

FREWEN COLLEGE
SAFEGUARDING CHILDREN - CHILD PROTECTION POLICY

Policy No.

This policy which applies to the whole school is publicly available on the school website and upon request a copy (which can be made available in large print or other accessible format if required) may be obtained from the School Office.

Information Sharing Category	Public Domain
Version	V6
Date Published	April 2021
Authorised by (if required)	Board of Trustees and the Principal
Review/Update Date	September 2021
Responsible Area	Safeguarding Team

Amendment:

Date	Amendment
1 st July 2018	Working Together to Safeguard Children (WTTSC), (HM Govt: July 2018)
19 th September 2018	Keeping Children Safe in Education (KCSIE), (DfE: September 2018) (Updated 19 th September 2018)
2 nd September 2019	Keeping Children Safe in Education (KCSIE) (DfE: September 2019)
2 nd September 2020	Keeping Children Safe in Education (KCSIE) (DfE: September 2020)
1st April 2021	Keeping Children Safe in Education (KCSIE) (DfE: January 2021)

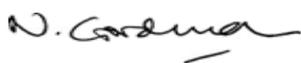
Safeguarding is the golden thread that runs throughout every aspect of the school. All our school policies supports this policy.

Safeguarding is everyone’s responsibility. All who work, volunteer or supply services to our school have an equal responsibility to understand and implement this policy and its procedures both within and outside of normal school hours including activities away from school. All employees and volunteers are required to sign that they read, understood and will abide with our Child Protection Policy, ‘KCSIE Part 1 inclusive of Annex A’ This policy takes full account of the child protection procedures agreed by East Sussex Safeguarding Children’s Board (ESSCB) and statutory guidance WTTSC, along with the Prevent Duty Guidance, our Safer Recruitment Policy, Whistleblowing Policy, Staff Behaviour policy, and The Teachers’ Standards.

We will always act in the best interests of the child. Frewen College recognises it is an agent of referral and not of investigation. Any person may make a referral (including whistleblowing) to external agencies such as the East Sussex Local Safeguarding Children’s Partnership, the Multi Agency Safeguarding Hub (MASH) or the Local Authority Designated Officer (LADO) and the police, if necessary. Frewen College also allows access for children’s social care from the host local authority and, from the local authorities where the children reside in undertaking their safeguarding (Child Protections) duties. This Child Protection Policy which is in accordance with locally agreed interagency procedures has been approved by the East Sussex Safeguarding Children’s Partnership who are our Local Safeguarding Children Partnership (LSCP).

Monitoring and review: This policy is subject to continuous monitoring, refinement and audit by Principal and Vice Principal, who is the Designated Safeguarding Lead (DSL) and Head of Boarding, who is the deputy DSL. The Board of Governors will undertake a full annual review of this policy and its procedures, inclusive of the implementation and efficiency with which the related duties have been discharged. This discussion will be formally documented in writing. The Trustees recognises the expertise staff build by undertaking safeguarding training and managing safeguarding concerns. As such, staff have the opportunity to contribute to and shape our safeguarding arrangements and child protection policy. Any deficiencies or weaknesses recognised in arrangements or procedures will be remedied immediately and without delay. All staff will be informed of the updated/reviewed policy and it is made available to them in either a hard copy or electronically.

Signed:


N. Goodman
Principal


J. Stevenson
Chair of Governors

Date reviewed: April 2021

Date of next review: September 2021

Frewen College is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. It is our aim that all children fulfil their potential

This policy was last reviewed and agreed by the Board of Governors at the school in April 2021 and will next be reviewed no later than one year from this date or earlier if significant changes to the systems and arrangements take place, or if legislation, regulatory requirements or best practice guidelines so require.

The Board of Governors at Frewen College takes seriously its responsibility under Section 157 of the Education Act 2002 to safeguard and promote the welfare of children; and to work together with other agencies to ensure adequate arrangements within our school to identify, assess, and support those children who are suffering harm. The Board of Governors have ensured that a member of the senior leadership team, appointed as designated safeguarding lead (DSL), is able to discharge that role with sufficient independence. This is particularly in relation to any allegations involving a trustee or the proprietor. The written confirmation of the appointment as DSL states that part of the duties of the post involve contacting the Local Authority Designated Officer (LADO) on any matter that the DSL considers cannot be properly dealt with internally. Our DSL is also provided with external supervision and can directly access advice as required without first referring to the Governors. This enables there to a separation between the DSL and the Governors.

Please note that the local authority area will transition from Local Safeguarding Children Board (LSCB) to the 'East Sussex Safeguarding Children Partnership' on the 30th of September 2019 – this includes the East Sussex County Council, the Sussex and East Sussex Clinical Commissioning Groups (CCGs) and Sussex Police. East Sussex 'Safeguarding partners' have named Frewen College as a relevant agency and as such will allow it to be fully engaged in the new local safeguarding arrangements. A new system of child death review partner arrangements is also in place. Both these new systems will feed into the new national Child Safeguarding Practice Review Panel the role of which will be to promote improvement nationally. This policy is amended in accordance with the new arrangements set out by the Safeguarding Partnership.

Our child protection policy forms pages 1 to 24 of this document. The appendices are on pages 25 to 43. However, the inspectorate requires us to number all pages consecutively and not to have the appendices as separate documents. We have separate comprehensive document Safer Recruitment and Staff Selection, Sexual Violence and Sexual Harassment (Peer-on-peer abuse).

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KEY INTERNAL CONTACT DETAILS

Our School's Designated Safeguarding Lead (DSL) and the Deputy DSL, who are members of the Senior Leadership Team (SLT), have lead responsibility for child protection and are also the Prevent Officer and Deputy Prevent Officer responsible for the prevention of radicalisation, extremism and being drawn into terrorism. Their telephone numbers are prominently displayed in the school. Frewen College's DSL and Deputy DSL are:

Designated Safeguarding Lead (DSL) and Prevent Officer for the whole school inclusive Of boarding and also designated teacher for children in care (Looked After Children

Mr. Gregoire Godin who is the Vice Principal

Telephone number for school hours: 01797 254102 Out of school hours: 07876 833287

Email: gregoiregodin@frewencollege.co.uk

Deputy Designated Safeguarding Lead (DSL) and Deputy Prevent Officer for the whole school inclusive of boarding

Miss Sarah Medcroft who is the Head of Boarding

Telephone number for school hours: 01797 254102 Out of school hours: 07876 833286

Email: sarah.medcroft@frewencollege.co.uk

The Chair of Governors

Mr. John Stevenson who is the Chair of Governors

Telephone: 01797 252 494

Email: chgov@frewencollege.co.uk

The Designated Board of Governor for Safeguarding and Prevent Duties

In our school the Governor for Child Protection, **Jo Slater**, will liaise with the Local authority and/or partner agencies on issues of child protection who can be contacted 01843 227169

KEY EXTERNAL CONTACT DETAILS

The relevant external responsibilities and therefore details of any external personnel named below may be subject to change without notification to the school.

The Local Authority Designated Officer (LADO)* for East Sussex: **Amanda Glover** who can be telephoned on: **07825 782793** or email: amanda.glover@eastsussex.gov.uk.

If the LADO unavailable, please contact the Safeguarding Children's Team and ask to speak to a Duty IRO who can take your referral or assist with your inquiry on: **01323 464222. The emergency team number (for outside of office hours and at weekends) is:** 01273 335905/6 **Email:** 0-19.SPOA@eastsussex.gov.uk

Allegations of abuse against a member of staff or a volunteer are reported to the LADO in accordance with the instructions on page 5 of this policy and also Appendix 5. **see definition of the role and responsibilities of the LADO (Appendix 3)*

We differentiate between '**children at risk**' who have suffered or are likely to suffer significant harm and '**children in need of additional support from one or more external agencies**' inclusive of '**Early Help Assessment**'.

The DSL must immediately report this to **Children's Social Care Referral and Assessment Team/ Multi Agency Safeguarding Hub (MASH)**. The contact details are as follows: **9.00am-5.00pm Monday to Friday Telephone: 01323 464222**

Out of hours team: 5.00pm to 9.00am and weekends Telephone: 01273 335905/6 Email: 0-19.SPOA@eastsussex.gov.uk

The Prevent Schools and Schools Officer for advice, guidance, training queries and referrals to Channel Panel for the prevention of radicalisation is Naomi Watkinson: 07788 566585 and naomi.watkinson@sussex.pnn.police.uk or channel@sussex.pnn.police.uk

For support and advice around the prevention of radicalisation you can contact the local Prevent Schools Officer **PC Dave Law - Sussex Police Prevent Engagement Officer** David.law@sussex.pnn.police.uk. The non-emergency police telephone number is 101 and the Department for Education (DfE) dedicated telephone helpline and mailbox for non-emergency advice for staff and governors: 020 7340 7264 and counter-extremism@education.gsi.gov.uk

The non-emergency police telephone number is: 111 and the Department for Education (DfE) dedicated telephone helpline and mailbox for non-emergency advice for staff and governors: 020 7340 7264 and counter-extremism@education.gsi.gov.uk.

If an adult working in our school has concerns or identifies a pupil as being at risk of radicalisation, the adult should immediately make a referral to our Designated Safeguarding Lead who is also our Prevent Officer who will consider the most appropriate referral which could include Channel or Children's Social Care. Although decisions to seek support for a child in need, or about whom there are concerns relating to radicalisation, would normally be taken in consultation with parents and pupils, their consent is not required for a referral when there are reasonable grounds to believe that a child is at risk of significant harm.

Child Sexual Exploitation (CSE) – If there were concerns regarding Child Sexual Exploitations, staff should inform the DSL who will immediately contact: **Children's Social Care Referral and Assessment Team/ Multi Agency Safeguarding Hub (MASH)**. The contact details are as follows: **9.00am-5.00pm Monday to Friday Telephone: 01424 724144**

Out of hours team: 5.00pm to 9.00am and weekends Telephone: 07699 391462 Email: dateast@eastsussex.gov.uk

Female Genital Mutilation (FGM): Any child at risk of FGM must be referred to Children's Social Care.

Contacting the Single Point of Advice

01323 464222 (Monday to Thursday 8.30am to 5pm, Friday 8.30am to 4.30pm)

Out of hours, with serious concerns that can't wait till the next working day, contact our Emergency Duty Service. **01273 335906** or **01273 335905** – (Monday to Thursday 5pm to 8.30am, after 4.30pm on Fridays, weekends and bank holidays).

General enquiries: 0-19.SPOA@eastsussex.gov.uk

Always use secure email to send personal information:

Or contact the police: For non-emergency 101 and for emergency calls 999. For advice and guidance telephone: 0800 028 3550 or Email: fgmhelp@nspcc.org.uk

If a child is in immediate danger or left alone, you should contact the police or call an ambulance immediately on 999.

Police Child Abuse Investigation Team – call 101

Police Domestic Abuse Investigation Team – call 101

Keeping Children Safe in Education (DfE: September 2019) **makes it clear that anybody can make a direct referral to the MASH including the LADO** in line with the referral threshold set by the Local Safeguard Children Board. If a child's situation does not appear to be improving the staff member with concerns should press for re-consideration.

Printed copies of the ESSCP procedures are available from the school office. The ESSCP can be contacted as follows: The Local Safeguarding Children Board (LSCB), East Sussex County Council. Telephone: 01273 481544 or 03456 080190; Email: lscbcontact@eastsussex.gov.uk (please do not email sensitive or highly personal information to this email address).

The **NSPCC whistleblowing helpline** is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00am to 8:00PM, Monday to Friday and **email:** help@nspcc.org.uk

Child Protection Helpline: 0808 800 5000

Childline: Tel: 0800 1111 www.childline.org.uk

Other relevant contacts:

- **Ofsted** Piccadilly Gate, Store Street, Manchester, M1 2WD
Telephone: 03001234234 Email: enquiries@ofsted.gov Web: www.ofsted.gov.uk
- **Disclosure and Barring Service (DBS)** Address for referrals:
PO Box 181, Darlington, DL1 9FA Telephone for referrals: 01325 953 795
Telephone for customer services: 087909 08 Email: customerservices@dbs.gsi.gov.uk

Independent Schools Inspectorate

- CAP House, 9-12 Long Lane London, EC1A 9HA Tel: 0207 600 0100 Email: info@isi.net Website: www.isi.net

ALLEGATIONS AGAINST THE DSL, STAFF, VOLUNTEERS OR THE TRUSTEES (SEE ALSO APPENDIX 5):

This applies where an adult within the school community has behaved in a way that has harmed, may have harmed, poses a risk of harm to a child or indicates they may not be suitable to work with children. This also applies when an adult within the school community may have possibly committed a criminal offence against or related to a child.

- Allegations concerning all, other than the Principal, are to be reported straight away to the Principal (or in his absence, the DSL). The DSL will immediately contact the LADO to discuss the allegation. The individual against whom the allegation is made, is not to be informed.
- Where an allegation is made against a supply teacher, the Principal will immediately contact both the agency concerned and the LADO.
- Allegations concerning the Principal are to be reported straight away to the Chair of Trustees, who will immediately contact the LADO to discuss the allegation. The Principal is not to be informed.
- Allegations concerning the Trustees are to be reported straight away to the Principal who will immediately contact the LADO and act on the advice provided. The individual, against whom the allegation is made, is not to be informed.
- Allegations against an adult who is no longer employed by the school, or historical allegations, will be referred to the police.

