

WILMSLOW PREP SCHOOL

Child Protection and Safeguarding Policy

Person responsible for the Policy:	Mr B Lavagna-Slater
Date Approved:	06/10/2021
Signed:	D. Vanstone
Date for Review:	September 2022

At Wilmslow Prep School (WPS) the named personnel with designated responsibility for Child Protection and Safeguarding are:

Designated Safeguarding Lead	Deputy Designated Safeguarding Lead	Safeguarding Governor
Mr B Lavagna-Slater	Mrs L Pierce (EYFS) Miss A Shaw	Mr D Vanstone

The named personnel with designated responsibility regarding allegations against staff/those working in the school are:

Designated Senior Manager (normally the Headteacher)	Chair of Governors (in the event of an allegation against the Headteacher, without the Headteacher being informed.)
Mr B Lavagna-Slater 01625 524246/07725107029 headteacher@wilmslowprep.co.uk	Mr N Rudgard 01625 524246 bursar@wilmslowprep.co.uk

Additional Responsibilities:

Designated teacher for cared and previously cared for children
Mrs N Savage
Mental Health Lead
Miss A Shaw

STAYING SAFE AT Wilmslow Prep School

KEY CONTACTS IN OUR SCHOOL:

- **Designated Safeguarding Lead:** Mr B Lavagna-Slater
- **Deputy DSL:** Mrs L Pierce (EYFS) and Miss A Shaw
- **Chair of Governors:** Mr N Rudgard
- **Mental Health Lead:** Miss A Shaw

OUR LOCAL CONTACT NUMBERS ARE:

- **Cheshire East Consultation Service (CHECS):**
0300 123 5012 (option 3)
- **Emergency Duty Team (Out of Hours):** 0300 123 5022
- **Safeguarding of Children Concerns (Children living in other authorities):**
 - Tel: 0151 356 6614
 - Email: noreen.gallagher@cheshirewestandchester.gov.uk
 - Contact Officer at the Manchester Contact Centre on **0161 234 5001** or fax on 0161 255 8266.
- **Local Authority Designated Officer (LADO):**
lado@cheshireeast.gov.uk 01270 685904/01606 288931
katherine.pitchers@cheshireeast.gov.uk
- **Prevent referrals:** [Prevent Referral Process](#)
- **Police:** 999 (Emergency) / 101 (Non-emergency)
- **Mental Health Helpline:** 0300 303 3972
- **Adult Safeguarding:** 0300 123 5010

1. Introduction:

At Wilmslow Prep School (WPS) we recognise the responsibility we have under Section 175 of the Education and Inspections Act 2002, to have arrangements for safeguarding and promoting the welfare of children. The Governing Board in our school approve the S175/157 return to the Cheshire East Safeguarding Children's Partnership (CESCP) on a yearly basis. We follow their procedures and liaise and engage as required.

This policy demonstrates the school's commitment and compliance with safeguarding legislation; it should be read in conjunction with:

- [Cheshire East Safeguarding Children's Partnership \(CESCP\) procedures](#)
- [Working Together to Safeguard Children 2018](#)
- [Keeping Children Safe in Education 2021](#)
- [What to do if you are worried a child is being abused. 2015](#)
- [Statutory framework for the early years foundation stage 2021](#)
- [Guidance for Safer Working Practices for adults who work with children in Education Settings May 2019](#)
- School online safety policy
- School Mental Health Policy (EHS provided a model policy)
- School Relationships (and Sex) Education Policy
- Staff Code of Conduct
- Staff use of mobile phones and Social Media Policy
- [Substance Misuse Policy](#)
- ["Preventing and Tackling Bullying" DfE July 2017](#)
- [School and Colleges: When to call the police](#)
- Prevent Duty Guidance 2015
- The Use of Social Media for online radicalisation July 2015

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

Staff with safeguarding experience may contribute to the writing of this policy.

No single practitioner can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action. Through our day-to-day contact with pupils and direct work with families, staff take notice of indicators of possible abuse or neglect

and consult with Children's Services in Cheshire East (or in neighbouring authorities dependent upon the child's area of residence). We recognise that we form part of the wider safeguarding system for children. This responsibility also means that we are aware of the behaviour of staff in the school; we maintain an attitude of '**it could happen here**' where safeguarding is concerned.

In our school we ensure that:

- All children, regardless of age, gender, ability, culture, race, language, religion or sexual identity, are treated equally and have equal rights to protection
- All staff act on concerns or disclosures that may suggest a child is at risk of harm
- Pupils and staff involved in Safeguarding issues receive appropriate support
- Staff adhere to the Staff Handbook (includes Staff Code of Conduct) and understand what to do in the event of any allegations against any adult working in the setting
- All staff are aware of Early Help and ensure that relevant assessments and referrals take place
- All staff are aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label; they recognise that, in most cases, multiple issues will overlap with one another
- All staff understand that children's poor behaviour may be a sign they are suffering harm or that they have been traumatised by abuse.
- We teach children to be safe, physically and on-line through our PSHEE/RSE programme, assemblies and special events throughout the years e.g. NSPCC visits and On-line Safety lessons and awareness weeks. We also teach about the risk of radicalisation and how to build resilience towards this.

This policy is available on our school website and printed copies of this document are available to parents upon request. We inform parents and carers about this policy when their children join our school and through our school newsletter.

The policy is provided to all staff (including temporary staff and volunteers) at induction, alongside our Staff Code of Conduct.

In addition, all staff are provided with Part one and Annex B of Keeping Children Safe in Education 2021 and are required to sign to indicate that they have read and understood it. The Designated Lead is able to support all staff in understanding their responsibilities and implementing it in their practice.

2.0 Aims of this document:

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

- To demonstrate our commitment to protecting children
- To raise the awareness, of all staff, of the need to safeguard all children and of their responsibilities in identifying and reporting possible cases of abuse
- To emphasise the need for good communication between all members of staff in matters relating to child protection
- To promote safe practice and encourage challenge for poor and unsafe practice
- To promote effective working relationships with other agencies involved with Safeguarding and promoting the welfare of children, especially with Children's Social Care and the Police
- To ensure that all members of the school community are aware of our procedures for ensuring staff suitability to work with children
- To ensure that staff understand their responsibility to support children who have suffered abuse in accordance with their agreed plan e.g. Child in Need/ Child Protection Plan

3.0 Scope of this Policy

This policy applies to all members of the school community (including staff, pupils, volunteers, supply teachers, parents/carers, visitors, agency staff and students, or anyone working on behalf of WPS).

This policy is consistent with Cheshire East Safeguarding Children's Partnership (CESCP) child protection procedures.

4.0 Definitions of terms used in this document:

Child Protection: refers to the activity undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

Safeguarding and promoting the welfare of children: refers to the process of protecting children from maltreatment, preventing the impairment of children's mental and physical health or development, ensuring that children are growing up in circumstances consistent with the provision of safe and effective care and taking action to enable all children to have the best life chances.

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

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by

others. 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.

Staff: refers to all those working for or on behalf of the school/education setting in either a paid or voluntary capacity, full time or part time. This also includes parents and Governors.

Child: refers to all children who have not yet reached the age of 18. On the whole, this will apply to pupils from our own school; however, the policy will extend to children visiting from other establishments

Parent: refers to birth parents and other adults who are in a parenting role e.g. carers, stepparents, foster parents, and adoptive parents.

5.0 Prevention:

Children feel secure in a safe environment in which they can learn and develop. We achieve this by ensuring that:

- Children develop realistic attitudes to their responsibilities in adult life and are equipped with the skills needed to keep themselves safe; including understanding and recognition of healthy/unhealthy relationships and support available
- Children are supported in recognising and managing risks in different situations, including on the internet; being able to judge what kind of physical contact is acceptable and unacceptable, recognising when pressure from others, including people they know, threatens their personal safety and well-being and supporting them in developing effective ways of resisting pressure
- All staff are aware of school guidance for their use of mobile technology and have discussed safeguarding issues around the use of mobile technologies and their associated risks
- Importance and prioritisation are given to equipping the children with the skills needed to stay safe, including providing opportunities for Personal, Social and Health Education throughout the curriculum
- Appropriate filters (Smoothwall) and monitoring systems are in place and these are managed by 'Fathom IT'; however, we are careful that "over blocking" does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching, remote learning and safeguarding
- All adults feel comfortable and supported to draw safeguarding issues to the attention of the Headteacher and/or the Designated Safeguarding Lead and can pose safeguarding questions with "respectful uncertainty" as part of their shared responsibility to safeguard children

- Emerging themes are proactively addressed and fed back to the local authority and CЕСCP to ensure a coherent approach so that multi-agency awareness and strategies are developed
- We have a drugs and substance misuse policy, which is delivered through the PSHEE curriculum and phase group assemblies.
- We comply with 'Working Together to Safeguard Children' 2018 and support the Cheshire East Safeguarding Children's Partnership (CESCP) [Timely Support for Children and Families in Cheshire East](#), this document supports professionals to access the **right help and support** for children and their families at the **right time**
- We monitor pupil welfare (Form File that is monitored weekly by the Senior Management Team), keeping accurate records, speaking to parents and notifying appropriate agencies when necessary
- All staff are aware of children with circumstances which mean that they are more vulnerable to abuse/less able to easily access services and are proactive in recognising and identifying their needs
- The voice of the child is paramount; therefore, our pupils are actively involved in safeguarding development. There is an established school council which works with and challenges staff in order to develop aspects of safeguarding e.g. through examining the curriculum, school environment and approaches, and displays.
- We consult with, listen and respond to pupils; our school's arrangements for this are discussed in our PSHEE lessons, special events e.g. On-line safety week, key stage assemblies, school council and form time. Every class has a worry box where pupil can post anonymously or named. Staff check these boxes daily and either speak to the child directly, discuss with the whole class and if necessary reported to the DSL.

6.0 Early Help:

All staff understand the Cheshire East Safeguarding Children's Partnership (CESCP) 'Continuum of Need' and Child Protection procedures; (see Timely Support – link above) to ensure that the needs of our children are effectively assessed; decisions are based on a child's development needs, parenting capacity and family & environmental factors. We ensure that the most appropriate referrals are made. We actively support multi agency planning for these children and, in doing so, provide information from the child's point of view; bringing their lived experience to life as evidenced by observations or information provided. Staff know how to act on and refer early signs of abuse, neglect and radicalisation and to pass on any concerns no matter how trivial they seem.

Staff members always act in the interests of the child and are aware of their responsibility to take action as outlined in this policy. In our school staff are aware that they must be prepared to identify those children who may benefit from early help. The staff are alert to the potential need for early help for a child who:

- is disabled and has specific additional needs
- has special educational needs (whether they have a statutory Education, Health and Care Plan or do not)
- has a mental health need
- is a young carer
- is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups and county lines
- is frequently missing/goes missing from care or from home
- is at risk of modern slavery, trafficking or exploitation
- is at risk of being radicalised or exploited
- has a family member in prison, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing drugs or alcohol themselves
- has returned home to their family from care
- is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a 'privately fostered child'
- is persistently absent from education, including persistent absences for part of the school day

If there are concerns about a child's welfare that do not meet the thresholds of child abuse the school will consider whether the Early Help approach should be considered. Staff are aware that early identification of concerns and the use of Early Help to develop a multi-agency plan for the child can reduce the risk of subsequent abuse. This may include TAC or CAF approaches.

Our school is an Operation Encompass school which means that we are able to give proactive support to those children and their families where domestic abuse is identified. We support children through small group sessions with our Mental Health Lead and/or a trained mental health teaching assistant. If needed, the DSL could

support the family through social services and through support groups i.e. Cheshire East Domestic Abuse Hub (CEDAH), Refuge and Rape Crises Centre, Men's Advice Line, NSPCC, Victim Support, Family Rights Group, Relate, National Domestic Abuse, National LGBT+ Domestic Abuse and Childline.

<https://www.childrenssociety.org.uk/information/young-people/well-being/resources>

If a member of staff has concerns about a child, they will need to decide what action to take. Where possible, there should be a conversation with the Designated Safeguarding Lead to agree a course of action, although any staff member can make a referral to Children's Social Care/consult with Cheshire East Consultation Service (ChECS)/contact the police. When to call the police [NPCC Guidance 'When to call the Police'](#). Other options could include referral to specialist services or early help services and should be made in accordance with the referral threshold set by Cheshire East's Safeguarding Children Partnership.

