consistently poor hygiene;
- Children who make strong efforts to avoid specific family members or friends, without an obvious reason;
- Children who don't want to change clothes in front of others or participate in physical activities;
- Children who are having problems at school, for example, a sudden lack of concentration and learning or they appear to be tired and hungry;
- Children who talk about being left home alone, with inappropriate carers or with strangers;
- Children who reach developmental milestones, such as learning to speak or walk, late, with no medical reason;
- Children who are regularly missing from school or education;
- Children who are reluctant to go home after school;
- Children with poor school attendance and punctuality, or who are consistently late being picked up;
- Parents who are dismissive and non-responsive to practitioners' concerns;
- Parents who collect their children from school when drunk, or under the influence of drugs;
- Children who drink alcohol regularly from an early age;
- Children who are concerned for younger siblings without explaining why;
- Children who talk about running away; and
- Children who shy away from being touched or flinch at sudden movements.

Knowing what to look for is vital to the early identification of abuse and neglect. Staff members working with children are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. Abuse may take several forms, which are not mutually exclusive.

3.3. In an abusive relationship, the child may:

- appear frightened of their parent(s)
- act in a way that is inappropriate to their age and development, although full account needs to be taken of different patterns of development and different ethnic groups
- however, they may also not exhibit any signs of stress / fear

3.4. In an abusive relationship, the parent or carer may:

- persistently avoid child health services and treatment of the child's illnesses
- have unrealistic expectations of the child
- frequently complain about or to the child and fail to provide attention or praise
- be absent
- be misusing substances
- persistently refuse to allow access on home visits by professionals
- be involved in domestic violence and abuse
- be socially isolated

3.5. Serious case reviews, now known as safeguarding practice reviews, have found that parental substance misuse, domestic abuse and mental health problems, sometimes referred to as the 'toxic trio', if they coexist in a family could mean significant risks to children. Problems can be compounded by poverty, frequent house moves or eviction.

3.6. Staff should be aware that children with special educational needs and disabilities can face additional safeguarding challenges including:

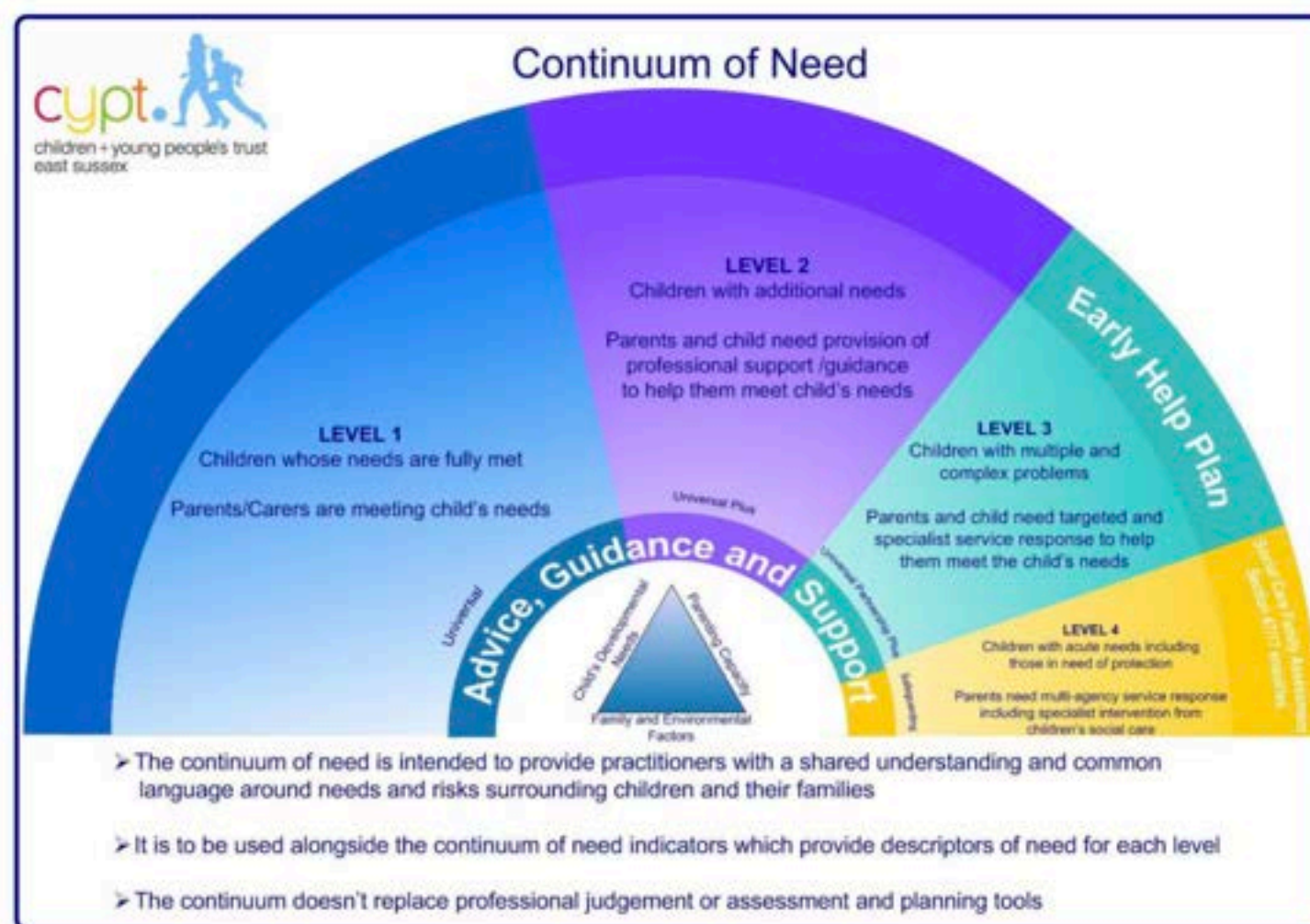
- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability
- children with special educational needs and disabilities are particularly vulnerable to bullying and often show no outward signs
- communication issues can be a barrier to effective safeguarding

4. Safeguarding Children Continuum Of Need

4.1. The Safeguarding Children Continuum of Need has been developed so that everyone working with children in East Sussex has a common language for understanding the needs and risks surrounding children and their families. It is important that all members of staff are familiar with it.

4.2. The Continuum of Need shows that a child's or family's additional needs can be on a range from one to four, and that needs can shift from early help to child protection and back to preventative early help. It covers children whose needs are increasing as well as children whose needs are decreasing after Children's Social Care involvement. The Continuum of Need will help practitioners to identify the right level of support for the child in the least intrusive way while keeping the child safe.

4.3. The Continuum of Need identifies four levels of need.



Level 1:

- children who are achieving expected outcomes
- their needs are met by their parents and by accessing universal services such as health and education
- they do not have additional needs

Level 2:

- children with additional needs
- parents need professional support or guidance to help them meet their children's needs
- extra support can usually be provided by agencies that already know the family, eg their pre-school, school or college or NHS community services such as Health Visiting

Level 3 :

- children with multiple and complex needs
- children and parents need targeted early help or specialist services to meet the children's needs
- needs are met through multi-agency support and the use of Early Help Plans

Level 4:

- children with acute needs, including those in need of protection
- children and parents need multi-agency responses which include specialist intervention from Children's Social Care through the family assessment process

4.4. By referring to the Continuum of Need and indicators, the school can identify when assessment and support for a child and family need 'stepping up' to a referral to Social Care and when the needs of a child and their family have been reduced enough for them to be 'stepped down' to early help services.

4.5. There will be other circumstances, not amounting to abuse, but which give cause for serious concern about the welfare of a pupil. Questions of the young person being in moral danger, being uncared for, engaging in anti-social or inappropriate behaviour and so on may be referred to the Children's Services Department or, of course, to the headmaster of the relevant school within the Charity. The relevant school will always communicate with East Sussex Safeguarding team whenever an allegation or disclosure of abuse is made and will always discuss what appear to be borderline cases with the Local Area Designated Officer. This applies to cases whether on or off school premises, and whether during term time or holidays.

4.6. When assessing cases of possible neglect, the ESCC [Neglect Matrix](#) will be used. This tool mirrors the Continuum of Need, but with greater focus upon potential indicators of neglect mapped across each of the four levels of need.

5. What Action To Take If You Have Concerns About A Child

5.1. When concerned about the welfare of a child, staff should always act in the best interests of the child. The Charity acknowledges the importance of children receiving the right help at the right time to address risks and prevent issues escalating which means:

- acting on and referring the early signs of abuse and neglect,
- keeping clear records,
- listening to the views of the child,
- reassessing concerns when situations do not improve,
- sharing information quickly,
- challenging inaction

5.2. If staff are unsure, they should always speak to the DSL or deputy DSL at the relevant school

5.3. If staff have any concerns about a child's welfare, they should act on them immediately. In an emergency take the necessary action to help the child and call 999. In a case of serious harm, the police should be informed from the outset. Then inform the DSL.

5.4. Staff should not assume a colleague or another professional will take action.

5.5. The DSL or a deputy should always be available to discuss safeguarding concerns. If in exceptional circumstances, the DSL (or deputy) is not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the senior leadership team and / or take advice from SPoA (see front page of this policy for contact). In these circumstances, any action taken should be shared with the DSL (or deputy) as soon as is practically possible.

5.6. After initial contact with the DSL by phone / email, the DSL will require the member of staff to write up the concern on an official form and resubmit to them. A copy of this form can be seen at [appendix J](#).

6. Dealing With A Disclosure Made By A Child - Advice For All Members Of Staff

6.1. If a child discloses that he or she has been abused or experienced harm in some way, the member of staff or volunteer should follow this guidance. Any adult to whom abuse is reported by a pupil has a duty to listen to the pupil, to provide comfort, and to record the pupil's statements preferably in the presence of a second adult, preferably a DSL or the headmaster of the relevant school (although that may not be possible). During the conversation:

- Listen to what is being said without displaying shock or disbelief
- Remain calm and do not overreact – the pupil may stop talking if they feel they are upsetting you.
- Only ask questions when necessary to clarify.
- Accept what is being said.
- Allow the child to talk freely – do not put words in the child's mouth.
- Reassure the child that what has happened is not his or her fault.
- Give reassuring nods or words of comfort – 'I'm so sorry this has happened', 'I want to help', 'This isn't your fault', 'You are doing the right thing in talking to me'.
- Do not be afraid of silences – remember how hard this must be for the pupil.

- Under no circumstances ask investigative questions – such as how many times this has happened, whether it happens to siblings too, or what does the pupil’s mother think about all this-; this is the remit of Social Services and the Police.
- Do not make promises that you may not be able to keep.
- Do not automatically offer any physical touch as comfort. It may be anything but comforting to a child who has been abused.
- Do not promise confidentiality – it may be necessary to refer the child to Children’s Social Care. At an appropriate time tell the pupil that in order to help them you must pass the information on.
- Stress that it was the right thing to tell. Avoid admonishing the child for not disclosing earlier. Saying ‘I do wish you had told me about this when it started’ or ‘I can’t believe what I’m hearing’ may be your way of being supportive but the child may interpret it that they have done something wrong.
- Do not criticise the alleged perpetrator.
- Explain what has to be done next and who has to be told. The pupil may agree to go with you to see the designated person. Otherwise let them know that someone will come to see them before the end of the day.
- **Inform the DSL verbally without delay – do not wait until the next day.**
- **If the child is at risk of immediate / imminent harm, do not allow them to leave your supervision until you have sought further advice**
- Complete the child protection incident / [welfare concern form](#) and pass it to the DSL. If you do not have access to a form, simply email the DSL the details as soon as possible. Also pass over any contemporaneous notes. Dealing with a disclosure from a child and safeguarding issues can be stressful. Consider seeking support for yourself and discuss this with the DSL. Use CPOMS if you have been trained and are authorised to do so.
- Issues which do not cross a more serious safeguarding threshold must still be logged on the relevant digital system at the school attended by the pupil (currently ClassCharts at StAs and PUPIL at EC).

7. Discussing Concerns With The Family And The Child

7.1. The DSL will be responsible for informing the relevant headmaster as soon as practicably possible. A plan must be drawn up concerning communication with relevant hsms and parents. In general, we will always discuss any concerns the school may have with the child’s parents. They need to know that we are worried about their child. However, we will not discuss our concerns if we believe that this would place the child at greater risk or lead to loss of evidence for a police investigation.

7.2. **If we make a decision not to discuss our concerns with the child’s parents or carers** this must be recorded in the child’s safeguarding file with a full explanation for our decision.

7.3. **It is important to consider the child’s wishes and feelings**, if age appropriate, as part of planning what action to take in relation to concerns about their welfare.

7.4. When talking to children, we will take account of their age, understanding and preferred language, which may not be English. It is also important to consider how a disabled child may need support in communicating.

7.5. How we talk to a child will also depend on the substance and seriousness of the concerns. We may need to seek advice from Children’s Social Care or the Police to ensure that neither the safety of the child nor any subsequent investigation is jeopardised. The DSLs will ensure that the reporting thresholds for seeking advice from the Duty Assessment Team are low and will always work on the principle that it is better to consult the Children’s Services / LADO for informal advice if there is any doubt.

7.6. If concerns have arisen as a result of information given by a child, it is important to reassure the child but not to promise confidentiality. Information will be shared on a need-to-know basis only and not discussed with colleagues or friends.

7.7. We will discuss our concerns with the parents and seek their consent to making a referral to Children’s Social Care, unless we consider that this would place the child at increased risk of significant harm.

7.8. We do not need the parents’ consent to make a referral if we consider the child is in need of protection, although parents will ultimately be made aware of which organisation made the referral.

7.9. If parents refuse to give consent to a referral but we decide to continue, we will make this clear to Children’s Social Care.

7.10. If we decide to refer the child without the parents’ consent, we will record this with a full explanation of our decision.

7.11. When we make a referral, we will agree with Children’s Social Care what the child and parents will be told, by whom and when.

7.12. Referrals will be made by one of the DSLs to Children’s Services within 24 hours of disclosure or when there is sufficient concern that a child is at risk of significant harm. Any telephone referral will be followed up in writing.

8. Early Help For Children And Families

8.1. Most parents can look after their children without the need of help other than from their family or friends. However, some parents may need additional help from our school or other services such as the NHS. Providing help early is more effective in promoting the welfare of children than reacting later.

8.2. Any child may benefit from early help, but all staff should be particularly alert to the potential need for early help for a child who (see also section 4):

- is disabled and has specific additional needs;
- has special educational needs (whether or not they have a statutory education, health and care plan);
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
- is frequently missing / goes missing from care or from home;
- is misusing drugs or alcohol themselves;
- is at risk of modern slavery, trafficking or exploitation;
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
- has returned home to their family from care;
- is showing early signs of abuse and / or neglect;
- is at risk of being radicalised or exploited;
- is a privately fostered child.

8.3. Our Charity will work together with other agencies to provide a coordinated offer of early help, in line with *Working Together to Safeguard Children* and local guidance, to any child who needs it.

8.4. We will pool our knowledge within the school and with other agencies about which families or children need additional support in a range of ways so that we can work out how best to help them. We will use the East Sussex Safeguarding Continuum of Need tool to identify what level of need the child or their family has.

8.5. We will work closely with targeted early help services and Children’s Social Care if we feel families need more support and input, or children are at risk of harm, and we will continue to provide support if other services are also needed.

8.6. We will talk to the family about referral to a targeted early help service and explain that there may be a need to involve other professionals, including talking to a social worker about our concerns. We will seek the family’s consent for the referral.

8.7. If the family does not consent to an early help service, we will make an assessment about whether the needs of the child will escalate, or the child will become unsafe without help. If our assessment is that the needs or concerns will escalate, then we will contact the Children’s Social Care Single Point of Advice for a consultation with a qualified social worker in order to make a shared decision about whether the level of concerns calls for a referral to Children’s Social Care.

9. Children’s Social-Care-Led Responses To Concerns About A Child

9.1. Once Children’s Social Care has accepted our referral as needing a social-care-led response (Level 4 of the Continuum of Need), we will cooperate with Children’s Social Care and the police in any emergency action they take using their legal powers for immediate protection of the child.