In each case above, the LADO will be given sufficient detail to allow consideration of the nature, content and context of the allegation and to agree a course of action including any involvement of the Police. Guidance will be sought from the LADO and/or Police to enable the school to make decisions about whether or not the person against whom an allegation has been made should be allowed to remain on school premises and if so what, if any, conditions should apply. If given information that suggests that a member of staff was abusing a pupil who is not a pupil at the school, the DSL reports immediately to the LADO and follows the procedure as if it was one of our own pupils.

In borderline cases, where there is room for doubt as to whether a referral should be made, the DSL will consult with the LADO on a no names basis without identifying the family. However, as soon as sufficient concern exists that a pupil may be at risk of significant harm, a referral to MASH will be made without delay. The school will not investigate allegations without first gaining the agreement of the LADO. In the case of serious harm, the Police will be informed from the outset. Discussions will be recorded in writing, with any communication with both the individual and the parents of the child/children agreed. Frewen College will make every effort to maintain confidentiality and guard against publicity if there are allegations against staff up to the point where the accused person is charged with an offence. The following definitions will be used when determining the outcome of all allegation investigations:

- **Substantiated:** there is sufficient evidence to prove the allegation;
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive;
- **False:** there is sufficient evidence to disprove the allegation;
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence;

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- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made.

Unsubstantiated, false or malicious allegations: Where an allegation by a pupil is proven to have been deliberately invented or malicious, the Principal will consider whether to take disciplinary action in accordance with the school's Behaviour and Sanctions Policy. Where a parent has made deliberately invented or malicious allegations, the Principal will consider whether to terminate the pupil's placement at the school on the basis that they have treated the school or a member of staff unreasonably, unless a working relationship based on trust, respect and transparency is established moving forward. Frewen College reserve the right to contact the MASH to determine the appropriate action. We have a duty of care towards our employees by ensuring that effective support is provided for anyone facing an allegation through the school's Human Resources (HR)/Personnel arrangements.

SEQUENCE OF EVENTS TO BE FOLLOWED WHEN A CHILD DISCLOSES ABUSE OR NEGLECT

This strict guidance relates to any disclosures involving events within or outside the school or concerning adults or other children:

Create a safe environment by offering the child a private and safe place if possible. Stay calm and reassure the child, stressing that they are not to blame. Tell the child that you know how difficult it must have been to confide in you. If there is a need for medical attention seek assistance without delay.

Listen to what the child has to say taking it seriously. Stay calm, reassuring the child but **advising that you cannot promise to keep a secret or confidentiality**. (as this may ultimately not be in the best interest of the child). A suggested form of words that may help when talking to children and which will likely need to be simplified for some of our pupils are as follows: *"I will keep our conversation confidential and agree with you what information I can share, unless you tell me something that will affect your personal safety or that is illegal, but I will tell you if I am going to pass information on and who to."* If immediate medical intervention is required, assistance should be called for. Tell the child what you are going to do next after the disclosure.

When talking to the child, do not interview the child and keep questions to a minimum. Encourage the child to use his/her own words and do not ask leading questions, interrupt their dialogue or make assumptions which might give particular answers. Do not repeat the disclosure or ask the child to repeat their disclosure other than to clarify what is being said. Do not display shock or disbelief. Seek consent from the child to share any information disclosed but should consent not be given, an explanation can be given as to why the DSL must be told. When the child has finished speaking, do not leave the child alone, but speak to someone who can help keep the child safe.

Record in detail the circumstances and timings of the disclosure including the nature and extent of any injuries, explanations given by the child (as much as possible in the child's own words) and the action taken (which may be used in any subsequent court proceedings). After the disclosure immediately **record in writing** the child's name, address and date of birth and the child's behaviour and emotional state as well as who else was present at the time of the disclosure. Sign (with time and date) all notes made and give them to the DSL. Call for immediate assistance from the DSL or deputy DSL or follow the procedures for allegations against staff, volunteers, and Proprietors. The DSL (or other responsible person within the scope of this policy) will then deal with the matter. The child has chosen to tell a member of staff and their account will be believed and actions taken accordingly. The official school safeguarding form should also be completed by the person who receives the allegation and forwarded to the DSL.

Do not take responsibility for investigating the allegation yourself, as investigation is the sole statutory responsibility of Children's Services and/or the police. Reassure the child that the matter will be dealt with. Do not approach or inform the alleged abuser. Immediately inform the DSL so any required action can be taken to protect the pupil. The DSL will consider the information and decide on the next steps. Every complaint or suspicion of abuse from within or outside the School will be taken seriously and action taken in accordance with this policy.

Never take photographs of injuries or examine marks and injuries solely to assess whether they may have been caused by abuse or investigate or probe, aiming to prove or disprove possible abuse. Do not assume that someone else will take the necessary action. Do not speculate or accuse anybody, confront another person (adult or child) allegedly involved, offer opinions about what is being said or about people allegedly involved or forget to record what you have been told. **Never** fail to pass the information on to the correct person, or ask a child to sign a written copy of the disclosure or a 'statement'. Frewen

College is a co-educational special school for children between the ages of 10 and 18. The Board of Trustees at Frewen College takes seriously its responsibility under Section 157 of the Education Act 2002 to safeguard and promote the welfare of children; and to work together with other agencies to ensure adequate arrangements within our school to identify, assess, and support those children who are suffering harm.

Although referrals are normally to be managed by the DSL, anyone may refer a child if necessary. Our approach is child-centred and at all times, we will act in **the best interests** of the child. This policy takes full account of the child protection procedures agreed by the Local Safeguarding Children Board and statutory guidance *Working Together to Safeguard Children* (WtSC) (HM Govt: July 2018). and *Keeping Children Safe in Education* (KCSIE (DfE: September 2019)). During term time, the DSL (or deputy DSL) should always be available during school hours for staff to discuss any safeguarding concerns. Our school will organise adequate and appropriate cover arrangements for any out of hours/out of time activities and also during school holidays.

Definition of safeguarding from *Keeping Children Safe in Education* (KCSIE) (DfE: September 2020 – Updated January 2021):

This 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. Children include everyone under the age of 18.

The Difference between Safeguarding and Child Protection: Safeguarding is a broader term than child protection. It encompasses all the elements set out above and is what a school must do for all children. Child Protection is part of this definition and refers to activities undertaken to protect children who have been harmed or are at significant risk of being harmed. Policies and procedures for Child Protection are, therefore, included in the Safeguarding policy and procedures. Where a child is thought to be suffering significant harm, or to be at risk of suffering significant harm, this should be reported to MASH immediately. Action should also be taken to promote the welfare of child who are believed to be in need of additional support, even if they are not suffering harm or at immediate risk. Such instances should be addressed through inter- agency assessment using local processes.

SPECIFIC SAFEGUARDING ISSUES

Abuse and Neglect (please refer to Appendix 1 of this policy): *Working Together to Safeguard Children* (HM Government, 2018) defines abuse as a form of maltreatment of a child. Somebody may abuse or neglect a pupil by inflicting harm, or by failing to act to prevent harm. Children may be abused by a family member, institution or a community setting, by those known to them or more rarely by others e.g. online abuse, any type of abuse that happens on the web, whether through social networks, playing online games or using mobile phones. They may be abused by an adult or adults or another pupil or children. They may be abused through being witnesses to domestic abuse and teenagers can suffer domestic abuse in their relationships. It is important to remember that significant harm can be ‘actual’ (happening now) or ‘likely’ (events are leading to a situation where harm is probable). To be considered a safeguarding concern or allegation, it is likely that some of the following features may be found regarding physical abuse, emotional abuse, neglect and sexual abuse (PENS), as defined by:

- **Physical abuse** - violence, particularly pre-planned/deliberate; causing injuries such as bruises, broken bones, burns or cuts; forcing others to use drugs or alcohol.
- **Emotional abuse** – also known as psychological abuse; blackmail or extortion; emotional maltreatment; threats and intimidation; can cause children serious harm
- **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.
- **Sexual abuse** – indecent exposure/touching or sexual assaults/harassment; forcing others to watch pornography or; sexting, encouraging other pupils to attend inappropriate parties; photographing or videoing other pupils performing indecent acts. and **child sexual exploitation** in which children are sexually exploited for money, power or status.

Our school recognises that safeguarding issues are rarely covered with one definition or label. In most cases multiple issues will overlap with one another. Expert organisations provide guidance and practical support on specific safeguarding issues. The NSPCC offers information for schools on the TES website and also on its own website www.nspcc.org.uk/preventing-abuse/ . Additionally government guidance is listed on the GOV.UK website: <https://www.gov.uk/>

The three main elements to our school's safeguarding policy are:

Prevention: We safeguard children whether they are at risk of maltreatment or abuse or in need of specific local authority or inter-agency care. Our safer recruitment procedures include checking and recording the suitability of staff and volunteers developing procedures to deal with safeguarding issues which may be specific to individual children in our school and local area. We work with other agencies to reduce risks. Frewen College seeks to promote the welfare of pupils at all times. Staff must be alert to situations where pupils appear to be unhappy or where there are marked changes in behaviour. The aim will be to 'listen' to pupils through the provision of early help, either through the school (counsellors, independent visitor) or through children's services under 'child in need' provision.

Protection: Staff are trained and supported to respond appropriately and sensitively to all safeguarding concerns following our agreed procedures. We:

- encourage a culture of listening to children, identifying and acting on early signs of abuse and neglect, reassessing concerns when situations do not improve to ensure the right help at the right time to address risks and prevent risks escalating;
- ensure that allegations, concerns, suspicions and complaints against staff are dealt with promptly, and in accordance with DfE and local guidance. We keep accurate records and share relevant information quickly in order to challenge inactivity and
- we take all practical and appropriate steps to ensure that our school premises are as secure as circumstances permit.

Support: We support children who may have been at risk of significant harm (which includes the way staff respond to their concerns and any work that may be required) or children who have been abused, in accordance with their agreed child protection plan. We seek to address both the mental and emotional welfare of children and families through:

- the provision of individual counselling, providing a positive and safe school environment, careful and vigilant teaching, accessible pastoral care, good adult role models and by promoting full co-operation with and contributions to the provision of appropriate co-ordinated support and/or early help from external agencies.
- operating robust and sensible health and safety procedures and along with clear and supportive policies on drugs, alcohol and substance misuse and recognising that children have a right to feel secure and cannot learn effectively unless they do so.

Any adult can harm a child either by direct acts or failure to provide proper care, or both. Our children have the right to respect and protection from abuse, regardless of age, gender, ability, language, religion, race, nationality, sexuality, culture or disability. They have the right to feel valued and confident, knowing how to approach adults if they are in difficulty. In our school a bullying incident is treated as a child protection concern when there is reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm.

Our safeguarding Child Protection Policy is also dove-tailed with the Behaviour Management and Anti-bullying Policies. Whilst the school will work openly with parents as far as possible, the school reserves the right to contact MASH or the Police, without notifying parents if this is in the child's best interests. In preparing this policy, we have been attentive to the nature, age range and other significant features of the school in the provisions made for safeguarding. In Frewen College with a current age range of 11 to 19 years on roll, we are aware of the potential scope for social, emotional and mental health difficulties (SEMH). This could include, body image, eating disorders, self-harm, and also radicalisation and extremism.

This policy provides staff, volunteers and the trustees with the guidance they need in order to keep children safe and secure in our school and informs parents and guardians how we will safeguard their children whilst they are in our care. Our school promotes safe practice and professional conduct to safeguard children and to mitigate against the potential for misunderstandings or situations being misconstrued so teachers and other staff are not vulnerable to allegations. Our staff maintains an attitude of 'it could happen here' as far as safeguarding is concerned. We understand the importance of children receiving the right help at the right time to address risks and prevent issues escalating.

Thresholds for Intervention: If staff have **any concerns** about a child's welfare, they should act on them immediately, following the procedures set out in this policy. Please see Appendix 4 which sets out the process our staff will go through if they have concerns about a child. Options will then include:

- managing any support for the child internally via the school or school's own pastoral support processes;

- an early help assessment; or a referral for statutory services (for example as the child might be in need, is in need or suffering or likely to suffer harm).

Early Help: In the first instance staff should discuss early help requirements with our DSL. The DSL will lead on liaising with other agencies and in setting up an inter-agency assessment as appropriate. Early Help in our school allows pupils to be supported at any point in their life by a range of external support agencies enabling potential concerns to be addressed, to prevent further problems arising or before a child may come into immediate danger. Targeted early help services, arranged by the local authority, address the assessed needs of a child and their family as a result of an *Early Help Assessment Form* coming under the term “*Team around the Child*” (TAC). This form would normally be completed by the DSL acting as the Lead Professional or another Educational agency. Our staff are, in particular, alert to the potential need for early help for a child who is not making age appropriate progress and needs support from more than one additional agency to meet the child’s needs, or health or emotional difficulties are impacting the pupil’s progress and/or wellbeing. Our staff are, in particular, alert to the potential need for early help for a child who:

- is disabled and has specific additional needs; has special educational needs (with an Early Help Care Plan or not);
- is showing signs of engaging in anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
- is frequently missing/goes missing from care or from home; is misusing drugs or alcohol themselves;
- is at risk of modern slavery, exploitation or trafficking (where children are recruited, moved or transported and then exploited, forced to work or sold);
- is a young carer; is in a family presenting challenges for the child, such as substance abuse, adult mental health problems and domestic violence;
- has returned home to their family from care and/or is showing early signs of abuse and/or neglect;
- is at risk of being radicalised or exploited; is a privately fostered child.