In the first instance staff should discuss 'Early Help' requirements with the Designated Safeguarding Lead. If early help is appropriate the Designated Safeguarding Lead will support the staff member in liaising with other agencies and setting up an inter-agency assessment as appropriate.

As staff may be required to support other agencies and practitioners and parents/carers and children in an early help assessment; all staff are aware of the relevant assessments and appropriate support is given to them when they undertake an early help assessment.

Where early help and or other support is appropriate, we ensure that the situation for the child is kept under constant review. If the child's situation doesn't appear to be improving, we take appropriate action.

The children in our school are made aware that there are adults whom they can approach if worried or in difficulty. There is a safeguarding board in the dining hall and posters around the school.

There is adequate signposting to external sources of support and advice for staff, parents and pupils on the Safeguarding board in the Dining Hall.

7.0 Early Help, Child in Need and Child Protection

In our school we ensure that we follow [Cheshire East's Multi-agency Practice Standards](#) to ensure that our work, on behalf of our children, is of a consistently good standard. We use these standards to challenge other workers on behalf of children where the standards are not being met. See Appendix 1

8.0 Concerns about a child- recording and reporting:

Our recording procedures are in line with those outlined in Cheshire East's "Recording and Reporting Guidance." 2021; the Designated Safeguarding Lead and the Deputy Lead are aware of this document.

Where a member of staff is concerned that a child is in immediate danger or is at risk of harm, they should report this to the Designated Safeguarding Lead, or their Deputy, without delay. Staff are aware that they can report concerns directly to **ChECS (Cheshire East Children's Consultation Services)**. A written record should be made of these concerns as soon as possible following the disclosure/concern being raised; this must be on the same working day.

The DSL will make prompt contact with **ChECS (Cheshire East Children's Consultation Services)** or Channel where there are concerns that a child may be in need of help or at risk and/or with the LADO in relation to allegations against someone working in the school and/or with the police if a criminal offence is suspected.

Where staff have conversations with a child who discloses abuse, they follow the basic principles:

- listen rather than directly question, remain calm
- never stop a child who is recalling significant events
- never ask a child if they are being abused
- make a record of the discussion to include time, place, persons present and what was said (child language – do not substitute words)
- advise you will have to pass the information on
- avoid coaching/prompting
- never take photographs of any injury
- never undress a child to physically examine them
- allow time and provide a safe haven / quiet area for future support
- at no time promise confidentiality to a child or adult
- all victims are reassured 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.
- where abuse has occurred online or outside of the school or college it will not be downplayed and will be treated equally seriously

Staff are aware that they should not question the child; other than to respond with TED - **Tell me what you mean by that, Explain what you mean by that, Describe that.** Staff

will observe and listen, but do not probe/ask any leading questions. Staff are aware to not view, ask to view or forward any images of children.

The Designated Safeguarding Lead will obtain key information and agree relevant actions after making a timely assessment of the information.

See Appendix 1 and 3

We recognise that parents may hold key information about incidents/allegations therefore, **in the majority of situations; the Designated Safeguarding Lead will speak to the parents and gain their consent** to discussing the situation with others. Staff are aware that there will be very few instances where, to speak to the parents, could further endanger the child. In those situations, they would still consult/refer, but would have clearly recorded reasons as to why they had not gained parental consent.

The following situations are the instances in which parental consent would not be gained prior to a referral:

- Discussion would impede a police investigation or social work enquiry
- Sexual abuse is suspected
- Organised or multiple abuse is suspected
- Fabrication of an illness is suspected
- Female Genital Mutilation (FGM) is suspected
- Forced marriage is suspected
- Honour Based Abuse
- Extremism or radicalisation is suspected
- County Lines activities are suspected

Staff are also aware that, even in situations where the parent does not give consent, the best interests of the child are paramount and therefore, they would share their concerns. In addition, the referral will not be delayed if it has not been possible to contact the parents/carers. We do not require the consent of the parents to refer allegations to the LADO.

A consultation will take place with Cheshire East Consultation Service (ChECS) and/or the police immediately. Where a child lives in a different authority the Designated Safeguarding Lead follows the procedures for that authority.

Where possible we ensure that contacts with outside agencies are through the Designated Safeguarding Lead or their Deputy; however, staff are aware that anyone can make this contact. Where a member of staff makes contact, they ensure that they make the Designated Safeguarding Lead aware as soon as possible.

Safeguarding records are held as hard copies. Safeguarding and Child Protection records are stored securely and are separate from the main pupil file. Authorisation to access these records is controlled by the Headteacher and Designated Safeguarding Lead.

All records provide a factual, accurate, evidence-based account. Records are signed, dated and where appropriate, witnessed.

The school ensures that safeguarding information, including Child Protection information, is stored and handled in line with the principles of the Data Protection Act 2018 and General Data Protection Regulation (GDPR) ensuring that information is:

- used fairly and lawfully
- for limited, specifically stated purposes
- used in a way that is adequate, relevant and not excessive
- accurate
- kept for no longer than necessary
- handled according to people's data protection rights
- kept safe and secure.

We ensure that information is transferred safely and securely when a pupil with a Safeguarding Record transfers to another school. We also ensure that Key workers or social workers are notified where a child leaves the school (as appropriate). See Appendix 2 for signs of abuse.

9.0 Safe Working Practices

Use of mobile phones, cameras and internet:

The school and staff (including EYFS) take safeguarding seriously and understand this policy is over- arching. We refer staff to the '*Staff use of mobile phones and Social Media Policy*', '*Code of conduct*' and '*Guidance for Safer Working Practice for those working with children and young people in Education Settings May 2019*'.

Personal mobiles and electronic devices:

Personal mobile phones and recording devices (tablets, cameras, laptops etc) are never used by staff (including EYFS) at the school/setting.

If staff have personal phones or devices these are stored securely and will be switched off or on silent whilst during the teaching day.

Electronic devices should be password protected so that content cannot be accessed by unauthorised users.

It is the responsibility of the staff member to ensure that there is no illegal or inappropriate content stored or used on their device when brought on to school grounds.

School devices:

School devices remain the property of WPS and in using them staff (including EYFS) will follow the Staff use of School devices Policy.

Electronic devices should be password protected so that content cannot be accessed by unauthorised users.

Cameras, photography and images:

WPS will obtain parents' and carers' written consent for photographs to be taken or published (for example, on our website or in newspapers or publications).

Staff will ensure the designated camera or recording devices (tablets, cameras, laptops etc) are used when capturing evidence of work undertaken.

Online safety:

On school equipment we ensure that appropriate filters and appropriate monitoring systems are in place. We use Smoothwall, which is monitored by 'Fathom - IT support'.

Working off school premises:

Where staff take school computer/digital equipment / or records in paper form off the school site they do so with the view that they abide by the Staff use of School devices Policy and Schools Data Protection policy.

Staff are reminded that information, both in paper or electric form, is sensitive and protected under data protection and GDPR and should be safe and securely stored off the premises and during transportation. (See WPS Data Protection Policy)

10.0 Allegations against staff

Support and advice are sought from Children's Services or the Local Area Designated Officer (LADO), and our Personnel/Human Resources advisor whenever necessary.

Katherine Pitchers Independent
Reviewing Officer Child
Protection

katherine.pitchers@cheshireeast.gov.uk
01606 288934

Local Authority Designated
Officer (LADO)

lado@cheshireeast.gov.uk 01606 288931
katherine.pitchers@cheshireeast.gov.uk

At WPS we recognise the possibility that adults working in the school; including directly employed staff, volunteers, and supply teachers, may harm children; that they may have

- behaved in a way that has harmed a child, or may have harmed a child

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

These can include incidents outside of school which do not involve children but could have an impact on their suitability to work with children

Any concerns of this nature, about the conduct of other adults, should be taken to the Headteacher without delay or, where that is a concern about the Headteacher, to the Chair of Governors and the LADO.

Staff are aware that this must be done on the same working day. In the most serious of cases and if a crime has been committed, the police must be informed.

The school will not internally investigate until instructed by the LADO.

We make all staff aware of their duty to raise concerns. Where a staff member feels unable to raise an issue or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them. They have been made aware of those other channels of support (*Whistle Blowing Policy; Safeguarding Governor-David Vanstone; SCiES Team*)

NSPCC Whistleblowing helpline 0808 800 5000

As part of our whole School approach to safeguarding we promote an open and transparent culture in which all concerns about adults working in or on behalf of the School (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately. This includes allegations which do not meet the harms threshold-see below.

Supply Staff- if an allegation is made against a supply member of staff, school will (along with the LADO) take the lead whilst keeping the supply agency fully informed and involved. We would not just cease to use the member of staff.

We would send a report to the DBS if we dispensed with a member of staff's services because of their unsuitability to work with children, or if they resigned beforehand. Likewise, if a member of staff is suspended or redeployed because of concerns that they pose a risk of harm.

Consideration will be given to making a referral to the TRA where a teacher has been dismissed (or would have been dismissed if they had not resigned) and a prohibition order may be appropriate because of 'unacceptable professional conduct', 'conduct that may bring the profession into disrepute' or a 'conviction at any time for a relevant offence'.

Levels of thresholds

KCSIE (2021) has two sections covering two levels of allegation/concern and should be referred to as the source document:

- allegations that may meet the harms threshold;
- allegations/concerns that do not meet the harms threshold ('low level concerns').

Allegations that may meet the harms threshold

These are allegations that might indicate that a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in our school. If it has been alleged that any member of staff including supply teachers, volunteers and contractors has:

- 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 (including because of transferable risk)

If we identify:

- that a child has been harmed,
- that there may be an immediate risk of harm to a child, or
- if the situation is an emergency,

then we contact children's social care and as appropriate the police immediately in accordance with the processes set out in part one of *KCSIE*.

If an allegation is made, it is essential to looking after the welfare of the child and also investigate and support the person subject to the allegation. We will conduct basic enquiries to establish facts that will help then determine whether there is any foundation to the allegation.

Further, detailed guidance can be found in KSCIE (2021) on:

- when to inform the individual of the allegation;
- what to do if there is cause to suspect a child is suffering or is likely to suffer significant harm;
- where the case manager is concerned about the welfare of other children in the community of the member of staff's family;
- where it is clear or decided that an investigation by the police or children's social care is unnecessary;
- where the initial discussion leads to no further action;
- where further enquiries are necessary (including where there is a lack of appropriate resource within the school);
- suspension (which should not be an automatic response when an allegation is reported);
- support (of the child(ren) involved, employees of the school subject to an allegation and the parents or carers of any child involved);
- confidentiality and information-sharing;
- allegation outcomes;
- following a criminal investigation or prosecution;
- unsubstantiated, unfounded, false or malicious accusations;
- returning to work;
- resignations and settlement agreements;
- record keeping;

- references;
- learning lessons;
- non-recent allegations.

As soon as basic enquiries and initial information have been conducted to establish facts and help determine whether there is any foundation to the allegation, the LADO will be promptly contacted. There will then be a discussion with the LADO(s) about the allegation which will consider the nature, content and context and agree a course of action including any involvement of the police. GDPR cannot be allowed to stand in the way of safeguarding children. Discussions should be recorded in writing, and any communication with both the individual and the parents of the child/children agreed. Schools should give due weight to the views of the LADO, *KCSIE* and *WT* when making a decision about suspension and whether the circumstances warrant it or if alternative arrangements should be put in place.

Record Keeping

Records concerning allegations of abuse must be preserved for the term of the Independent Inquiry into Child Sexual Abuse and at least until the accused has reached normal pension age or for 10 years from the date of the allegation if it is longer. For all allegations, other than those found to have been malicious or false, the following information must be kept on the file of the person accused:

- a clear and comprehensive summary of the allegation;
- details of how the allegation was followed up and resolved;
- a note of any action taken, and decisions reached and (new) whether the outcome was substantiated, unsubstantiated or unfounded;
- a copy provided to the person concerned, where agreed by children's social care or the police
- a declaration on whether the information will be referred to in any future reference

Substantiated allegations should from September 2021 be included in references, provided that the information is factual and does not include opinions.

Concerns that do not meet the harm threshold ('low-level concerns')

Along with the staff code of conduct and whistleblowing policy, this policy makes clear the importance of sharing ANY concerns that staff may have. These may arise from a variety of sources, including suspicion, complaint, a disclosure (by child or adult) or during vetting checks.