9.2. We will participate in any multi-agency discussions (strategy discussions), if invited to do so, and share information about the child and their family to plan the response to concerns.

9.3. We will ensure that a relevant staff member participates in all initial and review child protection conferences, if we are invited to attend. The staff member will work together with other agencies to discuss the need for and agree to an outcome-focused child protection plan and will ensure that the child's wishes and views are considered in their own right in planning.

9.4. If we are members of the core group to implement a child protection plan, we will ensure a relevant staff member participates in all core group meetings.

9.5. We will ensure that we complete all actions allocated to us as part of the outcome-focused plan, whether a child protection plan or a family support plan, in a timely way.

9.6. We will continue to monitor children once their plans are ended to ensure that they are supported and kept safe.

10. Information Sharing And Consent

10.1. It is essential that people working with children can confidently share information as part of their day-to-day work. This is necessary not only to safeguard and protect children from harm but also to work together to support families to improve outcomes for all.

10.2. The school may have to share information about parents or carers, such as their medical history, disability or substance misuse issues, for investigations of child abuse carried out by Children's Social Care.

10.3. We will proactively seek out information as well as sharing it. This means checking with other professionals whether they have information that helps us to be as well informed as possible when working to support children.

10.4. The Data Protection Act 2018 and the General Data Protection Regulations 2018 are not barriers to sharing information and **do not change duties under safeguarding**. They are there to ensure that personal information is managed in a sensible way and that a balance is struck between a person's privacy and public protection.

10.5. We should be sharing any concerns we have with parents at an early stage, unless this would put a child at greater risk or compromise an investigation. Parents need to know what our responsibilities are for safeguarding and protecting children and that this involves sharing information about them with other professionals.

10.6. As a Charity we will be clear about the purpose of sharing confidential information and only share as much as we need to achieve our purpose.

10.7. We will try to get consent from parents (or the child, if they have sufficient understanding¹) to share information, if possible. However, we do not need consent if we have serious concerns about a child's safety and well-being. If we decide to share information without consent, we will record this with a full explanation of the decision.

10.8. **Consent should not be sought from parents or carers (or the child, if they have sufficient understanding), if:**

- it would place a child at increased risk of harm; or
- it would place an adult at risk of serious harm; or
- it would prejudice a criminal investigation; or
- it would lead to unjustified delay in making enquiries about allegations of significant harm to a child; or
- required by law or a court order to share information.

10.9. **Consent is not necessary** in cases where Children's Social Care are making child protection enquiries under section 47 of the Children Act 1989. Information needs to be shared with Children's Social Care; staff members must make sure to record what information has been shared.

10.10. **Consent is necessary, for:**

- Children's Social Care investigations or assessments of concerns under section 17 of the Children Act 1989. Children's Social Care will assume that we have obtained consent from the parents to share information unless we make them aware that there is a specific issue about consent. This must be discussed with a social worker in the Single Point of Advice.
- Early help (level 3) referrals and assessments. Assessments are undertaken with the agreement of the child and their parents or carers.

10.11. Where there is any doubt about the need for seeking consent, advice will be sought from the relevant DSL or from the Children's Social Care Single Point of Advice.

10.12. A record will be made of the decision to share information, with or without consent, and the reasons for it. Equally a record will be made of any decision not to share information including the reason for this.

1. Children aged 12 or over may generally be expected to have sufficient understanding. Younger children may also have sufficient understanding. All people aged 16 and over are presumed, in law, to have the capacity to give or withhold their consent, unless there is evidence to the contrary.

12. Record Keeping

12.1. Accurate and timely record keeping is an important part of the Charity's accountability to children and their families and will help us in meeting our key responsibility to respond appropriately to welfare concerns about children.

12.2. All concerns, discussions and decisions made, and the reasons for those decisions, will be recorded in writing. Information will be kept confidential and stored securely.

12.3. Records will include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved;
- a note of any action taken, decisions reached and the outcome.

12.4. Records should be factual, accurate, relevant, up to date and auditable. They should support monitoring, risk assessment and planning for children and enable informed and timely decisions about appropriate action to take.

12.5. All staff members, governors, volunteers, contractors and activity providers should ensure that they record and report safeguarding concerns in line with guidance from the [ESSCP Keeping Records of Child Protection and Welfare Concerns Guidance](#).

12.6. The DSL will ensure that records are maintained accurately for children with safeguarding concerns and that stand-alone files are created and maintained in line with requirements of the above guidance.

12. Professional Challenge And Disagreements

12.1. Working with children and families, and in particular child protection work, is stressful and complex, as well as involving uncertainty and strong feelings. To ensure that the best decisions are made for children, we need to be able to challenge one another's practice.

12.2. We aim to promote a culture within our school that enables all staff members to raise, without fear of repercussions, any concerns they may have about the management of safeguarding in the school. This may include raising concerns about decisions, action and inaction by colleagues about individual children. If necessary, staff members will speak with the Designated Safeguarding Lead, the headmaster, or the chair of governors.

12.3. Cooperation across agencies is crucial; professionals need to work together, using their skills and experience, to make a robust contribution to safeguarding children and promoting their welfare within the framework of discussions, meetings, conferences and case management.

12.4. If there are any professional disagreements with practitioners from other agencies, the DSL or the relevant headmaster will raise concerns with the relevant agency's safeguarding lead in line with section 7.2 [Resolving Professional Differences](#) guidance in the Pan-Sussex Child Protection and Safeguarding Procedures.

12.5. If the school disagrees with the child protection conference chair's decision, the DSL or the headmaster will consider whether they wish to challenge it further and raise the matter with Children's Services Head of Safeguarding.

13. Safer Recruitment

13.1. Our Charity has robust recruitment and vetting procedures to help prevent unsuitable people from working with children.

13.2. Our job advertisements and application packs make explicit reference to the school's commitment to safeguarding children, including compliance with the Disclosure and Barring Service (DBS) process and clear statements in the job description and person specification about the staff member's safeguarding responsibilities.

13.3. All staff members who have contact with children, young people and families will have appropriate pre-employment checks, which will be scrutinised, in line with *Keeping Children Safe in Education*.

13.4. At least one member on every short listing and interview panel will have completed safer recruitment training. The relevant headmaster is responsible for ensuring that safer recruitment training is kept up to date (5-year currency).

13.5. The headmaster, DSL and the safeguarding governor are responsible for ensuring that our **single central record** is accurate and up to date for each relevant school.

14. Procedure For Managing Allegations Of Abuse Made Against Staff

14.1. Within this document the term staff should be broadly read as any adult working within the school, whether directly employed, providing a contracted service, a one-off service such as a supply teacher or a volunteer.

14.2. Our aim is to provide a safe and supportive environment which secures the well-being and very best outcomes for the children at the Charity schools. We do recognise that sometimes the behaviour of adults may lead to an allegation of abuse being made.

14.3. Allegations sometimes arise from a differing understanding of the same event, but when they occur, they are distressing and difficult for all concerned. We also recognise that some allegations are genuine and there are some adults who deliberately seek to harm or abuse children.

14.4. We will take all possible steps to safeguard our children and to ensure that the adults in our school are safe to work with children. We will always ensure that the procedures outlined in Part 4 of Keeping Children Safe in Education are adhered to and will follow the flowchart in [Appendix F](#).

14.5. If an allegation is made or information is received about an adult who works in our school which indicates that they may have:

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

The member of staff receiving the information should inform the headmaster of the relevant school immediately. Should an allegation be made against the headmaster of one of the schools, this will be reported to the chair of governors without informing the head. In the event that neither the headmaster nor chair of governors (as relevant) are contactable on that day, the information must be passed to and dealt with by either the member of staff acting as headmaster or the vice chair of governors.

If an allegation is against a governor, then the matter should be referred directly to the chairman of governors, who will in turn consult the LADO (see front page for contact; once the online form is completed, the LADO will respond by email / phone). If the allegation is against the chairman of governors, the matter should be referred direct to the LADO whom will in turn, provide further advice. Historical allegations of abuse by staff should be referred to the police.

All referral / consultation requests must include the following information for adults and children and some of the fields in the referral will be mandatory:

- Full names, dates of birth and addresses for member of staff and child/ren involved
- Relevant employment history including any previous disciplinary investigations, allegations or complaints you are aware of.
- Details of any employment in another local authority area where applicable.
- Details of any secondary roles the adult might have if known or make enquiries about this as part of the referral process.

14.6. The headmaster or chair of governors will follow the flowchart and narrative in [Appendix F](#). No member of staff or the governing body will undertake further investigations before receiving advice from Single Point of Advice or LADO. See below (14.7) important guidance regarding direct communication with external agencies if deemed necessary.

14.7. Any member of staff or volunteer who does not feel confident to raise their concerns with the headmaster or chair of governors should follow the flowchart in [Appendix F](#) and make the appropriate contact direct. Staff are also reminded of the whistleblowing policy should they need to report an allegation concerning a colleague. Members of staff disclosing information regarding abuse by other members of staff towards pupils will be protected under the Charity's Whistleblowing Policy.

Staff have a right and duty to refer potential or actual child abuse direct to the Local Authority Children's Services or the Police if they feel that senior staff and / or governor action is / has been inadequate and / or inappropriate. They may also seek advice from the National Prevention of Cruelty to Children (NSPCC) helpline <https://www.nspcc.org.uk/> or tel. 0808 800 5000.

14.8. The LADO must be consulted immediately on any allegation against a member of staff, and in borderline cases it is recognised that discussion with the LADO can be held informally and without naming the school or the individual. The LADO will consider the nature, content and context of the allegation and agree a course of action including any involvement of the police. Discussions will be recorded in writing, and communication with both the individual and the parents of the child / children agreed.

14.9. The Charity will consider carefully whether the circumstances of the case warrant suspension or whether alternative arrangements should be put in place. The College will give due weight to the views of the LADO when making a decision about suspension.

14.10. Procedures for dealing with allegations against staff need to be applied with common sense and judgement, and a timely resolution of the allegation will be a clear priority for all concerned. Should the allegation involve a member of staff accommodated within boarding accommodation (Hsm, Resident Tutor or Matron), alternative accommodation will be found for the member of staff for the duration of the investigative process.

14.11. Supporting people:

- The relevant school together with Children's Social Care and the Police, if they are involved, will consider the impact on the child concerned and provide support as appropriate.
- The relevant headmaster will ensure that the child and family are kept informed of the progress of the investigation. This may include providing some information to the parents of any children interviewed as witnesses.
- The Personnel / HR lead for the organisation will be contacted at the earliest opportunity for advice in relation to the investigation of any allegation in line with the Charity's Disciplinary Policy, where appropriate.
- The staff member who is the subject of the allegation will be advised to contact their union, professional association or a colleague for support, (depending on the outcome of the safeguarding strategy meeting which is normally chaired by the LADO / Children's Social care).
- The Personnel / HR lead for the organisation will ensure that the staff member is provided with appropriate support, if necessary, through occupational health or welfare arrangements.

- The headmaster will appoint a named representative to keep the staff member updated on the progress of the investigation; this will continue during any police or section 47 investigation or disciplinary investigation.
- The legislation imposing restrictions makes clear that “publication” of material that may lead to the identification of the teacher who is the subject of the allegation is prohibited. “Publication” includes “any speech, writing, relevant programme or other communication in whatever form, which is addressed to the public at large or any section of the public”. This means that a parent who, for example, published details of the allegation on a social networking site would be in breach of the reporting restrictions (if what was published could lead to the identification of the teacher by members of the public).
- Allegations found to be malicious will be removed from personal records. Any that are found to be unfounded or not substantiated will not be referred to in employer references.
- Pupils that are found to have made a malicious allegation are likely to have breached the school’s behaviour policy and the relevant school is entitled to consider whether to apply an appropriate sanction.
- Due to the restrictions on the reporting or publishing of allegations against teachers the College will make every effort to maintain confidentiality and guard against unwanted publicity. These restrictions apply up to the point where the accused person is charged with an offence, or the DfE / Teaching Regulation Agency publish information about an investigation or decision in a disciplinary case.

14.12. The Charity has a legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one 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. The DBS will consider whether to bar the person. If these circumstances arise in relation to a member of staff at our school, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO and / or the Personnel / HR lead for the organisation. In the case of a member of teaching staff, a decision will be made about whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

14.13. In accordance with the Boarding Schools Association (BSA) Commitment to Care Charter, member schools are asked to let BSA know of any actual or potential cases of abuse they are dealing with (non-recent or current). The Charter demonstrates the importance of the care, wellbeing and safeguarding of boarding school pupils. These are at the heart of the Charter and of being a BSA member. The College will report such cases to the BSA in appropriate circumstances.

14.14. The Charity Commission requires charities to report to it serious incidents. A serious incident is an adverse event, whether actual or alleged, which results in or risks significant:

- loss to a charity’s money or assets
- damage to a charity’s property
- harm to a charity’s work, beneficiaries or reputation.

In the context of this policy framework, it is the third point which is relevant.

14.15. In line with Keeping Children Safe in Education, under no circumstances will the Charity decide to 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.

14.16. Where there are conduct issues with a supply teacher or contracted tutor, which may not reach the threshold for safeguarding, we will consult the LADO nonetheless.

14.17. The agency for the supply teacher will be fully involved and expected to co-operate in any enquiries from the LADO, police and / or children’s social services.

14.18. Where directed to do so by the LADO, police and / or children’s social services, the relevant school will support any safeguarding investigation by collecting the facts when an allegation is made.

14.19. In this respect it may be that the school take a lead on this safeguarding element of investigation.

14.20. If the Charity receives an allegation relating to an incident that happened when an individual or organisation was using the school premises for the purposes of running activities for children, we will respond, as with any safeguarding allegation, by following our safeguarding policies and procedures, including informing the LADO.

15. Procedure For Managing Low-Level Concerns

15.1. As part of our whole Charity approach to safeguarding, we promote an open and transparent culture in which all concerns about all adults working in or on behalf of the Charity (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

15.2. Creating a culture in which all concerns about adults (including allegations that do not meet the harms threshold) are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. This will encourage an open and transparent culture; enable our schools to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the school are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the Charity.

15.3. If anyone has a ‘low-level’ concern this does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold set out in section 13 of this annex. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ - that an adult working in or on behalf of the Charity may have acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, but does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

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

- Being over friendly with children;
- Having favourites;
- Taking photographs of children on their mobile phone;
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Using inappropriate sexualised, intimidating or offensive language.
- Humiliating pupils.
- Other breaches of professionalism including but not restricted to, inappropriate use of College funds or resources, breaches of health / safety, behaviour generally

15.5. 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.

15.6. It is crucial that any such concerns, including those which do not meet the allegation / harm threshold, are shared responsibly with the relevant headmaster (this should include self-referral) so that they can be recorded and dealt with appropriately. (Where the concerns may be about the headmaster or a governor, see section 13 above for who to refer these to). Ensuring they are dealt with effectively should also protect those working in or on behalf of schools and colleges from becoming the subject of potential false low-level concerns or misunderstandings.

15.7. If the concern has been raised via a third party, the relevant headmaster will collect as much evidence as possible by speaking directly to the person who raised the concern, unless it has been raised anonymously and to the individual involved, along with any witnesses.

15.8. Where a low-level concern arises about supply staff or contractors, their employer will be notified so that any potential patterns of inappropriate behaviour can be identified.

15.9. If there is ever any doubt as to whether information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, then the LADO will be consulted.

15.10. To ensure that there is clarity about how staff should behave, and to avoid inadvertent or thoughtless behaviour, staff should ensure that they have fully read and understood the Staff Code of Conduct.

15.11. In line with requirements stated in KCSIE, the Charity is required to maintain written records of all low-level concerns. This requirement is to provide an ability to observe any pattern of concerning behaviour exhibited by individual staff. To this end, records are maintained by each school but are available to key senior staff within the Charity because many staff work across both schools and issues may arise on one but not the other. In the event of any pattern of behaviour being observed, the Charity will decide on appropriate action

either through its training or disciplinary procedures. This record is maintained without time limit to assist with any potential historical allegation or investigation which may arise in future.

16. The Use Of 'Reasonable Force'

16.1. There are circumstances when it will be appropriate for staff to use reasonable force to safeguard children. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of the classroom.