After gaining consent from the child/family to share information gathered from discussions, relevant professionals will be invited to come together in a ‘Team around the Child’ (TAC) to assess the child’s needs and decide with the child/family a course of action to provide the services needed. A TAC is a multi-disciplinary team of practitioners established on a case-by-case basis to support a child and their family. Where appropriate, pupils will be provided with a personal risk assessment.

If the allegation threshold is NOT met, the LA Designated Officer will agree with you an appropriate response (E.g. for the agency to undertake further enquiries or undertake an internal investigation).

If the allegation threshold is met a strategy meeting will normally be held either by phone or in person. Normally a senior manager / safeguarding lead, the LA Designated Officer, HR, Police and social care are invited to attend. Relevant information is shared, risks to children are considered and appropriate action agreed –e.g. child protection and other enquiries, disciplinary measures or criminal proceedings. A record of the meeting will be made, and regular reviews will take place until a conclusion is reached. After gaining consent from the child/family to share information gathered from discussions, relevant professionals will be invited to come together to assess the child’s needs and decided with the child/family a course of action to provide the services needed. This is a multi-disciplinary team of practitioners established on a case-by-case basis to support a child and their family.

Child in Need - S17 of the Children Act 1989: A ‘Child in Need’ referral should be considered where the needs of the child are unlikely to be met under an EHA, such as a child with complex disabilities, when a social work led assessment is required. Section 17 of the Children Act says that an assessment for services should be undertaken by the Local Authority if: Child(ren) are unlikely to achieve or maintain, or to have opportunity to achieve or maintain a reasonable standard of health or development, without the provision of services by a local authority. Their health or development is likely to be impaired, or further impaired without the provision of such services. They are disabled This could include children who self-harm or disclose an intent to commit suicide.

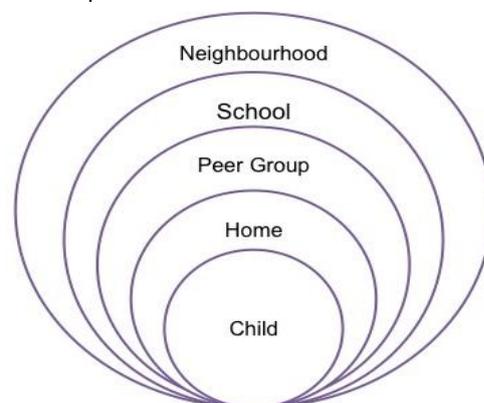
Child Protection (S47 Children Act 1989): The Local Authority has a statutory duty to investigate when there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm due to the actions or inactions of others. It is not possible to rely on one absolute criterion when judging what constitutes significant harm. Consideration of the severity of ill-treatment may include the extent of the harm suffered, the context within which it occurred and its duration. In order to

understand and evidence 'significant harm', it is necessary to consider the family context, together with the child's development within their wider social and cultural environment. Significant harm may also arise from a combination of significant events which are both acute and long standing and which may impair the child's physical, psychological and social development. If staff or volunteers have significant concerns about any child they should make them known to the DSL. A referral to children's social care will be made immediately if there is risk of immediate harm to a child and, if a crime may have been committed, the matter will be reported to the police. It is important to understand that anyone can make a referral.

Working with our Safeguarding Partners: Frewen College will work with children's social care, the police, health services and other services to promote the welfare of children and protect them from harm. This includes providing a coordinated offer of early help when additional needs of children are identified and will contribute to inter-agency plans to provide additional support to children subject to child protection plans. We allow access for children's social care from the host local authority and, where appropriate, from a placing local authority, for that authority to conduct, or to consider whether to conduct, a section 12 or a section 47 assessment.

Contextual Safeguarding: We recognise that young people's behaviours, levels of vulnerability and levels of resilience are all informed by the social/public, as well as private, contexts in which young people spend their time. When spending time in these extra-familial contexts young people may be exposed to healthy norms which promote pro-social relationships, or they may encounter harmful norms that are conducive to abusive and exploitative relationships.

As a result, we identify, assess and intervene where possible in all of the social environments where abuse and exploitation of young people can occur – in essence to take a 'contextual' approach to safeguarding. For example, our school leadership works with professionals and pupil body to challenge harmful, gendered school cultures, thus improving the pre-existing school environment. Additionally, we help to promote a culture of safety with the curriculum and around the school regarding pupils' online activities – a place where young people spend an increasing amount of time, raising their vulnerability to potential abuse.



Serious Violence: Our staff are aware of the indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs. If staff suspect that a pupil is at risk of serious violence, this will be reported to the DSL immediately. Please see the [Home Office Guidance](#), which the school follows, on [Preventing youth violence and gang involvement](#).

Concerns and allegations of abuse made against other children (Peer on Peer Abuse inclusive of sexual violence or harassment and banter): We recognise that some pupils on occasion will negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the school's Anti-Bullying (including Cyber-bullying) and Behaviour Management Policies. Staff are clear as to our policy and procedures with regards to peer on peer abuse and are trained to manage a report of child on child sexual violence and sexual harassment. There are also different gender issues that can be prevalent when dealing with peer on peer abuse (i.e. girls being sexually touched/assaulted, or boys being subjected to initiation/hazing type violence).

We recognise the gendered nature of peer on peer abuse (i.e. that it is more likely that girls will be victims and boys' perpetrators), but that all peer on peer abuse is unacceptable and will be taken seriously. We make it clear that abuse is abuse and should never be tolerated or passed off as 'banter', 'just having a laugh', 'boys being boys' or 'part of growing up'. Peer on peer abuse can take many forms, including:

- bullying (including cyberbullying);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual Violence, such as rape, assault by penetration and sexual assault;

- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse;
- upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
- sexting (also known as youth produced sexual imagery) and
- initiation/hazing type violence and rituals.

When dealing with abuse by young people on peers, we follow the key safeguarding documents, *Keeping Children Safe in Education* (DfE: September 2020 – Updated January 2021) and *Working Together to Safeguard Children* (HM Govt: July 2018), even where an alleged perpetrator is a child and we adhere to the Human Rights Act and the Equality Act. Additionally, we use a [Peer-on-Peer Abuse toolkit](#) to support staff in their safeguarding of our students. Sexualised abuse, including verbal abuse by peers is a safeguarding issue and is included in the college's broader approach to safeguarding. If the college received an allegation of abuse by one or more pupils but is alleged to have taken place outside of the college premises, our safeguarding principles remain the same, and we could still carry out a referral to children's services as necessary.

However, where there is 'reasonable cause to suspect that a pupil is suffering, or likely to suffer significant harm' the concern or allegation of Peer on Peer abuse must be reported to the DSL immediately, who will then refer to the MASH to discuss the case. A factual record should be made of the concern or allegation, but no attempt at this stage should be made to investigate the circumstances. A copy of the discussions and outcomes will be kept in both pupils' files. Additionally, if appropriate the DSL will also refer pupils to an external safeguarding agency such as Childline and NSPCC.

Peer-on-peer abuse: Staff are clear as to our policy and procedures with regards to peer on peer abuse and are trained to manage a report of child on child sexual violence and sexual harassment. When dealing with abuse by young people on peers, we follow the key safeguarding documents, *Keeping Children Safe in Education* (DfE: 2020 – Updated January 2021) and *Working Together to Safeguard Children* (HM Govt: 2018), even where an alleged perpetrator is a child. This will entail:

- effective implementation of our school's usual safeguarding and anti-bullying policies (and recognition that sexualised abuse, including verbal abuse, by peers is a potential safeguarding issue);
- seeking advice from statutory agencies, as appropriate, and readiness to make a referral if an incident meets the [referral threshold](#) set by the East Sussex Safeguarding Children Partnership;
- if a child is in immediate danger or is at risk of harm, an immediate referral to children's social care and/or the police;
- following the advice for practitioners in: *What to do if you're worried a child is being abused*;
- effective information sharing with any agencies or other professionals involved;
- where allegations of abuse or assault have been made against one or more of our pupils, a thorough risk-assessment of the situation and risk-based decision-making (with the benefit of the advice of statutory authorities, where appropriate) should be carried out with a view to ensuring the safety of all pupils and that both alleged victims and perpetrator pupils receive appropriate support.
- decisions arising that might include, for example, whether the accused pupil should be removed from our school for a period of time, or from certain classes; whether contact with certain individuals should be prevented or supervised,
- the availability of counselling, the adequacy of arrangements for listening to children etc;
- good record keeping of related conversations, meetings and communications.

Minimising the risk of peer on peer abuse: Frewen College, we recognise the wide variety of pupils' backgrounds and cultures who attend the school and as such, the requirement for us to promote pupils to respect, tolerate and show good will toward each other. We have employed a number of procedures to help minimise the risk of peer on peer abuse, with the majority of these focusing on educating our pupils about what is and what is not appropriate with regards to all forms of relationships with their peers. As part of our PSHEE and Relationship and Sex Education (RSE) lessons, we promote healthy and respectful peer-to-peer communications and behaviours between or pupils and provide an environment which challenges inappropriate behaviour. We teach our pupils to look out for potential signs that there may be an imbalance in power or control, the importance of permission-seeking and giving in relationships with friends, peers and adults and what to do to seek support. We make it explicit to our pupils what constitutes sexual harassment and sexual violence and why these are always unacceptable. We also teach our pupils about different types of bullying (including cyberbullying), the impact of bullying, responsibilities of bystanders (primarily reporting bullying to an adult) and how to get help.

Sexual Violence and Sexual Harassment between children: At Frewen College, we take our definition of sexual violence from the Sexual Offences Act 2003, which considers rape, assault by penetration and sexual assault, all types of sexual violence. In addition, we define sexual violence as ‘unwanted conduct of a sexual nature’ that can occur online and offline. Sexual violence and sexual harassment can be between two children, or a group of children. Both sexes may be affected, although girls are more likely to be victims of sexual violence, and boys are more likely to be perpetrators of sexual harassment. We recognise that Children with SEND are likely to be more vulnerable. Frewen College is aware that online sexual violence or sexual harassment can be more complex, such as images shared at another school or across the internet, or the victim being excluded offline as well as online. 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. We recognise that sexual violence and harassment can occur both online and offline, both physically and verbally and is never acceptable. We make it clear that all forms of sexual violence and harassment are unacceptable and will not be tolerated. 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;
- upskirting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes (this may cross a line into sexual violence) 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 (both often referred to as sexting); 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.

Responding to reports of sexual violence and sexual harassment: 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. Though it may not be necessary to report one-off issues of sexual harassment to the police, each allegation of abuse will be taken seriously, and the Designated Safeguarding Lead will still refer these allegations to children’s social care, who will support the school in deciding whether the victim or alleged perpetrator are in need of protection or other services. However, all allegations of sexual violence will be reported to the police, in parallel with children’s social care. Though children’s sexual behaviours can be developmentally expected, some more harmful sexual behaviours may cause developmental damage. The Brook sexual behaviours traffic light tool is used to help us consider harmful sexual behaviours.

Reports of sexual violence are often complex and require difficult decisions to be made, on a case-by-case basis, with the DSL taking the lead role, supported by external agencies such as children’s social care or the police. Some situations are statutorily clear: a child under the age of 13 can never consent to sexual activity (the age of consent is 16); sexual intercourse without consent is rape (as defined in law); creating or sharing sexual images or videos of under 18s is illegal, including children making or sharing these themselves.

Actions following a report of sexual violence and/or sexual harassment: A factual record should be made of the concern or allegation, taking the victim seriously, but no attempt at this stage should be made to investigate the circumstances, unless a child is in immediate danger or is at risk of harm, in which case, an immediate referral will be made to children’s social care and/or the Police. Every report will be considered on a case-by-case basis. Additionally, in cases where there is a report of rape, assault by penetration or sexual assault this should be passed to the Police. Victims will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment; they will not be made to feel ashamed for making a disclosure. The DSL will follow the advice for practitioners in: What to do if you’re worried a child is being abused and will follow through the outcomes of the discussion and if so advised by Children Social Care, will make a formal referral if the incident meets the referral threshold set by the East Sussex Safeguarding Children Partnership ensuring effective information sharing with any agencies or other professionals involved. The DSL will ensure good record keeping of related conversations, meeting and communications with a copy of the discussions, and outcomes will be kept securely. Staff should not assume that someone else is dealing with the incident and should discuss concerns with the DSL. Where an incident between two pupils takes place away from the school, the school’s duties and procedures remain the same.

School Staff are trained as per Part One of KCSIE on how to manage a disclosure and are aware of anonymity in cases where an allegation is progressing through the criminal justice system. Frewen College will do all they reasonably can to protect the

Frewen College is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. It is our aim that all children fulfil their potential

anonymity of any children involved in any report of sexual violence or sexual harassment, including considering the impact of social media. The DSL will make an immediate written risk and needs assessment where there has been a report of sexual violence, considering the victim, alleged perpetrator and other children and staff at the school (including actions to protect them). Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis.

Risk assessments will be kept under review. In cases of sexual violence a professional risk assessment by external specialists may be required, and should be used to inform the school's own risk assessment. Frewen College will consider carefully any report of sexual violence or harassment and act in the best interests of the child. Frewen College will also consider carefully when to inform the alleged perpetrator, and this may be discussed with relevant agencies. The school actively considers the risks posed to our pupils and ensures adequate measures are in place to protect pupils and keep them safe. Staff may be expected to participate in any early help assessment, child protection enquiry, strategy discussion or other outcome, following a referral.

