

## Safeguarding & Child Protection Policy including EYFS PG9 (BG23)



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Approved by:			
Name	Role	Signature	Date
GS	Safeguarding Gov		

## **Key Contacts in School**

### **Designated Safeguarding Lead (DSL)**

Senior DSL – Nicholas Roddis – [n.roddis@westhillpark.com](mailto:n.roddis@westhillpark.com)

Deputy DSL Responsible for EYFS Sarah Hall - [s.hall@westhillpark.com](mailto:s.hall@westhillpark.com)

DSL Team – Chris Ward – [headmaster@westhillpark.com](mailto:headmaster@westhillpark.com)

DSL Team – Liz Alway – [e.alway@westhillpark.com](mailto:e.alway@westhillpark.com)

DSL Team - Craig Boyce – [c.boyce@westhillpark.com](mailto:c.boyce@westhillpark.com)

Safeguarding Governor – Mrs G Sommers can be contacted via the Front Office

Or any of the DSL team can be contacted on 01329 842356

### **Professional Safeguarding Partnerships Contacts**

[Hampshire Safeguarding Children Partnership](#) HSCP

Tel No: 01962 876355

[hscp@hants.gov.uk](mailto:hscp@hants.gov.uk)

Emergency: 999

### **For concerns about extremism:**

Local Police Force 101

Hants Direct 0300 555 1384

[prevent.engagement@hampshire.pnn.police.uk](mailto:prevent.engagement@hampshire.pnn.police.uk)

DfE dedicated helpline 020 7340 7264 or [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk)

Hampshire Children Missing Education (CME) Tracking Officer 01962 845363  
or [cme@hants.gov.uk](mailto:cme@hants.gov.uk)

## I. DEFINITIONS

**Safeguarding** is defined as:

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

Keeping Children Safe in Education (KCSIE).

**Child Protection** refers to the action required to protect a child from a situation that is causing significant harm, or that is likely to do so.

## 2. INTRODUCTION

At West Hill Park School, we are committed to safeguarding children and young people, and we expect everyone who works in our school to share this commitment.

Adults in our school take all welfare concerns seriously and encourage children and young people to talk to us about anything that worries them. Where there is a safeguarding concern, governing bodies, and school leaders should ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide.

We will always act in the best interest of the child. Everyone who comes into contact with children and their families and carers has a role to play in safeguarding children, irrespective of their role within the school. In order to fulfil this responsibility effectively, all professionals should make sure their approach is child-centred. This means that they should consider, at all times, what is in the best interests of the child. Everyone who comes into contact with children and young people has a role to play in identifying concerns, sharing information, and taking prompt action.

West Hill Park School is committed to safeguarding and promoting the welfare of children by:

- The provision of a safe environment in which children and young people can learn. At West Hill Park School, pupils are taught about safeguarding, including online, through various teaching and learning opportunities, as part of providing a broad and balanced curriculum. Children are taught to recognise when they are at risk and how to get help when they need it. This includes engaging with the NSPCC [Speak Out Stay Safe, Share Aware Resources](#)
- Fulfilling our statutory responsibilities to identify children who may need extra help or who are suffering, or are likely to suffer, significant harm.

All action taken by the school will be in accordance with:

### **Legal framework:**

- The Children's Act –S47, S17
- Disqualification Under the Childcare Act 2006 amended 2018
- Education Act 2002 (s175)
- The Prevent Duty 2021

- Safeguarding Vulnerable Groups Act 2006
- Independent Schools Standards Regulations
- The Protection of Children Act 1999
- Data Protection Act 1998 • GDPR 2018
- The Education (Prohibition from Teaching or Working with Children) Regulations 2003.
- Keeping Children Safe in Education
- The Children and Families Act 2014
- The Counterterrorism and Security Act 2015

### **DfE Guidance that the School has regard to•**

Working Together to Safeguard Children (2018) (December 2020 changes), which sets out the multi-agency working arrangements to safeguard and promote the welfare of children and young people and protect them from harm; in addition, it sets out the statutory roles and responsibilities of schools.

- Keeping Children Safe in Education (2021) is statutory guidance issued by the Department for Education which all schools and schools must have regard to when carrying out their duties to safeguard and promote the welfare of children.
- The Teacher Standards (2012) which states that teachers, (including head teachers), should safeguard children’s wellbeing and maintain public trust in the teaching profession as part of their professional duties.

This policy applies to all members of West Hill Park School, while they are working at the school and those in our Early Years Foundation Stage (EYFS) setting. West Hill Park School is fully committed to ensuring that the application of this Safeguarding policy is non-discriminatory in line with the UK **Equality Act 2010**. This document has regard to DfE **Working Together to Safeguard Children 2018** updated December 2020 and **Prevent Duty Guidance: for England and Wales 2021**. It should also be read in conjunction with **What to do if you’re worried a child is being abused 2015 – Advice for practitioners**.

This policy complies with the procedures of Hampshire Children’s Services, which provides core multi-agency child protection procedures. We work in accordance with Hampshire Children’s Partnership Hampshire Police procedures. West Hill Park School keeps a record of all child protection allegations or concerns in accordance with Education (pupil information) (England) Regulations 2005. The Policy applies to all staff (teaching and non-teaching), contractors and volunteers working in the school. It should be read in conjunction with the following policies:

- Whistle blowing Policy (HG15)
- Code of Conduct for Staff (SG4)
- Prevention and Tackling of Bullying Policy (PG8)
- Tackling Extremism and Radicalisation (PG9c)
- Pupil Behaviour and Discipline Policy (PG7)
- Low Level Concerns Policy
- Mental Health Policy
- Physical Restraint Policy
- Children Missing Education Policy (PG19)
- E-Safety Policy and Electronic Device Acceptable Use Agreement (SG14)
- Acceptable use of ICT for staff
- Acceptable use of ICT for pupils

- Staff Recruitment and Selection (HGI)
- Health and Safety Policy (HSGI)

This policy cannot be separated from the general ethos of the school, which ensures that pupils are treated with respect and dignity, taught to treat each other with respect, feel safe, have a voice, and are listened to.

Staff members working with children are advised to maintain an attitude of ‘it could happen here’ where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the best interests of the child.

**For the avoidance of doubt, Corporal punishment is NOT to be used or THREATENED at any time or at any level within the school.**

### 3. TRAINING

#### i) Induction Training:

All staff, working directly with children will be provided with induction training that includes copies of the following policies:

- Safeguarding and Child Protection Policy
- Staff Code of Conduct
- Whistle Blowing Policy
- Low Level Concerns Policy
- Pupil Behaviour and Discipline Policy
- Online and E-Safety Policy and Electronic Device Acceptable Use Agreement
- Physical Restraint Policy
- Children Missing Education Policy
- Acceptable use of ICT for staff
- Acceptable use of ICT for pupils
- Safeguarding Risk Assessment: Welfare, Health and Safety Policy
- Details of the role of the Designated Safeguarding Lead and contact details, together with the details of the Deputies
- Safeguarding and Child Protection training, in accordance with the [Hampshire Safeguarding Children Partnership procedures](#)
- A copy of Keeping Children Safe in Education KCSIE (2021) Part I or Annex A and Annex B for school leaders and those who work directly with children.

#### i) Safeguarding and Child Protection Training:

- All staff, will receive a copy of this policy;
- All staff are required to read Part I of KCSIE and complete a questionnaire/quiz to evidence their understanding. Leaders and staff working directly with children also read Annex B.
- All staff members will undertake appropriate Safeguarding and Child Protection Training which will be updated regularly, in line with advice from IAPS and Hampshire Children’s Partnership. All staff will receive training in child protection and reminders in procedures and awareness on appointment and updated every two years or as changes to local/national procedures dictate. In addition, staff will receive an annual training update to provide them

with relevant skills and knowledge to safeguard children effectively. This may include a presentation, discussion forum and a Q& A session which is audited. Regular informal updates may be provided via staff meetings, emails or e-bulletins. These may include Prevent and on-line safety and current safeguarding issues.

- The school will ensure that at least one person on any appointment panel will have undertaken Safer Recruitment Training, in line with School Staffing (England) Regulations 2009. The School operates safer recruitment procedures, in compliance with Independent School Standards Regulations, and only employs staff with enhanced DBS checks and checks of identity, background, qualifications, references, medical fitness, any overseas checks and right to work in the UK. Appropriate checks are carried out to ensure that individuals are not disqualified under the Childcare (Disqualification) Regulations 2009 or the Prohibition from Management check.

Prohibition checks must be carried out:

- On former teachers (identifiable through their employment history) applying for teaching assistant roles.
- When a current member of staff moves from 'non-teaching work' into 'teaching work', even though they are not a new member of staff.
- West Hill Park School will not employ people to work in the EYFS, or in later years provision for children under the age of 8, if they are disqualified (disqualification includes: barred from working with children or cautioned, convicted, or charged with a violent or sexual offence); convictions are not considered 'spent' in this connection). Disqualification under the Child Care Act applies to staff themselves who work in a childcare capacity, whether paid, volunteer or are on work placements.
- Relevant staff are those working in childcare, or in a management role because they are: working with reception age children at any time; or working with children older than reception until age eight, outside school hours including breakfast clubs and after school care.
- This also applies to employees who are directly concerned in the management of such provision even though they may not work in the early years or relevant later years provision themselves. All staff must sign a self-declaration form to this effect.
- Staff are aware that the relationships and associations they have in school and outside (including online), may have an implication for the safeguarding of children in the school. Where this is the case, the member of staff must speak to the school.
- West Hill Park School is aware of the concerns around transferable risk and is alert to the signs that some professionals working with children may pose a risk to them: *'behaved or may have behaved in a way that indicates they may not be suitable to work with children'* (WTSC). This could include perpetrating domestic abuse.
- Additionally, the Designated Safeguarding Lead (DSL) will assess the appropriate level and focus for staff training and responsiveness to specific safeguarding concerns for example: Radicalisation, Child Sexual Exploitation, Child Criminal Exploitation, Female Genital Mutilation, Cyber bullying, Peer on Peer Abuse and Mental Health.