16.2. Further guidance on the use of reasonable force and restrictive physical interventions should be sought within both the Charity *Staff Code of conduct / behaviour policy and the Restraints policy held at each school*. *ESBAS Restrictive Physical Intervention Guidance for Schools Settings and Colleges May 2022* contains further guidance.

16.3. When managing incidents of reasonable force and restrictive physical interventions the school will consider whether to liaise with the LADO, where it is thought that the physical intervention may lead to an allegation. Records should always be written up and retained and appropriate advice sought about whether to and how to best inform parents of the child involved.

Appendix B: Specific Safeguarding Issues

1. Introduction

School Staff members needs to be aware of specific safeguarding issues and be alert to any risks.

1.1. Annex B of Keeping Children Safe in Education identifies a number of specific safeguarding issues, listed below, which all staff need to be aware of. All staff must read Annex B of Keeping Children Safe in Education to ensure that they can identify any indicators of any of these possible issues and raise them with the DSL where they have a concern about a child at the school.

- Child abduction and community safety incidents
- Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)
- County lines
- Children and the court system
- Children missing or absent from education
- Children with family members in prison
- Cybercrime
- Domestic abuse
- Homelessness
- Mental health
- Modern Slavery and the National Referral Mechanism
- Preventing radicalisation, the Prevent duty and the Channel process
- Child on child abuse
- Sexual violence and sexual harassment between children in schools and colleges
- Serious violence
- So-called 'honour-based' abuse (including Female Genital Mutilation (FGM) and Forced Marriage)

1.2. There is mandatory reporting duty for teachers with regards to FGM so staff should take careful note of that when reading Annex B of Keeping Children Safe in Education.

1.3. Within this appendix there is further local information, in addition to the information provided in Annex B of Keeping Children Safe in Education, on the following issues

- Children Missing from Education
- CCE, CSE and County Lines: MACE
- Domestic abuse
- Children with medical conditions
- Prevent
- Private Fostering
- Self-Harm and suicidal behaviour
- Children and the court system
- Children with family members in prison
- Homelessness
- So-called 'honour-based' abuse including female genital mutilation and forced marriage
- Further Information on Online Safety (use of ICT, the internet, mobile technology and social media)
- Serious violence

1.4. Child-on-child abuse is dealt with separately in [Appendix C](#) of this policy.

1.5. Further information about preventing extremism and radicalisation (the Prevent Duty) is provided in [Appendix D](#) of this policy.

2. Children Missing or Absent from Education

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

2.2. This includes when problems are first emerging but also where children are already known to Children's Social Care and need a social worker (such as on a child in need or child protection plan, or as a looked after child), where going missing or being absent from education may increase known safeguarding risks within the family or in the community.

The relevant school must inform the local authority of any pupil who fails to attend regularly or has been absent without the schools permission for a continuous period of 10 schools days or more, at such intervals as are agreed between the school and the local authority (or in default of such agreement, at intervals determined by the Secretary of State).

2.3. All staff should be aware of the school's unauthorised absence, missing from school and children missing from education procedures. All staff should be aware of the importance of completing registers in a timely and accurate way.

2.4. All in-school procedures around absence should be followed by staff. Although the DSL has oversight of attendance, this does not prevent staff from speaking directly with the DSL about the attendance / absence of any child about whom they have concerns, and indeed they should do so.

2.5. We follow the guidance on school attendance, <https://www.gov.uk/government/publications/working-together-to-improve-school-attendance> Working Together to Improve School Attendance, which informs how we work with the local authority children's services where school absence indicates safeguarding concerns.

3. CCE, CSE, And County Lines: Mace

3.1 As part of the graduated support available to schools for MACE (Multi Agency Child Exploitation) and VARP (Vulnerable Adolescent Risk Panel) pupils at risk of exclusion there is a mechanism to ensure that schools are aware of the support available to them to maintain the placement when a pupil open to the MACE Operational Group or VARP is at risk of exclusion. To ensure schools are aware of the universal support available to maintain full time education in these cases, and to provide an opportunity for additional, targeted, multi-agency support where required, an Education Review Meeting (ERM) can be requested by the school, through the MACE Operational Group process, or through the VARP, as a tool to prevent exclusion. An ERM will also be automatically triggered by the fixed term exclusion of a pupil open to MACE Operational Group or VARP, to prevent the risk associated with further exclusion. Further information on ERMs can be found here: [ISEND Services - Education Support, Behaviour and Attendance Service \(ESBAS\) - ESBAS Resources - Czone \(eastsussex.gov.uk\)](#)

Child criminal exploitation (CCE)

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

3.3. CCE can include children

- being forced to work in cannabis factories
- being coerced into moving drugs or money across the country,
- forced to shoplift or pickpocket, or to threaten other young people.

3.4. Some of the following can be indicators of CCE:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who suffer from changes in emotional well-being;
- children who misuse drugs and alcohol;
- children who go missing for periods of time or regularly come home late; and
- children who regularly miss school or education or do not take part in education.

Child Sexual Exploitation (CSE)

3.5. CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants, and / or (b) for the financial advantage or increased status of the perpetrator or facilitator.

3.6. 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. CSE can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex.

3.7. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media).

3.8. The above CCE indicators can also be indicators of CSE, as can:

- children who have older boyfriends or girlfriends; and
- children who suffer from sexually transmitted infections or become pregnant.

County Lines

3.9. County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line".

3.10. Exploitation is an integral part of the county lines offending model with children and coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes.

3.11. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

3.12. One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services / third sector providers who offer support to victims of county lines exploitation.

4. Domestic Abuse

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

4.2. Operation Encompass is coordinated by Sussex Police. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable support to be given to the child according to their needs.

4.3. When approaching conversations with children or adults about domestic violence and abuse we will do so in line with the ESCC Domestic Abuse Toolkit: Supported Conversations with Young People and their Carers.

5. Children with Medical Conditions

5.1. Children with medical conditions will be supported in accordance with each school's extensive suite of Medical Centre policies and the statutory guidance Supporting Pupils at School with Medical Conditions 2015.

5.2. The Charity will ensure that arrangements are in place to support children with medical conditions. These arrangements will be informed through liaison with the parents and medical professionals, where appropriate, and dependent on the age and capacity, the child as well.

5.3. Most ongoing (and more serious) conditions will require an individual healthcare plan, unless it is agreed that this would be inappropriate and disproportionate.

5.4. The healthcare plan will be shared with staff as necessary, to ensure that staff are aware of what arrangements are in place, as well as any emergency procedures.

5.5. Systems are in place to ensure that the Designated Safeguarding Lead is kept informed of arrangements for children with medical conditions and is alerted where a concern arises, such as an error with the administering of medicines or intervention, or repeated medical appointments being missed, or guidance or treatments not being followed by the parents or the child.

5.6. The DSL will consult with Health Professionals and consider further safeguarding actions in the event of:

- concerns about attendance
- if a medical condition is impacting on a child's ability to participate in normal school activities
- if emergency treatment is being provided regularly
- If there has been a significant health event at school

5.7. In respect of health concerns for a child the DSL will give due consideration to the possibility of fabricated or induced illness and perplexing presentations following Pan-Sussex Child Protection and Safeguarding Procedures [here](#).

6. Private Fostering

6.1. Parents and carers often fail to notify schools about private fostering arrangements even though they are legally required to notify Children's Services. Often this is because they are unaware of the requirements. They believe that this is a private family arrangement which does not concern anybody else.

6.2. Private Fostering definition: Private fostering occurs when a child under 16 (or 18 if the child is disabled) is cared for and lives with an adult who is not a relative for 28 days or more. This could be a step-parent (by marriage or civil partnership), grandparent, step grandparent, brother, sister, uncle or aunt.

6.3. Private fostering is a private arrangement made by the parent(s), (or those with parental responsibility) for someone to care for their child because they are unable to do so (permanently or temporarily). This may be due to a number of reasons such as parental ill health, a parent going abroad or into prison, a child being brought to the UK to study English or the relationship between the child and parent has broken down.

6.4. School staff play an essential role in identifying privately fostered children. If you know a child is being privately fostered, you should advise the parent / carer that they have a legal obligation to report the arrangement to Children Social Care at least six weeks before it happens or within 48 hours if the arrangement is current having been made in an emergency.

6.5. Alert your Designated Safeguarding Lead who will ensure this is followed up with Children Social Care and the arrangement is assessed, approved and monitored.

Host families and guardians

The Charity does not arrange homestays or guardians. This is the responsibility of parents.

6.6. Where the Charity need to arrange a homestay or guardian *in extremis*, it will consider what intelligence / information will best inform its assessment of the suitability of the adults in those families who will be responsible for the visiting child during the stay. Direct prior liaison and agreement between parents and the homestay / guardian in such a case would always be necessary.

Additionally, it will be for key Charity staff to use their professional judgement to decide what it considers what will be relevant. However, to help inform that assessment, the Charity would obtain an Enhanced DBS certificate with Barred List check. This check will not only establish whether the adults are barred from engaging in regulated activity relating to children, but where criminal record information is disclosed, it will also allow the Charity to consider, alongside all other intelligence that it has obtained, whether the adult would be a suitable host for a child.

6.7. Further consideration should be given whether the homestay then becomes a case of private fostering, in the case where the stay exceeds 28 days. This situation has occurred in recent years (during the Covid-19 pandemic).

7. Self-harm and Suicidal Behaviour

7.1. Self harm, self-mutilation, eating disorders, suicide threats and gestures by a child must always be taken seriously and may be indicative of a serious mental or emotional disturbance. We will make use of the ESCC [Self-harm Toolkit](#) to support our practice in this area.

7.2. The DSL will always make onward referral to mental health specialist services or Children's Social Care, in line with the Pan-Sussex Child Protection and Safeguarding Procedures.

7.3. Within East Sussex there is a protocol so that when a young person attends the Emergency Department of The Conquest Hospital, Hastings or the Eastbourne District General Hospital, and self-harm is evident, the hospital will seek to share information with the DSL at the young person's school or college. The sharing of this information is based entirely upon consent from the young person / parent / carer, so the school will not receive information about every incident. Where the school does receive information about an incident of self-harm, this will be a care plan devised by a paediatric liaison mental health nurse who assessed the young person at the hospital. Any care plan received will be used to inform the ongoing safeguarding of that young person and communication / liaison with the young person / parent / carer will be arranged to facilitate this.

7.4. If a young person's presentation at the Emergency Department represents a safeguarding concern, then the safeguarding team at the hospital will raise this through their own safeguarding processes and SPOA will be informed. In this respect not all presentations at the Emergency Department will automatically trigger a referral to SPOA, so if on receipt of a care plan from the hospital further concerns emerge, either from existing contextual information the school has, or from new information shared by the young person, then we will follow our usual safeguarding processes and consider making a referral to SPOA.

7.5. To support our staff in recognising the signs, identifying risks, supporting children and young people who may be at risk of suicide, and to manage unexpected death within our school and wider community we use the ESCC Unexpected Death Toolkit. The principles of the toolkit, whilst focused on suicide, apply to any unexpected death. See [Practical resources – Czone \(eastsussex.gov.uk\)](#) and [14.2 Response to a suspected suicide | Sussex Child Protection and Safeguarding Procedures Manual](#)

Further information on the local procedures in response to the above issues can be found within section 8 of the [Pan-Sussex Child Protection and Safeguarding Procedures](#).

8. Children and the Court System

8.1. Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age-appropriate guides to support children 5 - 11 year olds and 12 - 17 year olds. They explain each step of the process and support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

8.2. Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

8.3. Schools need to be mindful of the stress of these situations and signposting parents to external resources where necessary. Equally the impact upon staff of managing these situations also needs to be considered.

9. Children with Family Members in Prison

9.1. 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. NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

10. Homelessness

10.1. Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise / progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and or discussion with the Local Housing Authority should be progressed as appropriate, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

10.2. The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the new duties: Homeless Reduction Act Factsheets. The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

10.3. In most cases school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's services will be the lead agency for these young people and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances.

11. So-called 'Honour-based' Abuse including Female Genital Mutilation and Forced Marriage

11.1. So-called 'honour-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and / or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

Actions

11.2. If staff have a concern regarding a child that might be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding lead (or deputy). As appropriate, they will activate local safeguarding procedures, using existing national and local protocols for multiagency liaison with police and children's social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on **teachers** that requires a different approach (see following section).

FGM

11.3. FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

FGM mandatory reporting duty for teachers

11.4. Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon **teachers** along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should **not** be examining pupils, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at: Mandatory reporting of female genital mutilation procedural information.

11.5. Teachers **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has good reason not to, they should still consider and discuss any such case with the schools designated safeguarding lead (or deputy) and involve children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases (ie where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures.

Forced marriage

11.6. 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 (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

11.7. The Forced Marriage Unit has published statutory guidance and Multi-agency guidelines, with pages 35 and 36 of which focus on the role of schools and colleges. School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: [020 7008 0151](tel:02070080151) or email fmufco.gov.uk.

12. Information on Online Safety (Use Of ICT, the Internet, Mobile Technology and Social Media)

12.1. The Charity has an online safety policy which includes guidance for all pupils in relation to Online Safety and using the internet and social media. There are appropriate filtering and monitoring systems in place. Staff should report their concerns if they believe that children are using the internet, mobile technology or social media inappropriately to the pupil's hsm or head of section as appropriate. More serious issues must be referred directly to the relevant DSL. In these instances, the DSL will review the circumstances and speak with parents and make appropriate referrals as necessary. For further information see Keeping Children Safe in Education Annex C.

12.2. All of our pupils will use mobile phones, tablets and computers at some time. They are a source of fun, entertainment, communication and education. However, we know that some men, women and young people will use these technologies to harm children. The harm might range from sending hurtful or abusive texts and emails, to enticing children to engage in sexually harmful conversations, webcam photography or face-to-face meetings. Cyber-bullying by pupils, via texts, emails and social networking will be treated as seriously as any other type of bullying and will be managed through our anti-bullying procedures.

12.3. Social networking is one of the more obvious potential sources of inappropriate and harmful behaviour. Some pupils will undoubtedly be 'chatting' on mobiles or social networking sites in the evening, and we have included online safety at a number of points within our pastoral and academic curriculum, as well as invited speakers to the College so that parents and pupils understand the possible risks.

12.4. Staff working at the College must adhere to the guidelines under the heading 'Guidance for Staff' contained within the College's Mobile Phone Policy, all relevant aspects contained within the Staff Code of Conduct, the Staff ICT Acceptable Use Policy and the Social Media Policy. Considerably more detail is contained in these policies including the fact that staff must not accept current pupils as friends or seek to contact them through any private or personal social networking site account or media.

Staff working at St Andrew's must also adhere to all relevant aspects contained within the Charity Staff Code of Conduct, the school's Staff ICT Acceptable Use Policy and Online safety policy suite.

12.5. Staff must always communicate with pupils and parents using their work e-mail address. If in receipt of an e-mail from a pupil's personal e-mail account, members of staff must reply to the pupil's school e-mail account and instruct them of the issue having occurred as well as self-reporting to the DSL.

12.6. Staff must avoid using their own mobile devices or their own cameras to **take pictures** of pupils or pupils from other schools. If pictures need to be taken – for example on a field trip – a College-owned device must be used. Marketing (and possibly Photography) departments may be approached to see if loaning a camera may be possible, if a higher quality lens is required for a specific event.

12.7. Staff must not store images of College pupils or pupils from other schools on their own laptops, computers or other personally owned storage devices including digital cameras. Such images must be stored on work-based equipment.

12.8. In the case of sexting / sending nude images, the Charity will follow the UK Council for Child Internet Safety (UKCCIS) advice for schools and colleges on responding to sexting incidents. Based upon this, when determining a response, the Charity will consider:

- Whether there is an immediate risk to a young person or young people
- If a referral should be made to the police and / or children's social care
- If it is necessary to view the imagery in order to safeguard the young person – in most cases, imagery will not be viewed
- What further information is required to decide on the best response
- Whether the imagery has been shared widely and via what services and / or platforms. This may be unknown.
- Whether immediate action should be taken to delete or remove images from devices or online services
- Any relevant facts about the young people involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils involved - in most cases parents will be involved

12.9. The Charity will always make a referral to the police and / or children's social care if:

- The incident involves an adult

- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to special educational needs)
- What is known about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the imagery is under 13
- There is reason to believe a young person is at immediate risk of harm owing to the sharing of the imagery, for example, the young person is presenting as suicidal or self-harming

More information is contained in the [online safety policy](#).