With any report of sexual violence and/or harassment, the DSL will consider:

- the wishes of the victim in terms of how they want to proceed. Victims will be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered;
- the nature of the alleged incident(s), including: whether a crime may have been committed and consideration of harmful sexual behaviour;
- the ages of the children involved, the developmental stages of the children involved;
- any power imbalance between the children, including age gaps or differences in maturity, cognition or understanding (including SEND or learning difficulties);
- if the alleged incident is a one-off or a sustained pattern of abuse;
- are there ongoing risks to the victim, other children, adult pupils or school staff and
- other related issues and wider context.

Managing the report: Whatever the school's response, it is underpinned by the principle that sexual violence and sexual harassment is never acceptable and will not be tolerated. All concerns, discussions, decisions and reasons for decisions will be recorded. Dependent on the disclosure of sexual violence or sexual harassment, the school will consider the following courses of action:

- **Managing internally:** in some cases of sexual harassment (such as one-off incidents) the school may manage the incident internally, without the involvement of early help, following our behaviour management policy;
- **Involve Early help:** when a report may not require the use of statutory intervention, involving early help is particularly useful in addressing non-violent, harmful sexual behaviour and may prevent escalation;
- **Referral to children's social care:** in cases where there has been harm, is at risk of harm, or there is an immediate danger, a referral will be made to children's social care. Parents or carers will generally be informed of this, unless there is a clear reason not to at this stage. A risk and needs assessment will also be produced at this stage;
- **Reporting to the Police:** in cases where rape, assault by penetration or sexual assault is reported. Frewen College will not wait for the outcome of a Police investigation before protecting the victim, perpetrator and other children in the school. The DSL will work closely with the Police to ensure that the school's actions do not jeopardise the Police investigation. If a child is convicted or cautioned, the school will update the risk assessment and consider suitable action through their behaviour policy.

It is important for Frewen College to ensure the victim and perpetrator remain protected, especially from bullying or harassment. Where no further action is taken, or a child found not guilty, Frewen College will continue to support the victim and perpetrator.

This is how victims of peer on peer abuse will be supported: All pupils involved, whether perpetrator or victim, are treated as being 'at risk'; a thorough risk-assessment and risk-based decision-making (with the benefit of the advice of statutory authorities, where appropriate) will be carried out with a view to ensuring the safety of all pupils and that example, whether the accused pupil should be removed from school for a period, or removal of the alleged perpetrator from classes and any transport etc which is shared with the victim, whether sleeping arrangements should be changed for boarders, whether contact with certain individuals should be prevented or supervised, the availability of counselling such as referring pupils to an external

safeguarding agency such as ChildLine and NSPCC and the adequacy of arrangements for listening to children etc. We recognise that any actions taken will be in the best interests of both children and is not perceived to be a judgement of guilt of the alleged perpetrator.

Additionally, Frewen College:

- supports for the victim will consider their age, the nature of the allegations and the risk of further abuse; an alleged perpetrator may have unmet needs themselves;
- ensures needs and wishes of the victim will be paramount, and they will be able to continue their normal routine as far as possible, so that school is a safe space for them;
- will be prepared to support a victim over a long period of time;
- Frewen College will do everything we reasonably can to protect victims from bullying or harassment as a result of any report they have made.
- Ensures that if a victim or perpetrator moves to another school it is important that the new establishment is made aware of any ongoing support needs.
- must ensure the victim is safeguarded, but still provide the perpetrator with an education and support as necessary.
- may discipline the alleged perpetrator, including while the police or social care investigation is ongoing, although they will liaise with these bodies to assist in determining any sanctions.
- will be clear about when their actions are to support the victim or perpetrator, and when their actions are to discipline the perpetrator for their past conduct.

A pupil against whom an allegation of abuse has been made may be excluded from the school for a fixed period during the investigation and the School's policy on behaviour, discipline and sanctions will 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 Children's Social Care, the pupil's parents are informed as soon as possible and that the pupil is supported during the interview by an appropriate adult. Normally, the DSL will try to discuss any concerns about a child's welfare with the family and where possible to seek their agreement to making a referral to MASH if necessary. However, in accordance with DfE guidance, this will only be done when this will not place the child at increased risk. The child's views will also be considered. Where neither social services nor the police accept the complaint, a thorough school investigation should take place into the matter using the school's usual disciplinary procedures. In situations where the school considers a safeguarding risk is present, a risk assessment will be prepared along with a preventative supervision plan. The plan should be monitored and a date set for a follow-up evaluation with everyone concerned.

When a pupil is in need of *urgent* medical attention and there is suspicion of abuse an ambulance should be called. If the response from the emergency services states that the school should take the child to hospital then the DSL, with an escort, should take the child to the Accident and Emergency Unit at the nearest hospital. They should first notify MASH and seek advice about what action the MASH or the police will take and how the parents will be informed. Normally, parents would be informed that a child requires urgent hospital attention. If the suspected abuse is sexual then the medical examination should be delayed until the MASH and the police can liaise with the hospital, unless the needs of the child are such that medical attention is the priority. There must at all times be a responsible adult with the child, whether from the school, MASH or the police, if the parents are not included. All unnecessary delays should be eradicated and inaction at any level can and should be challenged. In borderline cases, this can be done informally and without giving names in the first instance. The School will not investigate allegations without first gaining the agreement of the LADO. In the case of serious harm, the police will be informed from the outset. Discussions will be recorded in writing, with any communication with both the individual and the parents of the child/children agreed.

Working with parents and carers: Frewen College will, in most cases, engage with the parents of both the victim and the perpetrator and will consider carefully what information they provide. It is good practice for Frewen College to meet the victim's parents with the victim present to discuss safeguarding arrangements and also good practice to meet the perpetrator's parents to discuss what arrangements are being put in place, such as moving them out of classes. Where there are doubts or reservations about involving the child's family, the DSL should clarify with MASH or the police whether, and if so when and by whom, the parents should be told about the referral. This is important in cases where the police may need to conduct a criminal investigation. Where appropriate, the DSL should help the parents understand that a referral is in the interests of the child and that the school will be involved in the enquiry or police investigation. In the case of pupils whose parents are abroad, the pupil's

Education Guardian will be requested to provide support to the pupil and to accommodate him / her if it is necessary to exclude him / her during the investigation.

Supporting witnesses of sexual violence or sexual harassment: Consideration should be given to supporting children who have witnessed sexual violence, especially rape and assault by penetration. Witnessing such an event is likely to be traumatic and support may be required. Following any report of sexual violence or sexual harassment, it is likely that some children will take “sides”. The school or college should be doing all they can to ensure both the victim and alleged perpetrator, and any witnesses, are not being bullied or harassed. Social media is very likely to play a significant role in the fall out from any incident or alleged incident. There is the potential for contact between victim and alleged perpetrator and a very high likelihood that friends from either side could well harass the victim or alleged perpetrator online. When writing a risk-assessment for the pupils involved in an incident of sexual violence or sexual harassment, the school will consider any additional potential support needs to keep all our pupils safe.

All staff and volunteers: Safeguarding is everyone’s responsibility. It applies to all who work, or volunteer, or learn, or supply services to our school. All staff and volunteers have an equal responsibility to understand and implement this policy and its procedures both within and outside of normal school hours including activities away from school. This includes a duty to act upon any suspicion, concern or disclosure that may suggest that a pupil is at risk of significant harm or in need of support services. All staff and volunteers should be alert to pupils at risk of being radicalised or drawn into extremism or child sexual exploitation whether from an adult or another pupil (further details of these signs are in Appendix 1). They are required to report instances of actual or suspected child abuse or neglect to the DSL or Deputy DSL. Additionally they are expected to make themselves available for appropriate training and to read and understand both this policy and Part 1 of the latest edition of KCSIE along with ‘What to do if you are a worried a pupil is being abused’ latest edition. Special arrangements will be put in place for anyone working in the school whose command of English is insufficient to enable them to read and digest the contents of this policy and Part 1 of KCSIE.

Safer Recruitment, the Single Central Register (SCR) (Please also refer to our Safer Recruitment Policy) Our school operates safer recruitment procedures (in accordance with government recommendations) including required pre-appointment checks on teaching and non-teaching staff, volunteers, proprietor, supply staff, staff of contractors and other individuals working with or nearby pupils. In accordance with the full requirements of the SCR, before starting work, the details of these checks are recorded. The SCR of appointments is rigorously maintained. All employees, proprietor, supply staff, volunteers and others working within the school are checked. In accordance with the ISSR, checks are recorded in the SCR by reference to the usual considerations such as role, frequency, supervision, payment and employment by another organisation. For employees working with children under the age of 8 years there is a requirement to report to school managers any issues of association with people who may be barred from working with children.

Through risk assessments, the school also ensures that appropriate checks have been made upon the staff of other organisations working with our pupils on external trips and visits, including adults who supervise pupils on work experience. In any case where the required documentation is unavailable, or checks have not been completed prior to the starting date for any member of staff or other adult who may have access to pupils, then a risk assessment is carried out to determine the appropriate course of action, e.g. allowing appropriately supervised access for a specified period or postponing the starting date.

Safeguarding arrangements for staff employed by another organisation: We ensure procedures are followed to enable appropriate pupil protection (including DBS checks) and are applied to staff employed by other organisations in contact with School (including obtaining written confirmation that DBS checks have been completed) pupils including working on another site (please see policy on Educational Visits). Frewen College will obtain DBS checks on contractor staff, who also receive safeguarding training from the DSL. In no circumstances will the school decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the local authority designated officer (LADO) to determine a suitable outcome. The Board of Governors and Proprietor will discuss with the supply agency whether it is appropriate to suspend the supply teacher subject to an allegation or concern, or redeploy them to another part of the school, whilst an investigation is carried out. The school, in co-operation with the LADO, police and/or children’s social services and the supply agency, will usually take the lead on an investigation of this nature.

Visitors and visiting speakers: Appropriate safeguarding and prevent duty checks upon visiting speakers and other visitors will be made and recorded. All visitors and visiting speakers will be required to undergo an identity check on arrival and wear a visitor's badge. They will not be allowed unsupervised access to pupils. The School keeps a visitor's book at Reception. All visitors must sign in on arrival and sign out on departure and are escorted whilst on School premises by a member of staff or appropriately vetted volunteer. Unidentified visitors will be challenged by staff or reported to the Principal or School Office.

We have protocols for ensuring that any visiting speakers, who might fall within the scope of the *Prevent* duty, whether invited by staff or by the pupils themselves, are suitable and appropriately supervised. This will if appropriate include a barred list check and internet search. At Frewen College, speakers are never left alone with pupils. The interaction between the *Prevent* requirement to check speakers and the KCSIE (September 2020 – Updated January 2021) is likely to mean in practice that checks on visiting speakers will be recordable on the SCR either as checks on staff or un-prescribed checks on volunteers. In accordance with the ISSR, checks are recorded in the SCR by reference to the usual considerations such as role, frequency, supervision, payment and employment by another organisation.

Preventing Extremism and Radicalisation: (Also please refer to our Preventing Extremism and Radicalisation policy and also Appendix 1 of this policy). Our school also ensures that we can 'demonstrate activity', as required by the statutory guidance, in the following key areas: risk assessment of pupils being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology, working in partnership, staff training and IT policies. This is wholly in keeping with our school ethos and approach to promote a broad, tolerant and open-minded understanding of the world around us, including an appreciation of the democratic process and precluding the promotion of partisan political views in the classroom, in extra and co-curricular activities, or in any other aspect of the school's activities. The school is able to demonstrate a general understanding of the risks affecting pupils and young people in the area.

Protecting pupils from the risk of radicalisation is seen as part of Frewen College's wider safeguarding duties, and is similar in nature to protecting pupils from other harms (e.g. drugs, gangs, neglect, sexual exploitation), whether these come from within their family or are the product of outside influences. We understand that during the process of radicalisation, it is possible to intervene to prevent vulnerable people being radicalised. We consider the level of risk of pupils identified as being at 'risk of radicalisation' and make an appropriate referral, which can include Channel or Children's Social Care. Our prevent strategy demonstrates a specific understanding of the risks affecting children and young people and identifying pupils who may be at risk of radicalisation, including support we can give.

Prevent duty: The DSL receives appropriate training, in accordance with Annex B of KCSIE (including higher level Prevent awareness training) at least every two years in order to:

- provide advice and support to members of staff on protecting pupils from radicalisation;
- equip staff through Prevent, Channel and other appropriate training to identify and assess pupils at risk of being drawn into terrorism and to challenge extremist ideas;
- liaise with those responsible for Personal, Social, Health and Economic Education (PSHEE), Spiritual, Moral, Social and Cultural (SMSC) assembly and other appropriate curricular programmes actively to promote British values and to teach pupils about the dangers of radicalisation and extremism and
- liaise with those responsible for the school's electronic systems seriously to limit through appropriate filtering mechanisms the scope for access through these systems to any website or Internet source deemed problematic from a Prevent perspective.

Teaching pupils how to Keep Safe (Educating pupils about safeguarding and radicalisation including the delivery of the prevent strategy): Our programme for PSHEE supports the process of helping our pupils develop an understanding of keeping safe and maintaining wellbeing as part of a broad and balanced curriculum. Within our PSHEE curriculum, we have a programme for Relationship and Sex Education (RSE) which includes issues such as:

- "sexting", "banter", sexual assault between young people and gender based issues
- 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;

- keeping safe whilst online, when accessing remote learning, the dangers of Cyber-bullying and
- that sexual violence and sexual harassment is always wrong; and addressing cultures of sexual harassment.