KCSIE 2021 describes it as critical that a culture is created in which **all** concerns about adults are shared responsibly and with the right person, recorded and dealt with appropriately. This should enable an open and transparent culture, enable the early identification of concerning, problematic or inappropriate behaviour, minimise the risk of abuse, ensure that adults working in schools are clear about and act within professional boundaries in accordance with the values and ethos of the institution, and protect those working in or on behalf of schools from potential false allegations or misunderstandings.

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 (staff, supply staff and contractors) working in or on behalf of the school or college may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate contact outside of work, and

- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.’

These behaviours can exist on a wide spectrum, from inadvertent to that which is ultimately intended to enable abuse. They include, for example:

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with children on a one-to-one basis in a secluded area or behind a closed door
- using inappropriate sexualised, intimidating or offensive language.

Low-level concerns about a member of staff should be reported to the headteacher. Staff should feel confident to self-refer. Low-level concerns about someone employed by a supply agency or contractor should be shared with the head, the concern recorded, and their employer notified so that potential patterns of inappropriate behaviour can be identified.

Where a third party has raised the concern, the headteacher should collect as much evidence as possible by speaking:

- directly to the person who raised the concern (if known);
- to the individual involved and any witnesses.

The headteacher should record all low-level concerns in writing. This should include:

- details of the concern;
- the context in which it arose;
- evidence collected by the DSL where the concern has been raised via a third party;
- name of the person reporting noted but respecting wishes to be anonymous.
- the decision categorising the type of behaviour;
- action taken;
- the rationale for decisions and action taken; the name of the individual sharing the concerns (respecting any wish to remain anonymous as far as possible)

The records must be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK GDPR. They **should be reviewed** so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where such a pattern is identified, the school should either take action through its disciplinary procedures or, if it meets the harms threshold, refer to the LADO. *KCSIE* specifies that, ‘**Consideration should also be given to whether there are wider cultural issues within the school that enabled the behaviour to occur and where appropriate policies could be revised or extra training delivered to minimise the risk of it happening again.**’ It is recommended that schools retain this information at least until the individual leaves their employment. The rationale for all decisions and actions taken must be recorded.

Detailed guidance is provided in *KCSIE* as to when a low-level concern should be referred to in a reference.

More detailed guidance and case studies on low-level concerns are available in [Developing and implementing a low-level concerns policy \(farrer.co.uk\)](https://www.farrer.co.uk).

11.0 Safer Recruitment

The school pays full regard to DfE guidance 'Keeping Children Safe in Education' 2021 and with reference to the 'Position of Trust' offence (Sexual Offences Act 2003). We ensure that all appropriate measures are applied in relation to everyone who works in the school who is likely to be perceived by the children as a safe and trustworthy adult. We do this by:

- Operating safe recruitment practices; including highlighting the importance we place on safeguarding children in our recruitment adverts and interview questions, appropriate Disclosure and Barring Service (DBS) and reference checks, verifying identity, academic and vocational qualifications, obtaining practitioner references, checking previous employment history and ensuring that a candidate has the health and physical capacity for the job. It also includes undertaking interviews and checking the Children's Barred List and right to work in England checks in accordance with DBS and Department for Education procedures
- Ensuring that staff and volunteers adhere to a published code of conduct and other professional standards at all times, including after school activities. Staff are aware of social media/ on-line conduct- see Staff Handbook and Code of Conduct Policy.
- Ensuring that all staff and other adults on site are aware of the need for maintaining appropriate and professional boundaries in their relationship with pupils and parents, following our Code of Conduct
- Requiring all staff to disclose any convictions, cautions, court orders, reprimands and warnings that may affect their suitability to work with children (whether received before or during their employment at the setting). Disqualification under the Child Care Act 2006 (amended following the 2018 Regulations)
- Maintaining an accurate, complete, up to date Single Central Record
- Those members of staff teaching or caring for children in the EYFS, or in out of school care will sign a declaration that they are not disqualified from working in childcare.

See Safer Recruitment Policy

12.0 Staff training and updates:

In our school there is a commitment to the continuous development of all staff, regardless of role, with regard to safeguarding training and all new staff are given safeguarding induction training prior to their commencement.

All staff will receive initial in-house training by the DSL before they commence work. Staff also undertake Cheshire East Safeguarding Children Partnership (CESCP) 'endorsed' Basic Awareness in Safeguarding and Child Protection training within the first six months of their employment/placement – only if they fall between the whole

school 3-year training schedule. This training is refreshed every 3 years (last training with CESOP - 2019 and staff updated training - 2nd September 2021); to enable them to understand and fulfil their safeguarding responsibilities effectively. They will also be trained in Prevent awareness (16th February 2021), how to identify children and young people at risk and on-line safety- renewed every three years.

All staff receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings), as required, but at least annually, to provide them with the relevant skills and knowledge to safeguard children effectively. Any contractors or visitors are given basic safeguarding information on a WPS Safeguarding leaflet.

The Designated Lead and any Deputy have completed specific training such as Designated Safeguarding Lead Training to carry out the duties of the role, and attend (CESCP) multi agency Safeguarding and Child Protection training on an annual basis which includes child protection, inter-agency working and the safeguarding partners' approach to Prevent duties.

There will be at least one member of an interview panel that has been trained in safer recruitment. At WPS the Chair of governors, Safeguarding Governor, Bursar and Headteacher are all trained.

The Designated Safeguarding Lead, and/or Deputy attend the Designated Safeguarding Leads Meetings held each term coordinated by the SCiES Team, therefore enabling them to remain up to date with Safeguarding practices and be aware of any emerging concerns/themes within Cheshire East.

The school acknowledges serious case review findings and shares lessons learned with all staff to ensure no child falls through the gaps.

Induction- all new staff will have training in the following: safeguarding policy, staff code of conduct, whistleblowing policy, pupil behaviour policy, safeguarding response to those children who go missing from education, the identity and function of the DSL/DDSLs, Part 1 and Annex B of KCSIE 2021 and on-line safety/acceptable use of technologies policies.

13.0 Cared for children (Looked after children) and previously cared for children

At WPS we ensure that staff have the skills, knowledge and understanding necessary to keep Cared for Children safe as we are aware that children often become cared for as a result of abuse and/or neglect. We have identified a designated teacher for our Cared for Children; this person works closely with the Virtual school.

14.0 Children with special needs and disabilities

We ensure that staff have knowledge and understanding of the additional barriers which can exist when recognising abuse and neglect in children with special needs/disabilities.

These barriers can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- children with SEN and disabilities being disproportionately impacted by things like bullying - without outwardly showing any signs
- communication barriers and difficulties in overcoming these barriers

We aim to build the necessary skills in staff so that they can safeguard and respond to the specific needs of this group of children.

15.0 The use of 'reasonable force'

There are circumstances when it is appropriate for staff in schools and colleges 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'.

We have a key emphasis on de-escalation and only use physical touch to prevent a child or others being harmed. If we do this is for the shortest time necessary.

Where it has been necessary to use physical intervention, we ensure the following:

- The child's wellbeing after the event is monitored and supported
- parents are fully briefed
- the incident is fully recorded including antecedents, de-escalation attempted, and holds used.
- an individual plan is agreed and recorded so that it is clear what will happen should a similar situation arise in the future
- any incident involving the restraint of a child is always reported to an identified senior manager

At WPS all staff have received training in de-escalation on Inset September 2019 with subsequent updates. De-escalation procedures revisited in September 2021.

(see Staff Handbook and Intimate Care Policy incl EYFS)

16.0 Private Fostering

We recognise that our school has a mandatory duty to report to the local authority when we become aware of, or suspect that, a child is subject to a private fostering arrangement. To aid our awareness we ensure that we establish parental responsibility for every child; we take steps to verify the relationship of the adults to the child when we register them.

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.

A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.

Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.

Whilst most privately fostered children are appropriately supported and looked after, we recognise that they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases, privately fostered children are affected by abuse and neglect, or are involved in trafficking, child sexual exploitation or modern-day slavery.

Where a member of staff becomes aware of private fostering arrangements, they are aware that they need to notify the Designated Safeguarding Lead. The Designated Safeguarding Lead will then speak to the family of the child involved to check that they are aware of their duty to inform Cheshire East. The school would also inform Cheshire East of the private fostering arrangements.

17.0 Children Missing out on Education and Missing from Education

Under Section 175 of the Education Act 2002 we have a duty to investigate any unexplained absences especially as a child going missing from education is a potential indicator of abuse or neglect.

At WPS we follow Cheshire East's procedures for dealing with children that go missing from lessons and/or school. All staff are aware that children going missing, particularly repeatedly, 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. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage.

We also ensure that we are rigorous in our attendance procedures; these are outlined in our attendance policy. Where a child's destination is unknown when they have left

our school, we ensure we carry out all necessary checks and refer them as Children Missing Education (CME), using the [appropriate notification form](#) the Cheshire East website, so that they can be followed up on. Staff are aware of the trafficking of children and the importance of rigour around our attendance procedures to reduce this as a threat to our children's safety.

17.1 Elective Home Education (EHE)

From September 2016 the Education (Pupil Registration) (England) Regulations 2006 were amended so that schools must inform their LA of all deletions from their admission register when a child is taken off roll. Where a parent/carers has expressed their intention to remove a child from School with a view to educating at home, the school, and other key professionals will work together to coordinate a meeting with parents/carers where possible. Ideally, this would be before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child. This is particularly important where a child has SEND, is vulnerable, and/or has a social worker.

18.0 Children who need a social worker (Child in Need and Child Protection Plans)

Children may need a social worker due to safeguarding or welfare needs. Children 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 mental health.

Our Designated Safeguarding Leads will be aware of the fact a child has a social worker and will use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes.

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

19.0 Children requiring mental health support

The School has an important role to play in supporting the mental health and wellbeing of their pupils. 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.

Any concerns staff have regarding pupils mental health will be referred immediately to the medical team and safeguarding team, who will take the lead in appropriate next steps.

Assessment of mental health in a pupil involves thinking about several aspects. It is highly likely that medical staff will need to make an initial assessment. Much of this is 'second nature' to nursing professionals but it is helpful to outline key points:

- What has brought the pupil to see you; what has triggered this?
- How do they look? Body language, demeanour, eye contact.
- How are they feeling?
- What are the pupil's current support mechanisms e.g. family structure?
- Are there risk factors that are a concern?

When there is an identified cause for concern, and it is deemed to be beneficial for a pupil to be monitored more carefully to safeguard their emotional wellbeing, an Individual Healthcare Plan will be initiated by the DSL or DDSL.

All staff received Mental Health training - Inset 16th February 2021.
See Emotional Resilience Policy

<https://www.cheshireeast.gov.uk/livewell/campaigns/covid-19-information-point/mental-health-help-for-young-people.aspx>

<https://www.nspcc.org.uk/keeping-children-safe/childrens-mental-health/>

<https://learning.nspcc.org.uk/child-health-development/child-mental-health>

<https://learning.nspcc.org.uk/child-health-development/promoting-mental-health-wellbeing>

20.0 Educational Outcomes

Our Designated Safeguarding Lead ensures that staff know the children who have experienced or are experiencing welfare, safeguarding and child protection issues so

that, as relevant, we know who these children are, understand their academic progress and attainment; this means that we are able to make necessary adjustments to help these children to achieve. In this way we maintain a culture of high aspirations for this cohort. This includes children with a social worker and those previously known to social care; we ensure that teachers are made aware of those children in this category.

21.0 Specific safeguarding issues

All staff have an awareness of safeguarding issues. They are aware that these safeguarding issues may not directly involve the child in our school but could be happening to their siblings or parents. They are also aware that some issues could be happening in the lives of staff members.

Staff are supported in accessing and completing the relevant screening tools.

As a listening school staff would pick up on these issues and would know how to identify and respond to:

- Physical Abuse
- Sexual Abuse including sexual violence and sexual harassment
- Emotional
- Neglect
- Drug/substance/alcohol misuse (both pupil and parent)
- Child sexual exploitation / trafficked children
- Criminal Exploitation including county lines and serious violence
- Extremism and Radicalisation
- Children missing education
- Domestic abuse
- Peer relationship abuse/Teenage Relationship Abuse
- Peer on Peer abuse
- Risky behaviours
- Problematic and Harmful Sexual Behaviour
- Sexual health needs
- Obesity/malnutrition
- Online grooming
- Inappropriate behaviour of staff towards children
- Bullying, including homophobic, racist, gender and disability. Breaches of the Equality Act 2010
- Mental health issues including Self-Harm and eating disorders
- Honour based abuse including - Female Genital Mutilation, Breast Ironing, Forced Marriage
- Unaccompanied asylum-seeking children
- Child Trafficking
- Modern Day Slavery

- Children and the court system
- Children with family members in prison
- Homelessness

Staff are aware that behaviours linked to issues such as drug taking, alcohol abuse, domestic abuse, deliberately missing education and sharing nudes or semi-nudes put children in danger. No member of staff should view or forward such images.