13. Serious Violence

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

Appendix C: Child on Child Abuse

1. Introduction

1.1. **Our Charity takes a zero-tolerance approach to child-on-child abuse.** We believe that all children have a right to attend and learn in a safe environment. Children should be free from harm by adults in the school as well as other children. Child on child abuse does not occur in a vacuum, it occurs in a society where there are structures and norms that shape young people's views, experiences and behaviours, as well as responses to them.

1.2. Throughout this section reference will be made to the terms perpetrator and victim. These terms appear within DfE guidance such as Keeping Children Safe in Education and are easily understood. These terms are being used within this document to aid the flow of sentences however when discussing incidents of child-on-child abuse with children, parents or carers the term perpetrator should be replaced with 'child who has displayed X behaviour' and victim should be replaced with 'child who has experienced X behaviour'.

1.3. All staff should be aware that children can abuse other children. This is generally referred to as child-on-child abuse and can take many forms. It can happen both inside and outside of school and online. It is important that all staff recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports.

At our Charity schools we continue to ensure that any form of abuse or harmful behaviour is dealt with as soon as possible and consistently to reduce the extent of harm to the pupil, with full consideration to impact on that pupil's emotional and mental health and well-being. Our approach to Child on child abuse is very closely linked to each school's anti-bullying policy, as well as other key documents which include e-safety / online policy suites, behavioural expectations and school rules in each school.

1.4. Staff should be able to recognise the importance of distinguishing between developmentally expected behaviour and problematic behaviour and highly abnormal / abusive behaviour.

What is Child on child abuse?

1.5. Child on child abuse is any form of physical, sexual, emotional and financial abuse, and coercive control, exercised between children and within children's relationships (both intimate and non-intimate), friendships, and wider peer associations.

1.6. It can take various forms including (but is not limited to):

- bullying (including cyber-bullying prejudice-based and discriminatory bullying) – see also A below
- abuse in intimate personal relationships between children (teenage relationship abuse) (see also B below);
- youth violence and physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/ or encourages physical abuse);
- harmful sexual behaviours (HSB) including:
 - sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and / or encourages sexual violence)
 - sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
 - 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 (also part of child sexual exploitation)
 - consensual and non-consensual (known as cyber-flashing) sharing of nudes and semi nudes images and or videos (also known as sexting or youth produced sexual imagery);
 - upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
 - initiation / hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

(b) **Bullying** (including cyberbullying prejudice-based and discriminatory bullying) includes actions such as making threats, spreading rumours, attacking someone physically or verbally or for a particular reason eg size, hair colour, gender, sexual orientation, and excluding someone from a group on purpose. In assessing if the behaviour is bullying it is worth considering the level of aggression and if it is repeated behaviour or a significant one-off incident.

An Imbalance of Power: Young people who bully use their power - such as physical strength, access to embarrassing information, or popularity - to control or harm others. Power imbalances can change over time and in different situations, even if they involve the same people. Repetition: Bullying behaviours happen more than once or have the potential to happen more than once.

Cyberbullying is the use of phones, instant messaging, e-mail, chat rooms or social networking sites such as Snapchat and Twitter to harass, threaten or intimidate someone for the same reasons as stated above.

Prejudiced behaviour refers to a range of hurtful behaviour, physical or emotional or both, which causes someone to feel powerless, worthless, excluded or marginalised, and which is connected with prejudices around belonging, identity and equality in wider society – in particular, prejudices to do with disabilities and special educational needs, ethnic, cultural and religious backgrounds, gender, home life, (for example in relation to issues of care, parental occupation, poverty and social class) and sexual identity (homosexual, bisexual, transsexual).

(b) **Relational abuse** is defined as a pattern of actual or threatened acts of physical, sexual, and / or emotional abuse, perpetrated by an adolescent (between the ages of 13 and 18). Abuse may include insults, coercion, social sabotage, sexual harassment, threats and / or acts of physical or sexual abuse. The abusive teen uses this pattern of violent and coercive behaviour, in a heterosexual or same gender relationship, in order to gain power and maintain control over the partner. Abuse in intimate personal relationships between peers may include sexual violence, such as rape, assault by penetration and sexual assault.

Relational aggression is a form of bullying set to intentionally manipulate and damage the relationships of their victims. This may include; spreading rumours, making friendships conditional, making fun of the individual's appearance, coercing or encouraging them to take a particular course of "negative" action or excluding the individual from a social group.

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

1.8. The [Hackett continuum model](#) demonstrates the range of behaviours, ranging from acceptable to abusive which in turn is useful to understand to inform us how to respond. See [Appendix G](#). Whilst Hackett's model is focused on sexual abuse, it is a useful generic starting point for categorising other types of child-on-child abuse

1.9. The **East Sussex RAG rating system for HSB focuses** on a spectrum of developmentally acceptable sexual behaviours at various ages, through to those which are unacceptable and abusive. It is shown at [H](#) and again, is a key reference for staff on informing next steps.

1.10. All staff understand that children may not find it easy to tell staff about their abuse verbally. Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report, or a member of school staff may overhear a conversation that suggests a child has been harmed or a child's own behaviour might indicate that something is wrong. If staff have any concerns about a child's welfare, they will act on them immediately rather than wait to be told.

1.11. **The initial response to a report of child-on-child abuse from a child is incredibly important.** How we respond to a report can encourage or undermine the confidence of future victims of child-on-child abuse to report or come forward.

1.12. Staff understand that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory and so children may not be able to recall all details or timeline of abuse.

1.13. Staff will be mindful that certain children may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity, and / or sexual orientation.

1.14. All staff will reassure victims that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the school or college will not be downplayed and will be treated equally seriously. A 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. Pupil victims in this category will be supported appropriately with their Hsm / section head and DSL. The pupil's wishes and feelings will be taken into account to determine the action taken and what services to provide. Parents should be kept informed unless this will cause further upset or harm.

1.15. All staff should understand, that even if there are no reports in the school of child-on-child abuse it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding child-on-child abuse, they should speak to the DSL or deputy.

1.16. **If an allegation of child-on-child abuse is made:**

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

All staff will:

- Not promise confidentiality
- Be supportive and respectful of the child;
- Listen carefully to the child, being non-judgmental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions – where, when, what, etc;
- Record the facts as the child presents them, without reflecting the personal opinion of the note taker as such reports could become part of a statutory assessment by children's social care and / or part of a criminal investigation;
- If possible, have two members of staff present, (preferably one of them being the designated safeguarding lead or a deputy). However, this might not always be possible; and informing the designated safeguarding lead (or deputy), as soon as practically possible, if the designated safeguarding lead (or deputy) is not involved in the initial report.
- Staff will consider what support might be needed for the alleged perpetrators as well as the victims.
- Staff will record the disclosure and inform both the DSL and the hsm / section head without delay. All reports of child-on-child abuse will be recorded initially on PUPIL / CPOMS and then as necessary and if thresholds are met, on the safeguarding files for each child involved. Staff should seek advice and support from the DSLs if they have any doubt.
- The DSL will assess the information and identify and record appropriate outcomes to the incident, which may include school-based support or interventions, and or referrals to other agencies, as necessary, such as SPoA, Children's Social Care, CAMHS and the Police (if the allegation involves a potential criminal offence).
- Where it is necessary to contact the Police, we will explain to those children involved that the law is in place to protect children and young people rather than to necessarily criminalise them, and this will be explained in such a way that avoids alarming or distressing them.
- When responding to a disclosure of child on child abuse the wishes of the victim, in terms of how they want to proceed, will be taken into account. This is especially important in the context of sexual violence and sexual harassment. Victims will be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however need to be balanced with the school's duty and responsibilities to protect other children.
- The DSL will complete a risk assessment and where necessary create a written support plan for all children involved, including the child/ren who has experienced the abusive behaviour and the child/ren who is alleged to have displayed the abusive behaviour as well as any others affected, with a named person they can all talk to if needed. See [appendix M](#) for East Sussex risk assessment template and also an aid memoir summarising the approach for Harmful Sexual Behaviour (HSB) as stated in KCSIE.
- Any risk assessment will give consideration to potential intra-familial harms and any necessary support for siblings.
- Where an incident has occurred within one of the schools then the time and location will be identified; it may be that a risk assessment is completed to make the location safer.
- Risk assessments and support plans will be completed in conjunction with parents / carers, the child (depending on their age) and with support from any other agencies involved such as Children's Social Care or the police.
- The format of any support plan will vary with the exact nature of the incident, but will always be in line with processes outlined in our behaviour or anti-bullying policies
- If the incident involves a Harmful Sexual Behaviour (HSB) then the guidance in the [East Sussex Protocol for Managing Peer on Peer Harmful Sexual Behaviour in Schools](#) will be followed and a Safeguarding Risk Reduction Plan created accordingly.
- Incidents involving consensual and non-consensual sharing of nudes and semi nudes images and or videos will be managed in line with guidance in [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)
- Any risk assessments / support plans devised will be shared with staff within the school, as necessary, to ensure that staff are aware of the additional measure in place to safeguard those children.

Regarding incidents involving online images, the Charity will always make a referral to the police and / or children's social care if:

- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to special educational needs)
- What is known about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the imagery is under 13
- There is reason to believe a young person is at immediate risk of harm owing to the sharing of the imagery, for example, the young person is presenting as suicidal or self-harming

Regarding child-on-child abuse incidents more generally:

- any report which involves activity which is suspected of being a crime: the Charity will refer to the police.
- Any report which involves activity which places a child at level 3 or 4 on the continuum of need: the school will refer to children's social care.
- The school will give consideration to what other agencies or resources might be of support to children and families, seeking consent and making referrals as necessary.

Important considerations will include:

- The wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered;
- The nature of the alleged incident(s), including: whether a crime may have been committed and consideration of harmful sexual behaviour;
- The ages of the children involved;
- The developmental stages of the children involved;
- Any power imbalance between the children. For example, is the alleged perpetrator significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?;
- If the alleged incident is a one-off or a sustained pattern of abuse;

- Are there ongoing risks to the victim, other children, adult students or school or college staff; and
- Other related issues and wider context.

Alongside actions to provide protection and support to both victims and perpetrators of child-on-child abuse, where appropriate, they may also need to be managed through the school behaviour or anti bullying policies.

Initiation / hazing type violence and rituals are likely to be complex and may involve a range of behaviours. The school will manage reports of such activity on a case-by-case basis applying the same principles and considerations as outlined above for other types of child-on-child abuse.

All incidents of child-on-child abuse will be categorised and recorded by the nature of the incident i.e. bullying (including the type such as cyber, racial, biphobic, transphobic and homophobic etc), physical abuse (identifying the specifics: hitting, kicking etc) or a Harmful Sexual Behaviour or other specifics such as sexting / sharing nudes and semi-nudes or whether the incident was potentially criminal).

1.17. The Charity will minimise the risk of child-on-child abuse by:

- Challenging behaviours, such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.
- Addressing any inappropriate behaviour (even if it appears to be relatively innocuous) is an important intervention that helps prevent problematic, abusive and / or violent behaviour in the future.
- Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images.
- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys, whilst at the same time recognising that any of these issues can affect any pupils regardless of their gender.
- Ensuring our whole school approach to safeguarding and preventive curriculum helps to educate pupils about appropriate behaviour and consent.
- Ensuring pupils are aware of the different ways in which they can speak with a trusted adult in the school, either directly or through other means such as worry boxes or online help buttons, which are monitored by key staff in the safeguarding team.
- Ensuring pupils are aware of the different ways in which they can speak with an adult outside of the school through agencies such as Child Line or the NSPCC.
- As a Charity we gather pupil voice to capture the full breadth of the pupil demographic, including pupils with SEND and those who are vulnerable or have experienced challenges in their lives, to understand the experience of pupils at the school, so that this can inform the development of safeguarding practice.
- Ensuring that staff are aware of child-on-child abuse and maintain an attitude of ‘it could happen here’, as they do with all areas of safeguarding.
- Ensuring that staff are trained to understand that a pupil harming a peer could be a sign that the child is being abused themselves.
- Promoting “speak up” and “upstanding” (as opposed to by standing) cultures amongst pupils
- Identify and be alert to locations that may be vulnerable for pupils
- Identify any pupils who may be vulnerable (all staff and especially Hsms)
- Communicate with those who need to be aware (Hsms / tutors / DSLs)
- Actively promote inclusivity and equality for all protected characteristics and healthy relationships (diversity champion in SCR / raise awareness with Prefects, role of the Peer Mentors)
- We raise awareness and frequent messaging about healthy relationships to pupils. Examples of what is unhealthy and what is abusive. Link to positive mental health.
- We will provide a developmentally appropriate PSHE syllabus which develops pupils’ understanding of acceptable behaviour and keeping themselves safe. Fuller details can be seen in relevant schemes of work and departmental policies for PSHE and ICT.
- We have systems in place for any pupil to raise concerns with staff, knowing they will be listened to, believed and valued.
- We deliver targeted work on assertiveness and keeping safe to those pupils identified as being at risk.
- Where the Charity is advised that a pupil may present a risk to other children, due to a factor outside of school, such as having spent time in custody, or experienced abuse themselves, a Safeguarding Risk Reduction Plan will be completed to ensure that all children at school can be safeguarded.

1.18. Sexual violence and sexual harassment between children is an element of child-on-child abuse which requires particular consideration due to the potentially criminal nature of incidents. As with other areas of child-on-child abuse these types of behaviours and incidents may occur within the community, outside of the school day, or indeed within the school premises, during the school day. In either instance the abuse could be occurring face to face or online. In many cases abuse will take place concurrently via online channels and in daily life.

1.19. Sexual violence and sexual harassment 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. 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. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk of experiencing sexual violence or harassment. Although it is more likely that it will be perpetrated by boys, it is recognised that boys will at times be victims as well. In any case, all child-on-child abuse is unacceptable and will be taken seriously and not tolerated.

1.20. Children who are victims of sexual violence and sexual harassment wherever it happens, will likely 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 our school as well.

What is Sexual violence and sexual harassment?

1.21. Sexual violence and harassment form part of a broader range of Harmful Sexual Behaviours (HSB). All problematic and Harmful Sexual Behaviours will be responded to by the relevant school within the Charity.

1.22. **Sexual Violence:** It is important that school and college staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

1.23. **Rape:** A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

1.24. **Assault by Penetration:** A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her / his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

1.25. **Sexual Assault:** A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. (Schools should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone’s bottom / breasts / genitalia without consent, can still constitute sexual assault.)

1.26. **Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

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

1.28. Sexual consent

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

1.29. Sexual harassment

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

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

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual “jokes” or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim);
- displaying pictures, photos or drawings of a sexual nature;
- **upskirting** (is a criminal offence: The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12th April 2019. Upskirting is where someone takes a picture under a person’s clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone, of any gender, can be a victim)
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and / or sexual violence. It may include:
- consensual and non-consensual sharing of nude and semi-nude images and videos;
- Sharing of unwanted explicit content
- sexualised online bullying;
- unwanted sexual comments and messages, including, on social media;
- sexual exploitation; coercion and threats; and
- coercing others into sharing images of themselves or performing acts they are not comfortable with online.

All child-on-child abuse is unacceptable and will be taken seriously.

Appendix D: Prevent Extremism and Radicalisation

1.1. All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have “due regard to the need to prevent people from being drawn into terrorism”. This duty is known as the Prevent Duty.

The SPoC (Single Point of Contact) for Prevent at Eastbourne College is **Gwen Taylor-Hall**.

The SPoC (Single Point of Contact) for Prevent at St Andrew’s Prep is **Mark Tomsett**.

1.2. Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk is all part of our whole Charity approach to safeguarding.

1.3. When approaching this area of work our school uses the following accepted Governmental definitions of extremism, radicalisation and terrorism:

- **Extremism** is the vocal or active opposition to our fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces. Extremism is defined by the Government in the Prevent Strategy as:
 - vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.