We ensure that our pupils are aware of the dangers of these safeguarding issues and promote positive relationships based on mutual respect. Through our school values, we encourage pupils to respect others, in particular within this topic. Age appropriate anti-bullying assemblies are held during antibullying week and as part of our PSHEE & C programme during the school year. Additionally whenever appropriate subjects in the curriculum and co-curriculum activities will be used to reinforce the messages given. We follow the standards for safeguarding and protecting children in sport stated by the NSPCC Child Protection in Sport Unit [NSPCC Standards for Safeguarding in Sport](#).

Due to the special educational needs of our pupils, staff will determine, in consultation with parents, when it is appropriate to address issues of sexting and inappropriate banter with our pupils. If a member of staff becomes aware of an allegation or suspected case which involves sexting, inappropriate banter or sexual assault between young pupils, gender based or otherwise, this will be considered as a safeguarding concern and reported to the DSL, who will consider the allegation on a case by case basis. Depending on the severity of the case, this may involve the school's anti-bullying procedures or the parents of the pupils involved. In the case of serious harm, a referral to the MASH will be completed and the police are informed from the outset.

Within Spiritual, Moral, Social and Cultural (SMSC) development, we instil within pupils values that build resilience and prevent pupils being drawn into radicalisation and extremism. We explore what extremism might look like and how this poses a threat to peace and we build resilience to radicalism by providing a safe environment for debating controversial issues. We actively promote British Values within our SMSC and create an environment in which pupils know they are listened to and valued. We educate our pupils to reject violence and cruelty in whatever forms they take on whether it be from animal rights activists, Al Qaeda influenced groups, racist and fascist organisations or any other extremist group.

Racist Incidents: Our policy on racist incidents is set out separately under our Behaviour / Anti-bullying policies, which acknowledge that repeated racist incidents or a single serious incident may lead to consideration under child protection procedures. We keep a record of any racist incidents.

Emerging Technology including the internet and the use of social media (Please see our E-safety Policy for more details): in particular has become a major factor in the radicalisation of young people. We ensure that pupils are safe from potentially harmful and inappropriate content including terrorist and extremist material when accessing the internet on school systems through appropriate levels of filtering, internet safety rules and e-safety education with the curriculum in line with our **E-safety and Cyberbullying policies**. However, we are careful to ensure “over blocking does not lead to unreasonable restrictions. We have a whole school approach to on-line safety, including a clear policy on the use of mobile technology which is integrated, aligned and considered as part of the overarching safeguarding approach. We ensure staff are appropriately trained in on-line safety and we carefully consider how to measure 3G and 4G usage on the school premises through our behaviour management policy. Pupils understand the risks posed by adults or young people, who use the internet and social media to bully, groom, abuse or radicalise young people, especially pupils and vulnerable adults. We support parents in providing links to up-to-date advice and guidance on Internet-Safety, social media and on-line radicalisation through CEOP’s www.Thinkuknow.co.uk _ and the Google Legends project along with:
<https://www.google.co.uk/safetycenter/families/legends//>

Use of mobile phones, cameras and electronic devices: Staff should not use personal mobile telephones in the presence of pupils and must never be used for taking or storing images or recordings of pupils. Any images or recordings should only be taken, edited or stored on school computers. Photographs or recordings should only be made where there is a legitimate school purpose; pupils’ privacy and dignity must be preserved at all times. Images or recordings should not be transmitted to third parties without permission of the Principal or parents of the pupil involved. The School’s’ Acceptable Use Policy sets out the expectations for pupils and parents on the use of mobile phones and cameras whilst at the school. Staff should not use any other electronic device capable of capturing images of pupils other than a school camera, i-pad or i-pod. This is in line with the whole school policy on the use of mobile phones and cameras. The LADO is to be informed if there is any contravention of the school policy regarding the use of personal mobile phones, cameras or other electronic and communication devices by adults working or volunteering at the school. For more details, please see our e-safety policy.

Information and support: There is a wealth of information available to support us in keeping children safe online. The following is not exhaustive but should provide a useful starting point: www.disrespectnobody.co.uk, www.ceop.police.uk, www.saferinternet.org.uk, www.internetmatters.org, www.pshe-association.org.uk, educateagainsthate.com, <https://www.gov.uk/government/publications/teaching-online-safety-in-schools>

Induction and On-Going Training for all staff, temporary staff, volunteers and the Principal and Trustees in line with RBK&C

advice: Our arrangements for the level and focus of role-appropriate and refresher training is in accordance with East Sussex Safeguarding Children Partnership criteria, as required by KCSIE (DfE: Sept. 2020 – Updated January 2021). All staff are provided with copies of key documents which they are required to understand. For staff who cannot read English, our school takes steps to ensure that they understand key information. This includes the active promotion of British values and an understanding of extremism and radicalisation and child exploitation. All our staff are made aware of the systems which supports safeguarding in our school and these are explained to them, as part of their staff induction. This includes:

- the child protection policy (safeguarding policy); the identity of the DSL and Deputy DSL's and information about their roles (such as the implications for mental health and pastoral care and how to identify pupils at risk of radicalisation);
- the staff behaviour policy (Staff code of conduct) (which covers as a minimum, acceptable use of technologies, staff pupil relationships and communications, including via social media and whistleblowing);
- Part One of KCSIE (DfE: Sept. 2020 – Updated January 2021) and 'Annex A' (which includes some types of abuse formerly mentioned in Part One of KCSIE) and copies of policies (such as behaviour management policy, anti-bullying policy, whistleblowing policy, children who are missing education and e-safety including cyber bullying).
- Ensuring all staff are sensitised to act when any incident may be referred to as bullying, tyrannize, terrorise, intimidate, harass, etc., even if the alleged person has no history of that behaviour.
- Our Board of Governors will also be expected to fully understand Part Two of KCSIE (DfE: September, 2020 – Updated January 2021) also.

We assist staff in understanding and undertaking their roles and responsibilities as set out in Part One of KCSIE. This includes talking new staff through the content of Part One in a level and depth appropriate and proportionate to the person and/or to the particular role for which they are being inducted. There is also training and reminders in staff meetings. The DSL monitors the outcome of staff training through post-training discussions with staff, highlighting any gaps in staff knowledge or failings on procedures. All staff undertake prevent awareness training and are able to refer pupils to the DSL for further help. Staff are informed of arrangements to listen to pupils by the use of counsellors, listeners, helplines and other systems to gain views and insight. When relevant, we would work in partnership with our local Prevent co-ordinator. When available in our local authority for our pupils' age group, WRAP training will be provided for all staff.

In addition, all staff receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings) as required but at least annually, to provide them with the relevant skills and knowledge to safeguard pupils effectively. Our Staff are also made aware of the early help process and understand their role in it. This includes identifying emerging problems, liaising with the DSL, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking an early help assessment. Our staff receive annual e-safety training, which looks at emerging technologies strategies to support online safety and highlighting key requirements from our e-safety policy.

Our staff are made aware of the process for making referrals to MASH and statutory assessments under the Children Act of 1989 that may follow a referral, along with the role they might be expected to play in such assessments. The DSL makes it clear in induction, in other training, and in guidance provided for staff they have a responsibility to speak up about safeguarding and welfare matters within the school and to external agencies where necessary. This is one part of our establishing a positive safeguarding culture. This applies not only to new staff but also those already in post. There is also training and reminders in staff meetings. Our staff receive annual e-safety training, which looks at emerging technologies strategies to support online safety and highlighting key requirements from our e-safety policy.: Online safety training for staff is integrated, aligned and considered as part of the overarching safeguarding approach.

Following consultation with the RBK&C, all staff members and the Proprietor will undertake appropriate child protection training regularly i.e. every 3 years as a minimum for all staff (Frewen College provides an annual update to all staff), with the DSL and Deputy DSL attending training every 2 years in line with requirements within KCSIE (DfE: September 2020 – Updated January 2021), inter-agency working. Such training will include local inter-agency protocols and training in the RBK&C approach

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to Prevent duties. Prevent training is included at the beginning of school year INSET, utilising the Home Office e-learning tool

Pupils who are particularly vulnerable: We recognise that some pupils are more vulnerable to abuse and neglect and that additional barriers exist when recognising abuse for some children. We understand that this increase in risk is due more to societal attitudes and assumptions or child protection procedures, which fail to acknowledge pupil's diverse circumstances, rather than the individual child's personality, impairment or circumstances, such as young carers or those with special educational needs or disabilities. A young carer is a person under 18 who provides or intends to provide care for another person (of any age, except generally where that care is provided for payment, pursuant to a contract or as voluntary work).

In some cases possible indicators of abuse, such as a child's mood, behaviour or injury, might be assumed to relate to the child's impairment or disability rather than giving a cause for concern; or a focus may be on the child's disability, special educational needs or situation without consideration of the full picture. In other cases, such as bullying, the child may be disproportionately impacted by the behaviour without outwardly showing any signs that they are experiencing it. Some children may also find it harder to disclose abuse due to communication barriers, lack of access to a trusted adult or not being aware that what they are experiencing is abuse.

Our staff are alert to those pupils with longer-term medical conditions who are young carers or have special educational needs or disabilities. Particular vigilance will be exercised in respect of pupils who are the subjects of Child Protection Plans and any incidents or concerns involving these pupils will be reported immediately to the allocated Social Worker (and confirmed in writing). If a pupil discloses that he/she has witnessed domestic violence, or it is suspected that he/she may be living in a household which is affected by family violence, this will be referred to the DSL as a safeguarding issue. Here it comes to our notice that a child under the age of 13 is, or may be, sexually active, this will result in an immediate referral to MASH and advice being given to the DSL. This will determine how and when information will be shared with parents/guardians/carers and the investigating agencies.

Safeguarding disabled pupils and pupils with medical conditions: Our staff are aware that disabled pupils experience greater risks, vulnerability and barriers to services and resources. They may have additional needs relating to physical, sensory, cognitive and/or communication impairments. Some disabled pupils may be more vulnerable to abuse because it could be assumed that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration; they may have fewer outside contacts (isolation) than other pupils; receive intimate, personal care; have an impaired capacity to resist or avoid abuse; have communication difficulties; fear losing services or; be more vulnerable to peer abuse (e.g. bullying, sexual assault, intimidation). Our staff are alert to the medical needs of pupils including those pupils with longer term medical conditions or disabilities and offer additional pastoral support to these pupils.

Listening to the wishes of children and young people: If Frewen College becomes aware that a child is at 'risk of harm' or 'in need', a referral to the MASH will be completed regardless of the child's or parent's wishes. We believe it is critical that our pupils have an adult who they can trust and Frewen College ensures that there are appropriate systems so pupils know who they can turn to and that staff will listen to them. These include: the School Council (Pupil Voice); Staff and therapists; Spiritual, Moral, Social and Cultural (SMSC) Curriculum and Helplines such as NSPCC and Child line (Contact numbers are at the end of this policy). Frewen College actively encourages a sensitive and open 'listening' environment in which staff and pupils may feel free to discuss general matters relating to safeguarding and to raise specific concerns. Members of staff should use the school's whistleblowing policy should they have any concerns about the handling of safeguarding matters either in general or in specific cases.

Looked After Children: The Principal will ensure staff have the skills, knowledge and understanding necessary to keep safe children who are looked after by a Local Authority, if they have such children on roll. This includes ensuring that there is a designated member of staff with responsibility for their welfare and progress and educational achievement and ensuring this person has up to date assessment information from the relevant Local Authority to ensure prompt action is taken where necessary to safeguard these children. The designated teacher will also have responsibility for promoting the educational achievement of children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales. This includes the child's social worker and virtual Headmaster, the most recent care plan and contact arrangements with parents, and delegated authority to carers including the child's legal status. In our school this person is Gregoire Godin, DSL

Pupil Mental Health: (Please also refer to the Frewen College Mental Health Policy) Frewen College takes its responsibilities towards pupils that may be experiencing mental health difficulties seriously. We provide support including having links with therapists, psychiatrists and the NHS. The staff team being responsible for the safety and wellbeing of pupils, operate an 'open door' policy to encourage pupils to seek help themselves and for staff to refer any concerns so they are dealt with quickly and appropriately. We work closely with these professionals to maintain the pupil's safety within school and adhere to any advice and guidance we are given. We want to make sure our pupils are happy, healthy and thrive and understand we all need a little help from time to time with the busy and stressful lives we have today. We ensure all staff are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Whilst we refer pupils to trained professionals for a diagnosis of a mental health problem, our staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, we recognise this can have a lasting impact throughout childhood, adolescence and into adulthood. Staff are aware of how these children's experiences, can impact on their mental health, behaviour and education. If staff have a mental health concern about a child that is also a safeguarding concern, our Safeguarding procedures are followed, by speaking to the DSL.

Children missing from Education (Please also refer to our policy for lost and missing children): Our staff will follow the school's separate procedures for dealing with children who go missing, particularly on repeat occasions (Please see our Missing Children Policy). All staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. They should act to identify any risk of abuse and neglect, including sexual abuse or exploitation. Staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. It may indicate Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. More information can be found in 'Statutory guidance on children who run away or go missing from home or care' and KCSIE (September 2020 – Updated January 2021). Frewen College has an admission register and an attendance register.