### iii) Designated Safeguarding Lead Training:

To perform their roles effectively, the Designated Safeguarding Leads and Deputy Designated Safeguarding Leads undertake Safeguarding and Child Protection training and training in interagency and multi-agency working and attend refresher training every two years. All training will be carried out in accordance Hampshire Children's Partnership procedures. Prevent Duty training will be consistent with the Home Office Workshop to Raise Awareness of Prevent (WRAP) training.

#### **4. THE ROLE OF THE DESIGNATED SAFEGUARDING LEAD (DSL)**

The Designated Safeguarding Lead (DSL) is a senior member of staff, who has lead responsibility for safeguarding and child protection within the school.

The following people have delegated responsibility to oversee Child Protection:

**Designated Safeguarding Lead (DSL) Mr Nicholas Roddis – Deputy Headmaster**  
School Tel: 01329 842356 email: [n.roddis@westhillpark.com](mailto:n.roddis@westhillpark.com)

**Deputy Designated Safeguarding Lead (DDSL) Mr Chris Ward - Headmaster**  
email: [headmaster@westhillpark.com](mailto:headmaster@westhillpark.com)

**Deputy Designated Safeguarding Lead (DDSL) Mrs Elizabeth Alway – Head of Boarding**  
email: [e.alway@westhillpark.com](mailto:e.alway@westhillpark.com)

**EYFS Designated Safeguarding Lead (EYFS DSL Nursery) Mrs Sarah Hall – Head of Pre-Prep** email: [s.hall@westhillpark.com](mailto:s.hall@westhillpark.com)

**Safeguarding Governor - Mrs Gill Sommers School Tel: 01329 842356**

All Governors will know the name of the DSL and the DSL responsible for EYFS, understand the role and appreciate their own responsibility for referring child protection concerns. Governors must also be aware of the procedures laid down in this policy. Governors, the Headteacher and all staff will receive regular child protection training at intervals of not more than three years.

Whilst the activities of the DSL can be delegated to appropriately trained Deputies, the ultimate lead responsibility for Safeguarding and Child Protection remains with the DSL.

If the DSL is not available, staff should speak to a member of the SLT and/or take advice from the local safeguarding children partnership.

The broad areas of responsibility for the DSL are:

- The DSL should be aware of the context within which safeguarding incidents and behaviours occur – this is known as **assessment of risk outside the home** or contextual safeguarding where an assessment of a child should consider whether wider environmental factors are a threat to their safety or welfare. For this reason, it is imperative that schools provide as much information as possible as part of the referral process. This is referred to in Working Together to Safeguard Children 2018 December 2020; and in Keeping Children Safe in Education.

- Managing referrals to other agencies, [Hampshire Children's Services](#) including cases of suspected abuse; the Channel Programme where there is a radicalisation concern; the Disclosure and Barring Service in cases where a person is dismissed or has left due to risk/harm to a child and the Police in cases where a crime may have been committed in relation to safeguarding. The DSL will also support and advise other staff in making referrals to other agencies.
- Work with others to fulfil statutory responsibilities in relation to children and young people subject to a child protection plan by attending child protection conferences and implementing multi-agency child protection plans.
- Liaise with the Local Authority Designated Officer (LADO) where there are concerns about staff conduct, or an allegation is made against a member of staff or volunteer at the school (N.B. if there is an allegation against the Head, then the Chair of Governors will liaise with the LADO).
- Raise awareness to ensure the Safeguarding and Child Protection Policy is known, understood and implemented appropriately across the school including parents. The DSL will also provide a termly report to the Governing body on Safeguarding and Child Protection activity within the school.
- Manage safeguarding information through the collection, monitoring, reviewing, safe storage and transfer of Safeguarding and Child Protection files in line with Hampshire guidelines.
- Ensure the availability of the DSL (or a Deputy) during term time and school hours for staff in the school to discuss any safeguarding concerns.
- Ensure appropriate cover is in place during holiday periods.
- Ensure that child protection information is transferred to the pupil's new school.

#### Safeguarding and Child Protection Policy

- Oversee Online and E- safety
- Be aware of pupils who have a social worker
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues with teachers and school and leadership staff
- Be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation
- Meet any other expectations set out for DSLs in KCSIE

#### **A more detailed description of the role of the DSL and the required training content is available in Keeping Children Safe in Education 2021 – Annex C.**

- The DSL attends appropriate inter-agency refresher training every two years;
- All other staff who work with children undertake regular safeguarding training;
- Temporary staff, contractors and volunteers are made aware of the school's arrangements for Safeguarding and Child Protection and their responsibilities;
- The school takes a risk-based approach to the level of information that is provided to temporary staff and volunteers;
- The school remedies any deficiencies or weaknesses brought to its attention without delay;
- The school has procedures for dealing with allegations of abuse against staff/volunteers;
- The school reviews its policies/procedures annually;



- A governor with interest in safeguarding is appointed to chair the Pastoral and Compliance Committee and will liaise with the Headmaster and DSL. The role is strategic rather than operational – they will not be involved in concerns about individual pupils;
- The DSL will produce a termly report for the Governing body and complete the annual safeguarding audit for the Local Authority.
- The Chairman of Governors is responsible for liaising with the Local Authority and other partner agencies in the event of allegations of abuse being made against the Headmaster.

## **5. ROLE OF THE GOVERNING BODY (Management and monitoring)**

The Governing Body of a school must:

- Sanction the Safeguarding and Child Protection Policy review the policy annually, monitor and evaluate its effectiveness and be satisfied that it is complied with
- Ensure that a DSL together with a nominated Governor for Child Protection are in place
- Ensure that there are safe and effective recruitment policies and disciplinary procedures in place which adhere to The Education (Prohibition from Teaching or Working with Children) Regulations.
- Recognise the importance of the role of the DSL and support them, ensuring the training necessary to be effective is undertaken and appreciate the additional duties taken on by the member of staff when carrying out this role especially when there are on-going Child Protection issues.
- Recognise the contribution the school can make to helping children keep safe through the teaching of self-protection skills and encouragement of responsible attitudes to adult life through the PSHE and RSE curriculum.
- Receive regular reports on patterns of use, searches, words and access denials flagged up by the IT filtering system

## **6. WHAT STAFF NEED TO KNOW**

All staff need to be aware of the systems within the school which support safeguarding and child protection. This forms part of the induction process but also on-going training which is regularly updated.

**All staff should:**

- Know how to contact the DSL, the Safeguarding Governor, and the Chair of the Governors
- Read and understand this policy and revisit it annually or when significantly amended
- Read and understand Part 1 of Keeping Children Safe in Education, and/or Annex A and Annex B for school leaders and those who work directly with children.
- Attend all relevant safeguarding training
- Be trained to manage a report of child-on-child sexual harassment
- Adhere to the school's Staff Code of Conduct
- Be aware of signs of abuse or neglect (see Appendix 1)
- Be aware of the process for making referrals to children's social care

- Be aware of the school's procedures and the Hampshire Early Help arrangements to identify those pupils in need of early intervention/help and take appropriate action where there are concerns for the welfare and protection of children and young people.

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

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

In regard to seeking parental consent for an Early Help assessment, the agreement of the child and parents is not required to share information for assessment, although it is important inform them that information is being shared and why: *'in cases where agreement to an early help assessment cannot be obtained, practitioners should consider how the needs of the child might be met. However, practitioners should still inform individuals that their data will be recorded and shared and the purpose explained to them.'* (WTSC)

**Report concerns about a child/young person immediately or as soon as it is practicable to the DSL; however, if a child is in immediate danger or is at risk of harm a referral should be made to children's services or the police immediately**

- Be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments. All staff should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines.
- Know what to do if a child tells them he/she is being abused or neglected. Staff should know how to manage the requirement to maintain an appropriate level of confidentiality whilst at the same time liaising with relevant professionals such as the DSL and children's services.

Staff should never promise a child that they will not tell anyone about an allegation, as this may ultimately not be in the best interests of the child.