An overview of specific safeguarding issues and our response are provided within appendix 5.

21.0 Governor Responsibilities

Governing bodies and proprietors should ensure they facilitate a whole school or college approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. Ultimately, all systems, processes and policies should operate with the best interests of the child at their heart. (KCSiE 2021)

The Governing Board fully recognises its responsibilities with regard to Safeguarding and promoting the welfare of children in accordance with Government guidance.

The Governing Board have agreed processes which allow them to monitor and ensure that the school:

- Has robust Safeguarding procedures in place
- Operates safe recruitment procedures and carries out appropriate checks on new staff and adults working on the school site
- Has procedures for dealing with allegations of abuse against any member of staff or adult on site
- Has a member of the Leadership Team who is designated to take lead responsibility for dealing with Safeguarding and Child Protection issues
- Takes steps to remedy any deficiencies or weaknesses regarding Safeguarding arrangements
- Is supported by the Governing Board nominating a member responsible for liaising with the LA and/or partner agencies in the event of allegations of abuse against the Headteacher or on other issues of child protection; this is the Chair
- Carries out an annual review of the Safeguarding policy and procedures and their implementation, ensuring that the school contributes to inter-agency working, and give the date of this review and how it is overseen by the governors.
- Carries out an annual Safeguarding Audit (Section 175 audit) in consultation with the Governing Board, sharing this with the CЕСP on request.

- Trains governors to ensure they are equipped with the knowledge to fulfil their functions.

Finally:

Staff at WPS take the safeguarding of each child very seriously. This means that, should they have any concerns of a safeguarding nature, they are expected to report, record and take the necessary steps to ensure that the child is safe and protected. This is never an easy action, nor one taken lightly. They are aware that it can lead to challenge from parents/carers, but at all times staff have the child at the heart of all their decisions and act in their best interests.

Further information on our safeguarding and related policy documents and procedures is available on request from the Headteacher or Designated Safeguarding Lead.

Appendix 1



<p>Universal</p> <p>Children whose needs are being adequately met by their family, friends and community and who are accessing universal services. (e.g. health, GP, schools)</p> <ul style="list-style-type: none"> • Response: - Continue meeting child's needs as a universal service in a safe environment. Universal services will remain at all levels of need. 	<p>Targeted</p> <p>Children who would benefit from additional help with moderate difficulties in order to make the best of their life chances.</p> <ul style="list-style-type: none"> • Response: - A practitioner who identifies unmet needs for a child should consider how these needs can best be met, usually by some additional help from within their own agency. The Early Help Assessment (EHA) can help to identify and plan to meet needs and involve others where necessary.
<p>Complex</p> <p>Children who have a range of additional needs affecting different areas of their life.</p> <ul style="list-style-type: none"> • Response: Request support from other agencies such as family support, commissioned services Youth Justice Services and the Attendance and Children Out of School Team. Agencies work together to provide a network of support to the child and their family. • Identify a lead practitioner to co-ordinate support and be primary link with the family. • Hold a multi-agency meeting and use the Early Help Assessment (EHA) with child and family to assess their needs. Develop and implement an Action Plan and review progress. 	<p>Specialist</p> <p>Children who need immediate protection or who require integrated support from a statutory service such as CAMHS, Children's Social Care, or Youth Justice Service.</p> <ul style="list-style-type: none"> • Children's Social Care lead multi-agency planning and support through a Child-in-Need Plan, Child Protection Procedures, or accommodation by Children's Social Care. • Youth justice Service lead multi-agency interventions for Court-Ordered Supervision of Young Offenders in the community and in custody.

If at any point you are concerned about the safety of a child or young person, contact Cheshire East Consultation Service (ChECS)

Tel: 0300 123 5012
Tel: 0300 123 5022 (Emergency Duty Team for out of hours)

Signs of Abuse

Physical

- Bruises, black eyes and broken bones.
- Unexplained or untreated injuries.
- Injuries to unusual body parts e.g. thighs, back, abdomen.
- Bruising that resembles hand/finger marks.
- Burns/scalds.
- Human bites/cigarette burns.
- Injuries that the child cannot explain or explains unconvincingly.
- Injuries in babies and non-mobile children.

Sexual

- Genital discomfort, pain, itching, bruising, injuries.
- Public/compulsive masturbation
- Eating disorders
- Sexually explicit behaviour or language not appropriate for their age
- Sexually Transmitted Infection
- Sexually explicit drawings
- Pregnancy

Behaviours

- Marked change in general behaviour
- Low self-esteem
- Extremely passive/aggressive
- Withdrawn/withdrawal from family and friends
- Sleeping difficulties
- Eating disorder
- Lethargy/tiredness
- Fear of certain adults
- Poor social relationships
- Bullying/anti-social behaviours
- Attendance difficulties
- Disclosure
- Self-harm

Neglect

- Child cold/ inappropriately dressed
- Undernourished/always hungry
- Untreated medical problems, e.g. dental decay, headlice, etc
- Lethargy, tiredness or aggressive tendencies

Emotional

- Physical, mental and emotional development lags
- Talks of excessive punishment
- Fear of parents being contacted
- Sudden speech disorders
- Running away
- Self-deprecation/ low self esteem

Receiving Disclosures:

Receive

- Listen, try not to look shocked or be judgmental
- Believe what they say, accept what they say and take it seriously
- Don't make them feel bad by saying "you should have told me earlier"
- Don't 'interrogate' them – let them tell you, try not to interrupt
- Note the date and time, what was done, who did it, and where it took place
- Don't criticise the perpetrator
- Don't ask leading questions – use 'open' questions to clarify only (T.E.D)



Tell me what you mean by that?

Explain that to me

Describe that....

Reassure

- Stay calm, tell the **child** they've done the right thing in telling you
- Reassure them they are not to blame
- Empathise – don't tell them how they should be feeling
- Don't promise confidentiality, explain who needs to know
- Explain what you'll do next
- Be honest about what you can do

Report and Record

- Make a brief, accurate, timely and factual record
 - Discuss with the Designated Safeguarding Lead (DSL) or their Deputy, without delay
 - The DSL will assess the situation and decide on the next steps
- Things to include:**
- Time and full date of disclosure/incident and the time and full date the record was made
 - An accurate record of what was said or seen, using the child's words as appropriate
 - Whether it is 1st or 2nd hand information
 - Whether the child was seen/spoken to
 - Whether information is fact/ professional judgement
 - Full names and roles/status of anyone identified in the report
 - Sign the record with a legible signature.
 - Record actions agreed with/by the Designated Lead (SMART)
 - Avoid acronyms/jargon/abbreviations

Action for DSL: Review records regularly; add any new concerns, respond to these immediately and record evidence of actions taken and outcomes.

DO NOT PHOTOGRAPH INJURIES OR MARKS EVEN IF REQUESTED TO DO SO

Appendix 4

Forms of Abuse

Contextual Safeguarding

Including Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) and County Lines

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence.

CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

We know that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation. In some cases, the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator.

Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim.

Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including,

- sexual identity
- cognitive ability
- learning difficulties
- communication ability
- physical strength
- status
- access to economic or other resources

Some of the following can be indicators of both child criminal and sexual exploitation where children:

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

Children who have been exploited will need additional support to help maintain them in education.

Child Criminal Exploitation (CCE)

Some specific forms of CCE can include children

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

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

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

Child Sexual Exploitation (CSE).

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

CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g., through others sharing videos or images of them on social media. CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

Some additional specific indicators that may be present in CSE are children who:

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

County lines.

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line". This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children's homes and care homes. Children are also increasingly being targeted and recruited online using social media.

Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing and are subsequently found in areas away from their home
- have been the victim or perpetrator of serious violence (e.g. knife crime)

- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection
- are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity
- owe a 'debt bond' to their exploiters
- have their bank accounts used to facilitate drug dealing

Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age-appropriate guides to support children: 5-11-year olds and 12-17 year olds which of which links can be found in KCSIE 2021.. The guides explain each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained. 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.

Children Missing from Home or Care

Children who run away from home or from care can provide a clear behavioural indication that they are either unhappy or do not feel safe in the place that they are living. Research shows that children run away from conflict or problems at home or school, neglect or abuse, or because they are being groomed by predatory individuals who seek to exploit them. Many run away on numerous occasions.

Our school are aware of the [Pan-Cheshire Joint Protocol on Children and Young People Who run Away or Go Missing from Home or Care 2020-2022](#).

The association of chief police officers has provided the following definition a missing person *is*: 'Anyone whose whereabouts cannot be established will be considered as missing until located, and their well-being or otherwise confirmed'.

Within any case of children who are missing both push and pull factors need to be considered.

Push factors include:

- Conflict with parents/carers
- Feeling powerless
- Being bullied/abused
- Being unhappy/not being listened to
- The Toxic Trio

Pull factors include:

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

As a school we will inform all parents of children who are absent (unless the parent has informed us).

If the parent is also unaware of the location of their child, and the definition of missing is met, we will either support the parent to contact the police to inform them, or we will take the relevant action.

Children with family members in prison

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

Cyberbullying

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

The school recognises that it must take note of bullying perpetrated outside school which spills over into the school and so we will respond to any bullying including cyber-bullying that we become aware of carried out by pupils when they are away from the site.

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

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

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

Cyber-bullying may be at a level where it is criminal.

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

Domestic abuse/violence

WPS believes that all our pupils have the right to be safe at school and also in their own homes. We are aware that all children can witness and be adversely affected by domestic abuse.

As an Operation Encompass school, we are alert to the indicators of abuse, and we have a planned approach to supporting children in a proactive way. We do this by The DSL will support the family through social services and through support groups i.e. Cheshire East Domestic Abuse Hub (CEDAH), Refuge and Rape Crises Centre, Men's Advice Line, NSPCC, Victim Support, Family Rights Group, Relate, National Domestic Abuse, National LGBT+ Domestic Abuse and Childline.

<https://www.childrenssociety.org.uk/information/young-people/well-being/resources>

Domestic abuse can affect anybody; it occurs across all of society, regardless of age, gender, race, sexuality, wealth or geography. Domestic abuse affects significant numbers of children and their families causing immediate harm as well as damaging future life chances.

Domestic abuse negatively affects children. We know that they are often more aware of what is happening than parents think. How they respond depends on their age, personality and support network; but they recover best when they are helped to understand and to process what is

happening/has happened to them. Their experiences will shape their self-worth, identity, and ability to relate to others in childhood and adulthood; making it much more difficult to succeed at school and develop friendships.

To support our children, we:

- Have an ethos which puts children's wellbeing at the heart of all that we do
- Create a predictable school life with set routines
- Ensure that rules and expectations are clearly stated and understood by all
- Understand that oppositional and manipulative behaviours are not attempts to 'provoke us', but may be attempts by these children to control their world when so much feels out of control for them
- Model respectful and caring behaviour, positive conflict resolution and respectful interactions. Helping children learn not only what not to do, but what to do instead
- Use the language of choice, making clear the benefits and negative consequences of their choices. Ensuring that we follow through with any consequences or sanctions
- Support children to put feelings into words. We build up a vocabulary of emotional words with them so that they can begin to express their feelings more appropriately/accurately (*A child exposed to domestic abuse may have seen a lot of behaviours that express strong feelings, but may not have heard words to appropriately express/ describe these feelings*)
- Understand that the child may experience conflicting and confusing emotions when thinking of or talking about their parents
- Create opportunities for children to feel successful. We let the child know that they matter, taking an active interest in them
- Accept that they may not be willing or able to talk about it right away (if ever)
- Provide effective, non-verbal, systems for children to access support
- Provide reassurance that only people who need to know about the incident will know
- Allow the child, where necessary, to safely store work in school or shred it after completion when providing interventions
- Have visible and accessible worry boxes/internal support systems /information regarding external sources of support e.g. Childline etc.