We will follow-up unexplained absences of any child with a telephone call from the School on the morning of the first day of absence and notify social services if there is an unexplained absence of more than two days of a pupil who is on a Child Protection Plan. Wherever possible, we will hold three emergency contact details for each pupil to make contact with a responsible adult if necessary. Frewen College and the DSL shall also inform the applicable local authority of any pupil who 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 (or in default of such agreement, at intervals determined by the secretary of state). Additionally, the DSL will notify the applicable Local Authority (within which the pupil resides when not at Frewen College) of any pupil who is going to be deleted from the Admission Register where he or she:

- has been taken out of school by his/her parents and are being educated outside the school system e.g. home education;
- has ceased to attend Frewen College and no longer live within reasonable distance of Frewen College;
- has been certified by a doctor as unlikely to be in a fit state of health to attend Frewen College before ceasing to be of compulsory school age, and neither he/she nor his/her parent has indicated the intention to continue to attend Frewen College after ceasing to be of compulsory school age;
- is in custody for a period of more than four months due to a final court order and Frewen College does not reasonably believe he/she will be returning at the end of the period; or has been permanently excluded.

The applicable local authority must be notified as soon as the grounds for deletion are met, but no later than deleting the pupil's name from the register. This will assist the local authority to fulfil its duty to identify pupils of compulsory school age who are missing in education and follow up with any pupil who might be in danger of not receiving an education and who might be at risk of abuse or neglect

Notifiable Incidents: This is an incident involving the care of a child that meets any of the following criteria:

- A child has died (including cases of suspected suicide) and abuse or neglect is known or suspected;

- A looked after child has died (including cases where abuse is **not** known or suspected);
- A child has been seriously harmed and abuse or neglect is known or suspected;
- A child in a regulated setting or service has died (including cases where abuse is **not** known or suspected).

Any such incident should be reported to the East Sussex Safeguarding Children Board Child Death Overview Panel (CDOP) coordinator on Child-Death.Overview-Panel@eastsussex.gcsx.gov.uk or CDOP@eastsussex.gov.uk; 01273 481544, Ofsted and the DfE along with the *Reporting of Injuries, Diseases and Dangerous Occurrences* (RIDDOR) in accordance with the regulations of 2013

Pupils being withdrawn from School: If a pupil is withdrawn from the school, all efforts will be made to identify the school to which the pupil is being admitted; their confidential educational and pupil protection records will be sent separately. If the parent/guardian/carer fails to provide information regarding the new school, an urgent referral will be made to the Education Welfare Service (EWS), unless Frewen College has safeguarding concerns about the child in which case it will be MASH.

Records and the sharing of information with relevant agencies: Written notes will be kept of all incidents relating to individual pupils. These may be shared with other agencies. All contact with parents and external agencies relevant to Child Protection will be logged and kept in confidential records which are kept separate from educational records and can only be accessed by designated people within the school. The content of Child Protection reports will be shared with the parents/guardians/carers in advance of any meetings. Referrals made to Frewen College and are recorded on the Inter-agency Referral form. All concerns, discussions and decisions made and the reason for those decisions should be recorded in writing. If in doubt about recording requirements, staff should discuss this with the Designated Safeguarding Lead. As part of meeting a pupil's needs we recognise the importance of information sharing between our professionals and local agencies and we follow procedures set out in 'Working Together to Safeguard Children' (HM Gov 2018). Our Data Protection Officer and DSL provide guidance to staff to ensure they are confident with processing information for safeguarding purposes and also the sharing of safeguarding information without permission where there is a good reason to do so. This may also include withholding information where the serious harm test under legislation is met.

Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. Although inter agency working and information sharing are vital in identifying and tackling all forms of abuse, it is clear they are especially important to identify and prevent child sexual exploitation. Records concerning allegations of abuse must be preserved for the term of the Independent inquiry into Child Sexual Abuse and at least until the accused has reached normal pension age or for 10 years from the date of the allegation if it is longer.

School website safeguarding statement: To ensure the privacy and safety of pupils where children are named, only their first names are given. Where a pupil is named, no photograph of that pupil is displayed. Where a photograph is used which shows a pupil, no name is displayed. By observing these points, the school ensures that visitors to the website cannot link images of pupils to names of pupils. When choosing photographs for the website, the school is mindful of the way pupils may appear in them, and will not include images which are in any way inappropriate. Frewen College follows a policy of seeking parent, guardian or carer's permission before using images which show pupils on the website or in the local press. The list showing the pupils who are barred from appearing in the press, or on the website, is kept in the School Office and is available whenever photographers are present. No private information about pupils is published on the website such as surnames or contacts details.

Staff Behaviour Policy (Staff Code of Conduct) - Power, Positions of Trust and Staff Behaviour: Guidance is provided in the Frewen College *Staff Behaviour policy and Teachers' Standards* on how adults can ensure that their behaviour and actions do not place pupils or themselves at risk of harm or of allegations of harm to a pupil (for example, in one-to-one tuition, sports coaching, conveying a pupil by car, engaging in inappropriate electronic communication with a pupil, and so on). The staff Behaviour policy is wide-ranging and covers staff/pupils relationships and communications including use of social media, "breach of trust" and expands on the whistle-blowing statement in this policy. Staff must seek medical advice if they are taking medication which may affect their ability to care for children, and any staff medication must be securely stored and out of the reach of pupils at all times.

Corporal Punishment is prohibited for all pupils. The prohibition includes the administration of corporal punishment to a pupil during any activity, whether or not within the school premises. The prohibition applies to all 'members of staff'. These include all those acting *in loco parentis*, such as unpaid, volunteer supervisors.

Safeguarding arrangements during mandatory school closures / remote working (such as COVID-19): Frewen College considers safeguarding of critical importance at a time when our school is required to close and will do all it can to continue to protect its pupils and staff, especially those who are vulnerable. This includes arrangements for online/remote learning spaces and the monitoring of attendance to those lessons. Whilst additional arrangements have been established, all the school's policies, rules and guidelines remain in place and adherence to all statutory guidance is expected. We will incorporate any updated advice from the LA about local arrangements, including changes to contact details or referral thresholds ect. Additional detail regarding the behaviour and conduct of both staff and pupils, including our arrangements for remote learning and 1:1 meetings can be found in our Safeguarding Arrangements for Remote Working Policy.

School Closure/Remote Working Risk Assessment: As part of our additional safeguarding arrangements, we have developed a 'School Closure/Remote Working' risk assessment, which identifies and addresses the risks associated with pupils being required to stay at home. The mitigation measures devised by this risk assessment will enable the school to ensure we can, as effectively as possible, safeguard pupils who are not physically at the school. Although not an exhaustive list, below are some specific examples of how staff will safeguard pupils:

Teaching and support staff will:

- be available during their normal working hours (either full school day or part-time as specified in their contracts) to respond to email and other appropriate work software alerts.
- keep a register of attendance of video lessons and a log of work completed, feeding back concerns in attendance to the DSL.
- attend any relevant meetings via telephone or video conference as requested.
- report any safeguarding or pastoral concerns as normal through CPOMs and follow-up with DSLs as usual.
- know which pupils/students are vulnerable and will ensure regular contact is made both with the families and the child's social worker (if applicable), particularly if pupils are unable to physically attend school.

Senior Leadership Team will:

- be available during their normal working hours (either full school day or part-time as specified in their contracts) to respond to email and other appropriate work software alerts.
- establish a system to monitor safeguarding and attendance patterns and respond accordingly where there are concerns for the safety of children.
- attend/chair any relevant meetings via telephone or video conference as requested.
- inform all staff on a regular basis by email of safeguarding training or updates.
- know which pupils/students are vulnerable and will ensure regular contact is made both with the families and the child's social worker (if applicable).
- Ensure that there is always a DSL / Deputy DSL available to contact throughout the year, in the event that a DSL is unwell.

Safeguarding pupils engaged in close, one-to-one teaching: We recognise that children may be more vulnerable when working with adults in a close one-to-one teaching provision. Please refer to the *Frewen College Staff Code of Conduct and Teachers' Standards* on how adults can ensure that their behaviour and actions do not place pupils or themselves at risk of harm or of allegations of harm to a pupil (for example, in one-to-one tuition, sports coaching, conveying a pupil by car, counselling and so on). The *Staff Code of Conduct* is wide-ranging and covers staff/pupils' relationships (including working alone with pupils) and communications including use of social media, "breach of trust" and expands on the whistle-blowing statement in this policy. The following guidance and arrangements have been taken from our Staff Behaviour (Code of Conduct) Policy which aim to safeguard pupils in one-to-one teaching situations:

- Staff must conduct themselves professionally in their relationships with pupils, parents and staff and must not behave in a way that could bring the School into disrepute or risk allegations being made.
- No member of staff should ever be behind a locked door with a child.
- One-to-one meetings should, wherever possible, take place in public or semi-public places such as classrooms or offices. If in classrooms, ensure you are seated so that you and the child can be seen through the visibility panel in the door.
- When in a private meeting with a child or one-to-one session, staff should ensure furniture is positioned to allow easy access into or out of the room and that the glass panel in the door is not obscured.
- Staff will at no time travel unaccompanied outside of the School with children.

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- Staff should ensure that a meeting is arranged during normal School hours when there are plenty of other people about;
- Staff will avoid sitting or standing in close proximity to the pupil, except as necessary to check work.
- Staff must report any incident that causes you concern to the Designated Safeguarding Lead in accordance with the School's Child Protection Policy, and make a written record (signed and dated); and
- report any situation where a pupil becomes distressed or angry to the Designated Safeguarding Lead.

Physical restraint: Our policy on physical restraint is compliant with the Local Authority's 'Physical Restraint in Schools' guidance along with guidance from the DfE. Events are recorded and signed by a witness. Staff who are likely to need to use physical intervention are appropriately trained. We understand that physical intervention, of a nature that causes injury or distress to a pupil, may be considered under child protection or disciplinary procedures.

Whistleblowing: Our whistleblowing policy is integrated into training and codes of conduct. We make it clear both in induction and other training and in guidance provided for staff that they have a responsibility to speak up about safeguarding and welfare matters within our school and to external agencies where necessary. This is one part of the way in which we establish in our school, a positive safeguarding culture. We have an open environment and culture of safety where staff feel free to raise concerns. The school also has a culture of valuing staff and of reflective practice. There are procedures for reporting and handling concerns, including poor or unsafe practice and potential failures in the safeguarding regime, provision for mediation and dispute resolution where necessary. Training and support are provided for staff including transparency and accountability in relation to how concerns are received and handled. Frewen College has regard to KCSIE (September 2020 – Updated January 2021) and as a result has clear processes for reporting and recording allegations. The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 or Email: help@nspcc.org.uk

Working in Partnership and Responding to Parents and Carers: Our school works in partnership with parents/guardians/carers and local authorities communicating as clearly as possible with them (in particular with parents for whom English is not their first language) for the best outcomes for children. Parents are welcome to approach the Designated Safeguarding Lead if they have any concerns about the welfare of any child in the School. If preferred, parents may discuss concerns in private with the child's class teacher or the , Principal who will notify the DSL in accordance with these procedures.

Young carer: A young carer is a person under 18 who provides or intends to provide care for another person (of any age, except generally where that care is provided for payment, pursuant to a contract or as voluntary work).

Our school operates these safeguarding procedures in line with locally-agreed inter-agency procedures. Our Integrated Safeguarding Portfolio consists of the following legal status documents, related documents and references which have been used in formulating this policy along with the forms required to be completed when referring to Children's Social Care and the LADO and the Proprietor's annual Safeguarding Audit and Review.

Reasons for no longer using a person's services and reporting to the Disclosure and Barring Service (DBA) along with considering referral to the Teaching Regulation Agency (TRA). If a member of staff or volunteer tenders his or her resignation, or is dismissed and a prohibition order may be appropriate, 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 and the TRA as soon as possible if the criteria are met.

We also ensure that 'Compromise Agreements' or 'ACAS Agreements' never apply in such circumstances.

Legal Status Documents and References (statutory and best practice guidance)

- Part 3, paragraphs 7 (a) and (b) of the education (Independent School Standards)(England)(Amendment) Regulations (ISSR) currently in force; also in compliance with *Part 4 of the ISSR* with reference to the appointment of the Proprietor, all staff, external providers and volunteers inclusive of completion of the Single Central Record (SCR) otherwise referred to as the Centralised Register to ensure that the School meets its commitment to safeguarding and promoting the welfare of children and young people by carrying out all necessary pre-employment checks.
- This policy is consistent with *Keeping Children Safe in Education* KCSIE) (DfE: September 2020 – Updated January 2021) including DfE Non-statutory interim supplements to KCSIE: Coronavirus – Guidance for full opening: Schools; Remote Education during Coronavirus

- KCSIE also refers to the non-statutory advice for practitioners: [What to do if you're worried a child is being abused](#) (HM Government)
- [Working Together to Safeguard Children](#) (WTtSC) (Inter-agency working) (HM Government: July 2018) WTtSC also refers to non-statutory but important advice, [Information sharing advice for practitioners providing safeguarding services](#) along with the [Disclosure and Barring Service](#) (DBS) Behaviour Policy
- [East Sussex Safeguarding Children Partnership Arrangements](#) (June 2019)
- [Prevent Duty Guidance: for England and Wales](#) (July 2015) (Prevent). Prevent is supplemented by non-statutory advice and a briefing note:
 - [The Prevent duty: Departmental advice for schools and childminders](#) (June 2015)
 - [The use of social media for on-line radicalisation](#) (July 2015)
 - [Searching, screening and confiscation](#) (January 2018)
- [Mental health and behaviour in schools](#) (November 2018) and [Counselling in schools: a blue print for the future](#) (February 2016)
- [Child sexual exploitation and children missing from home, care or education: Ofsted targeted inspection advice](#) (HM Govt: 14 January 2016)
- [Sexual Offences Act 2003](#) (HM Government: 2003); [Definition of child sexual exploitation](#) (February 2016)
- [Sexual violence and sexual harassment between children in schools and colleges](#) (DfE: December 2017)
- [Child Abuse Image Database](#) (May 2018); [Child Sexual Exploitation Safe Steps Project](#) (March 2017)
- [Child sexual exploitation gangs and children missing from home, care or education](#) (January 2017)
- [CSE Guidance Core Document](#) (February 2017); [Safer working practices for those working with children](#) (May 2019)
- [UKCCIS sexting advice](#); ; [Children missing education](#) (September 2016)
- [Mandatory Reporting of Female Genital Mutilation – procedural information](#) (December 2016)
- [Child Abuse and Neglect \(NSPCC\)](#) (February 2018); [When to Call the Police \(NPCC\)](#) May 2020
- [Help, protection, education: concluding the Children in Need review](#) (June 2019)