- Be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. School staff are not expected or trained to diagnose mental health conditions or issues but may notice behaviours that may be of concern. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by speaking to the designated safeguarding lead or a deputy.
- Be aware of whistle blowing procedures if they have concerns about safeguarding practices within the School. Where a staff member feels unable to raise an issue with the senior leadership team, or feels that their genuine concerns are not being addressed, they should contact the Chairman of the Governing body (The NSPCC Whistle blowing helpline is also available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – the line is available from 8:00AM to 8:00PM, Monday to Friday, or they can get in touch via email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)).
- It is mandatory that teachers must **personally** report to the Police cases of suspected Female Genital Mutilation (FGM).
- Report their concerns to the DSL if they think a pupil may be at risk of radicalisation or involved in terrorism.
- Report any potential safeguarding concerns about an individual's behaviour towards children and young people immediately.
- At West Hill Park School, we recognise the possibility that adults working in the school may harm children, including governors, volunteers, supply teachers and agency staff. Allegations or concerns about colleagues and visitors must be reported directly to the Headmaster or, in the Head's absence, the chair of the Governing Body. If the concern relates to the Head, it should be reported to the chair of the Governing Body, (without first informing the Head) who will liaise with the Local Authority Designated Officer (LADO) to decide on any action required. In cases of serious harm the police will be informed from the outset.
- The guidance in KCSIE (Part Four) should be followed where it is alleged that anyone working in the school, including supply teachers and volunteers has:
  - behaved in a way that has harmed a child, or may have harmed a child;
  - possibly committed a criminal offence against or related to a child;
  - behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or behaved or may have behaved in a way that indicates they may not be suitable to work with children.
- Be aware that if staff are employed under provisions covered by the Childcare Regulations 2009 and fall within the scope of Childcare Act 2018, they must complete a self-declaration form in addition to the enhanced DBS. At West Hill Park School, this also applies to employees who are directly concerned in the management of such provision even though they may not work in the early years or relevant later year's provision themselves. Later year's provision covers childcare that is provided outside of school hours, including Before School Clubs and After School Care. All staff must sign a self-declaration form to this effect.

## **7. PROCEDURES FOR HANDLING AND REPORTING CONCERNS:**

Every disclosure or suspicion of abuse from within or outside the school will be taken seriously and action taken in accordance with this policy. **Anyone can make a referral.**

If a child is in immediate danger or is at risk of harm, a referral should be made to [Hampshire Safeguarding Children Partnership](#) and/or the Police immediately. Where referrals are not made by the DSL, they should be informed, as soon as possible that a referral has been made.

When abuse is disclosed, observed or suspected, staff or volunteers should refer the matter to the School's DSL as soon as possible, the expectation **being within one working day**. If a member of staff suspects or hears a disclosure of abuse, the following procedures must be followed:

- Stay calm. Listen with care, reassurance, seriousness and sincerity and keep an open mind. Do not take a decision as to whether or not the abuse has taken place.
- Do not communicate shock, anger, or embarrassment.
- Do not interrupt when the child is recalling significant events.
- Reassure the child. Tell him/her that you are pleased that they are speaking to you. It is essential that all alleged 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. Abuse that occurs online or outside of the school should not be downplayed and should be treated equally seriously. 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.
- Do not ask leading or closed questions. Instead, ask open questions e.g. "How did this make you feel?"
- Take care not to make assumptions about what the pupil is saying and do not make suggestions to the pupil as to an alternative explanation for their concerns.
- Do not promise absolute confidentiality to a pupil who makes a disclosure but make clear to the pupil that you will need to pass on what has been told to ensure the protection of the child concerned. Within this context, the pupil should be assured that the matter will be disclosed only to people who need to know.
- Check that you have correctly understood what the child is trying to tell you. Listen and remember.
- Write an accurate and contemporary record of the conversation using the child's own language. The record should include; the date and time; the place of the conversation; the essence of what was said and done by whom and in whose presence. Do not add opinions or interpretations. The written record of the disclosure should be signed and dated.
- Concern forms can be obtained directly from the DSL. There are separate forms for reporting peer-on-peer abuse and sexual violence and sexual harassment and harmful sexual behaviours.
- Report this information to the DSL.
- All evidence, for example, notes, mobile phones containing text messages, clothing, computers, must be safeguarded, preserved, and passed to the DSL.
- All suspicions or complaints of abuse must be reported to the DSL, or a Deputy, as soon as possible, so that it may be reported to [Hampshire Safeguarding Children Partnership](#) (or other safeguarding board) within 24 hours, unless the allegation is against a member of staff (see the procedures - Dealing with Allegations against Staff, the Head, or Volunteers).

- If the DSL is not available, staff should speak to a member of the SLT and/or take advice from local children's social care (KCSIE (2021))
- Under no circumstances should staff seek to investigate the claims further themselves.
- All information should be recorded on CPOMS

**Recognise → Respond → Reassure → Refer → Record**

Immediately after an allegation/disclosure is made, the Designated Safeguarding Lead will:

- obtain written details of the allegation, signed, and dated, from the person who received the allegation. All verbal conversations should be **promptly** recorded in writing.
- record any information about times, dates, locations, and names of potential witnesses.
- where appropriate, talk to the child concerned.

All information should be recorded on CPOMS

- i) **Involving Parents and Carers:** In general, the DSL will discuss any child protection concerns with parents/carers before approaching other agencies and will seek their consent to making a referral to another agency. However, there may be occasions when the school will contact another agency before informing parents/carers, because it considers that contacting them may increase the risk of significant harm to the child. *'The Data Protection Act 2018 and General Data Protection Regulations (GDPR) do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children.'* (WTSC)
- ii) **Multi Agency Working:** Staff work in partnership with other agencies in the best interests of the children. If there are Child Protection concerns, referrals should be made by the DSL (or Deputy DSL) to [Hampshire Children's Services](#). Where the child already has a social worker, the request for service should go immediately to the social worker involved or, in their absence, to their team manager. West Hill Park School will co-operate with any child protection enquiries conducted by children's social care: the school will ensure representation at appropriate inter-agency meetings such as integrated support plan meetings, initial and review child protection conferences and core group meetings. Where a pupil is subject to an inter-agency child protection plan or a Multi-Agency Risk Assessment Conference (MARAC) meeting, the school will contribute to the preparation, implementation, and review of the plan as appropriate.
- iii) **Exclusions:** When the school is considering excluding, either fixed term or permanently, a vulnerable pupil and/or a pupil who is the subject of a child protection plan, or where there is an existing child protection file, the school will call a multi-agency risk-assessment meeting prior to making the decision to exclude. In the event of a one-off serious incident resulting in an immediate decision to exclude, the risk assessment must be completed prior to convening a meeting of the Pastoral and Compliance Committee.
- iv) All staff are particularly reminded that:

- Teachers must report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should still consider and discuss any such case with DSL.
- Normal referral processes must be used when there are concerns about children who may be at risk of being drawn into terrorism.
- Detailed guidance is given to staff and volunteers to ensure that their behaviour and actions do not place pupils or themselves at risk of harm or of allegations of harm to a pupil. This guidance is contained in the Staff Code of Conduct.
- This includes, whenever possible, staff should avoid occasions where a single adult is in the company of a lone child, particularly where there is little, or no possibility of the activity being supervised or observed.
- Staff employed by other organisations working directly with our pupils on or off the site are subject to (DBS) checks in written form and logged on the Single Central Register of appointments.
- Do not allow an unknown adult access to children: a known person should accompany visitors: see Visitors' Policy.
- Activities that involve lone children working with an adult should take place where they can be easily observed. Viewing panes are installed in most rooms and doors should be left open. Physical contact should be kept to a minimum and only used when there is a genuine reason in relation to the activity or event e.g. First Aid, Physical Education, Swimming.
- Staff should choose their words carefully so they cannot be misconstrued, and they should avoid belittling or making jokes at the expense of children.

Staff and volunteers should also feel able to follow the school's separate Whistle Blowing Policy to raise concerns about poor or unsafe safeguarding practices at the school, potential failures by the school or its staff to properly safeguard the welfare of pupils or other wrongdoing in the workplace that does not involve the safeguarding and welfare of children.

**West Hill Park School understands its duty towards a member of staff 'whistle blowing' in good faith; they will be provided with immunity from retribution or disciplinary action (for further information see Whistle Blowing policy)**

## **8. DEALING WITH ALLEGATIONS AGAINST STAFF, THE HEAD OR VOLUNTEERS**

At West Hill Park School we recognise the possibility that adults working in the school may harm children, including governors, volunteers, supply teachers and agency staff.

The school's procedures for dealing with allegations made against staff will be used where the member of staff, the Head, or volunteer has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child; or
- behaved towards a child or children in a way that indicates he or she would 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 (also includes behaviour outside the school).

Any allegations meeting one of the above criteria will be dealt with in accordance with the Hampshire Children's Partnership procedures. The LADO's role is to provide advice and guidance, liaise with the Police and other agencies, if involved, and monitor the progress of cases to ensure they are dealt with as quickly as possible, consistent with a thorough and fair process.

Allegations against a teacher who is no longer teaching, historical allegations, including allegations relating to former pupils and all allegations where a criminal offence may have been committed will be referred to the Police.

Where an allegation or complaint is made against any current member of staff, or volunteer, the matter should be reported directly to the Headmaster. The Headmaster will consult with the Designated Safeguarding Lead and the Local Authority Designated Officer (LADO) before further action is taken. Concerns may come from various sources, for example, a suspicion; complaint; or disclosure made by a child, parent, or other adult within or outside of the organisation; or because of vetting checks undertaken.

If there is a conflict of interest in reporting a concern to the Headmaster the LADO should be contacted directly.

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

The Headmaster has to decide whether the concern is an allegation or low-level concern. The term 'low-level' concern does not mean that it is insignificant; it means that the behaviour towards a child does not meet the threshold for referral to the Local Authority Designated Officer (LADO)

If the allegation relates to the Designated Safeguarding Lead the matter should be reported directly to the Headmaster.

If the allegation relates to the Headmaster then this should be reported to the Chair of the Governing body (without first informing the Head). The Chair of the Governing body will then liaise with the LADO to decide on any action required.

The LADO must be informed within 24 hours of all allegations that come to the school's attention or that are made directly to the Police.