Extremism is defined by the Crown Prosecution Service as:

- the demonstration of unacceptable behaviour by using any means or medium to express views which:
 - encourage, justify or glorify terrorist violence in furtherance of particular beliefs
 - seek to provoke others to terrorist acts
 - encourage other serious criminal activity or seek to provoke others to serious criminal acts; or foster hatred which might lead to inter-community violence in the UK.
- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- **Terrorism** is an action that endangers or causes serious violence to a person / people; cause 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.

1.4. There is no place for extremist views of any kind in our educational Charity of schools, whether from internal sources, pupils, staff or governors, or external sources - school community, external agencies or individuals. The Charity will refer anyone for whom there are concerns of radicalisation to Prevent.

1.5. The normalisation of extreme views may also make children and young people vulnerable to future manipulation and exploitation. Extremist groups have attempted to radicalise vulnerable children and young people to hold extreme views, including views justifying political, religious, sexist or racist violence, or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation. Exploitation and radicalisation should be viewed as a safeguarding concern.

1.6. We value freedom of speech and the expression of beliefs / ideology as fundamental rights underpinning our society’s values. It is important that our pupils and parents see our schools as a safe place where they can discuss and explore controversial issues safely and in an unbiased way and where our staff encourage and facilitate this. Both pupils and staff have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion.

1.7. Any prejudice, discrimination, or extremist views, including derogatory language, displayed by pupils or staff will always be challenged and, where appropriate, dealt with in line with our Behaviour Policy for pupils and the Code of Conduct for staff.

1.8. We are aware that technology is a significant component of many safeguarding and wellbeing issues and that children are at risk of being exposed to illegal, inappropriate or harmful content including radicalisation and extremism online. As such the Charity will ensure that children are safe from terrorist and extremist material when accessing the internet in school by establishing appropriate levels of filtering and supporting this with our Preventative Curriculum. For further information please see our Online safety policy , as well as relevant policies such as those which cover SMSC and Fundamental British Values.

1.9. We will promote the values of democracy, the rule of law, individual liberty, mutual respect and tolerance for those with different faiths and beliefs.

1.10. We will teach and encourage pupils to respect one another and to respect and tolerate difference, especially those of a different faith or no faith.

1.11. We will ensure that all our teaching approaches help our pupils build resilience to extremism and give pupils a positive sense of identity through the development of critical thinking skills.

1.12. We will ensure that all our staff are equipped to recognise extremism and are skilled and confident enough to challenge it.

1.13. We will be flexible enough to adapt our teaching approaches, as appropriate, to address specific issues to become even more relevant to the current issues of extremism and radicalisation. Chapel, assemblies, house, year-group presentations and class discussions may be used as forums to raise awareness of linked issues.

1.14. As part of our whole school safeguarding responsibilities school staff will be alert to:

- Disclosures by pupils of their exposure to the extremist actions, views, or materials of others outside of school, such as in their homes or community groups, especially where pupils have not actively sought these out.
- Graffiti symbols, writing or artwork promoting extremist messages or images.
- Pupils accessing extremist material online, including through social networking sites.
- Parental reports of changes in behaviour, friendship or actions and requests for assistance.
- Partner schools, local authority services, and police reports of issues affecting pupils in other schools or settings.
- Pupils voicing opinions drawn from extremist ideologies and narratives.
- Use of extremist or ‘hate’ terms to exclude others or incite violence.

- Intolerance of difference, whether secular or religious or, in line with our equalities policy, views based on, but not exclusive to, gender, disability, homophobia, race, colour or culture.
- Attempts to impose extremist views or practices on others.
- Anti-Western or Anti-British views.

1.15. There is no such thing as a “typical extremist”: those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity. Pupils may become susceptible to radicalisation through a range of social, personal and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that school staff are able to recognise those vulnerabilities.

1.16. Indicators of vulnerability include:

- identity crisis – the pupil is distanced from their cultural / religious heritage and experiences discomfort about their place in society
- personal crisis – the pupil may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging
- personal circumstances – migration; local community tensions; and events affecting the pupil / pupil’s country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy
- unmet aspirations – the pupil / pupils may have perceptions of injustice; a feeling of failure; rejection of civic life
- experiences of criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement / reintegration
- special educational need – pupil / pupils may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.

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

1.18. However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in children’s behaviour which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a referral to the Channel programme.

1.19. We encourage the use of external agencies or speakers to enrich the experiences of our pupils; however, we will positively vet those external agencies, individuals or speakers who we engage to provide such learning opportunities or experiences for our pupils.

1.20. Our Charity will assess and document the suitability and effectiveness of input from external agencies or individuals to ensure that:

- Any messages communicated to pupils are consistent with the ethos of the Charity and do not marginalise any communities, groups or individuals
- Any messages do not seek to glorify criminal activity or violent extremism or seek to radicalise pupils through extreme or narrow views of faith, religion or culture or other ideologies
- Activities are properly embedded in the curriculum and clearly mapped to schemes of work to avoid contradictory messages or duplication.
- Activities are matched to the needs of pupils
- Activities are carefully evaluated by schools to ensure that they are effective

1.21 We recognise, however, that the ethos of our Charity is to encourage pupils to understand opposing views and ideologies, appropriate to their age, understanding and abilities, and to be able to actively engage with them in informed debate, and we may use external agencies or speakers to facilitate and support this.

1.22 We are aware of the potential indicating factors that a child is vulnerable to being radicalised or exposed to extreme views, including peer pressure, influence from other people or the internet, bullying, crime and anti-social behaviour, family tensions, race / hate crime, lack of self-esteem or identity, prejudicial behaviour and personal or political grievances.

- All concerns will be reported to the DSL.
- All concerns will be fully investigated and responded to from a safeguarding perspective, alongside, where needs be, the Behaviour Policy / Code of Conduct.
- Parents / carers will be contacted, and the concern discussed in detail, aiming to identify motivating factors, any changes in circumstances at home, parental views of the incident.
- If a crime has been committed, then the Police will be contacted.
- If the school are concerned that someone is vulnerable to radicalisation, we will submit a [Prevent referral form](#). This referral is screened by the police Prevent team to determine if the young person is vulnerable to being drawn into terrorism.
- If a vulnerability is identified the case will be discussed at the local ‘Channel’ meeting - a voluntary programme through which individuals consent to receive support to address their vulnerabilities and reduce the risk to them.
- The school will have a representative at these meetings.
- The [Prevent referral form](#) can be found in [Appendix N](#).

1.23. The arrangements for recruiting all staff, governors and volunteers, to our Charity will follow guidance for safer recruitment. Within this we will be alert to the possibility that people may seek to gain positions within our Charity to unduly influence our organisation’s character and ethos. We are aware that such people seek to limit the opportunities for our pupils thereby rendering them vulnerable to extremist views and radicalisation as a consequence.

1.24. Where the school premises are used for non-school activities, we will ensure due diligence around those activities to ensure that these do not conflict with the Prevent Duty.

1.25. The headmasters, Chair of Governors, Safeguarding Governors, DSL, hsms / section heads will all complete additional Prevent Training. Whole school safeguarding training will include Prevent.

1.26. The ongoing whole school approach to fulfilling the Prevent Duty will be informed by a risk assessment which will take into account the local context and the pupil demographic. This will determine the level and frequency of any additional training as well as curriculum content or interventions for groups or individual pupils.

1.27. **Risk assessment considerations for 2023/24 (East Sussex)**

Local Channel referral themes currently include:

- Males (13-17yrs): Think families and future outcomes for younger children.
- Accessing extremist materials on websites and forums and making contact with others on encrypted and gaming platforms.
- ASD traits are often present but should not be considered as the only vulnerability
- Racist views (comfortable in expressing these openly to peers either online or in person) and other hate themes: religion / sexuality / disability
- Mental health: anxiety, low mood, depression and self-harm
- Historic and current bullying which have left a negative impression on them about their school: how they view their peers and as well as staff who dealt with any incidents – creating a sense of injustice and grievance.
- Isolation / loner with few ‘real friends’ / peers – creating no sense of belonging.

[The link to our Prevent Risk Assessment is here](#)

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

Channel

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

1.30. The school or college's Designated Safeguarding Lead (and any deputies) should be aware of local procedures for making a Channel referral. As a Channel partner, the school or college may be asked to attend a Channel panel to discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required.

Appendix E: The Role of the Designated Safeguarding Lead

1. Role of the Designated Safeguarding Lead

1.1. The Designated Safeguarding Lead (DSL) at each of the Charity schools will always be a senior member of staff from the school leadership team, and their lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place) will always be explicit in their job description.

1.2. The DSL will be given the additional time, funding, training, resources and support they need to carry out the role effectively.

1.3. Their additional responsibilities include providing advice and support to other staff on child welfare, safeguarding and child protection matters, taking part in strategy discussions and interagency meetings, and / or supporting other staff to do so, and to contributing to the assessment of children.

2. Availability

2.1. During term time (and during non-term periods when holiday trips are operating) the DSL or a deputy will always be available for staff in the school to discuss any safeguarding concerns. Both schools have boarders and so a DSL is always required to be available day or night when pupils are under the duty of care of each school.

3. Managing Referrals

3.1. The designated safeguarding lead will refer cases:

- of suspected abuse and neglect to East Sussex children's social care as required and support staff who make referrals to East Sussex children's social care;
- to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme;
- where a person is dismissed or left due to risk / harm to a child to the Disclosure and Barring Service as required; and
- where a crime may have been committed to the Police as required, using the [NPCC-When to call the police](#) guidance to inform this decision.

3.2. And will:

- liaise with agencies providing early help services and coordinate referrals from the school to targeted early help services for children in need of support.
- monitor any cases referred to early help and consider referral to children's services where the situation does not improve.

4. Working with Others

4.1. The DSL will:

- act as a source of support, advice and expertise for all staff
- act as a point of contact with the safeguarding partners
- liaise with the relevant headmaster and nominated governor to inform them of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- as required, liaise with the "case manager" and the LADO for child protection concerns in cases which concern a staff member.
- liaise with staff (especially teachers, hsms, tutors, pastoral support staff, school nurses, mental health lead, IT Technicians, SENCO / Head of Learning Support, and School Counsellor) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically
- liaise with the senior mental health lead and, where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health
- promote supportive engagement with parents and / or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances;
- work with the headmaster and relevant strategic and management leads at the schools (hsms and section heads), taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at school.

This includes:

- ensuring that the school knows who the cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort; and,
- support teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.
- Attend, or ensure other relevant staff members attend, child protection conferences, core group meetings and other multi-agency meetings, as required.
- Liaise with other agencies working with the child, share information as appropriate and contribute to assessments.
- Play a pivotal role in multi-agency safeguarding arrangements. Liaise with agencies providing early help services and coordinate referrals from the school to targeted early help services for children in need of support. Monitor any cases referred to early help and consider referral to children's social care where the situation does not improve.
- Communicate with parents of a child in a manner which works in the best interests of the child, putting their welfare and needs first. This may involve seeking external agency advice first (eg if the child protection concern originates from home).
- Coordinating the school's contribution to child protection plans.
- Notifying children's social care if a child with a specific child protection plan is absent for more than two days without explanation.
- Develop effective links with relevant statutory and voluntary agencies, through ensuring regular attendance at training and networking conferences such as the Independent Schools Safeguarding Group (including a fair share of hosting these events).

5. Information Sharing and Managing the Child Protection File

5.1. The DSL will ensure that child protection files are kept up to date and that information will be kept confidential and stored securely.

5.2. Records will include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved;
- a note of any action taken, decisions reached and the outcome

5.3. The DSL will ensure that files are only accessed by those who need to see them and where files or content are shared, this will happen in line with information sharing advice and guidance.

5.4. Where children leave the school (including in year transfers) the DSL will ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This will be transferred separately from the main pupil file, by secure transit, and confirmation of receipt will be obtained. We will make use of the ESCC [Transition - Information Sharing](#) guidance to support this process.

5.5. When our school receives safeguarding information about a new or existing pupil this will be shared by the DSL with other key members of staff such as the SENCO, Hsm / section head.

5.6. Because a lack of information about their circumstances can impact on a child's safety, welfare and educational outcomes, in addition to the child protection file, the DSL will also consider if it would be appropriate to share any additional information with the new school or college 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 new school or college.

5.7. Where a parent / carer has expressed their intention to remove a child from the school with a view to educating at home, the DSL will liaise with East Sussex [Elective Home Education](#) (EHE) Team to ensure that any safeguarding concerns (should there be any) are shared adequately with them, so as to inform next steps. Where a child has an Education and Health Care Plan, the school will also liaise with the local authority who will need to review the plan closely with parents / carers and other relevant professionals.

6. Raising Awareness

6.1. The DSL will:

- organise whole school safeguarding and child protection training for all staff members annually and provide regular ongoing updates throughout the year;
- ensure each member of staff has access to, and understands, the school's child protection policy and procedures, especially new and part-time staff;
- Organise whole-school safeguarding and child protection training for all staff members regularly and provide updates at least annually. Ensure staff members who miss the training receive it by other means, e.g. by attending bespoke training
- Maintain accurate records of staff induction and training.
- ensure the school's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the governing body regarding this;
- ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this;
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements;
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and school leadership staff.
- This will include ensuring that the school, and staff, know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children.
- Ensure that staff understand that children who have a social worker due to safeguarding or welfare needs may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning behaviour and positive mental health.
- Where children need a social worker, this will inform decisions about safeguarding (for example, responding to unauthorised absences or missing education where there are known safeguarding risks) and promoting welfare (for example, considering the provision of pastoral and / or academic support, alongside action by statutory services).
- Ensure that staff are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.
- Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.
- If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following the safeguarding and child protection policy, and speaking to the DSL.

7. Training, Knowledge and Skills

7.1. The designated safeguarding lead (and any deputies) will undergo training to provide them with the knowledge and skills required to carry out the role. This training will be updated at least every two years. The DSL will undertake Prevent awareness training. This training will provide the DSLs with a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of children, as well as specific harms that can put children at risk, and the processes, procedures and responsibilities of other agencies, particularly children's social care, so they:

- understand the assessment process for providing early help and statutory intervention, including the East Sussex continuum of need and the SPOA referral arrangements;
- have a working knowledge of how East Sussex children's social care conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- understand the importance of the role the DSL has in providing information and support to children social care in order to safeguard and promote the welfare of children;
- understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes;
- are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers;
- understand the importance of information sharing, both within the school, and with the safeguarding partners, other agencies, organisations and practitioners;
- understand and support the school with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- are able to understand the unique risks associated with online safety (including an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school;
- can recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support children with SEND to stay safe online.

7.2. In addition to the formal training set out above, their knowledge and skills will be refreshed (this might be via e-bulletins, meeting other DSLs, conferences or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.

8. Providing Support to Staff

8.1. Training will support the DSL in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters. This includes specifically to:

- ensure that staff are supported during the referrals processes; and
- support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

9. Understanding the Views of Children

9.1. It is important that children feel heard and understood at our schools. Therefore, the DSL will be supported in developing knowledge and skills to:

- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school may put in place to protect them; and
- understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

10. Holding and Sharing Information

10.1. Due to the critical importance of recording, holding, using and sharing information effectively the DSL will be equipped to:

- understand the importance of information sharing, both within the school, and with other schools and colleges on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners;
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR); and
- be able to keep detailed, accurate, secure written records of concerns and referrals and understand the purpose of this record-keeping.

11. Quality Assurance

11.1. Monitor the implementation of and compliance with policy and procedures, including periodic audits of child protection and welfare concerns files (at a minimum twice a year).

11.2. Complete an audit of the schools' safeguarding arrangements at frequencies specified by the East Sussex Safeguarding Children partnership, using the audit tool provided by ESCC Education Division for this purpose.

11.3. Provide regular reports to the governing body detailing changes and reviews to policy, training undertaken by staff members and the number of children with child protection plans and other relevant data.

11.4. Take lead responsibility for remedying any deficiencies and weaknesses identified in safeguarding and child protection arrangements.

12. DSL Management Structure

12.1. At Eastbourne College there are two DSLs, who are based in offices next door to one another and communicate frequently face to face every day. They deputise for one another. The Second Master is listed as the DSL (by nature of holding a position as the headmaster's no. 2 and having more routine contact with and accountability to governors); the Deputy Head (Pastoral) is listed as the Deputy DSL but the reality is that both work closely together, taking a joint role in the management of safeguarding and child protection in the College. They consult over all safeguarding and child protection concerns. The Deputy Head (Pastoral) is a female member of staff and so may take the lead in situations where this is more appropriate. The Second Master lives on site and may take the lead in out-of-hours situations.