[Children, Young People and Domestic Abuse](#)

Emotional abuse

Staff are all aware that emotional abuse is the persistent emotional maltreatment of a child which can cause severe and adverse effects on the child's emotional development.

We understand that it may involve the following:

- Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

INDICATORS

Children

- Children who are excessively withdrawn, fearful, or anxious about doing something wrong
- Lack of confidence / self-esteem
- Sudden speech disorders
- Self-harming
- Extremes of passivity and / or aggression
- Compulsive stealing
- Drug, alcohol, solvent abuse
- Fear of parents being contacted
- Unwillingness or inability to play
- Excessive need for approval, attention and affection.
- Parents or carers who withdraw their attention from their child, giving the child the “cold shoulder”
- Blaming their problems on their child
- Humiliating their child, for example, by name-calling or making negative comparisons.

Homelessness

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, and in accordance with local procedures, 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. 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. Links to fact sheets are available in KCSIE 2021. 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. 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 social care will be the lead agency for these children and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child’s circumstances. The Department and the Ministry of Housing, Communities and Local Government have published joint statutory guidance on the provision of accommodation for 16 and 17 year olds who may be homeless and/or require accommodation.

Honour Based Abuse including Breast ironing, FGM and Forced Marriage

Staff are aware of “Honour-based” Abuse (HBA) which encompasses 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. All forms of so called HBA are abuse (regardless of the motivation) and staff will handle and escalate as such; they are alert to the possibility of a child being at risk of HBA, or already having suffered HBA.” *Keeping Children Safe in Education 2021*”

Awareness raising has taken place around HBA; staff are alert to possible indicators. They are aware that forced marriage is an entirely separate issue from arranged marriage; that it is a human rights

abuse and falls within the Crown Prosecution Service definition of domestic violence and that HBV and FM can affect both young men and women. Staff build up their knowledge and awareness through yearly updates and using resources provided by CEOPS.

As a school we would never attempt to intervene directly; where this is suspected we would speak to ChECS before sharing our concerns with the family.

Breast ironing also known as Breast Flattening

Staff have been made aware of an act of abuse performed on girls (from around the age of 9 years old) in which their breasts are ironed, massaged and/or pounded, burned with heated objects or covered with an elastic belt to prevent or delay the development of their breasts; the intention being to protect the child from rape, forced marriage, sexual harassment or removal from education. It is a practice in Cameroon, Nigeria and South Africa. It is often carried out by the girl's mother.

Staff are clear that they would follow our usual procedure for recording and reporting this abuse where it is suspected.

Female Genital Mutilation (FGM)

Staff are aware of Female Genital Mutilation (also known as female circumcision, cutting or Sunna) and that it is the partial or total removal of external female genitalia for non-medical reasons.

Staff are also aware that FGM

- Is child abuse; it's dangerous and it is a criminal offence. Religious, social or cultural reasons are sometimes given for FGM however there is no valid reason for it.
- Is illegal in the UK. It's also illegal to take a British national or permanent resident abroad for FGM or to help someone trying to do this.

Indications that FGM may be about to take place:

- When a female family elder is around, particularly when she is visiting from a country of origin.
- Reference to FGM in conversation e.g. a girl may tell other children about it.
- A girl may confide that she is to have a 'special procedure' or to attend a special occasion to 'become a woman'.
- A girl may request help from a teacher or another adult if she is aware or suspects that she is at immediate risk.
- Parents state that they or a relative will take the child out of the country for a prolonged period.
- A girl may talk about a long holiday to her country of origin or another country where the practice is prevalent.
- A girl being withdrawn from PSHE or from learning about FGM (parents may wish to keep her uninformed about her body and rights)

Indications that FGM has taken place:

- Difficulty walking, sitting or standing
- Spending longer than normal in the bathroom or toilet possibly with bladder or menstrual problems
- Unusual/a noticeable change in behaviour after a lengthy absence
- Reluctance to undergo normal medical examinations
- Asking for help, but may not be explicit about the problem due to embarrassment or fear
- Prolonged absences/ persistent unexplained absence from school/college
- Seek to be excused from physical exercise without the support of their GP
- Child not allowed to attend extra-curricular activities
- Close supervision of child by family/carers

Teachers in our school are aware of their responsibilities under section 74 of the Serious Crime Act 2015 which says that "If a **teacher**, in the course of their work in the profession, discovers that an act

of Female Genital Mutilation appears to have been carried out on a girl under the age of 18 the **teacher** must report this to the police”.

Members of our school community are alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. They have been made aware that FGM typically takes place between birth and around 15 years old. Potential indicators that a child or young person may be at risk of FGM have been shared and the next steps have been identified, in that we take the same course of action as we would with any form of abuse; the Designated Safeguarding Lead plays a full part in the process of identification recording and reporting. We are mindful that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity is always shown when approaching the subject.

Wilmslow Police Station, Hawthorn St, Wilmslow SK9 5HQ: [0845 458 6374](tel:08454586374)

Forced Marriage

Staff are aware of Forced Marriage and that it 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. School staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fm@fcdof.gov.uk.

Children, especially girls who are forced to marry, or those who fear they may be forced to marry, are frequently withdrawn from education, restricting their educational and personal development.

Indications that a Child is at risk of Forced Marriage:

Staff are aware that they need to be aware of significant changes in the child's presentation emotional and physical, in dress and behaviour.

- Appearing anxious, depressed and emotionally withdrawn with low self-esteem
- Self-harming, self-cutting or anorexia
- Criminal activity e.g. shoplifting or taking drugs or alcohol
- Declining performance, aspirations or motivation
- Not allowed to attend any extra-curricular or after school activities
- Girls and young women may be accompanied to and from school/college
- Attending school but absenting themselves from lessons
- Stopping attendance at school/college
- A family history of older siblings leaving education early and marrying early

Actions our school takes in relation to take around Honour Based Abuse:

- When managing requests for absence, we use an absence request form which requests information on all siblings who attend other schools. Sometimes younger siblings tell teachers information that has a bearing on older members of the family, so it is important that we liaise with the other schools
- The Headteacher teacher requires a meeting with parents to discuss applications for extended leave of absence during term time, as we feel this can provide an opportunity to gather important information. We ask for the precise location of where the child is going; the purpose of the visit; the return date and whether it is estimated or fixed
- We check in with the child/children to see if they know and corroborate the purpose of the visit.
- If a return date has been specified and a child has not returned to school, we would contact our Attendance/Education Welfare Officer. We would never remove the child from the roll without first

making enquiries about their disappearance in line with Cheshire East Children Missing Education Procedures and referring the case to the police and Children's Services as appropriate.

Modern Day Slavery including Trafficking

The Modern Slavery Act came into Force in 2015. Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs

Staff are aware that:

- a person commits an offence if they knowingly hold another person in slavery or servitude or if they knowingly require another person to perform forced or compulsory labour
- it is an offence to arrange or facilitate the travel of a person with a view to them being exploited. These are serious offences carrying a penalty of up to life imprisonment
- any consent victims have given to their treatment will be irrelevant where they have been coerced, deceived or provided with payment or benefit to achieve that consent
- children (under 18 years) are considered victims of trafficking, whether or not they have been coerced, deceived or paid to secure their compliance. They need only to have been recruited, transported or harbored for the purpose of exploitation

Trafficked Children

Human trafficking is defined by the United Nations, in respect of children, as "the recruitment, transport, transfer, harbouring or receipt of a person by such means as threat or use of force or other forms of coercion, of abduction, of fraud or deception for the purpose of exploitation."

Any child transported for exploitative reasons is considered to be a trafficking victim.

As a school we are alert to the signs both for our children and for their families and are aware that this may be if they:

- Show signs of physical or sexual abuse, and/or has contracted a sexually transmitted infection or has an unwanted pregnancy
- Have a history with missing links and unexplained moves
- Are required to earn a minimum amount of money every day
- Work in various locations
- Have limited freedom of movement
- Appear to be missing for periods
- Are known to beg for money
- Are being cared for by adult/s who are not their parents and the quality of the relationship between the child and their adult carers is not good
- Are one among a number of unrelated children found at one address
- Have not been registered with or attended a GP practice
- Are excessively afraid of being deported
- Look malnourished or unkempt
- Are withdrawn, anxious and unwilling to interact
- Are under the control and influence of others
- Live in cramped, dirty, overcrowded accommodation
- Have no access or control of their passport or identity documents
- Appear scared, avoid eye contact, and can be untrusting
- Show signs of abuse and/or has health issues

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

- Physical symptoms (bruising indicating either physical or sexual assault)

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

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

If staff believe that a child is being trafficked, this will be reported to the Designated Safeguarding Lead and will be reported as potential abuse.

Neglect

Staff are aware that neglect:

- is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development
- may occur during pregnancy, for example, as a result of maternal substance abuse
- once a child is born, may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment
- may also include neglect of, or unresponsiveness to, a child's basic emotional needs
- may potentially be fatal
- causes great distress to children and leads to poor outcomes in the short and long-term
- has possible consequences which may include an array of health and mental health problems, difficulties in forming attachment and relationships, lower educational achievements, an increased risk of substance misuse, higher risk of experiencing abuse as well as difficulties in assuming parenting responsibilities later in life. The degree to which children are affected during their childhood and later in adulthood depends on the type, severity and frequency of the maltreatment and on what support mechanisms and coping strategies were available to the child

If we suspect neglect, we will use the [CESCP Neglect Screening Tool](#)

INDICATORS

- 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
- Parents who fail to seek medical treatment when their children are ill or are injured
- Children who have poor personal hygiene
- Children who are frequently tired
- Children who are frequently late / non-attendance at school
- Children who have a poor relationship with peers
- Children who are compulsively stealing and scavenging
- Children who run away
- Children with a loss of weight / being constantly underweight
- Children who have low self esteem
- Children with poor dental hygiene

Online Safety

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

Some of the risks could be:

- **content:** being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
- **contact:** being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying)
- **commerce** - risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group

The school therefore seeks to provide information and awareness to staff, pupils and their parents through:

- Acceptable use agreements (sent out yearly and pops up on the screen each time children use the computer)) for children, teachers, parents/carers and governors
- Curriculum activities involving raising awareness around staying safe online
- Information included in letters, newsletters, web site
- Parents evenings / sessions
- High profile events / campaigns e.g. Safer Internet Day
- Building awareness around information that is held on relevant web sites and or publications
- Social media policy

Cyber crime: Preventing young people from getting involved

Children are getting involved in cybercrime, many do it for fun without realising the consequences of their actions – but the penalties can be severe. Cybercrime is a serious criminal offence under the Computer Misuse Act. If we become aware of any incidents of cyber crimes, we will consider each case individually as to any criminal act that may have been committed. The school will pass on information to the police if it feels that it is appropriate, or we are required to do so.

Risks associated with Gaming

Online gaming is an activity that the majority of children and many adults get involved in.

The school raise awareness by:

- Talking to parents and carers about the games their children play and help them identify whether they are appropriate
- Supporting parents in identifying the most effective way of safeguarding their children by using parental controls and child safety mode
- Talking to parents about setting boundaries and time limits when games are played
- Highlighting relevant resources
- Making our children aware of the dangers including of online grooming and how to keep themselves safe
- Making our children aware of how to report concerns

Peer on peer abuse

Peer on Peer Abuse Keeping Children Safe in Education, 2021 states that “All staff should be aware that children can abuse other children (often referred to as peer-on-peer abuse) and that it can happen both inside and outside of school or college and online. It is important that all staff recognise the indicators and signs of peer-on-peer abuse and know how to identify it and respond to reports. All staff should understand, that even if there are no reports in their school 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 peer-on-peer abuse, they should speak to their designated safeguarding lead (or deputy). It is important to be aware that safeguarding issues can manifest themselves via peer-on-peer abuse, which can happen both inside and outside of school and online. Often there is a gendered nature of peer-on-peer abuse, and it is more likely that girls will be victims and boys perpetrators, however all peer on peer abuse is unacceptable and will be taken seriously. This is most likely, but not limited to bullying (including cyber bullying, prejudice-based and discriminatory bullying), abuse in intimate personal relationships between peers, physical abuse (such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm this may include an online element which facilitates, threatens and/or encourages physical abuse), sexual violence (such as rape, assault by penetration and sexual assault), sexual harassment (such as sexual comments, remarks, jokes, online sexual harassment, which may be stand alone 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, consensual and non-consensual sharing of nudes and semi nudes images and or videos, Upskirting (which typically involves taking a picture under a person’s clothing 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 and anyone of any gender can be a victim), initiation type violence and rituals and sexting. This may include an online element which facilitates, threatens and/or encourages sexual violence. 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. Such abuse will never be tolerated or passed off as "banter" or "part of growing up" and will be treated as a safeguarding issue where it is reasonable to suspect that the child is suffering or likely to suffer significant harm. WPS takes a Zero tolerance approach to abuse. All children involved whether victim or perpetrator will be treated “at risk” and supported. (See Behaviour Policy & Anti- Bullying Policy).