Before contacting the LADO, the school will conduct basic enquiries in line with local procedures to establish the facts to help them determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation.

The LADO's role is not to investigate the allegation, but to ensure that an appropriate investigation is carried out, whether that is by the police, children's social care, the school, or a combination of these.

### **Low-level Concerns (see Low-Level Concerns Policy)**

Concerns may be graded Low-level if the concern does not meet the criteria for an allegation; and the person has acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work. Example behaviours include, but are not limited to:

- being over familiar with children;

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

If the concern has been raised via a third party, the Headmaster will collect as much evidence as possible by speaking:

- directly to the person who raised the concern unless it has been raised anonymously.
- to the individual involved and any witnesses.

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

Staff should be encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

Low-level concerns should be recorded in writing, including:

- name\* of individual sharing their concerns details of the concern
- context in which the concern arose
- action taken

(\* if the individual wishes to remain anonymous then that should be respected as far as reasonably possible)

Records must be kept confidential, held securely and comply with the Data Protection Act 2018. Schools should decide how long they retain such information, but it is recommended that it is kept at least until the individual leaves their employment.

Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.

If a concerning pattern of behaviour is identified and now meets the criteria for an allegation, then the matter should be referred to the LADO.

The records' review might identify that there are wider cultural issues within the school that enabled the behaviour to occur. This might mean that policies or processes could be revised or extra training delivered to minimise the risk of it happening again.

### **Further action to be taken by the school:**

The school has a duty of care towards its employees and as such, it must ensure that effective support is provided for anyone facing an allegation. The school will take action in accordance with Part Four of Keeping Children Safe in Education (2021) and the school's employment procedures. Suspension will not be an automatic response to an allegation. The LADO will be consulted as to the



appropriate action to take and full consideration will be given to all the options, subject to the need to ensure:

- the safety and welfare of the pupils or pupil concerned
- the need for a full and fair investigation.

All investigations will be conducted as speedily as possible without compromising thoroughness. Arrangements will be made for the member of staff or representative to be contacted regularly with information on progress.

i) **Ceasing to use staff:** If the school ceases to use the services of a member of staff or volunteer because they are unsuitable to work with children, a settlement/compromise agreement will not be used and a referral to the Disclosure and Barring Service will be made as soon as possible if the criteria are met. Any such incidents will be followed by a review of the safeguarding procedures within the school, with a report being presented to the Governing body without delay.

If a member of staff or volunteer tenders his or her resignation, or ceases to provide his or her services, any child protection allegations will still be followed up by the school in accordance with this policy and a referral will be made to the Disclosure and Barring Service (DBS) as soon as possible if the criteria are met.

Where a teacher has been dismissed, or would have been dismissed had he/she not resigned, separate consideration will be given as to whether a referral to the Teaching Regulation Agency (TRA) should be made.

ii) **Unsubstantiated, false or malicious allegations:** Where an allegation by a pupil is shown to have been deliberately invented or malicious, the Head will consider whether to take disciplinary action in accordance with the School's behaviour and discipline policies. Where a parent has made a deliberately invented or malicious allegation the Headmaster will consider whether to require that parent to withdraw their child or children from the school on the basis that they have treated the school or a member of staff unreasonably.

Whether or not the person making the allegation is a pupil or a parent (or another member of the public), the school reserves the right to contact the Police to determine whether any action might be appropriate.

iii) **Record keeping:** Details of allegations found to be malicious will be removed from personnel records.

For all other allegations, full details will be recorded on the confidential personnel file of the person accused. The record will be retained at least until the individual has reached normal pension age or for a period of ten years from the date of the allegation, if this is longer. An allegation proven to be false, unsubstantiated or malicious will not be referred to in employer references. In accordance with Keeping Children Safe in Education (2021), a history of repeated concerns or allegations which have all been found to be false, unsubstantiated or malicious will also not be included in any reference.

## **9. DEALING WITH ALLEGATIONS AGAINST PUPILS**

It is essential that any allegation of abuse made by a pupil against other pupil/pupils in the school is dealt with fairly, quickly, and consistently, in a way that provides effective protection for all the children involved. 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 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.

When there has been abuse by one or more pupils against another pupil and where there is reasonable cause to suspect that a child is suffering or likely to suffer significant harm, the school will apply the following procedures and refer to Hampshire Safeguarding Children Partnership guidance:

Further referral procedures are outlined in the [Hampshire Safeguarding Children Partnership](#):

The DSL will take advice from Hampshire Safeguarding Children Partnership on the investigation of such allegations as a child protection concern and will take all appropriate action to ensure the safety and welfare of all pupils involved.

The DSL will undertake a risk assessment in respect of the alleged perpetrator and victim, which will in turn inform any decision to suspend an alleged perpetrator from the school during the investigation and the appropriate school policies on behaviour, discipline and sanctions will thereafter apply.

If it is necessary for a pupil to be interviewed by the Police in relation to allegations of abuse, the school will ensure that, subject to the advice of the Hampshire Safeguarding Children Partnership, the pupil's parents are informed as soon as possible, and that the pupil is supported during the interview by an appropriate adult. In the case of pupils whose parents are abroad, a guardian will be requested to provide support to the pupil and to accommodate them if it is necessary to suspend them during the investigation.

## **10. INFORMING PARENTS**

Parents will normally be kept informed as appropriate of any action to be taken under these procedures. However, there may be circumstances when the Designated Safeguarding Lead will need to consult the Head, the LADO, children's social care and/or the Police before discussing details with parents. In relation to Channel referrals, the DSL will consider seeking the consent of the pupil (or their parent/guardian) when determining what information can be shared. Whether or not consent is sought will depend on the circumstances of the case but may relate to issues such as the health of the individual, law enforcement or protection of the public.

## **11. MISSING CHILD PROCEDURES**

All staff are informed of the separate procedure to be used for searching for, and if necessary, reporting any pupil missing from the School. The procedure includes the requirement to record any incident, the action taken and the reasons given by the pupil for being missing.

Please see the school's separate Children Missing Education Policy for further details.

## **12. PUPIL SUPPORT**

Pupils are advised as to whom they can turn if they need help, for example, all staff and the school counsellor, the Independent Listener, the school Reverend, medical staff, and outside agencies. They are also advised that, if they have concerns which have not been addressed, then they can contact the Office of the Children's Rights Director (0800 528 0731) and/or Childline.

Opportunities are provided for pupils to develop skills, concepts, attitudes, and knowledge that promote their safety, mental health, and wellbeing. Relevant issues are supported through the curriculum, specifically in PSHE/RSE, to explore key areas such as self-esteem, emotional literacy, assertiveness, power, sex and relationship education, e-safety, and bullying. Children are taught to recognise when they are at risk and how to get help when they need it.

## **13. SHARING OF INFORMATION**

Sharing information is an intrinsic part of any practitioners' job when working with children and young people. The decisions about how much information to share, with whom and when, can have a profound impact on individuals' lives. Information sharing helps to ensure that an individual receives the right services at the right time and prevents a need from becoming more acute and difficult to meet. Poor or non-existent information sharing is a factor repeatedly identified as an issue in Serious Case Reviews (SCRs) carried out following the death of or serious injury to, a child. In some situations, sharing information can be the difference between life and death. Fears about sharing information cannot be allowed to stand in the way of the need to safeguard and promote the welfare of children at risk of abuse or neglect. Every practitioner must take responsibility for sharing the information they hold, and cannot assume that someone else will pass on information, which may be critical to keeping a child safe. This includes allowing practitioners to share information without consent.

The school's information sharing policy is based on the guidance document 'Information sharing: advice for practitioners providing safeguarding services' (DfE, 2018).

'The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe.' (Keeping Children Safe in Education 2021). This includes:

The understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data. This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner, but it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.

## **14. E-SAFETY AND SAFEGUARDING CHILDREN**

Staff should be aware of the dangers posed to children and young people in relation to 'youth produced sexual imagery'. These terms refer to messages, photos and videos of a sexual nature created by children or young people which can be shared via mobile phones, the internet and social

media. Staff should report any concerns regarding sexting and youth produced sexual imagery immediately to the DSL.

Staff can refer to UK Council for Child Internet Safety (UKCCIS) 'Sharing nudes and semi-nudes: advice for education settings working with children and young people.'

#### **I4a Mobile Phones and cameras in the EYFS**

The EYFS is a designated 'mobile free area', and signs to this effect are to be displayed throughout. Smart watches with cameras are not permitted in this area. School tablets are used for an online learning journal and are kept on site and monitored by the Head of Pre-Prep. See Mobile Phone Policy in EYFS.

## **15. UNDERSTANDING ABUSE AND ITS MAIN INDICATORS**

### **Abuse**

Abuse constitutes a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm on them or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children.

All staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.

### **Categories of Abuse**

The following categories of abuse are recognised for the purposes of the child protection register.

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

**Emotional abuse:** the persistent emotional maltreatment of a child so as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), 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.

**Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as peer on peer or child on child abuse) in education and all staff should be aware of it and of their school policy and procedures for dealing with it.

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

**Historical abuse:** There may be occasions when a child or adult discloses abuse which occurred in the past. This 'historical abuse' must be treated in exactly the same way as a disclosure or suspicion of current child abuse; the abuser may still represent a risk to children now.