Specialist Organisations: [Barnardo's](#), [Lucy Faithfull Foundation](#), [NSPCC](#), [Rape Crisis](#), [University of Bedfordshire: Contextual Safeguarding](#), [UK Safer Internet Centre](#)

Support for victims: [Anti-Bullying Alliance](#), [MoJ Victim Support](#), [Rape Crisis](#), [The Survivors Trust](#), [Victim Support Toolkits](#): [Brook](#), [NSPCC](#), [Safeguarding Unit](#), [Farrer and Co.](#) and [Carlene Firmin, MBE, University of Bedfordshire](#)

Further information on confidentiality and information sharing: [Gillick competency Fraser guidelines](#), [Government information sharing advice](#), [Information Commissioner's Office: Education](#), [NSPCC: Things to know and consider](#)

Further information on sexting: [UKCCIS: sexting advice](#), [London Grid for Learning- collection of advice](#)

This policy has been compiled in conjunction with and reference to the following related documents which are:

- **Available on the Frewen College website and/or also on request from the school office:** Anti-bullying, Behaviour Management including Discipline, Sanctions and Exclusions; Physical Restraint; Preventing Extremism and Radicalisation Policy; First Aid; Educational Visits and Off-site Activities; E-Safety including Cyberbullying and Acceptable Use; Personal, Social, Health and Economic Education (PSHEE); Sex and Relationship Education (SRE); Special Education Needs and Disabilities (SEND Code of practice January 2015); Spiritual, Moral, Social and Cultural (SMSC) Development; Whistleblowing, Staff Code of Conduct; [Keeping Children Safe in Education Information for all school and school staff](#) (DfE: September 2020 – Updated January 2021)).
- **Available on the Staff Shared:** Safe Recruitment including the selection and appointment of staff; [Keeping Children Safe in Education. Statutory guidance for schools and school.](#) (DfE: September 2020 – Updated January 2021)); Appendix: – Safer Recruitment Flowcharts. All Staff existing and new are required to read Part 1 and Annex A of KCSIE September 2020 – Updated January 2021 and sign to say they have understood it.

Confidentiality: We regard all information relating to individual child or adult protection issues as confidential and we only pass information on to appropriate persons. The School will co-operate with MASH and police to ensure that all relevant information is shared for the purposes of child protection investigations under section 47 of the Children Act 1989 in accordance with the requirements of 'Working together to Safeguard Children' (July 2018). Our staff know they cannot promise confidentiality and that there are other agencies which children can turn to e.g. Childline: 0800 1111.

APPENDIX 1 - TYPES AND SIGNS OF ABUSE AND NEGLECT INCLUDING POSSIBLE INDICATORS

Types of Abuse and Neglect Including Specific Safeguarding Issues: We are 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. Abuse may take place wholly online, or technology may be used to facilitate offline abuse. Issues could include: *physical abuse; neglect (physical or emotional); peer abuse; extremism/radicalisation; domestic violence; drug/alcohol abuse; emotional abuse; abuse of trust; children who sexually abuse; witnessing domestic abuse or violence; child sexual exploitation (CSE); child exploitation and e-safety; pupil sexual exploitation; female genital mutilation (FGM); forced marriages; fabricated or induced illness; faith abuse; safeguarding disabled children; disability and vulnerability; honour-based violence vulnerable groups; bullying including cyberbullying; vulnerable pupils; children in need; child missing education (children who run away or go missing); child missing from home or care; missing children and adults strategy; young carers; cared for children and significant harm; gangs and youth violence; gender-based violence/violence against women and girls (VAWG); hate; mental health; private fostering; homeless; family members in prison; preventing radicalisation; teenage relationship abuse; sexting; trafficking.* Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example NSPCC offers information for schools and colleges on the TES website and also on its own website www.nspcc.org.uk/preventing-abuse/ and other government websites:

PHYSICAL ABUSE: The nature of 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. Most children collect cuts and bruises quite routinely as part of the rough and tumble of daily life. Clearly it is not necessary to be concerned about most of these minor injuries. But accidental injuries normally occur on the *bony prominences* e.g. shins. Injuries on the *soft* areas of the body are more likely to be inflicted intentionally. If a body map is to be used to record physical abuse, they should only be used to record observed injuries and no child should be asked to remove clothing by a member of staff of the school.

Indicators of physical abuse/factors that should increase concern include:

- multiple bruising or bruises and scratches/bi-lateral injuries (especially on the head and face including around the mouth); clusters of bruises – e.g. fingertip bruising (caused by being grasped); bruises around the neck and behind the ears – the most common abusive injuries are to the head;
- marks indicating injury by an instrument – e.g. linear bruising (stick), parallel bruising (belt), marks of a buckle;
- bite marks; deliberate burning may also be indicated by the pattern of an instrument or object - e.g. electric fire, cooker, cigarette; scalds with upward splash marks or *tide marks*; untreated injuries; injuries to genital areas;
- recurrent injuries, burns or bald patches; having broken bones or unexplained bruising, burns or welts in different stages of healing; being unable to explain an injury, or providing explanations that are inconsistent, vague or unbelievable.
- If a child has an injury to which they cannot explain, where the parent or child is apparently secretive or evasive or if the explanation does not appear to match the injury.

EMOTIONAL ABUSE: Definition of emotional abuse: the persistent emotional maltreatment of a child such 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 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. This can also occur when a child is a young carer for a parent who is disabled, has mental health problems or misuses alcohol or drugs. It may involve seeing or hearing the ill treatment of another, for example where there is fighting or violence in the home. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

The nature of emotional abuse: Most harm is produced in *low warmth, high criticism* homes, not from single incidents. Emotional abuse is chronic and cumulative and has a long-term impact. All kinds of abuse and neglect have emotional effects although emotional abuse can occur by itself. Witnessing someone harming another person – as in domestic violence, can harm children. It is sometimes possible to spot emotionally abusive behaviour from parents and carers to their children, by the

way that the adults are speaking to, or behaving towards children. An appropriate challenge or intervention could affect positive change and prevent more intensive work being carried out later on.

Indicators of emotional abuse: Developmental issues include delays in physical, mental and emotional development; poor school performance and speech disorders, particularly sudden disorders or changes.

Behaviour: acceptance of punishment which appears excessive; over-reaction to mistakes; continual self-deprecation (I'm stupid, ugly, worthless etc); neurotic behaviour (such as ricking, hair-twisting, thumb sucking); self-mutilation; suicide attempts; drug/solvent abuse; running away; compulsive stealing, scavenging; acting out; poor trust in significant adults; regressive behaviour – e.g. wetting; eating disorders; destructive tendencies; neurotic behaviour; arriving early at school, leaving late.

Social issues: withdrawal from physical contact or from social interaction; over-compliant behaviour or insecure, clinging behaviour; poor social relationships.

Emotional responses: extreme fear of new situations; inappropriate emotional responses to painful situations (“I deserve this”); fear of parents being contacted; self-disgust; unusually fearful with adults; lack of concentration, restlessness, aimlessness; extremes of passivity or aggression; excessive need for approval, attention and affection.

NEGLECT is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. 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 care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. Far more children are registered to the category of neglect on child protection plans than to the other categories. Neglect is a difficult form of abuse to recognise and is often seen as less serious than other categories. It is, however, very damaging: children who are neglected often develop more slowly than others and may find it hard to make friends and fit in with their peer group. Neglect is often noticed at a stage when it does not pose a risk to the child. The duty to safeguard and promote the welfare of children would suggest that an appropriate intervention or conversation at this early stage can address the issue and prevent a child continuing to suffer until it reaches a point when they are at risk of harm or in significant need. Neglect is often linked to other forms of abuse, so any concerns school staff have should at least be discussed with the DSL.

Indicators of neglect: The following is a summary of some of the indicators that may suggest a child is being abused or is at risk of harm. It is important to recognise that indicators alone cannot confirm whether a child is being abused. Each child should be seen in the context of their family and wider community and a proper assessment carried out by appropriate persons. What is important to keep in mind is that if you feel unsure or concerned, do something about it. Don't keep it to yourself.

Physical indicators of neglect include: constant hunger and stealing food; poor personal (including dental) hygiene – unkempt, dirty or smelly; being underweight; wearing dress unsuitable for weather; poor state of clothing; illness or injury untreated and looking sad, false smiles.

Behavioural indicators of neglect include: constant tiredness; frequent absence from school or lateness; or arriving early at school/leaving late; missing medical appointments; becoming isolated among peers; being frequently unsupervised; stealing or scavenging, especially food and having destructive tendencies, poor relationships with peers; running away.

SEXUAL ABUSE: The nature of sexual abuse: Sexual abuse is often perpetrated by people who are known and trusted by the child – e.g. relatives, family friends, neighbours, babysitters, and people working with the child in school, faith settings, clubs or activities. Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. 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 (including via the internet). Sexual abuse can take place online, and

technology can be used to facilitate offline abuse. Sexual abuse can be committed by anybody, including women and children as well as adult males. Where it comes to our notice that a pupil under the age of 13 is, or may be, sexually active, this will result in an immediate referral to Children's Services and advice being given to the DSL. This will determine how and when information will be shared with parents/guardians/carers and the investigating agencies.

Child sexual exploitation: 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, 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. Like all forms of child sex abuse, child sexual exploitation:

- can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex;
- can still be abuse even if the sexual activity appears consensual;
- can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity;
- can take place in person or via technology, or a combination of both;
- can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence;
- may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media);
- can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse; and
- is typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

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

- Children who appear with unexplained gifts or new possessions; who associate with other young people involved in exploitation; have older boyfriends or girlfriends;
- Children who suffer from sexually transmitted infections or become pregnant; 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 regularly miss school or education or do not take part in education; staying away from certain people or avoiding being alone with someone; displaying sexual behaviour that is inappropriate for their age;
- Inappropriate masturbation or self-harm (including eating disorders) and an unwillingness to remove clothes when changing for PE etc.

It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including Cyber Bullying and grooming. It is also important to recognise that some young people who are being sexually exploited or abused do not exhibit any external signs of this abuse.

Characteristics of Child Sexual Exploitation and abuse: it is often planned and systematic – people do not sexually abuse children by accident, through sexual abuse can be opportunistic; grooming the child – people who abuse children take care to choose a vulnerable child and often spend time making them dependent; grooming the child's environment – abusers try to ensure that potential adult protectors (parents and other carers especially) are not suspicious of their motives.

Indicators of sexual abuse: Physical observations include damage to genitalia, anus or mouth; sexually transmitted diseases; unexpected pregnancy, especially in very young girls; soreness in genital area, anus or mouth and other medical problems such

as chronic itching; unexplained recurrent urinary tract infections and discharges or abdominal pain. The concerns listed are not exhaustive. Staff can and should also record and report other concerns about a child, such as general welfare concerns.

Child Criminal Exploitation (CCE): CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology. CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people. 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.

Specific safeguarding issues

Our staff are of safeguarding issues - some of which are listed below. They are aware that behaviours linked to the likes of drug taking, alcohol abuse, truancy and sexting put children in danger. Our staff are aware safeguarding issues manifest themselves via peer-on-peer abuse. This is most likely to include, but not limited to: bullying (including Cyber Bullying), gender based violence/sexual assaults and sexting.

PEER-ON-PEER ABUSE: Our staff are clear as to the school's policy and procedures with regards to peer-on-peer abuse and we follow KCSIE and WTTSC. See paragraph '**Concerns and allegations of abuse made against other children (Peer-on-Peer Abuse) inclusive of sexting and banter**' for the procedures we take to minimise the risk of peer-on-peer abuse and how allegations will be investigated and dealt with.

Youth produced sexual imagery (Sexting) - *Please refer to our Peer on Peer Abuse Policy.* *The practice of children sharing images and videos via text message, email, social media or mobile messaging apps has become commonplace. The DfE provides searching screening and confiscation advice for schools. The UK Council for Child Internet Safety (UKCCIS) Education Group has recently published sexting advice for schools and colleges. However, this online technology has also given children the opportunity to produce and distribute sexual imagery in the form of photos and videos. Such imagery involving anyone under the age of 18 is illegal. Youth produced sexual imagery refers to both images and videos where a person under the age of 18:*

- creates and shares sexual imagery of themselves or by another person under the age of 18 or an adult.
- is in possession of sexual imagery created by another person under the age of 18.

All incidents of this nature should be treated as a safeguarding concern and in line with the guidance 'Sexting in schools and schools: responding to incidents and safeguarding young people'. Cases where sexual imagery of people under 18, is child sexual abuse and should be responded to accordingly.