12.2. At St Andrew's Prep, there are three DSLs all of whom communicate frequently face to face every day. They deputise for one another. They consult over all safeguarding and child protection concerns.

The head of pastoral care / boarding is the DSL and sits on the school's senior management team. He lives in the main school building as the boarding housemaster.

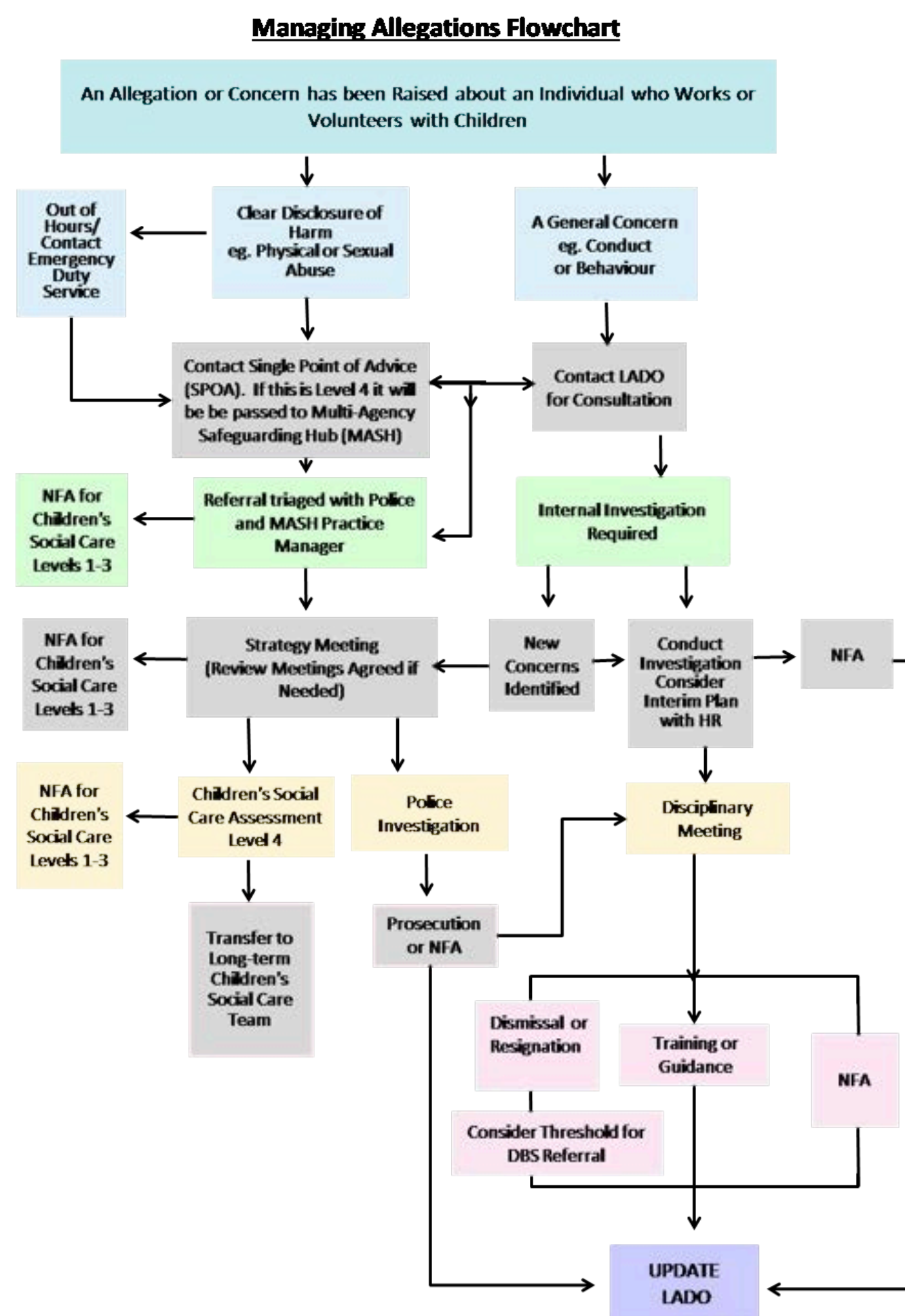
The senior nurse and head of wellbeing (deputies) are both female staff; the senior nurse also lives in dedicated school accommodation adjacent to the boarding house. The head of wellbeing lives close to the school.

Two live-in staff and a male-female mix allows for strong continuity of cover at all times for all pupils.

12.3. The DSL team at both schools communicate with one another regularly, both informally / ad-hoc as well as at scheduled meetings in order to:

- support, advise and challenge one another's work and approach
- share best practice and approaches
- develop further policy alignment across the Charity where necessary
- ensure continuity of care and support of children and families

Appendix F: Managing Allegations Flowchart and Narrative



Managing Allegations Flowchart and Narrative

What to do if an allegation or concern has been raised about an individual who works or volunteers with children.

If an allegation or concern has been raised about an individual who works or volunteers with children, you will initially need to decide whether it is a general concern, for example about conduct or behaviour, or if it is a clear disclosure of harm, such as physical or sexual abuse.

What to do if a general concern has been raised.

If a general concern about an individual who works or volunteers with children has been raised, for example about conduct or behaviour, contact the Local Authority Designated Officer (LADO) for a consultation. The LADO may advise that an internal investigation takes place or that you contact the Single Point of Advice (SPOA) or the Multi-Agency Safeguarding Hub (MASH).

If you are advised to complete an internal investigation, also consider consulting with Human Resources (HR) about putting in place an interim plan to ensure people are safeguarded whilst the internal investigation is completed.

There are three potential outcomes following an internal investigation: First, that no further action is taken. The second outcome is that a disciplinary meeting is held. Lastly, it may result in new concerns being identified.

In the case where a disciplinary meeting is held, the meeting could result in one of three possible outcomes: First, it could be decided that no further action is required. The second outcome could be that it is decided that training or guidance is required. Lastly, the disciplinary meeting could result in a dismissal or resignation.

If a dismissal or resignation takes place, you will need to consider whether the case meets the threshold for a referral to the Disclosure and Barring Service (DBS).

In the case where new concerns are identified during the internal investigation, you will need to either investigate these concerns as part of the internal investigation process also considering an interim plan with HR or convene a Strategy Meeting, where further review meetings can be agreed if needed.

The outcomes of the Strategy Meeting include no further action for Children's Social Care if assessed at Levels 1 to 3. Where the case is assessed by Children's Social Care at Level 4, it may be transferred to the Long-Term Children's Social Care Team. Alternatively, the decision to move to a police investigation may be made at the Strategy Meeting resulting in a prosecution or no further action. In either case, you may still need to hold a disciplinary meeting, depending on LADO advice. The outcomes of a disciplinary meeting have been outlined earlier in this text.

If, on first contact with the LADO in response to a general concern being raised, you are advised to contact SPOA the following will happen. Professionals at SPOA will review the concern and if it is assessed at Level 4 on the Continuum of Need, it will be passed to MASH.

If the concern is passed to MASH, the police and MASH practice manager will triage the referral. They may decide that there is no further action for Children's Social Care if the case is assessed Levels 1 to 3. Alternatively, the police and the MASH practice manager may decide to convene a Strategy Meeting, where review meetings can be agreed if needed. The outcomes of the Strategy Meeting have been outlined earlier in this text.

In all cases, ensure that the LADO is updated regarding the outcome of any internal investigation or police investigation.

What to do if a clear disclosure of harm has been made.

If an allegation or concern has been raised about an individual who works or volunteers with children and it is a clear disclosure of harm, such as physical or sexual abuse, you will need to take the following actions.

First contact the Single Point of Advice (SPOA). If SPOA is closed, contact the out of hours emergency duty team. If it is decided by professionals at SPOA that the concern is at Level 4 on the Continuum of Need, it will be passed to the Multi-Agency Safeguarding Hub (MASH). You may also be advised to contact the Local Authority Designated Officer (LADO) at this point, and you will need to follow any advice or instructions they provide as well.

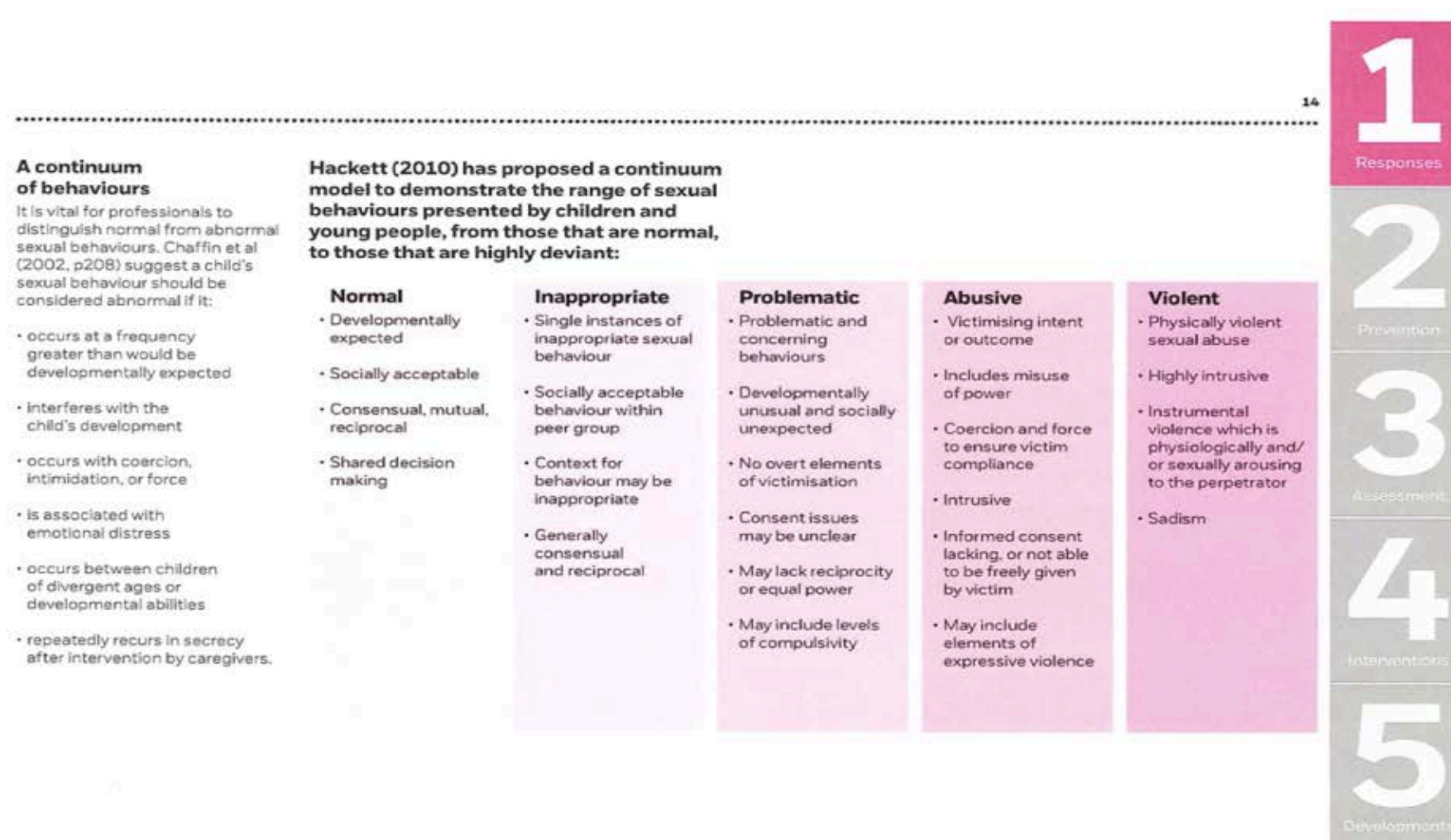
Where the concern is passed to MASH, the referral will be triaged by the police and MASH practice manager. They may decide that there is no further action for Children's Social Care if the case is assessed at Levels 1 to 3. Alternatively, the police and MASH practice manager may decide to convene a Strategy Meeting, where review meetings can be agreed if needed.

The outcome of the Strategy Meeting could be that it is decided that no further action for Children's Social Care is required because the case has been assessed at Levels 1 to 3. Alternatively, it could be decided at the Strategy Meeting that a police investigation is required, or a Children's Social Care Level 4 Assessment is required.

A police investigation could result in a prosecution or no further action. In either case, you may still need to hold a disciplinary meeting, depending on LADO advice. The outcomes of a disciplinary meeting have been outlined earlier in this text.

A Children's Social Care Level 4 assessment could result in no further action for Children's Social Care as the case has been assessed at Levels 1 to 3 or in a transfer to the Long-Term Children's Social Care Team.

Appendix G: Hackett Continuum Model



Hackett Continuum Model

Appendix H: East Sussex childrens' Sexual Behaviour Screening Resource summary charts (NB – full version with accompanying explanatory information accessibly via C-zone

Sexual Behaviour Screen Resource for Children and Young People, under [Harmful sexual behaviour | Czone \(eastsussex.gov.uk\)](https://www.eastsussex.gov.uk/harmful-sexual-behaviour-czone)

Note – behaviours which cross the red threshold must be referred to SPoA for advice; where a report of rape or assault by penetration is made, this should be referred to the police straight away.

General explanatory key

Green

Normal/developmentally appropriate sexual behaviours

- Sex play and sexual behaviour can be normal in children and young people and is not necessarily cause for alarm. Normal or developmentally appropriate sexual behaviours:
- May need some redirection or for the child to be reminded of appropriate personal boundaries.
- May be accompanied by laughter, spontaneity, curiosity, and experimentation.
- Children are easily diverted from these behaviours.
- Developmentally appropriate use of technology has little or low risk for harmful sexual behaviours. This use is described here to give a context for higher risk uses described below.

Amber

Inappropriate/problematic sexual behaviours

- The frequency and persistence of these behaviours should be monitored.
- Seek professional advice if a child or young person exhibits several of these behaviours, and/or the behaviours continue despite clear requests to stop.
- Risks with technology use include less time with peers, grooming, viewing inappropriate content.

Red

Abusive or violent sexual behaviours

- Contact Single Point of Advice (SPoA), especially if a child or young person is also secretive, anxious or tense - or if coercion, compulsion or threats are involved.
- Some of these behaviours become criminal offences when a young person reaches the age of criminal responsibility (10 years of age). Report criminal offences to the police immediately.
- Technology use risks include: grooming, sexual assault, pornography, exploitation.