Possible signs of abuse include, but are not limited to:

- The pupil says he/she has been abused or asks a question or makes a comment which gives rise to that inference;
- There is no reasonable or consistent explanation for a pupil's injury, the injury is unusual in kind or location or there have been a number of injuries and there is a pattern to the injuries
- The pupil's behaviour stands out from the group as either being extreme model behaviour or extremely challenging behaviour, or there is a sudden or significant change in the pupil's behaviour;
- The pupil asks to drop subjects with a particular teacher and seems reluctant to discuss the reasons;
- The pupil's development is delayed, the pupil loses or gains weight or there is deterioration in the pupil's general wellbeing;
- The pupil appears neglected, e.g. dirty, hungry, inadequately clothed;
- The pupil is reluctant to go home, or has been openly rejected by his/her parents or carers;
- Inappropriate behaviour displayed by other members of staff or any other person working with children, for example inappropriate sexual comments; excessive one to one attention

beyond the requirements of their usual role or responsibilities; or inappropriate sharing of images.

[The Hampshire Safeguarding Children Partnership](#) can provide advice on the signs of abuse and the DfE advice 'What to do if you're worried a child is being abused' (2015) provides advice in identifying child abuse. The NSPCC website is also a good source of information and advice: <https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/>

Certain pupils within school are more likely to be identified as requiring extra support to meet their safeguarding needs; these could include children in care, young carers, those living in households where there is domestic abuse, and/or substance misuse, those with Special Educational Needs etc. It is therefore important that those at greater risk are identified, regularly monitored and appropriate measures put in place to support their needs.

### **Safeguarding issues:**

All staff at West Hill Park have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education and consensual and non-consensual sharing of nudes and semi-nudes images and/or videos can be signs that children are at risk. Other safeguarding issues all staff should be aware of include:

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

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

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

CCE occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity

- (a) in exchange for something the victim needs or wants, and/or
- (b) for the financial or other advantage of the perpetrator or facilitator and/or
- (c) through violence or the threat of violence.

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. CCE does not always involve physical contact; it can also occur through the use of technology.

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.

Some of the following can be indicators of CCE:

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

Further information about CCE including definitions and indicators is included in Annex B KCSIE 2021

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

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

Indicators of child sexual exploitation may include:

- Acquisition of money, clothes, mobile phones, etc. without plausible explanation;
- Gang-association and/or isolation from peers/social networks;
- Exclusion or unexplained absences from school, college or work;
- Leaving home/care without explanation and persistently going missing or returning late;
- Excessive receipt of texts/phone calls;
- Returning home under the influence of drugs/alcohol;
- Inappropriate sexualised behaviour for age/sexually transmitted infections;
- Evidence of/suspicions of physical or sexual assault;
- Relationships with controlling or significantly older individuals or groups;
- Multiple callers (unknown adults or peers);
- Frequenting areas known for sex work;
- Concerning use of internet or other social media;

- Increasing secretiveness around behaviours; and
- Self-harm or significant changes in emotional well-being.

Potential vulnerabilities include:

Although the following vulnerabilities increase the risk of child sexual exploitation, it must be remembered that not all children with these indicators will be exploited. Child sexual exploitation can occur without any of these issues.

- Having a prior experience of neglect, physical and/or sexual abuse;
- Lack of a safe/stable home environment, now or in the past (domestic violence or parental substance misuse, mental health issues or criminality, for example);
- Recent bereavement or loss;
- Social isolation or social difficulties;
- Absence of a safe environment to explore sexuality;
- Economic vulnerability;
- Homelessness or insecure accommodation status;
- Connections with other children and young people who are being sexually exploited;
- Family members or other connections involved in adult sex work;
- Having a physical or learning disability;
- Being in care (particularly those in residential care and those with interrupted care histories); and
- Sexual identity.

More information can be found in: *Child Sexual Exploitation: Definition and a guide for practitioners* (DfE 2017)

**Online Sexual Abuse:** The use of technology to manipulate, exploit, coerce or intimidate a child to (but not limited to): engage in sexual activity; produce sexual material/content; force a child to look at or watch sexual activities; encourage a child to behave in sexually inappropriate ways; or groom a child in preparation for sexual abuse (either online or offline). It can also involve directing others to, or coordinating, the abuse of children online. As with other forms of sexual abuse, online abuse can be misunderstood by the child and others as being consensual, occurring without the child's immediate recognition or understanding of abusive or exploitative conduct. In addition, fear of what might happen if they do not comply can also be a significant influencing factor. No child under the age of 18 can consent to being abused or exploited. Financial gain can be a feature of online child sexual abuse, it can involve serious organised crime and it can be carried out by either adults or peers.

**Online safety:** The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm. All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life. Children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content. An effective approach



to online safety empowers a school to protect and educate the whole school or college community in their use of technology and establishes mechanisms to identify intervene in and escalate any incident where appropriate. Abuse can take place wholly online or technology may be used to facilitate offline abuse.

The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

- content: being exposed to illegal, inappropriate or harmful material;
- contact: being subjected to harmful online interaction with other users; and
- conduct: personal online behaviour that increases the likelihood of, or causes, harm.
- commerce: young people can be unaware of hidden costs and advertising in apps, games, and websites

West Hill Park School is doing all that they reasonably can to limit children's exposure to the above risks from the school's IT system. Our IT system ensures appropriate filters and monitoring systems are in place (DNA and Smoothwall).

### **Online learning whilst out-of-school:**

West Hill Park School is aware of the potential risks with remote teaching and have these safety considerations in place:

- Pupils will be provided with a school Google Classroom or a username and password.
- Pupils are reminded to always keep their login to this facility private and that they don't share their account with anyone.
- Many VLEs include a chat function or message boards, etc. It is important for parents and staff to monitor the use of these facilities and that children understand what is appropriate to write online. Pupils are reminded these messages will be visible to the school staff and they shouldn't put anything in a message, that they wouldn't want anyone else to see.
- It's important to remind children of their conduct online. As a member of the VLE, they share a digital environment, and their behaviour impacts the success of the online school community.

### **Female Genital Mutilation (FGM):**

Female genital mutilation refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK.

FGM is a form of child abuse and violence against women, with long lasting physical and psychological consequences. It particularly affects girls from North Africa, the Middle East and Asia.

FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8.

People found guilty of allowing FGM to take place are punishable by fines and up to 14 years in prison. All requests for extended leave or circumstances where a child is known to be going to a practising country of origin outside term time should be reported to Access and Response.

Risk factors for FGM include:

- She has a parent from a practising community;
- She and her family have a low level of integration into a community;
- The mother or any sisters have experienced FGM;
- She is withdrawn from her peers and social group;
- She has been withdrawn from PSHE/RSE lessons;
- She has talked about, or you know about, the arrival of a female family elder;
- She talks about it to other children;
- She refers to a 'special procedure' or 'special occasion' or 'becoming a woman';
- She is out of the country for a prolonged period (holidays of six weeks to two months or more);
- She is taking a long holiday to her country of origin or another country where the practice is prevalent (parents may talk about it too).

### **Symptoms of FGM**

FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents wish to take their daughter out-of-school to visit an 'at-risk' country (especially before the summer holidays), or parents who wish to withdraw their children from learning about FGM. Staff should not assume that FGM only happens outside the UK.

Indications that FGM may have already taken place may include:

- difficulty walking, sitting, or standing and may even look uncomfortable.
- spending longer than normal in the bathroom or toilet due to difficulties urinating.
- spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- frequent urinary, menstrual or stomach problems.
- prolonged or repeated absences from school or college, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return
- reluctance to undergo normal medical examinations.
- confiding in a professional without being explicit about the problem due to embarrassment or fear.
- talking about pain or discomfort between her legs

The Serious Crime Act 2015 sets out a duty on professionals (including teachers) to notify police when they discover that FGM appears to have been carried out on a girl under 18. In schools, this will usually come from a disclosure (unlike in the medical profession where an observation may have been made).

Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out; and discuss any such cases with the safeguarding lead and children's social care. The duty does not apply in relation to at risk or suspected cases.

Further Information:

- Staff can contact the NSPCC FGM hotline for support (Tel 0800 028 3550) or email: fgmhelp@nspcc.org.uk
- Please see the HM Government Multi Agency Statutory Guidance on Female Genital Mutilation

### **Radicalisation and the Prevent Duty:**

As part of the Counter Terrorism and Security Act 2015, the school has a legal duty to have due regard to the need to prevent people from being drawn into terrorism. The school aims to build pupils' resilience to radicalisation by teaching the school's core values alongside the fundamental British values, whilst making a positive contribution to the development of a fair, just and civil society. The school is committed to providing a safe space in which children, young people and staff can understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments. We use the curriculum to ensure that children and young people understand how people with extreme views share these with others, especially using the internet.

West Hill Park School has adopted the Government's definitions for the purposes of compliance with the Prevent Duty:

- Extremism: vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.
- Radicalisation: the process by which a person comes to support terrorism and forms of extremism leading to terrorism.

There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology. As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may need help or protection.

Children at risk of radicalisation may display different signs or seek to hide their views.

### **Recognising Extremism**

Early indicators of radicalisation or extremism may include:

- showing sympathy for extremist causes
- glorifying violence, especially to other faiths or cultures
- making remarks or comments about being at extremist events or rallies outside school
- evidence of possessing illegal or extremist literature
- advocating messages similar to illegal organisations or other extremist groups
- out of character changes in dress, behaviour, and peer relationships (but there are also very powerful narratives, programmes, and networks that young people can come across online so involvement with groups may not be apparent.)
- secretive behaviour
- online searches or sharing extremist messages or social profiles
- intolerance of difference, including faith, culture, gender, race, or sexuality
- graffiti, artwork or writing that displays extremist themes

- attempts to impose extremist views or practices on others
- verbalising anti-Western or anti-British views
- advocating violence towards others

School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately. In particular, outward expressions of faith, in the absence of any other indicator of vulnerability, will not be regarded as a reason to make a referral to Channel.