Signs that a child is being abused by their peers.

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

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

- failing to attend school, disengaging from classes or struggling to carry out school related tasks to the standard ordinarily expected
- physical injuries
- experiencing difficulties with mental health and/or emotional wellbeing
- becoming withdrawn and/or shy; experiencing headaches, stomach aches, anxiety and/or panic attacks suffering from nightmares or lack of sleep or sleeping too much
- broader changes in behaviour including alcohol or substance misuse
- changes in appearance and/or starting to act in a way that is not appropriate for the child's age
- abusive behaviour towards others. Abuse affects children very differently.

The above list is by no means exhaustive and the presence of one or more of these signs does not necessarily indicate abuse. The behaviour that children present with will depend on their particular circumstances. Rather than checking behaviour against a list, staff are trained to be alert to behaviour that might cause concerns, to think about what the behaviour might signify, to encourage children to share with them any underlying reasons for their behaviour, and, where appropriate, to engage with their parents so that the cause(s) of their behaviour can be investigated. Where a child exhibits any behaviour that is out of character or abnormal for his/her age, staff should always consider whether an underlying concern is contributing to their behaviour (for example, whether the child is being harmed or abused by their peers) and, if so, what the concern is and how the child can be supported going forwards. The power dynamic that can exist between children is also very important when identifying and responding to their behaviour: in all cases of peer-on-peer abuse, a power imbalance will exist within the relationship. This inequality will not necessarily be the result of an age gap between the child responsible for the abuse and the child being abused. It may, for example, be the result of their relative social or economic status. Equally, while children who abuse may have power over those who they are abusing, they may be simultaneously powerless to others. Children with particularly vulnerability to abusing or being abused by their peers. Any child can be vulnerable to peer-on-peer abuse and staff should be alert to signs of such abuse amongst all children. Individual and situational factors can increase a child's vulnerability to abuse by their peers. For example, an image of a child could be shared, following which they could become more vulnerable to peer-on-peer abuse due to how others now perceive them, regardless of any characteristics which may be inherent in them and/or their family. Peer group dynamics can also play an important role in determining a child's vulnerability to such abuse. For example, children who are more likely to follow others and/or who are socially isolated from their peers may be more vulnerable to peer-on-peer abuse. Children who are questioning or exploring their sexuality may also be particularly vulnerable to abuse by their peers. Research suggests that peer-on-peer abuse may affect boys differently from girls, and that this difference may result from societal norms (particularly around power, control and the way in which femininity and masculinity are constructed) rather than biological make-up. Barriers to disclosure will also be different. As a result, schools need to explore the gender dynamics of peer-on-peer abuse within their settings, and recognise that these will play out differently in single sex, mixed or gender imbalanced environments.

Definition of Peer on Peer Abuse

There is no clear boundary between incidents that should be regarded as abusive and incidents that should be dealt with by the School's disciplinary systems. If one child causes harm to another, this should not necessarily be dealt with as abuse: unkindness, physical fighting and harassment between

children are not always or inevitably seen as child protection issues. However, it may be appropriate to regard peer on peer behaviour as abusive if harm is caused because:

- There is a significant power imbalance between the children concerned. The abuse of children is often constructed around an age differential between the abuser and the abused, but in cases of peer-on-peer abuse this may not always be the case. In such circumstances, power imbalances can manifest in other ways, for example gender, social status within peer groups, intellectual ability, physical development, economic wealth, social marginalisation and so on. It is important to note that the perpetrator and/or victim may well be subject to power imbalances with other individuals in an incident of abuse and so it is important to investigate any incident as fully as possible.
- The perpetrator has repeatedly tried to harm one or more other children.
- There are concerns about the intention of the alleged perpetrator.

If evidence suggests that there was an intention to cause severe harm to the victim, this should be regarded as abusive whether severe harm was caused or not. Abusive behaviour can happen to pupils in schools and settings and it is necessary to consider what abuse is and looks like, how it can be managed and what appropriate support and intervention can be put in place to meet the needs of the individual and what preventative strategies may be put in place to reduce further risk of harm.

Types of peer on peer abuse

There are many forms of abuse that may occur between peers and this list is not exhaustive. Each form of abuse or prejudiced behaviour is described in detail followed by advice and support on actions to be taken. Physical abuse e.g. (biting, hitting, kicking, hair pulling).

Physical abuse may include, hitting, kicking, nipping, shaking, biting, hair pulling, or otherwise causing physical harm to another person. There may be many reasons why a child harms another and it is important to understand why a child has engaged in such behaviour, including accidentally before considering the action or punishment to be undertaken.

Sexually harmful behaviour/sexual abuse e.g. (inappropriate sexual language, touching, sexual assault) Sexually harmful behaviour from children is not always contrived or with the intent to harm others. There may be many reasons why a child engages in sexually harmful behaviour and it may be just as distressing to the child who instigates it as well as the child it is intended towards. Sexually harmful behaviour may range from inappropriate sexual language, inappropriate role play, to sexually touching another or sexual assault/abuse.

Bullying (physical, name calling, homophobic) Bullying is unwanted, aggressive behaviour among school aged children that involves a real or perceived power imbalance. Both children who are bullied and who bully others may have serious, lasting problems. In order to be considered bullying, the behaviour must be aggressive and include: An Imbalance of Power: Children 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. Bullying includes actions such as making threats, spreading rumours, attacking someone physically or verbally or for a particular reason e.g. size, hair colour, gender, sexual orientation, and excluding someone from a group on purpose. (See Anti Bullying Policy)

Cyber bullying is the use of phones, instant messaging, e-mail, chat rooms or social networking sites such as Facebook and Twitter to harass, threaten or intimidate someone for the same reasons as given above. It is important to state that cyber bullying can very easily fall into criminal behaviour under the Malicious Communications Act 1988 (section 1) which states that electronic communications which are indecent or grossly offensive, or convey a threat or false information or demonstrate that there is an intention to cause distress or anxiety to the victim would be deemed to

be criminal. This is also supported by the Communications Act 2003, Section 127 which states that electronic communications which are grossly offensive or indecent, obscene or menacing, or false, used again for the purpose of causing annoyance, inconvenience or needless anxiety to another could also be deemed to be criminal behaviour. If the behaviour involves the use of taking or distributing indecent images of children under the age of 18 then this is also a criminal offence under the Sexual Offences Act 2003. Outside of the immediate support children may require in these instances, the school will have no choice but to involve the police to investigate these situations.

Sexting (youth-produced sexual imagery) is one of a number of 'risk-taking' behaviours associated with the use of digital devices, social media or the internet. It is accepted that young people experiment and challenge boundaries and therefore the risks associated with 'online' activity can never be completely eliminated. However, WPS takes a pro-active approach in its Computing and PSHE programmes to help students to understand, assess, manage and avoid the risks associated with 'online activity'. The School recognises its duty of care to its young people who do find themselves involved in such activity as well as its responsibility to report such behaviours where legal or safeguarding boundaries are crossed. Sexting (youth-produced sexual imagery) includes the sending of sexually explicit photos, images, text messages, or e-mails by using a phone or other mobile device. These images are shared between young people and/or adults via a mobile phone, handheld device, computer, 'tablet' or website with people they may not even know. Once the image is taken and sent, the sender has lost control of the image and these images could end up anywhere. By having in their possession indecent images of a person under 18, or distributing them to someone else, children are unlikely to be aware that they could be breaking the law as these are offences under the Sexual Offences Act 2003. There are many different types of sexting and it is likely that no two cases will be the same. It is necessary to carefully consider each case on its own merit. However, it is important that the School applies a consistent approach when dealing with an incident to help protect children. For this reason the DSL (or Deputy) needs to be informed of any sexting (youth-produced sexual imagery) incidents. The range of contributory factors in each case also needs to be considered in order to determine an appropriate and proportionate response (see Behaviour Policy).

Initiation/Hazing Hazing is a form of initiation ceremony which is used to induct newcomers. There are a number of different forms, from relatively mild rituals to severe and sometimes violent ceremonies. The idea behind this practice is that it welcomes newcomers by subjecting them to a series of trials which promote a bond between them. After the hazing is over, the newcomers also have something in common with older members of the organisation, because they all experienced it as part of a rite of passage. Many rituals involve humiliation, embarrassment, abuse, and harassment. **Prejudiced Behaviour** The term prejudice-related bullying 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.

Expected action taken by all staff to Peer on Peer abuse

Although the type of abuse may have a varying effect on the victim and initiator of the harm, these simple steps can help clarify the situation and establish the facts before deciding the consequences for those involved in perpetrating harm. It is important to deal with a situation of peer abuse immediately and sensitively. It is necessary to gather the information as soon as possible to get the true facts around what has occurred and before the child(ren) may have forgotten. It is equally important to deal with it sensitively and think about the language used and the impact of that language on both the children and the parents when they become involved. For example, do not use the word perpetrator, this can quickly create a blame culture and leave a child labelled. In all cases of peer on peer abuse it is necessary that all staff are trained in dealing with such incidents, talking to children and instigating immediate support in a calm and consistent manner. Staff should not be prejudiced, judgmental, dismissive or irresponsible in dealing with such sensitive matters.

Preventative Strategies to minimise the risk of Peer on Peer abuse

WPS aims to create and sustain an environment that helps to minimise the risk and occurrence of peer on peer abuse. The school also looks to take a proactive, preventive and educative approach to safeguarding issues with its staff and pupils. Opportunities are sought to give teaching and learning opportunities to our pupils, within the context of PSHEE/RSE and the wider curriculum. Pupils are frequently told what to do if they witness or experience such abuse, the effect that it can have on those who experience it and the possible reasons for it, including vulnerability of those who inflict such abuse.

The possible avenues for such education to take place, including education about abusive behaviour, include the following:

- School Assemblies
- PSHEE/RSE lessons
- Challenging the attitudes that underlie such abuse (both inside and outside the classroom)
- Promote positive values and to encourage a culture of tolerance and respect amongst all members of the School community
- Creating conditions in which pupils can aspire to and realise safe and healthy relationships
- Creating a culture in which pupils feel able to share their concerns openly, in a non-judgmental environment, and have them listened to

Responding to cases of peer-on-peer abuse promptly and appropriately.

WPS will seek to ensure that it has an open environment where pupils feel safe to share information about anything that is upsetting or worrying them. To enable such an open and honest environment we will aim to make sure that all staff feel confident and able to talk about issues and challenge the perceptions and attitudes of children including where relevant their use of inappropriate language and behaviour towards one another. Staff will never dismiss issues as “banter” or “growing up” or compare them to their own experiences of childhood. All staff must consider each situation in its own right before taking action. Staff will ensure that they do not minimise the concerns raised as this may result in a child seeking no further help or advice and their predicament becoming far worse. Pupils should be aware that there are a variety of ways in which they can express their views and feelings on any pastoral matter; to access support in order to prevent abuse from occurring, to report abuse that is happening, and to find ongoing support after abuse has been identified. Pupils are able to seek support from staff if they feel they are being abused or that one of their peers is at risk from abuse or peer on peer abuse.

Multi-agency working regarding Peer on Peer abuse

The School actively engages with its local partners in relation to peer-on-peer abuse, and works closely with CЕСP. The School actively refers concerns/allegations of peer-on-peer abuse where necessary to CЕСP via MASH and/or other relevant agencies. This is particularly important because peer on-peer abuse can be a complex issue, and even more so where wider safeguarding concerns exist. It is often not appropriate for one single agency (where the incident cannot be managed internally) to try to address the issue alone – it requires effective partnership working.

Procedures Adopted when a Disclosure of Peer on Peer Abuse is made.

The following general principles and guidelines should be followed:

Initial response

- Any direct disclosure by a pupil of an incident of abuse should be taken very seriously and managed sensitively. Basic principles of listening sensitively, providing reassurance, not asking leading questions and not guaranteeing confidentiality should be remembered. Gather the facts and consider the Intent, has this been a deliberate or contrived situation for a child to be able to harm another?