0 - 4 years: infant, toddler, pre-school
(Ref: Gil, 1993 and Cavanagh Johnson 1999)

Green

Normal/developmentally appropriate sexual behaviours

- Touching or rubbing own genitals and showing others own genitals
- Touching or looking at private parts of other children or familiar adults, e.g., when in the bath
- Being nude, and playing doctors, nurses or mummies and daddies
- Using slang words for genitals and sexual functions e.g., “willy”, “Minnie” or talking about “sexing”
- Curiosity about the differences between males and females
- Playing age appropriate games or videos on electronic devices, under supervision (low risk for sexually abusive)

Amber

Inappropriate/problematic sexual behaviours

- Keeps masturbating after being told to stop
- Forcing another child to engage in sexual play
- Sexualised play with dolls, e.g., “humping” a teddy bear
- Touching the private parts of an animal or an unfamiliar adult
- Following other children into a toilet or bathroom to look at or touch their private parts
- Spending a lot of time using technology and being upset when devices are removed (risk of inappropriate content and contacts)
- Talking about sex using adult slang words

Red

Abusive or violent sexual behaviours

- Persistently touching or rubbing self to the exclusion of normal childhood activities; hurting own genitals by rubbing or touching
- Simulating sex with other children with or without clothes on
- Oral sex
- Sexual play involving forceful anal or vaginal penetration with objects
- Accessing sexual material online

5 - 9 years: early school years

(Ref: Gil, 1993 and Cavanagh Johnson 1999)

Green**Normal/developmentally appropriate sexual behaviours**

- Awareness of privacy about bodies
- Self-touching and masturbation
- With peers:
 - “Show me yours/I’ll show you mine”
 - Stories/questions/names/swearing re private parts/body functions
 - Kissing/holding hands; observed behaviour e.g., pinching a bottom*
 - Online social contact: skill based or dress up games
 - Using photos, videos to record their life, and
- Accidental access to pornography (potential risk of child acting out the behaviour or pornography being used to groom the child)

**If the child continues to pinch/touch other children’s bottoms following re-direction or touch the bottoms of an unfamiliar adult, this would likely be considered problematic.*

Amber**Inappropriate/problematic sexual behaviours**

- Continually rubbing/touching own genitals in public
- Persistent nudity and/or exposing private parts in public
- Continually wanting to touch other children’s private parts
- Persistently using sexualised language
- Wanting to play sex games with much older or younger children
- Sending/receiving nude sexual images
- Accessing pornography and playing violent or sexual video games (risks: grooming, lowers inhibitions)
- Having own social media accounts and spending a lot of time online (risks: grooming, less time with peers, inappropriate posts)

Red**Abusive or violent sexual behaviours**

- Touching or rubbing self persistently in private or public, to the exclusion of normal childhood activities
- Rubbing their genitals on other people
- Forcing other children to play sexual games
- Sexual knowledge too great for age
- Talking about sex and sexual acts habitually
- Posting sexual images or videos online
- Accessing/showing pornography to others

9 - 12 years: pre-adolescence

(Ref: Ryan 2000, and Ryan, Lane and Leversee)

Green**Normal/developmentally appropriate sexual behaviours**

- Growing need for privacy
- Masturbating in private
- With peers:
 - “Show me yours/I’ll show you mine”
 - Kissing and flirting
 - Talking about genitals or reproduction
 - Use of sexual language, including swear or slang words
- Having own social media accounts that are monitored by parents/carers
- Using photos, videos to record their life
- Playing age-appropriate games online
- Access to pornography (if isolated and motivated by curiosity)

Amber**Inappropriate/problematic sexual behaviours**

- Exhibitionism e.g., occasional flashing or mooning
- Attempting to expose other people’s genitals
- Pre-occupation with masturbation
- Mutual masturbation with a peer or group
- Simulating foreplay or intercourse with peers, with clothes on
- Sexual knowledge too great for their age, when the context is considered
- Talking about fear of pregnancy or sexually transmitted infection
- Peeping, exposing, using obscenities
- Seeking out pornography
- Taking nude, sexual images of themselves
- Secretive about using the internet/social media (risk of being groomed or exploited)

Red**Abusive or violent sexual behaviours**

- Compulsive masturbation, including interrupting tasks to masturbate
- Repeated/chronic peeping, exposing, using obscenities
- Chronic interest in adult pornography
- Making others watch pornography
- Seeking out and viewing indecent images of children
- Degrading/humiliating self or others using sexual themes
- Touching other children’s genitals without consent

13 - 18 years: adolescence

(Ref: Ryan, Lane and Leversee and LaTrobe University 2014 Health Study)

Green**Normal/developmentally appropriate sexual behaviours**

- Need for privacy
- Masturbating in private
- With peers:
 - Sexually explicit conversations, obscenities or jokes relevant to own culture
 - Sexual teasing and flirting
 - Kissing, hugging, holding hands
 - Foreplay with mutual consent
- Sexual intercourse plus full range of sexual activity with partner of a similar age/developmental ability
- Viewing sexual content for arousal
- Sending/receiving sexual images of others with consent

Amber**Inappropriate or problematic sexual behaviours**

- Being pre-occupied with/anxious about sex
- Being promiscuous (not making informed decisions about sexual relationships/have had frequent sexual relationships that they have felt uncomfortable about)
- Being interested in or using themes or obscenities involving sexual aggression
- Spying on others who are nude or engaged in sexual activity
- Engaging in unsafe sexual behaviour
- Seeking out pornography
- Having oral sex or intercourse with someone who is at least two years younger/older
- Sending/receiving sexual images of multiple people with their consent
- Giving out contact details online or arranging to meet an online contact alone

Red**Abusive or violent sexual behaviours**

- Compulsive masturbation (especially in public)
- Degrading/humiliating self or others using sexual themes
- Chronic preoccupation with sexually aggressive pornography or child sexual abuse images
- Attempting to expose other people's genitals*
- Touching others' genitals without permission
- Making written/verbal sexually explicit threats
- Making obscene phone calls, exhibitionism, voyeurism, or sexually harassing others

Appendix I: Safeguarding Induction Checklist for staff (retained on file in the school where the staff member spends the majority of their time).

Note some staff with less / little contact with pupils may not receive every single policy (eg teaching and learning policy and safe remote teaching).

Date of induction: _____

Name of adult: _____

Date of joining Eastbourne College: _____

Post: _____

SUBJECT	INITIALS OF DSL	DATE COMPLETED
<p>Safeguarding</p> <ul style="list-style-type: none"> Issue and explain the Charity's safeguarding and child protection policy and ensure that the member of staff has read it Child protection and safeguarding training, including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring Issue and explain the school pupil behaviour policy suite for the relevant school and ensure that the member of staff has read them Issue and explain the Charity's staff behaviour policy / code of conduct and ensure that the member of staff has read it and understands their responsibilities regarding whistleblowing Ensure that the relevant school policy / guidance which includes the safeguarding response to children who are absent from education, particularly on repeat occasions and / or for prolonged periods is read and understood Explain the role of the designated safeguarding lead (DSL) (including the identity of the DSL and any deputies) Issue Part One and Annex of Keeping Children Safe in Education (current edition)* and ensure that the member of staff has read and understood it Issue and explain the online safety policy (including the Staff ICT Acceptable Use policy) and ensure the member of staff has read it Set them up with the online safety certificate course to complete and set deadline Draw attention to remote teaching / learning and pastoral care policy (within online safety policy) (if pupil-facing) Issue the relevant (or both schools) teaching and learning policy (if pupil facing) Explain the emergency procedures for fire, critical incident and first aid / medical centre contact for the school they will mainly be working at Issue and explain the Eastbourne College / St Andrew's staff handbook 		

The Induction programme has been successfully completed.

Signed.....DSL Date.....

I confirm that I have received and read the ECI safeguarding and child protection policy.

I have been made aware of my duty to safeguard and promote children's welfare.
The procedure for reporting concerns about a pupil has been explained to me.
I have been made aware of my responsibilities to protect my own professional reputation.

Signed.....Employee / Adult Date.....

* Part One (plus annex) of Keeping Children Safe in Education 2023 is 'information for all staff' and all staff will be expected to read it. Staff (and governors) with middle or senior management and / or staff recruiting responsibilities should read the complete KCSIE version. In case of query of which version to read, please consult the DSL.

Each school will maintain accurate records of staff induction and training.

Note that having undertaken safeguarding training to commence work at the College or School, staff are not required to have additional safeguarding training if they have a role (or commence a new role) at the other setting. However, their line manager must point out the following practicalities for the other / new setting in which they are required to work:

- fire procedures
- critical incident procedures
- medical / first aid procedures
 - a reminder of who the DSLs are and that any safeguarding issue must be referred to the DSL of the school in which the pupil normally attends

✓ **Appendix I: Safeguarding Induction Checklist for staff (expand for downloadable copy)**

Appendix II: Renewal frequencies for safeguarding related training

Statements that are in bold are statutory requirements. Statements that are not in bold are best practice and/or practice guidance issues by the ESSCP.

Training	Review period where applicable	Offer information
Whole school safeguarding training that includes online safety and whistle-blowing procedures	Annually	This can be delivered by the DSL or is available from SLES via the Services2Schools webshop
Designated safeguarding leads (DSLs) initial or refresher training	2 years	Booked through the Learning Portal
Safeguarding and child protection training at induction	N/A	Online option through the Learning Portal
Safer recruitment training	5 years	Various online providers available
Safeguarding and child protection for contractors, agency and third-party organisations	2 years	Online option through the Learning Portal
Prevent training	School to determine frequency based upon their individual risk assessment	Online option - CLICK HERE
Designated teacher for children who are looked after appropriate training	3-4 years	Organised by the Virtual School
Managing allegations against staff	School to determine frequency based upon individual assessment of need	For the headteacher and chair of governors. Booked through the Learning Portal
Local Authority Governor Services training prior to or soon after appointment to the role of designated governor for safeguarding	4 years	Book through the Learning Portal

Strongly held view	Strong evidence		Unclear or no view
	Firm ground – what do we know?	Ambiguous information – what are we wondering?	
	What assumptions are we making?	Missing information – what don't we know?	
	Weak or no evidence		

^ Appendix J: Child Protection Incident/Welfare Concern Form (expand for downloadable copy)

Appendix J

EASTBOURNE COLLEGE INCORPORATED; Eastbourne College and St Andrew's Prep

CHILD PROTECTION INCIDENT / WELFARE CONCERN FORM

This form may be completed electronically but must be signed by hand (but may be then emailed)

Pupil Name			
Pupil Date of Birth		Year Group/House	
Name of Staff Member Reporting Incident			
Date Incident Reported (dd/mm/yyyy)		Time Incident Reported	
Details of the Incident: Note the reasons for recording the incident. Ensure the following factual information is provided – who, what, when and where. Includes names of witnesses, if relevant, and			

Reporting Staff Member's Proper Signature

Date/Time

Appendix K - Child Protection and safeguarding DSL A4 sized display posters for each school

Eastbourne College

Appendix K - Child Protection and safeguarding DSL A4 sized display posters for each school

Eastbourne College is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment and to work within the current legislative framework.

There are six main elements to our policy; these are to:

- Ensure we practise safe recruitment in checking the suitability of staff and volunteers to work with children.
- Establish a safe environment in which children can learn and develop.
- Raise awareness of child protection issues through staff induction procedures and regular staff training and updates to ensure consistent good practice.
- Equip children with the skills they need to know to stay safe.
- Develop and then implement procedures for identifying and reporting cases, or suspected cases, of abuse of any type.
- In accordance with an agreed child protection plan, support pupils who have been abused.

Every school must appoint a Designated Safeguarding Lead (DSL). Their role includes:

- providing training to all staff and senior pupils so that they may understand procedures and signs of concern;
- liaising with local agencies as required;
- being responsible for the Child Protection policy;
- establishing and maintaining an environment where children feel secure, are encouraged to talk, and are listened to;
- ensuring children know that there are adults in the school whom they can approach if they are worried (hsm, tutor, medical centre, chaplain, counsellor, teacher); and
- ensuring there are opportunities in the PSHE curriculum for children to develop the skills they need to recognise and stay safe from abuse.

At Eastbourne College the DSLs are:



Mr Symes
Second Master
Mobile: 07506 692799

Email: cwsymes@eastbourne-college.co.uk



Mrs Taylor-Hall
Deputy Head (Pastoral)
Mobile: 07841 342141

Email: getaylor-hall@eastbourne-college.co.uk

Both can be contacted at any time should anyone wish to raise a concern.

The Governor responsible for Child Protection and Safeguarding is:

Dr Rob Wicks who can be contacted via Reception or directly: rmwicks@eastbourne-college.co.uk

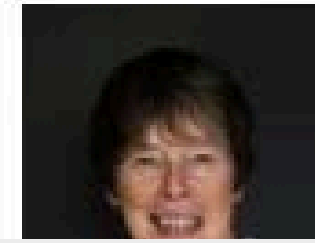
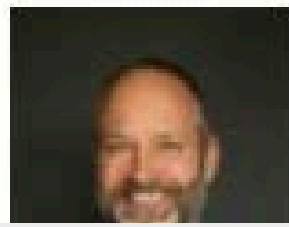
Appendix K - Child Protection and safeguarding DSL A4 sized display posters for each school

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Every school must appoint a Designated Safeguarding Lead (DSL). Their role includes:



Copies of this must be displayed in all house notice boards, all departmental offices and the staff room.

St Andrew's Prep School

Safeguarding is everyone's business at St Andrew's Prep

<p>Designated Safeguarding Lead/ Head of Pastoral Care Mr Mark Tomsett Tel no: 01323 744833 07808 715 338/ 07495 682 991 Email: mtomsett@standrewsprep.co.uk</p> 	<p>Deputy DSL / Head of Well-Being Mrs Sarah Piper Tel No: 01323 733203 07555 416 306 Email: spiper@standrewsprep.co.uk</p> 	<p>Deputy DSL/ Senior Nurse Sister Vicks Campion Tel no: 01323 744834 07790 567 131 Email: VLKCampion@standrewsprep.co.uk</p> 
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If a pupil wishes to disclose something to you, you should tell them: you will listen to what they say but will tell those who need to know.

What to do: Listen, don't ask leading questions. Do not put words into their mouths. Make accurate, detailed notes immediately afterwards and pass directly to DSL (Date and sign the document). Do not discuss with other colleagues.

Report the disclosure to Mark, Sarah, Vicks or Tom Gregory as soon as possible.
IT IS NOT YOUR JOB TO INVESTIGATE, ONLY TO REPORT AND REFER
The governor responsible for safeguarding and child protection is Nicky Eckert
She can be contacted Via Prep School Reception
Tel. 01323 733203 or by
Email: neckert@eastbourne-college.co.uk

Child Protection and safeguarding DSL A4 sized display posters - St Andrew's Prep (expand for downloadable copy)

Safeguarding is everyone's business at St Andrew's Prep

Designated Safeguarding Lead/ Head of Pastoral Care

Mr Mark Tomsett
Tel no: 01323 744833
07808 715 338/ 07495 682 991
Email: mtomsett@standrewsprep.co.uk



Deputy DSL / Head of Well-Being

Mrs Sarah Piper
Tel No: 01323 733203
07555 416 306
Email: spiper@standrewsprep.co.uk



Deputy DSL/ Senior Nurse

Sister Vicks Campion
Tel no: 01323 744834
07790 567 131
Email: VLKCampion@standrewsprep.co.uk



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Appendix L: Visitor Information Leaflets

Eastbourne College

Appendix L Visitor information leaflet



Welcome to Eastbourne College

Please take a few moments to read this leaflet.

We ask that all visitors comply with the following information, which is intended to ensure your health, safety and security whilst on Eastbourne College premises.

We hope that your visit is a comfortable and enjoyable experience. We recognise and promote our responsibilities for safeguarding and health and safety. We hope this leaflet will provide you with some useful advice when visiting our school.

This leaflet has been provided to make sure you understand what is expected of you. Please ask at reception if you are unclear about anything in it and keep the leaflet in a safe place so you can refer back if you need to.

Visitor Arrival Information

On arrival, please ensure that you sign in at reception (located in the Winn building) and

collect a visitor's badge / lanyard. Please wear your Visitor's Badge at all times in a visible position whilst on the premises.

If you have mobility or hearing problems, please inform Reception upon your arrival.

Under most circumstances and in accordance with current safeguarding guidelines, you will be accompanied by your host whilst you are on College premises. Visiting children must be accompanied at all times.

However if you are a visitor who regularly visits several different schools as part of your duties, you or your manager should have supplied a member of school staff with written confirmation that a satisfactory enhanced DBS check has been carried out.

Safeguarding and Child Protection

Eastbourne College is committed to safeguarding and promoting the welfare of children and young people and expects all visitors to share this commitment and to work within the current legislative framework.

At our school we consider the safeguarding of our children to be of paramount importance. Therefore everyone on our site must be responsible for safeguarding and protecting children, and aware of our procedures.

If you have a safeguarding or child protection concern about a child, or if you are concerned by anything you see or hear, please report to the Designated Safeguarding Lead (DSL) – Cris Symes, Second Master on 07506 692799, or in their absence, with the deputy DSL Gwen Taylor-Hall, Deputy Head (Pastoral) on 07841 432141, as soon as possible.

If you have a concern about a member of staff, please discuss your concerns with the headmaster, Mr Tom Lawson. If you have a concern about the headmaster please discuss them with the chair of governors Mr Philip Broadley.

The staff at reception will help locate them for you if needed

Appropriate Behaviour

As a visitor please remember we expect you to:

- behave appropriately and use suitable language
- avoid physical contact with a child
- never exchange personal contact details with a child or arrange to meet them outside of the school environment
- not use a personal camera, including mobile phone cameras, to take



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Welcome to St Andrew's Prep

Please take a few moments to read this leaflet.