### **Channel Duty Guidance:**

Protecting vulnerable people from being drawn into terrorism (2020) notes that "there is no single way of identifying who is likely to be vulnerable to being drawn into terrorism. Factors that may have a bearing on someone becoming vulnerable may include: peer pressure, influence from other people or via the internet, bullying, crime against them or their involvement in crime, anti-social behaviour, family tensions, race/hate crime, lack of self-esteem or identity and personal or political grievances."

Protecting children from the risk of radicalisation is part of the school's wider safeguarding duties and is similar in nature to protecting children from other harms (e.g., drugs, gangs, neglect, sexual exploitation), whether these come from within their family or are the product of outside influences.

Staff should report any concerns immediately to the Designated Safeguarding Lead or call 101 (999 if the child is at immediate risk of harm). The DSL has received training about the Prevent Duty and tackling extremism and is able to support staff with any concerns they may have.

For advice and guidance in making a referral, or about a pupil who is causing concern, staff can contact Hants Direct Prevent on 03005551384 or dial 101 (ask for the 'Prevent Team' explain you are calling about extremism/radicalisation), or email [prevent.engagement@hampshire.pnn.police.uk](mailto:prevent.engagement@hampshire.pnn.police.uk).

A dedicated DfE telephone helpline and mailbox is also available for non-emergency advice for staff and governors: 020 7340 7264 and [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk)

**Additional support.** There is further advice for schools on the Prevent duty. The advice is intended to complement the Prevent guidance and signposts to other sources of advice and support.

[Educate Against Hate](#), is a government website designed to support schoolteachers and leaders to help them safeguard their students from radicalisation and extremism. The platform provides free information and resources to help school staff identify and address the risks, as well as build resilience to radicalisation.

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

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

**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.

**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.

**Children Missing from Education:** A child going missing from education is a potential indicator of abuse or neglect and may also raise concerns about others safeguarding issues, including the criminal exploitation of children. School staff should follow the school's procedures for unauthorised absence and for dealing with children that go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of their going missing in future.

All schools must inform the local authority of any pupil who fails to attend school regularly or has been absent without the school's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the school and the local authority.

At West Hill Park School, we monitor attendance carefully and address poor or irregular attendance without delay. Any concerns are reported to the Hampshire Children Missing Education Tracking Officer on 01962 845363 or [cme@hants.gov.uk](mailto:cme@hants.gov.uk).

We will always follow up with parents/carers when pupils are not at school. This means we need to have a least two up to date contacts numbers for parents/carers. Parents should remember to update the school as soon as possible if the numbers change.

In response to the guidance in Keeping Children Safe in Education (2021) the school has:

- Staff who understand what to do when children do not attend regularly
- Appropriate policies, procedures and responses for pupils who go missing from education (especially on repeat occasions).
- Staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriage.
- Procedures to inform the local authority when we plan to take pupils off-roll when they:
  - a. leave school to be home educated
  - b. move away from the school's location
  - c. remain medically unfit beyond compulsory school age
  - d. are in custody for four months or more (and will not return to school afterwards); or
  - e. are permanently excluded

We ensure that pupils who are expected to attend the school but fail to take up the place will be referred to the local authority.

When a pupil leaves the school, we record the name of the pupil's new school and their expected start date.

**Mental health and possible links to safeguarding and child protection:** All staff at West Hill Park School are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

West Hill Park has two Mental Health First Aiders who are trained to offer support for children and adults.

School staff are not expected or trained to diagnose mental health conditions or issues but may notice behaviours that may be of concern.

School staff need to 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. Where staff have a mental health concern about a child that may also be a safeguarding concern, they should raise the issue by informing the designated safeguarding lead or deputy.

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

Childline: Call 0800 1111 to talk to anyone at any time for free

**Domestic Abuse:** In April 2021, the Domestic Abuse Act 2021 received Royal Assent and introduced a statutory definition for the first time.

#### Definition

The Domestic Abuse Act 2021 (Part 1) defines domestic abuse as any of the following behaviours, either as a pattern of behaviour, or as a single incident, between two people over the age of 16, who are 'personally connected' to each other:

- a) physical or sexual abuse.
- b) violent or threatening behaviour.
- c) controlling or coercive behaviour.
- d) economic abuse (adverse effect of the victim to acquire, use or maintain money or other property; or obtain goods or services); and
- e) psychological, emotional, or other abuse.

People are 'personally connected' when they are, or have been married to each other or civil partners; or have agreed to marry or become civil partners. If the two people have been in an intimate relationship with each other, have shared parental responsibility for the same child, or they are relatives.

The [definition of Domestic Abuse](#) applies to children if they see or hear, or experience the effects of, the abuse; and they are related to the abusive person.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

The National Domestic Abuse helpline can be called free of charge and in confidence, 24 hours a day on 0808 2000 247.

**Children who have a social worker who have a potentially greater risk of harm:** At West Hill Park School, we recognise that when a child has a social worker, it is an indicator that the child is more at risk than most pupils. This may mean that they are more vulnerable to further harm, as well as facing educational barriers to attendance, learning, behaviour, and poor mental health. We take these needs into account when making plans to support pupils who have a social worker.

The DSL will liaise with the social worker to ensure all information is shared.

## **16. KEY SAFEGUARDING AREAS**

In addition to the above, there are other key areas of safeguarding that the school has a responsibility to address and these include:

**Bullying:** All types of bullying, including cyber bullying, prejudiced or discriminatory bullying. Bullying or abuse should never be dismissed as “banter” or “part of growing up”. West Hill Park School has a separate Anti-Bullying Policy.

**Forced Marriage:** Forced marriage is not the same as an arranged marriage, as it involves coercion and force as opposed to a marriage based on free choice. It affects both males and females.

**Child and Adolescent Mental Health:** Good mental health and resilience are fundamental to our pupils’ physical health, relationships, education and to achieving their potential.

**Gangs and Youth Violence:** Teachers and designated staff have a range of powers in relation to discipline to tackle problems, including violence, in the school environment. Such powers cover disciplinary actions, the power to restrain violent pupils, and the power to search pupils for prohibited items.

**Drugs:** As part of School’s duty to promote pupils’ wellbeing, we have a role to play in preventing drug misuse as part of our pastoral responsibilities (Health and Wellbeing/Healthy Schools) and to support the Government’s Drug Strategy (2010) to provide information, advice and support to pupils via the curriculum.

**Fabricated Induced Illness:** This supplementary guidance, [Safeguarding Children in whom Illness is Fabricated or Induced](#) (2018), sets out a national framework within which agencies and professionals at local level – individually and jointly – draw up and agree upon their own more detailed ways of working together where illness may be being fabricated or induced in a child by a carer who has parenting responsibilities for them.

**Modern Slavery and the National Referral Mechanism:** Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance. Modern slavery: how to identify and support victims - GOV.UK ([www.gov.uk](http://www.gov.uk))

**Cybercrime:** is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include;

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

**Sexual violence and sexual harassment:** Sexual violence and sexual harassment can occur between two children of any sex. They can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Schools and colleges should consider the following:

- It is more likely that girls will be the victims of sexual violence and more likely that sexual harassment will be perpetrated by boys.

West Hill Park staff know the importance of:

- 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 behaviours (which are potentially criminal in nature), such as grabbing bottoms, breasts, and genitalia. Dismissing or tolerating such behaviours risks normalising them.

The most effective preventative education programme is through a whole-school approach that prepares pupils for life in modern Britain. West Hill Park School has a clear set of values and standards, and these will be upheld and demonstrated throughout all aspects of school life. This will be underpinned by the school's behaviour policy and pastoral support system, and by a planned



programme of evidence-based content delivered through the PSHE/RSE curriculum. Such a programme will be developed to be age and stage of development appropriate, and may tackle such issues as:

- healthy and respectful relationships.
- what respectful behaviour looks like.
- gender roles, stereotyping, equality.
- body confidence and self-esteem.
- prejudiced behaviour.
- that sexual violence and sexual harassment is always wrong; and
- addressing cultures of sexual harassment

## **Responding to reports of sexual violence and sexual harassment**

Reports of sexual violence and sexual harassment are likely to be complex and require difficult professional decisions to be made, often quickly and under pressure. The DSL has been trained to manage reports of sexual violence and sexual harassment

Ultimately, West Hill Park School will make decisions on a case-by-case basis, with the designated safeguarding lead (or a deputy) taking a leading role and using their professional judgment, supported by other agencies, such as children's social care and the police as required.

Some situations are statutorily clear:

- a child under the age of 13 can never consent to any sexual activity on the basis that they lack the capacity to give valid consent to any sexual act.
- the age of consent is 16.
- sexual intercourse without consent is rape.
- rape, assault by penetration and sexual assault are defined in law; and
- creating and sharing sexual photos and videos of under-18s is illegal. This includes children making and sharing sexual images and videos of themselves.

West Hill Park School recognises that incidents of sexual violence and sexual harassment that occur online (either in isolation or in connection to offline incidents) can introduce several complex factors. These include the potential for the incident to take place across a number of social media platforms and services and for things to move from platform to platform online. It also includes the potential for the impact of the incident to extend further than a school's local community (e.g. for images or content to be shared around neighbouring schools) and for a victim (or alleged perpetrator) to become marginalised and excluded by both online and offline communities. There is also the strong potential for repeat victimisation in the future if abusive content continues to exist somewhere online.