- All incidents should be responded to in line with the Safeguarding Policy and reported to a member of the Safeguarding Team without delay, such matters will be clearly recorded. The DSL will discuss the concerns or allegations with the member of staff who has reported them and will, where necessary, take any immediate steps to ensure the safety of the child/all children affected. The DSL should always use professional judgement to determine whether it is appropriate for alleged behaviour to be dealt with internally and, if so, whether any external specialist support is required. In borderline cases the DSL may wish to consult CЕСP on a 'no names' basis to determine the most appropriate response. Where the DSL considers or suspects that the behaviour in question might be abusive or violent on a spectrum (as opposed to inappropriate or problematic), the DSL should contact MASH immediately, and in any event within 24 hours of the DSL becoming aware of it.

Normal	Inappropriate	Problematic	Abusive	Violent
<ul style="list-style-type: none"> • Developmentally expected • Socially acceptable • Consensual, mutual, reciprocal • Shared decision making 	<ul style="list-style-type: none"> • Single instances of inappropriate sexual behaviour • Socially acceptable behaviour within peer group • Context for behaviour may be inappropriate • Generally consensual and reciprocal 	<ul style="list-style-type: none"> • Problematic and concerning behaviour • Developmentally unusual and socially unexpected • No overt elements of victimisation • Consent issues may be unclear • May lack reciprocity or equal power • May include levels of compulsivity 	<ul style="list-style-type: none"> • Victimising intent or outcome • Includes misuse of power • Coercion and force to ensure compliance • Intrusive • Informed consent lacking or not able to be freely given • May include elements of expressive violence 	<ul style="list-style-type: none"> • Physically violent sexual abuse • Highly intrusive • Instrumental violence which is psychologically and/or sexually arousing to the child responsible for the behaviour • Sadism

Course of action, which may include:

A - Manage internally with help from external specialists where appropriate and possible Where behaviour between peers is abusive or violent (as opposed to inappropriate or problematic), scenarios B, C or D should ordinarily apply. However, where support from local agencies is not available, the School may need to handle allegations/concerns internally. In these cases, the School will engage and seek advice from external specialists (either in the private and/or voluntary sector).

B – Undertake/contribute to an inter-agency Early Help assessment, with targeted Early Help services provided to address the assessed needs of a child/children and their family These services may, for example, include CAMHS, a specialist harmful sexual behaviour team, and/or youth offending services. Refer child/children to children's social care for a section 17 and/or 47 statutory assessment as a matter of best practice, if an incident of peer-on-peer abuse requires referral to and action by children's social care and a strategy meeting is convened, then the School will hold every professional involved in the case accountable for their safeguarding response, including themselves, to both the child who has experienced the abuse, and the child who was responsible for it, and the contexts to which the abuse was associated.

D – Report alleged criminal behaviour to the Police. Alleged criminal behaviour will ordinarily be reported to the Police, however, there are some circumstances where it may not be appropriate to report such behaviour. For example, where the exchange of youth produced sexual imagery does not involve any aggravating factors. All concerns/allegations will be assessed on a case by case basis, and in light of the wider context.

Points to consider regarding peer on peer abuse:

What is the age of the children involved? How old are the children involved in the incident and is there any age difference between those involved? Where did the incident or incidents take place? Was the incident in an open, visible place to others? If so was it observed? If not, is more supervision required within this particular area? What was the explanation by all children involved of what occurred? Can each of the children give the same explanation of the incident and also what is the effect on the children involved? Is the incident seen to be bullying? Is the version of one child different from another and why? What is each of the children's own understanding of what occurred? Do the children know/understand what they are doing? For example, do they have knowledge of body parts, of privacy and that it is inappropriate to touch? Is the child's explanation in relation to something they may have heard or been learning about that has prompted the behaviour? Is the behaviour deliberate and contrived? Does the child have understanding of the impact of their behaviour on the other person? In the same way it must be considered has the behaviour persisted after the issue has already been discussed or dealt with and appropriately resolved?

Next Steps

Once the outcome of the incident(s) has been established it is necessary to ensure future incidents of abuse do not occur again and consider the support and intervention required for those involved. For the child who has been harmed. What support they require depends on the individual child. It may be that they wish to seek Counselling or one to one support via a member of the school staff. It may also be that they feel able to deal with the incident(s) on their own or with support of family and friends. In that case, it is necessary that the child continues to be monitored and offered support should they require it in the future. If the incidents are of a bullying nature, the child may need support in improving peer groups/relationships with other children or some restorative justice work with all those involved may be required. Other interventions that could be considered may target a whole class or year group, for example a speaker on cyber bullying, relationship abuse etc. It may be that through the continued curriculum of assemblies, PSHEE, that certain issues can be discussed more frequently. If the child feels particularly vulnerable it may be that a risk assessment can be put in place for them whilst in school so that they have a key contact that they can talk to, support strategies for managing future issues and identified services to offer additional support.

For the child who has displayed harmful behaviour. In this circumstance it is important to find out why the child has behaved in such a way. It may be that the child is experiencing their own difficulties and may even have been harmed themselves in a similar way. In such cases support such as Counselling or one to one support via a member of school staff may also be necessary. Particular support from identified services may be necessary through an Early Help referral and the child may require additional support from family members. Once the support required to meet the individual needs of the child has been met, it is important that the child receives a consequence for their behaviour. This may be in the form of restorative justice e.g. making amends with the child they have targeted if this has been some form of bullying. In the cases of sexually harmful behaviour it may be a requirement for the child to engage in one to one work with a particular service or agency. Even following the conclusion of any investigation the behaviour that the child has displayed may continue to pose a risk to others in which case an individual risk assessment may be required. This should be completed via a multi-agency response to ensure that the needs of the child and the risks towards others are measured by all of those agencies involved including the child and their parents. This may mean additional supervision of the child or protective strategies if the child feels at risk of engaging in further

inappropriate or harmful behaviour. The school may also choose a punishment as a consequence such as exclusion or suspension for a period of time to allow the child to reflect on their behaviour.

After care

It is important that following the incident the children involved continue to feel supported and receive help even if they have stated that they are managing the incident. Sometimes the feelings of remorse, regret or unhappiness may occur at a much later stage than the incident. It is important to ensure that the children do not engage in any further harmful behaviour either towards someone else or to themselves as a way of coping (e.g. self-harm). In which case, regular reviews with the children following the incident(s) are imperative.

Child on Child Sexual violence and sexual harassment.

It is important WPS staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. We will respond to all reports and concerns of child on child sexual violence and sexual harassment, including those that have happened outside of the school or school premises, and or online. Whilst any report of sexual violence or sexual harassment should be taken seriously, staff should be aware of, it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys. 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 or their experience minimised. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with special educational needs and disabilities (SEND) and LGBT children are at greater risk.

Staff are aware of the importance of:

- challenging inappropriate behaviours;
- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and
- challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them. When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

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

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

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

Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.) Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice

Sexual harassment when referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. 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 (we should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include: consensual and non consensual sharing of nudes and semi-nudes images and/or videos. As set out in UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people taking and sharing nude photographs of under 18 year olds is a criminal offence, sharing of unwanted explicit content, upskirting, sexualised online bullying, unwanted sexual comments and messages, including, on social media; sexual exploitation; coercion and threats.

Responding to the report of Sexual violence and sexual harassment

The School will respond on a case-by-case basis, with the DSL (or a deputy DSL) taking a leading role and using their professional judgement, supported by other agencies, such as children's social care and the police as required. All victims will be taken seriously, supported and kept safe.

- If possible, managing reports with two members of staff present, (preferably one of them being the designated safeguarding lead or a deputy). However, this might not always be possible. Where the report includes an online element, being aware of searching screening and confiscation advice and UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people. The key consideration is for staff not to view or forward illegal images of a child. The highlighted advice provides more details on what to do when viewing an image is unavoidable. In some cases, it may be more appropriate to confiscate any devices to preserve any evidence and hand them to the police for inspection.
- Not promising confidentiality at this initial stage as it is very likely a concern will have to be shared further (for example, with the designated safeguarding lead or children's social care) to discuss next steps. Staff should only share the report with those people who are necessary in order to progress it. It is important that the victim understands what the next steps will be and who the report will be passed to.
- Recognising that a child is likely to disclose to someone they trust: this could be anyone on the school staff. It is important that the person to whom the child discloses recognises that the child has placed them in a position of trust. They should be supportive and respectful of the child.

- Recognising 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.
- Keeping in mind that certain children may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity and/or sexual orientation.
- Listening carefully to the child, reflecting back, using the child's language, 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. It is important to note that whilst leading questions should be avoided, staff can ask children if they have been harmed and what the nature of that harm was.
- Considering the best way to make a record of the report. Best practice is to wait until the end of the report and immediately write up a thorough summary. This allows the staff member to devote their full attention to the child and to listen to what they are saying. It may be appropriate to make notes during the report (especially if a second member of staff is present). However, if making notes, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking. Either way, it is essential a written record is made.
- Only recording the facts as the child presents them. The notes should not reflect the personal opinion of the note taker.

Risk Assessment

Following a report of sexual violence Following a report of sexual violence, the DSL (or deputy DSL) should make an immediate risk and needs assessment, considering: the victim, the alleged perpetrator and all other children (and if appropriate adult students and staff). Risk assessments will be recorded and kept under review. At all times, the school will actively consider the risks posed to all their pupils and students and put adequate measures in place to protect them and keep them safe. The DSL (or deputy DSL) should ensure they are engaging with children's social care and specialist services as required.

The School will consider:

- the wishes of the victim in terms of how they want to proceed
- the nature of the alleged incident
- the ages of the children involved
- the development stages of the children involved
- any power imbalance between the children
- is the incident a one-off or a sustained pattern of abuse
- are there ongoing risks to the victim, other children, school staff
- contextual safeguarding issues As always, all staff should act in the best interests of the child sexual violence and sexual harassment is not acceptable and will not be tolerated.
- Action following a report of sexual violence and/or sexual harassment
- Important considerations will include:

- the needs and wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered.

This will however need to be balanced with the school's duty and responsibilities to protect other children.

- the nature of the alleged incident(s), including: whether a crime may have been committed or whether HSB has been displayed
- the ages of the children involved
- the developmental stages of the children involved
- any power imbalance between the children
- Consider the proportionality of the response. Support should be tailored on a case-by-case basis. The support required regarding a one-off incident of sexualised name-calling is likely to be vastly different from that for a report of rape.
- if the alleged incident is a one off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature
- that sexual violence and sexual harassment can take place within intimate personal relationships between peers
- are there ongoing risks to the victim, other children or school staff
- other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation Immediate consideration should be given as to how best to support and protect the victim and the alleged perpetrator (and any other children involved/impacted). As always when concerned about the welfare of a child, all staff should act in the best interests of the child. In all cases, School should follow general safeguarding principles as set out in Keeping Children Safe in Education 2021. The starting point regarding any report should always be that there is a zero tolerance approach to sexual violence and sexual harassment and it is never acceptable and it will not be tolerated. It is especially important is not to pass off any sexual violence or sexual harassment as 'banter', 'part of growing up' or 'boys being boys' as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.

Four scenarios for schools and schools to consider when managing any reports of sexual violence and/or sexual harassment. (See Keeping Children Safe in Education 2021 for further details)

1. Manage internally – the school manages incidents.
2. Early Help – multi-agency Early Help
3. Referrals to Children's Social Care
4. Reporting to the police – in parallel to children's social care Considering bail conditions, It is unlikely that a child will be on police bail with conditions attached, so it is essential that when there is a criminal investigation that there is joined up working between the school, children's social care and the police so that the victim, alleged perpetrator and other children involved are supported. Managing any delays in the criminal process There may be delays in any criminal case but the School should not wait for the outcome before protecting the victim, alleged perpetrator and other children in the School. The end of the criminal process regardless of whether a child is convicted of a crime or not, all the children involved should be protected. The guidance makes it clear that the School need to

consider safeguarding issues around the victim and alleged perpetrator sharing classes and sharing space at School. The School needs to manage the balance between supporting the victim and ensuring the alleged perpetrator has an education and safeguarding support themselves.