We ask that all visitors comply with the following information, which is intended to ensure your health, safety and security whilst on St Andrew's Prep premises.

We hope that your visit is a comfortable and enjoyable experience. We recognise and promote our responsibilities for safeguarding and health and safety. We hope this leaflet will provide you with some useful advice when visiting our school.

This leaflet has been provided to make sure you understand what is expected of you. Please ask at reception if you are unclear about anything in it and keep the leaflet in a safe place so you can refer back if you need to.

Visitor Arrival Information

On arrival, please ensure that you sign in at reception (located at the main entrance from the front car park) and collect a visitor's badge / lanyard. Please wear your visitor's badge at all times in a visible position whilst on the premises.

If you have mobility or hearing problems, please inform Reception upon your arrival.

Under most circumstances and in accordance with current safeguarding guidelines, you will be accompanied by your host whilst you are on College premises. Visiting children must be accompanied at all times.

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Safeguarding and Child Protection

St Andrew's Prep is committed to safeguarding and promoting the welfare of children and young people and expects all visitors to share this commitment and to work within the current legislative framework.

At our school we consider the safeguarding of our children to be of paramount importance. Therefore, everyone on our site must be responsible for safeguarding and protecting children, and aware of our procedures.

If you have a safeguarding or child protection concern about a child, or if you are concerned by anything you see or hear, please report to the Designated Safeguarding Lead (DSL) – Mark Tomsett, on 07808 715 338/01323 744 833, or in their absence, with the deputy DSLs – Sarah Piper 07555 416 306 or Vicks Champion 07790 567 131 as soon as possible. If you are unable to contact any of the Safeguarding Leads, then please contact the office 01323 733203 and ask them

to locate and inform a DSL that you wish to speak to them about a safeguarding or child protection concern.

If you have a concern about a member of staff, please discuss your concerns with the headmaster, Mr Tom Gregory. If you have a concern about the headmaster please discuss them with the chair of governors Mr Philip Broadley.

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Appropriate Behaviour

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- behave appropriately and use suitable language
- avoid physical contact with a child
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- not use a personal camera, including mobile phone cameras, to take photographs without prior permission being given

If you witness any suspicious behaviour or objects please call reception immediately. DO NOT TOUCH ANY SUSPICIOUS OBJECT OR APPROACH ANYONE BEHAVING IN A STRANGE OR SUSPICIOUS MANNER.

Fire and Evacuation Procedures

If you hear the fire alarm (a continuous siren) please leave the building by the nearest available exit as quickly and calmly as possible. Do not collect personal belongings.

St Andrew's Prep EASTBOURNE

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Appendix M – Eastbourne College Incorporated: Safeguarding Risk Reduction Plan (SRRP)

Date:

Detail required	Child's Details
Name	
Date of Birth or age	
Class and Year Group	

Adults included in the development of the plan

Name	Relationship and contact

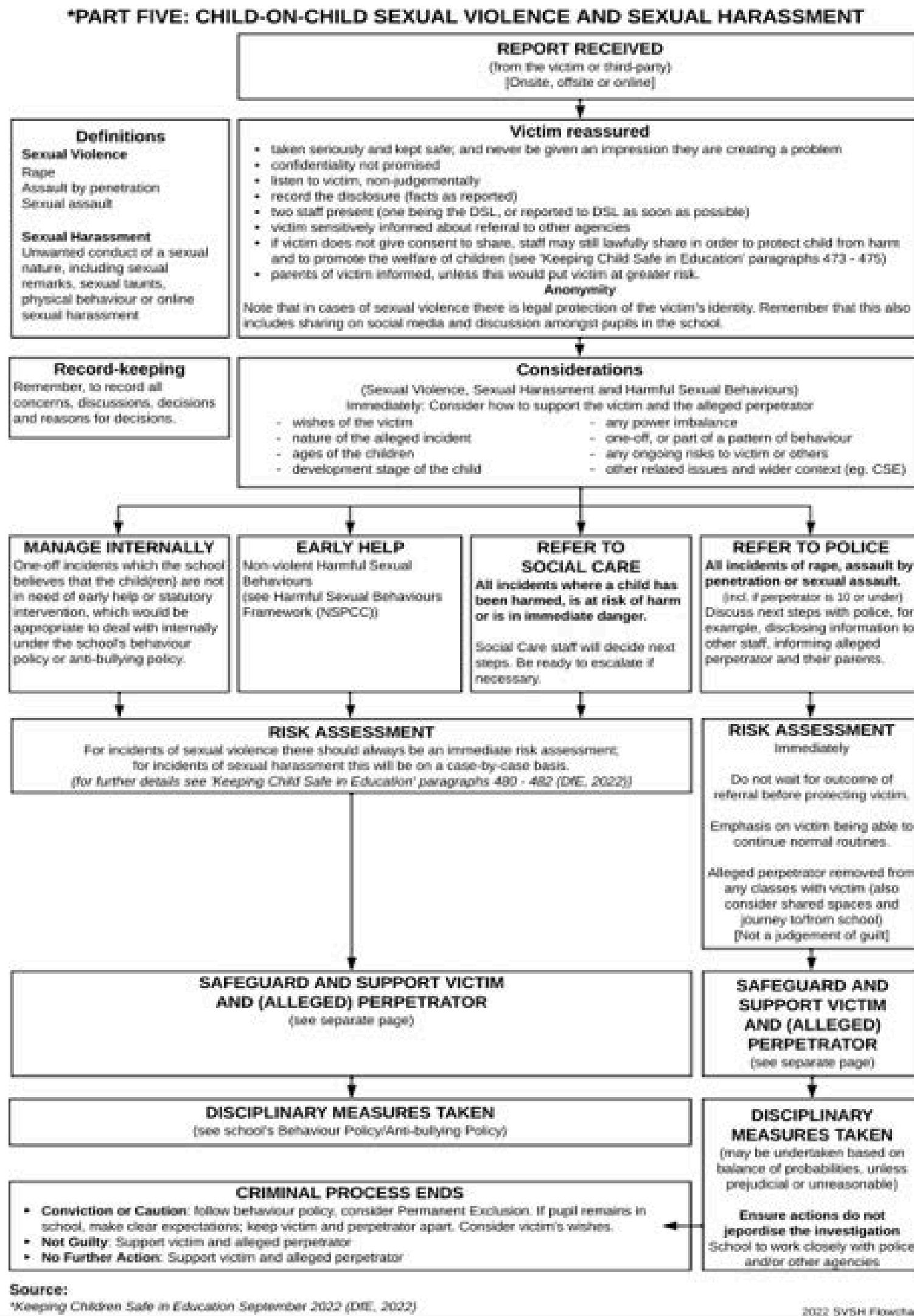
Details of decision regarding parent and carer or pupil involvement
<i>If not included in meeting specify why and how their views and wishes are conveyed.</i>
Specify any issues of SEN, Child Protection, Race, Culture or Diversity
Reason for risk management plan:
<i>(Summary of concerns leading to a plan being implemented; consider triggers, control mechanisms, specify the risk or risks and who is at risk. It may be helpful to outline actions that have previously been tried and whether they were successful or not.)</i> <i>Example: was there a specific incident, escalating behaviour, history</i>
Timescales
<i>Duration of plan, review dates and any additional specifics.</i>
Date plan to start:
<i>Insert date</i>
Please add any supplementary details relevant to this plan:
<i>Any relevant additional details not already identified (i.e., if there are other pupils with linked plans, any legal factors that need to be considered)</i>
Give details of any known strategies or precautions required to avoid, manage or predict the behaviour or risks and specific triggers to be avoided
<i>Details: i.e., enclosed spaces, loud noises, male or female worker, no lone worker, after specific intervention sessions (CAMHS, therapy) significant dates of bereavement, actions likely to occur.</i>
Are there any other risks or concerns that you feel should be considered that are not directly linked to this plan
<i>Please give details: i.e., known CSE risk, parental actions, other student responses.</i>
Please identify any essential documents that should be read or consider and where they can be located. Assessments, expert reports, assessments, chronologies, SEN plan, EHCP etc (any plan)
<i>Please give details (including date and location of document)</i>

Insert name and logo of school

Risk Management Action Plan for	Insert name of child
Date of plan	Insert date
Distributed to	List all people to receive a copy of the plan
Lead professional	Lead professional's name
Contact details	Lead professional's contact details
Review date	Insert date

Risk Detail	Action	Person responsible	Contingency plan
<i>Example: Child A has previously opportunistically touched another student when queueing</i>	<i>Example: Child A to be placed at the front of any queue until next review date</i>	<i>Example: All staff to be advised by DSL</i>	<i>Example: Should Child A not comply with the plan; this is to be immediately reported to the DSL for review</i>

Date risk assessment and plan agreed	Name and role in school	Signature
Date	Name – Headteacher	
Date	Name – Designated Safeguarding Lead	



Appendix M – Eastbourne College Incorporated: Safeguarding Risk Reduction Plan (SRRP)

Date:

Detail required	Child's Details
Name	
Date of Birth or age	
Class and Year Group	

Adults included in the development of the plan

Name	Relationship and contact

Example: was there a specific incident, escalating behaviour, history

Timescales

Duration of plan, review dates and any additional specifics

Appendix N- Prevent Referral Form

REFERRAL PROCESS

By sending this form you consent for it to arrive with both your dedicated Local Authority safeguarding team & Prevent policing team for a joint assessment. Wherever possible we aim to give you feedback on your referral, please be aware, however, that this is not always possible due to data-protection & other case sensitivities.

Once you have completed this form, please email it to the relevant address from the list below:

For Brighton referrals : PreventReferralsbrightonandhove@sussex.pnn.police.uk

For East Sussex referrals : PreventReferralseastsussex@sussex.pnn.police.uk

For West Sussex referrals : PreventReferralswestsussex@sussex.pnn.police.uk

For general Prevent enquiries within Sussex, or for advice on completing this form, please contact the Sussex local Prevent team or the Prevent Gateway Team:

PreventGateway@thamesvalley.pnn.police.uk or call 01865 555618

INDIVIDUAL'S BIOGRAPHICAL & CONTACT DETAILS

Forename(s):	First Name(s)
Surname:	Last Name
Date of Birth (DD/MM/YYYY):	D.O.B.
Approx. Age (if DoB unknown):	Please Enter
Gender:	Please Describe
Known Address(es):	Identify which address is the Individual's current residence
Nationality / Citizenship:	Stated nationality / citizenship documentation (if any)
Immigration / Asylum Status:	Immigration status? Refugee status? Asylum claimant? Please describe.
Primary Language:	Does the Individual speak / understand English? What is the Individual's first language?
Contact Number(s):	Telephone Number(s)
Email Address(es):	Email Address(es)
Any Other Family Details:	Family makeup? Who lives with the Individual? Anything relevant.

DESCRIBE CONCERNS

In as much detail as possible, please describe the specific concern(s) relevant to Prevent.

Please Describe

FOR EXAMPLE:

- How / why did the Individual come to your organisation's notice in this instance?
- Does it involve a specific event? What happened? Is it a combination of factors? Describe them.
- Has the Individual discussed personal travel plans to a warzone or countries with similar concerns? Where? When? How?
- Does the Individual have contact with groups or individuals that cause you concern? Who? Why are they concerning? How frequent is this contact?
- Is there something about the Individual's mobile phone, internet or social media use that is worrying to you? What exactly? How do you have access to this information?
- Has the Individual expressed a desire to cause physical harm, or threatened anyone with violence? Who? When? Can you remember what was said / expressed exactly?
- Has the Individual shown a concerning interest in hate crimes, or extremists, or terrorism? Consider *any* extremist ideology, group or cause, as well as support for "school-shooters" or public-massacres, or murders of public figures.
- Please describe any other concerns you may have that are not mentioned here.

COMPLEX NEEDS

Is there anything in the Individual's life that you think might be affecting their wellbeing or that might be making them vulnerable in any sense?

Please Describe

FOR EXAMPLE:

- Victim of crime, abuse or bullying.
- Work, financial or housing problems.
- Citizenship, asylum or immigration issues.
- Personal problems, emotional difficulties, relationship problems, family issues, ongoing court proceedings.
- On probation; any erratic, violent, self-destructive or risky behaviours, or alcohol / drug misuse or dependency.

- Expressed feelings of injustice or grievance involving any racial, religious or political issue, or even conspiracy theories.
- Educational issues, developmental or behavioural difficulties, mental ill health (see **Safeguarding Considerations** below).
- Please describe any other need or potential vulnerability you think may be present but which is not mentioned here.

OTHER INFORMATION	Please provide any further information you think may be relevant, e.g. social media details, military service number, other agencies or professionals working with the Individual, etc..
Please Describe	

PERSON WHO FIRST IDENTIFIED THE CONCERNS	
Do they wish to remain anonymous?	Yes / No
Forename:	Referrers First Name(s)
Surname:	Referrers Last Name
Professional Role & Organisation:	Referrers Role / Organisation
Relationship to Individual:	Referrers Relationship To The Individual
Contact Telephone Number:	Referrers Telephone Number
Email Address:	Referrers Email Address
PERSON MAKING THIS REFERRAL (if different from above)	
Forename:	Contact First Name(s)
Surname:	Contact Last Name
Professional Role & Organisation:	Contact Role & Organisation
Relationship to Individual:	Contact Relationship to the Individual
Contact Telephone Number:	Contact Telephone Number
Email Address:	Contact Email Address

REFERRER'S ORGANISATIONAL PREVENT CONTACT (if different from above)	
Forename:	Referrers First Name(s)
Surname:	Referrers Last Name
Professional Role & Organisation:	Referrers Role / Organisation
Relationship to Individual:	Referrers Relationship To The Individual
Contact Telephone Number:	Referrers Telephone Number
Email Address:	Referrers Email Address

RELEVANT DATES	
Date the concern first came to light:	When were the concerns first identified?
Date referral made to Prevent:	Date this form was completed & sent off?

SAFEGUARDING CONSIDERATIONS	
Does the Individual have any stated or diagnosed disabilities, disorders or mental health issues?	Yes / No
Please describe, stating whether the concern has been diagnosed.	
Have you discussed this Individual with your organisations Safeguarding / Prevent lead?	Yes / No
What was the result of the discussion?	
Have you informed the Individual that you are making this referral?	Yes / No
What was the response?	
Have you taken any direct action with the Individual since receiving this information?	Yes / No
What was the action & the result?	
Have you discussed your concerns around the Individual with any other agencies?	Yes / No
What was the result of the discussion?	

INDIVIDUAL'S EMPLOYMENT / EDUCATION DETAILS	
Current Occupation & Employer:	Current Occupation(s) & Employer(s)
Previous Occupation(s) & Employer(s):	Previous Occupation(s) & Employer(s)
Current School / College / University:	Current Educational Establishment(s)
Previous School / College / University:	Previous Educational Establishment(s)

THANK YOU
Thank you for taking the time to make this referral. Information you provide is valuable and will always be assessed.
If there is no Prevent concern but other safeguarding issues are present, this information will be sent to the relevant team or agency to provide the correct support for the individual(s) concerned.

PREVENT REFERRAL FORM

REFERRAL PROCESS

By sending this form you consent for it to arrive with both your dedicated Local Authority safeguarding team & Prevent policing team for a joint assessment. Wherever possible we aim to give you feedback on your referral, please be aware, however, that this is not always possible due to data-protection & other case sensitivities.

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INDIVIDUAL'S BIOGRAPHICAL & CONTACT DETAILS

Forename(s):	First Name(s)
Surname:	Last Name
Date of Birth (DD/MM/YYYY):	D.D ^ v 1 of 3 @ ↺ ↻ 🔍 ↗

- Does it involve a specific event? What happened? Is it a combination of factors? Describe them.
- Has the Individual discussed personal travel plans to a warzone or countries with similar concerns? Where? When? How?
- Does the Individual have contact with groups or individuals that cause you concern? Who? Why are they concerning? How frequent is this contact?
- Is there something about the Individual's mobile phone, internet or social media use that is worrying to you? What exactly?

Policy Owner(s)

 Symes CW

 Taylor-Hall GE

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