## **Managing the disclosure**

At West Hill Park School safeguarding practice includes:

- 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 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 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;
- listening carefully to the child, being non-judgmental, being clear about boundaries and how the disclosure will be progressed, not asking leading questions and only prompting the child where necessary with open questions – where, when, what etc;
- considering the best way to make a record of the disclosure. Best practice is to wait until the end of the disclosure 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 disclosure (especially if a second member of staff is present). However, if making notes during any disclosure, staff should be very 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. Schools should be aware that notes of such disclosures could become part of a statutory assessment by children’s social care and/or part of a criminal investigation;

If possible, managing disclosures with two members of staff present, (preferably one of them being the DSL or a deputy). However this might not always be possible; and

- informing the DSL (or deputy) as soon as practically possible if the designated safeguarding lead (or deputy) are not involved in the initial disclosure.

DfE advice highlights best practice and cross-references other advice, statutory guidance and the legal framework.

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

[Sexual violence and sexual harassment between children in schools and colleges \(publishing.service.gov.uk\) 2021](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/91222/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges-2021.pdf)

**Children with Special Educational Needs and Disabilities (SEND)** can be especially vulnerable. Children and young people with special educational needs and disabilities can face additional safeguarding challenges because:

- there may be assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child’s disability without further exploration;
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
- children with SEN and disabilities can be disproportionately impacted by things like bullying without outwardly showing any signs; and
- difficulties may arise in overcoming communication barriers.

At West Hill Park School, we identify pupils who might need more support to be kept safe or to keep themselves safe by:

- Identifying potentially vulnerable children
- Identifying their specific risks
- Keeping a SEND register and ensuring all staff are aware of the specific needs
- Reviewing practice and concerns
- Providing children with support to ensure they can access information through a range of means.
- Delivering a PSHE/RSE curriculum to ensure all children know how to recognise abuse

### **Peer-on-peer (child on child) abuse:**

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

Peer on peer abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, 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; (this may include an online element which facilitates, threatens and/or encourages sexual violence).

For further information about sexual violence see Annex B of KCSIE 2021.

- sexual harassment, such as sexual comments, remarks, jokes, and online sexual harassment, which may be standalone or part of a broader pattern of abuse.
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nudes and semi nudes’ images and or videos (also known as youth produced sexual imagery).
- upskirting, which typically involves taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm; and

- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

At West Hill Park School we believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm by adults in the school and other pupils.

We recognise that some pupils will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the school's Behaviour and Discipline Policy.

Occasionally, allegations may be made against students by others in the school, which are of a safeguarding nature. Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse and sexual exploitation. It is likely that to be considered a safeguarding allegation against a pupil, some of the following features will be found.

The allegation:

- is made against an older pupil and refers to their behaviour towards a younger pupil or a more vulnerable pupil
- is of a serious nature, possibly including a criminal offence
- raises risk factors for other pupils in the school
- indicates that other pupils may have been affected by this pupil
- indicates that young people outside the school may be affected by this pupil.

At West Hill Park School we will support the victims and perpetrators of peer on peer abuse.

- Children who are LGBTQ+ can be targeted by their peers. In some cases, a child who is perceived by their peers to be LGBTQ+ (whether they are or not) can be just as vulnerable as children who identify as LGBTQ+.

Procedure:

- When an allegation is made by a pupil against another pupil which is of a safeguarding nature it should be reported to the DSL.
- A factual record must be kept on CPOMS.
- The incident will be investigated at the time.
- The DSL will inform Hampshire Safeguarding Children Partnership
- If the allegation indicates a crime has been committed, HSCP will refer the case to the police.
- Parents of the alleged victim and the other party will be informed. This will have been discussed with HSCP
- It may be appropriate to exclude the pupil against whom the report has been made in line with the school's behaviour policy.
- Police and social care will lead any investigation. If thresholds have not been met the school will undertake a thorough investigation.
- A Risk Assessment will be written along with an appropriate supervision plan.
- Support should be given to all staff
- The plan will be monitored.

In cases of sharing sexual imagery, we follow guidance given to schools and colleges by the UK Council for Child Internet Safety (UKCCIS) 'Sharing nudes and semi-nudes: advice for education settings working with children and young people.'

**Sexual violence:** It is important that schools are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence, we do so in the context of child on child sexual violence. For the purpose of this document, 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.

**What is consent?** 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. 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.

**Sexual harassment:** Sexual harassment means 'unwanted conduct of a sexual nature' that can occur online and offline. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded, or humiliated and/or create a hostile, offensive or sexualised environment. Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual "jokes" or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering when any of this
- crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos, or drawings of a sexual nature; and
- online sexual harassment, which might include non-consensual sharing of sexual images and videos and sharing sexual images and videos); inappropriate sexual comments on social media; exploitation; coercion and threats. Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

It is important that schools consider sexual harassment in broad terms. Sexual harassment (as set out above) creates an atmosphere that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence

**Harmful sexual behaviour:** Children’s sexual behaviour exists on a wide continuum, from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is “harmful sexual behaviour”. The term has been widely adopted in child protection. Harmful sexual behaviour can occur online and/or offline and can also occur simultaneously between the two. Harmful sexual behaviour should be considered in a child protection context. When considering harmful sexual behaviour, ages and the stages of development of the children are critical factors to consider. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years’ difference or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature. See NSPCC: [Harmful sexual behaviour](#) for more information.

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

**Breast Ironing:** Concerns have been raised that breast ironing is found amongst African communities in the UK, with as many as 1,000 girls at risk. Keeping Children Safe in Education (2021) mentions breast ironing on, as part of the section on so-called ‘**Honour Abuse**’. So-called ‘honour-based’ abuse (HBA) 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 should be handled and escalated as such.

Staff worried about the risk of honour-based abuse at West Hill Park School should speak to the DSL as a matter of urgency. Schools need to know the risk level within their communities and tackle the risk as appropriate.

**Violence:** Domestic violence, gender-based violence, Violence against Women and Girls (VAWG) and Teenage Relationship Abuse involves any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence, or abuse between those who are, or have been in relationships or family members regardless of gender or sexuality and is applicable to teenagers engaged in abusive relationships.

**Domestic Abuse:** Domestic Abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to: psychological; physical; sexual; financial; and emotional.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or

violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

**Faith Abuse:** The national action plan to tackle child abuse linked to faith or belief is intended to help raise awareness of the issue of child abuse linked to faith or belief and to encourage practical steps to be taken to prevent such abuse.

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

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

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

### **How does it affect young people and vulnerable adults?**

Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources. One of the key factors found in most cases of county lines exploitation is the presence of some form of exchange (e.g. carrying drugs in return for something). Where it is the victim who is offered, promised, or given something they need or want, the exchange can include both tangible (such as money, drugs, or clothes) and intangible rewards (such as status, protection or perceived friendship or affection). It is important to remember the unequal power dynamic within which this exchange occurs and to remember that the receipt of something by a young person or vulnerable adult does not make them any less of a victim. It is also important to note that the prevention of something negative can also fulfil the requirement for exchange, for example a young person who engages in county lines activity to stop someone carrying out a threat to harm his/her family.

A number of the indicators for CSE and CCE 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.

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

**Private Fostering:** Private Fostering is essentially an arrangement made privately for the care of a child under the age of 16 (under 18, if disabled) by someone other than a parent or close relative 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, 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 be involved in trafficking, child sexual exploitation or modern-day slavery.

Schools have a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although schools have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the school. However, it should be clear to the school who has parental responsibility.

School staff should notify the DSL when they become aware of private fostering arrangements. The DSL will speak to the family of the child involved to check that they are aware of their duty to inform the Local Authority. The school itself has a duty to inform the LA of the private fostering arrangements.

On admission to the school, we will take steps to verify the relationship of the adults to the child who is being registered.

**Homelessness Duty and the importance of early identification:** Schools and authorities should consider how they might identify people at risk of homelessness at an earlier stage, and the



interventions that could be put in place to prevent them from being threatened with or becoming homeless. Full information is found here: [Homelessness Code of Guidance](#).

**Attendance:** Children Missing Education (see CME policy)

Knowing where children are during school hours is an extremely important aspect of Safeguarding. Missing school can be an indicator of abuse and neglect and may also raise concerns about others safeguarding issues, including the criminal exploitation of children.

We monitor attendance carefully and address poor or irregular attendance without delay.

We will always follow up with parents/carers when pupils are not at school. This means we need to have a least two up to date contacts numbers for parents/carers. Parents should remember to update the school as soon as possible if the numbers change. Two emergency contact numbers are also required.

In response to the guidance in Keeping Children Safe in Education (2021) the school has:

- Staff who understand what to do when children do not attend regularly
- Appropriate policies, procedures and responses for pupils who go missing from education (especially on repeat occasions).
- Staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriage.
- Procedures to inform the local authority when we plan to take pupils off-roll when they:
  - a. leave school to be home educated
  - b. move away from the school's location
  - c. remain medically unfit beyond compulsory school age
  - d. are in custody for four months or more (and will not return to school afterwards); or
  - e. are permanently excluded

We will ensure that pupils who are expected to attend the school but fail to take up the place will be referred to the local authority. At West Hill Park School, we monitor attendance carefully and address poor or irregular attendance without delay. Any concerns are reported to the Hampshire Children Missing Education Tracking Officer on 01962 845363 or [cme@hants.gov.uk](mailto:cme@hants.gov.uk).