Where sexual violence or sexual harassment between children is alleged then the school follows the guidance issued by the DfE in 2021. [Sexual violence and sexual harassment between children guidance](#)

Where sharing nudes or semi nudes (youth produced sexual images) are part of the abuse then the school follows the UK Council for Child Internet Safety (UKCCIS) [Sharing nudes and semi-nudes: advice for education settings](#)

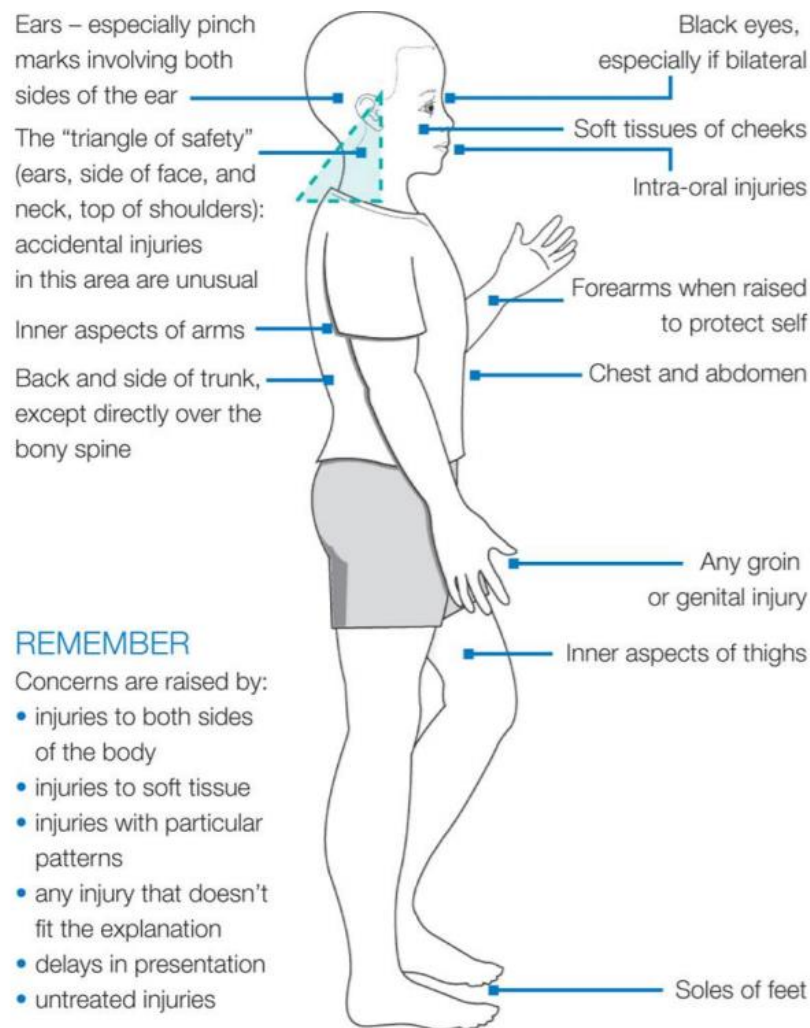
Physical abuse

Staff are aware of the signs of potential physical abuse and that it might involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child.

They are also aware that physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

INDICATORS

- Children with frequent injuries
- Children with unexplained or unusual fractures or broken bones
- Children with unexplained bruises or cuts, burns or scalds, bite marks. Typical accidental injuries involve knees, shins, elbows, palms of the hands, chin and forehead. They are in keeping with any explanation given and the development of the child. The body map shows injuries that are less likely to have been caused accidentally and are therefore possible indicators of physical abuse.



Prevent, Radicalisation and Extremism

WPS adheres to the Prevent Duty Guidance, July 2015 (most recently updated in April 2021) and seeks to protect children against the messages of all violent extremism and to prevent them being drawn into terrorism; including, but not restricted to, those linked to Islamist ideology, or to Far Right / Neo Nazi / White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.

Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

The school community has been made aware of the exploitation of vulnerable people, to involve them in terrorism or in activity in support of terrorism; they are also aware that the normalisation of extreme views may make children vulnerable to future manipulation and exploitation.

In order to raise awareness and reduce risks we ensure that our preventative work is specifically considered, outlined and highlighted in all relevant policies and procedures, including those for Information technology, Special Educational Needs, attendance, assemblies, the use of school premises by external agencies, behaviour and anti-bullying and the RE and PSHE curriculum.

Our staff are aware and vigilant, and our curriculum includes educating children of how people with extreme views share these with others; we are committed to ensuring that our pupils are offered a broad

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

The *Prevent* statutory guidance requires schools to ensure that any visiting speakers who might fall within the scope of the *Prevent* duty, whether invited by staff or pupils, are suitable and appropriately supervised. This means that even in cases where specific vetting checks are not required, action must be taken to ensure that they are suitable. An internet search, testimonial feedback, viewing a speech are examples of how staff can assess suitability. At least one member of staff must be in attendance during the speaker's speech at the School.

All staff have received training (Jan 2021) about the Prevent Duty and tackling extremism. This training is reinforced by circulation of one-minute guide/use of scenarios/etc.

WPS is clear that this exploitation and radicalisation should be viewed as a safeguarding concern; therefore, concerns need to be recorded and discussed with the DSL; with timely, appropriate action then being taken.

The **Prevent Duty** requires that all staff are aware of the signs that a child maybe vulnerable to radicalisation. The risks will need to be considered for political; environmental; animal rights; or faith-based extremism that may lead to a child becoming radicalised.

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

Channel is a key element of the Prevent Strategy. It is a multi-agency approach to protect people at risk of radicalisation. Channel uses existing collaboration between local authorities, statutory partners, the police and the local community to identify individuals at risk of being drawn into terrorism, assess the nature and extent of that risk and develop the most appropriate support for the individuals concerned. Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages. Wilmslow Prep School also recognises the importance of effective engagement with parents.

In Cheshire East if we suspect a child to be suffering or likely to suffer significant harm, including being radicalised we would contact:

Cheshire East Consultation Service (ChECS): **0300 123 5012 (Option 3)**

and complete a [Prevent referral](#) on the stopadultabuse.org.uk website.

National Police Prevent advice line on 0800 011 3764. In an emergency ring 999.

1st Floor, 10 Victoria Street

London

SW1H 0NN

Email: info@npcc.pnn.police.uk

Where necessary individuals may be discussed at Channel:

Staff are aware of Channel being a partnership approach to support individuals vulnerable to recruitment by violent extremists. The Channel Duty Guidance: protecting people vulnerable to being drawn into terrorism, was updated in 2020

In Cheshire East the Channel Co-ordinator is Sandra Murphy – Head of Adult Safeguarding.

The CE Channel Panel meets monthly. Attendees sign a Confidentiality Agreement and share case information. Discussion covers the vulnerabilities of individuals and their families, current support, and risks for the individual and community. Attendees agree if the case is appropriate for Channel and the support plan which is needed.

For those already open to Panel support plans are tailored, building on existing support, and may consist of help with family problems, mental health support, religious education, mentoring etc.

For those who are not Channel appropriate: a safe exit from Channel or a referral elsewhere is discussed.

The Safeguarding Children in Education Settings (SCiES) team represent education settings at these meetings. This means that SCiES may contact the Designated Safeguarding Lead before a meeting to request our view regarding the lived experience of the young person. They contact us afterwards to give us an update. Schools may be invited to attend the meeting.

Serious violence

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

All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. Advice for schools and colleges is provided in the Home Office's Preventing youth violence and gang involvement and its Criminal exploitation of children and vulnerable adults: county lines guidance.

Sharing Nudes and Semi-nudes

This form of abuse also includes underwear shots, sexual poses and explicit text messaging.

While sharing nudes can take place in a consensual relationship between two children under the age of 18, the use of explicit images in revenge following a relationship breakdown is becoming more commonplace. Sharing nudes can also be used as a form of sexual exploitation and take place between strangers.

As the average age of first smartphone or camera enabled tablet is 6 years old, sharing nudes and semi-nudes is an issue that requires awareness raising across all ages.

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

Sexual abuse

Staff are aware of sexual abuse and that:

- It involves forcing or enticing a child to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening
- The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing

- It may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse
- It can take place online, and technology can be used to facilitate offline abuse
- It is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children

The sexual abuse of children by other children is a specific safeguarding issue in education see peer on peer abuse.

INDICATORS

- Children who display knowledge or interest in sexual acts inappropriate to their age
- Children who use sexual language or have sexual knowledge that you would not expect them to have
- Children who ask others to behave sexually or play sexual games
- Children with physical sexual health problems, including soreness in the genital and anal areas, sexually transmitted infections or underage pregnancy
- Children who have sudden changes in behaviour and school performance
- Children who self-harm, self-mutilation or attempts at suicide
- Children who allude to secrets which they cannot reveal
- Children who have a tendency to cling or need constant reassurance
- Children with a fear of undressing for gym activities.

Appendix 5: Role of the Designated Safeguarding Leads and Deputy Designated Leads

The Governing body committees should ensure an appropriate senior member of staff, from the School leadership team, is appointed to the role of designated safeguarding lead. The designated safeguarding lead should take lead responsibility for safeguarding and child protection (including online safety). This should be explicit in the role holder's job description. This person should have the appropriate status and authority within the school to carry out the duties of the post. They should be given additional time, funding, training, resources and support to they need to carry out the role effectively. Their additional responsibilities include providing advice and support to other staff on child welfare, safeguarding and child protection matters, to take part in strategy discussions and inter-agency meetings, and/or supporting other staff to do so, and contributing to the assessment of children.

Deputy Designated Safeguarding - any deputies should be trained to the same standard as the Designated Safeguarding Lead. Whilst the activities of the Designated Safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection as set out above, remains with the designated safeguarding lead, this lead responsibility should not be delegated.

Manage referrals

The designated safeguarding lead is expected to:

- Refer cases of suspected abuse to the local authority children's social care as required and support staff who make referrals to local authority children's social care
- Refer cases to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme
- Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required
- Where a crime may have been committed to the Police as required. NPCC - When to call the police should help understand when to consider calling the police and what to expect when working with the police.

Working With others

The designated safeguarding lead is expected to:

- 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 Head to inform him or her 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 at the local authority for child protection concerns in cases which concern a staff member
- Liaise with staff (especially teachers, pastoral support staff, school nurses, IT Technicians, Senior Mental health leads and SENCO on matters of safety and safeguarding and welfare (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 Head and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children’s attendance, engagement and achievement at school This includes: ensuring that the school knows its 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 supporting 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.

Raise Awareness

The designated safeguarding lead should:

- ensure each member of staff has access to, and understands, the school’s child protection policy and procedures, especially new and part-time staff;
- 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 governing bodies or proprietors 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; and
- 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 and school leadership staff.

Information sharing and managing the child protection file

The designated safeguarding lead is responsible for ensuring that child protection files are kept up to date.

Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child.

Records should 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

They should ensure the file is only accessed by those who need to see it and where the file or content within it is shared.

Where children leave the school (including in year transfers) the designated safeguarding lead should ensure their child protection file is transferred to the new school or school 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 should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools and schools should ensure key staff such as designated safeguarding leads and SENCOs or the named person with oversight for SEN in schools, are aware as required.

Lack of information about their circumstances can impact on the child's safety, welfare and educational outcomes. In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any additional information with the new school or school in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school or school. For example, information that would allow the new school or school to continue supporting children who have had a social worker and been victims of abuse and have that support in place for when the child arrives.

Availability

During term time the DSL (or a deputy) should always be available (during Staff hours) for staff in the school to discuss any safeguarding concerns. Out of hours/Out of term activities contact is via mobile number 07725107029 (DSL)

Training, knowledge and skills

The designated safeguarding lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The designated safeguarding lead should undertake Prevent awareness training. Training should provide designated safeguarding leads 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 local criteria for action and local authority children's social care referral arrangements
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so
- understand the importance of the role the designated safeguarding lead 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 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
- obtain access to resources and attend any relevant or refresher training courses
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or school may put in place to protect them.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, 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.

Providing support to staff

Training should support the designated safeguarding lead 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 referral process and support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

Understanding the views of children

It is important that children feel heard and understood. Therefore, designated safeguarding leads should 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.

Holding and sharing information

The critical importance of recording, holding, using and sharing information effectively is set out in Parts one, two and five of KCSIE 2021, and therefore the designated safeguarding lead should be equipped to:

- understand the importance of information sharing, both within the school and school, and with other schools and schools 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.