When a pupil leaves the school, we will record the name of the pupil's new school and their expected start date.

## **17. CONSULTING WITH CHILDREN'S SERVICES**

### **HAMPSHIRE SAFEGUARDING CHILDREN PARTNERSHIP**

[Hampshire Safeguarding Children Partnership](#)

HSCP has details of the local procedures for agency involvement

Tel No: 01962 876355 or [hscp@hants.gov.uk](mailto:hscp@hants.gov.uk)

**HAMPSHIRE SAFEGUARDING CHILDREN PARTNERSHIP  
LOCAL AUTHORITY DESIGNATED OFFICER**

Tel No: 01962 832037 / 01962 876265 / 07903649530

**FOR CONCERNS ABOUT EXTREMISM:**

Local Police Force 101

Hants Direct 0300 555 1384

[prevent.engagement@hampshire.pnn.police.uk](mailto:prevent.engagement@hampshire.pnn.police.uk)

**HAMPSHIRE CHILDREN MISSING EDUCATION (CME) TRACKING OFFICER**

Tel No: 01962 845363 or [cme@hants.gov.uk](mailto:cme@hants.gov.uk)

Children's Services will:

- Help to clarify the concern
- Determine if a referral is necessary
- Advise on how to discuss the concern with parents if that is considered appropriate.

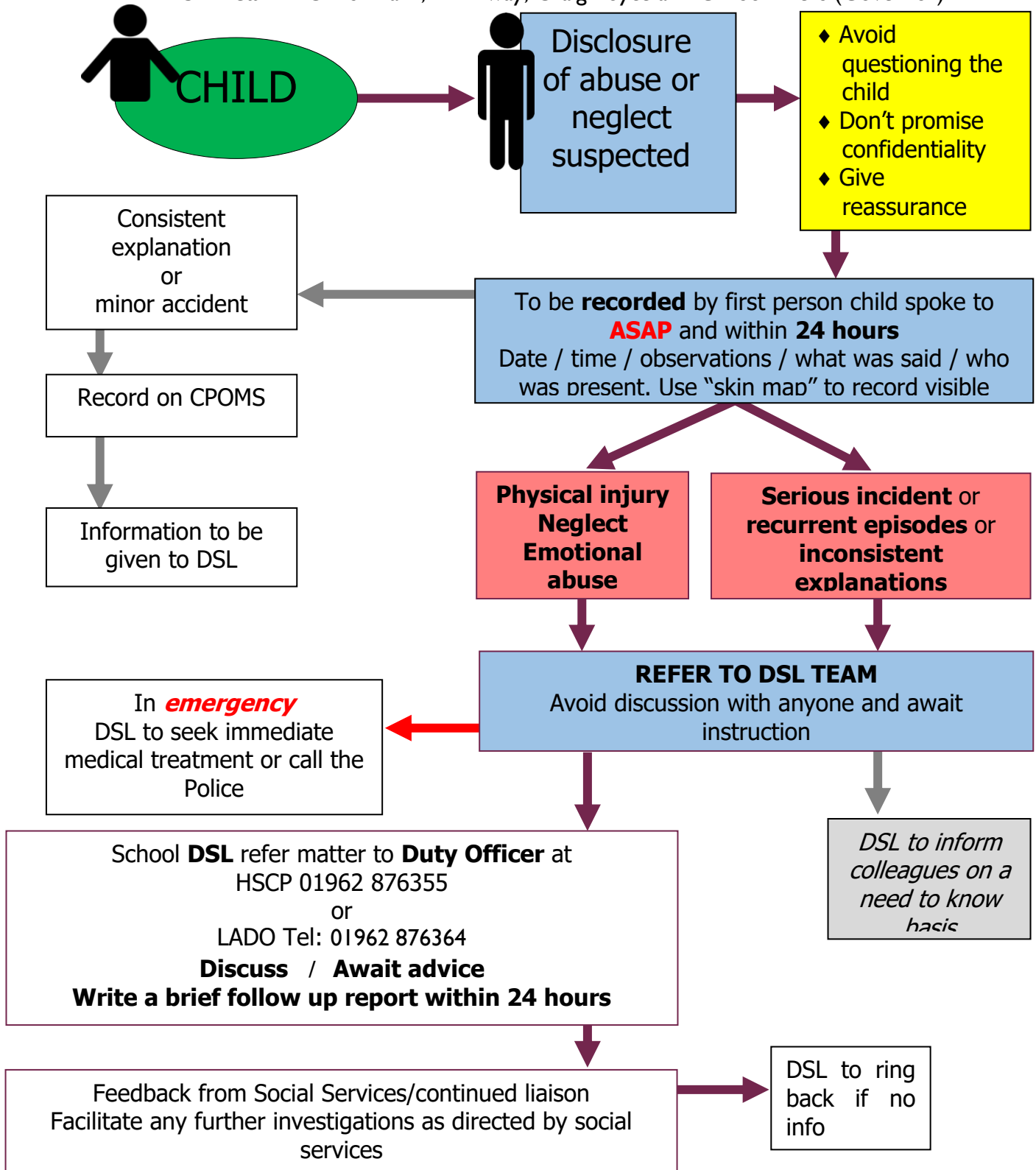
# Appendix I

## Child Protection Flow chart for staff to follow if a concern is raised

**DSL – Designated Safeguarding Lead - Mr Nicholas Roddis**

**Deputy DSL – Mrs Sarah Hall responsible for EYFS**

**DSL Team – Chris Ward, Liz Alway, Craig Boyce and Gill Sommers (Governor)**



**Recognise → Respond → Reassure → Refer → Record**

## Appendix 2: LOCAL AUTHORITY REFERRAL GUIDANCE

<b>If you have concerns about a child...</b>	
If a child is at immediate risk call the POLICE.	POLICE 999
To make an URGENT referral, ie: a child is likely to suffer or is suffering harm CALL HSCP	HAMPSHIRE SAFEGUARDING CHILDREN PARTNERSHIP 01962 876355 PROFESSIONAL ENQUIRIES 01329 335379
To make a NON-URGENT referral, contact HSCP on the online form or telephone	HAMPSHIRE SAFEGUARDING CHILDREN PARTNERSHIP <u>ONLINE REFERRAL FORM</u> 0300 555 1384
To raise concerns and ask for advice about extremism and radicalisation. Also contact HSCP	LOCAL POLICE FORCE 101 HANTS DIRECT 0300 555 1384 <a href="mailto:prevent.engagement@hampshire.pnn.police.uk">prevent.engagement@hampshire.pnn.police.uk</a>  DfE dedicated helpline 020 7340 7264 or <a href="mailto:counter.extremism@education.gov.uk">counter.extremism@education.gov.uk</a>
For advice and guidance about whether to make a referral	HAMPSHIRE SAFEGUARDING CHILDREN PARTNERSHIP 0300 555 1384 EARLY HELP TEAM <a href="#">HAMPSHIRE THRESHOLDS CHART</a>
For information, advice, and guidance in relation to safeguarding policy and procedures.	Senior DSL – Nicholas Roddis – <a href="mailto:n.roddis@westhillpark.com">n.roddis@westhillpark.com</a> Deputy DSL Responsible for EYFS Sarah Hall - <a href="mailto:s.hall@westhillpark.com">s.hall@westhillpark.com</a> DSL Team – Chris Ward – <a href="mailto:headmaster@westhillpark.com">headmaster@westhillpark.com</a> DSL Team – Liz Alway – <a href="mailto:e.alway@westhillpark.com">e.alway@westhillpark.com</a> DSL Team - Craig Boyce – <a href="mailto:c.boyce@westhillpark.com">c.boyce@westhillpark.com</a> Safeguarding Governor – Mrs G Sommers can be contacted via the Front Office Or any of the DSL team can be contacted on 01329 842356
<b>If you have concerns about a professional working with a child ...</b>	
To raise concerns and ask for guidance in relation to the conduct of someone who works with children.	HAMPSHIRE CHILDREN SAFEGUARDING PARTNERSHIP LOCAL AREA DESIGNATED OFFICER (LADO) 01962 876364

### Appendix 3: Key Documentation, Procedures and Guidance

- Keeping Children Safe in Education (2021)
- What to do if you're worried a child is being abused (2015)
- Working together to safeguard children (2018)
- Designated teacher for looked after children (2018)
- Prevent Duty Guidance for England and Wales (2021)
- Information sharing: Advice for practitioners providing safeguarding services to children; young people, parents and carers (2018)
- The Teachers' Standards (2013)
- Mandatory Reporting of Female Genital mutilation – procedural information (2015)
- Alternative provision (2018)
- Behaviour and Discipline in Schools (2016)
- Children Missing Education (2013)
- Parental responsibility measures for behaviour and attendance (2013)
- School exclusion (2015)
- Multi-Agency statutory guidance on female genital mutilation (2016)
- Promoting the education of looked-after children
- Supervision of activity with children (2013)
- Childcare Act 2018
- Education for children with health needs who cannot attend school (2013)
- Inclusive schooling: children with special educational needs (2001)
- SEND code of practice: 0 to 25 years (2015)
- Supporting pupils at school with medical conditions (2015)
- Section 175 of the Education Act 2002
- Sexual violence and sexual harassment between children (May 2018)
- Relationships Education, Relationships and Sex Education (RSE) and Health Education (2021)

All documents are available in school.