If a member of staff becomes aware of an incident involving youth produced sexual imagery they should follow the child protection procedures and refer to the DSL as soon as possible. The member of staff should confiscate the device involved and set it to flight mode or, if this is not possible, turn it off. Staff should not view, copy or print the youth produced sexual imagery. Parents should be informed, unless there is reason to believe that this would put the child at risk of harm. A referral should be made to Children's Social Care or the Police as appropriate. Immediate referral should be made to Children's Social Care/Police if;

- the incident involves an adult, the imagery involves sexual acts; the imagery involves anyone aged 12 or under;
- there is good reason to believe that a young person has been coerced, blackmailed or groomed or if there are concerns about their capacity to consent (for example, owing to special education needs);
- what you know about the imagery suggests the content depicts sexual acts which are unusual for the child's development stage or are violent;

- There is reason to believe a child is at immediate risk of harm owing to the sharing of the imagery, for example the child is presenting as suicidal or self-harming.

If none of the above applies then the DSL will consider if;

- There is a significant age difference between the sender/receiver;
- There is any coercion or encouragement beyond the sender/receiver;
- The imagery was shared and received with the knowledge of the child in the imagery;
- The child is more vulnerable than usual i.e. at risk;
- There is a significant impact on the children involved;
- The image is of a severe or extreme nature;
- The child involved understands consent;
- The situation is isolated or if the image been more widely distributed;
- There are other circumstances relating to either the sender or recipient that may add cause for concern i.e. difficult home circumstances;
- The children have been involved in incidents relating to youth produced imagery before.

If any of these circumstances are present the situation will be escalated according to our child protection procedures, including reporting to the police or children's social care. Otherwise, the situation will be managed within the school. The DSL will record all incidents of youth produced sexual imagery, including both the actions taken, actions not taken, reasons for doing so and the resolution in line with safeguarding recording procedures. This guidance reflects the UKCCIS Guidance.

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/551575/6.2439KGNCSEXtinginSchools

Removal of sexual images/videos: If the incident involves sexual images or videos that have been made and circulated online, the victim can be supported to get the images removed through the [Internet Watch Foundation \(IWF\)](#). The IWF will make an assessment of whether the image is illegal in line with UK Law. If the image is assessed to be illegal, it will be removed and added to the IWF's Image Hash list.

Upskirting: 'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and/or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim.

CHILD CRIMINAL EXPLOITATION: COUNTY LINES: 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 be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. 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 ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the [National Referral Mechanism](#) should be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

CHILDREN AND THE COURT SYSTEM: Frewen College recognises that children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children [5-11-year olds](#) and [12-17 year olds](#). They explain each step of the process and support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained. Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. We recognise this can be stressful for children. The Ministry of Justice has launched an online [child arrangements information tool](#) with clear and concise information on the dispute resolution service and this may be useful for some parents and carers.

CHILDREN WITH FAMILY MEMBERS IN PRISON: Approximately 200,000 children have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. Our staff use information provided by [NICCO](#) provides to support any pupils who have parents in prison, to help mitigate negative consequences for those children.

HONOUR-BASED ABUSE (including Female Genital Mutilation and Forced Marriage): 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. If in any doubts staff should speak to the designated safeguarding lead. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

Indicators of Honour-based abuse: Guidance on the warning signs that FGM or forced marriage may be about to take place, or may have already taken place, can be found on pages 38-41 of the Multi agency statutory guidance on FGM (pages 59-61 focus on the role of schools and colleges) and pages 13-14 of the Multi-agency guidelines: Handling case of forced marriage.

Actions if HBA is suspected: If staff have a concern regarding a child that might be at risk of HBA they should activate local safeguarding procedures, using existing national and local protocols for multiagency liaison with Police and Children's Services. In the social context of the school, it is normal to ask about a noticeable injury. The response to such an enquiry is generally light-hearted and detailed. So, most of all, concern should be increased when: the explanation given does not match the injury; the explanation uses words or phrases that do not match the vocabulary of the child (adults words); no explanation is forthcoming; the child (or the parent/carer) is secretive or evasive or the injury is accompanied by allegations of abuse or assault. **We become concerned if the child or young person** is reluctant to have parents/carers contacted; runs away or shows fear of going home; is aggressive towards themselves or others; flinches when approached or touched; is reluctant to undress to change clothing for sport; wears long sleeves during hot weather; is unnaturally compliant in the presence of parents/carers; has a fear of medical help or attention or admits to a punishment that appears excessive.

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

Circumstances / symptoms that may point to FGM happening include:

- A child talking about getting ready for a special ceremony; a child's family taking a long trip abroad
- A child's family being one of the 'at risk' communities for FGM (Kenya, Somalia, Sudan, Sierra Leon, Egypt, Nigeria, Eritrea as well as non-African communities including Yemeni, Afghani, Kurdistan, Indonesia and Pakistan);
- Knowledge that a sibling has undergone FGM; a child talking about going abroad to be 'cut' or to prepare for marriage; Difficulty in walking, sitting or standing; spending lengthier time in the bathroom/toilet than usual;
- Unusual behaviour after a school absence/reluctance to undertake usual medical examinations and
- Asking for help, but not detailing the problem in full due to fear or embarrassment.

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

Teachers **must** personally report to the Police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should also still consider and discuss any such case with the school DSL and involve Children’s Services as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures.

FORCED MARRIAGE: Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage. The Forced Marriage Unit has published Multi-agency guidelines, with pages 32-36 focusing on the role of schools and colleges. School and staff can contact the Forced Marriage Unit if they need advice or information. Contact: 020 7008 0151 or email: fm@fco.gov.uk.

HOMELESSNESS: Being homeless or being at risk of becoming homeless presents a real risk to a child’s welfare. Our designated safeguarding lead and deputy DSL are aware of contact details and referral routes in to the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Although our pupils have full-time boarding accommodation whilst at Frewen College, staff are still alert to the signs that families of pupils may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and or discussion with the Local Housing Authority should be progressed as appropriate, this does not, and should not, replace a referral into children’s social care where a child has been harmed or is at risk of harm.

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

GANGS AND YOUTH VIOLENCE: We will endeavour to protect our children and young people from exposure to gang activity and exploitation by having robust attendance and behaviour policies and to act on relevant information or allegations. We will take all reports seriously and will share this information appropriately with other agencies to safeguard our pupils from harm.

DOMESTIC VIOLENCE AND ABUSE: The current government definition of *domestic violence and abuse* (DVA), now includes 16 and 17-year olds, recognising that they are the largest group to experience domestic abuse and violence. It is now defined as: *‘Any incident or pattern of incidents of controlling, coercive or 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. This can encompass, but is not limited to, the following types of abuse: psychological; physical; sexual; financial; emotional’.*

Significant harm from domestic abuse can include: physical violence, emotional abuse, sexual abuse, and financial abuse. If a member of staff is concerned that domestic abuse is occurring within a family or relationship they should inform the DSL who will consider a referral to Children’s Services and/or the Police as necessary. In circumstances where there have been 3 known incidents of domestic abuse, a referral must be made to Children’s Services. In December 2015 a new criminal offence of coercive and controlling behaviour came into force in England and Wales. This means that repeated patterns of non-physical

behaviour (emotional abuse and control) within relationships are now considered a criminal offence capable of prosecution. For the offence to apply, criteria must be met.

Children may suffer both directly and indirectly if they live in households where there is domestic violence. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children and it will often be appropriate for such children to be regarded as Children in Need under the Children Act 1989. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life. Where there is evidence of domestic violence, we will report our concerns to the appropriate agency including children's social care and the police in order to prevent the likelihood of any further abuse taking place. Advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

[NSPCC- UK domestic-abuse Signs Symptoms Effects](#)

[Refuge what is domestic violence/effects of domestic violence on children Safelives: young people and domestic abuse](#)

BULLYING - Please also refer to our anti-bullying policy which sets out our procedures in order to prevent bullying and to deal with it if and when it occurs within the school. This may be defined as deliberate, repeated (systematic) aggressive verbal, psychological or physical conduct by an individual or group against another person or persons. Very often bullying is the act of oppressing or dominating by threat or force where the aggressor may persecute or tease physically or morally in order to frighten into action or inaction. Bullying can include:

- Physical: pushing, hitting, kicking, pinching etc.
- Verbal: name-calling, spreading rumours, constant teasing and sarcasm
- Emotional: tormenting, ridiculing, humiliating, ignoring
- Racial: taunts, graffiti and gestures; Religious / cultural
- Sexual, sexist or homophobic: unwanted physical contact or abusive comments
- Cyber-bullying: through social networking websites, mobile phones and text messages, photographs and email

Signs that may indicate bullying:

- Behavioural changes such as reduced concentration, becoming withdrawn, depressed, tearful, emotionally up and down, reluctance to go to school etc.; a marked drop off in performance at school
- Physical signs such as stomach aches, headaches, difficulties in sleeping, bingeing on food, cigarettes or alcohol and a shortage of money or frequent loss of possessions.

SELF-HARM AND SUICIDAL BEHAVIOUR: Self-harm can be deliberate with the aim of a child just causing themselves an injury, attempted suicide which does not result in end of life or a successful attempt to end life resulting in death. Majority of self-harmers keep it a secret that goes undiscovered, finding it is the only way to express their feelings. Children self-harm for many reasons including: being bullied both at school or online, mental health issues, eating disorders, domestic abuse, any type of child abuse, parental conflict and bereavement. The signs of the distress the child may be under can take many forms and can include:

- cutting behaviours and self-poisoning, other forms of self-harm, such as burning, scalding, banging, hair pulling; not looking after their needs properly emotionally or physically;
- direct injury such as scratching, cutting, burning, hitting yourself, swallowing or putting things inside;
- staying in an abusive relationship, taking risks too easily, eating distress (anorexia and bulimia);
- addiction for example, to alcohol or drugs and low self-esteem and expressions of hopelessness.

During a disclosure of self-harm staff should check whether the pupil has ingested anything or has anything on their person that could cause damage or harm. Any concerns from staff members should be referred to the DSL, as an early help assessment may need to be completed to involve services that can help, or in the case of significant harm a referral can be made to Children's Services.

PRIVATE FOSTERING ARRANGEMENTS: A private fostering arrangement occurs when someone other than a parent or close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16 or 18 if the child is disabled. Children looked after by the local authority or who are placed in residential schools,

children's homes or hospitals are not considered to be privately fostered. Private fostering occurs in all cultures, including British culture and children may be privately fostered at any age.

Frewen College recognise that most privately fostered children remain safe and well but are aware that safeguarding concerns have been raised in some cases. Therefore, all staff are alert to possible safeguarding issues, including the possibility that the child has been trafficked into the country. By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify children's services as soon as possible. However, where a member of staff becomes aware that a pupil may be in a private fostering arrangement they will raise this with the DSL and the DSL will notify East Sussex Children's Services of the circumstances.

LOOKED AFTER CHILDREN: The most common reason for children becoming looked after is as a result of abuse and neglect. The school ensures that staff have the necessary skills and understanding to keep looked after children safe. Appropriate staff have information about a child's looked after legal status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child and contact arrangements with birth parents or those with parental responsibility. The designated teacher and Member of the Board of Trustees for children looked after will have the appropriate level training to equip them with the knowledge and skills to undertake their role. The designated teacher for children looked after and the DSL have details of the child's social worker and the name and contact details of the East Sussex Head of Virtual School.

TRAFFICKED CHILDREN: Child trafficking involves moving children across or within national or international borders for the purposes of exploitation. Exploitation includes children being used for sex work, domestic work, restaurant/ sweatshop, drug dealing, shoplifting and benefit fraud. Where the School is made aware of a child is suspected of or actually being trafficked/exploited, including being in Private Fostering, the DSL will report our concerns to Children's Social Care.

RADICALISATION: KCSIE define radicalisation as 'the process by which a person comes to support terrorism and forms of extremism. Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty 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.' There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular has become a major factor in the radicalisation of young people.

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

The above list is not exhaustive and as new policy guidance and legislation develops within the remit of Safeguarding we will review and update our policy as appropriate and in line with the Local Safeguarding Children Board and local authority to ensure our school is a safe place to learn and work.

APPENDIX 2 – MAIN RESPONSIBILITIES OF THE DSL, DEPUTY DSL, TRUSTEES AND THE PRINCIPAL :

Designated Safeguarding Lead (DSL) and Deputy DSL: They are members of the school's senior leadership (SLT) with the status and authority to carry out the duties of the posts of DSL/Deputy DSL and /Deputy Prevent Officers. A detailed list of responsibilities for the DSL/Deputy DSL is given in Appendix 2. The Deputy DSL will act as DSL in their absence and otherwise will carry out safeguarding tasks and duties as specified by the DSL in accordance with the details set down below

The core responsibility of the DSL, who is a member of the SLT, is to take **lead responsibility** for safeguarding and child protection maintain an overview of safeguarding within the school, to open channels of communication with local statutory agencies and to monitor the effectiveness of policies and procedures in practice. This is explicit in the job description. Our DSLs are most likely to have a complete safeguarding picture and be the most appropriate person to advise on the response to safeguarding concerns. The DSL, who has the status and authority within the school to carry out the duties of the post is given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and interagency meetings – and/or to support other staff to do so – and to contribute to the assessment of children. If the DSL is unavailable these duties will be carried out by the Deputy DSL. Whilst the activities of the designated safeguarding lead may be delegated to appropriately to the DDSL, the ultimate **lead responsibility** for child protection, as set out above, remains with the designated safeguarding lead, this **lead responsibility** should not be delegated.

Managing Referrals includes: The DSL is expected to:

- refer cases of suspected abuse to the local authority children's social care as required, the LADO for child protection allegations which concern a member of staff or volunteer, the Disclosure and Barring Service where a person is dismissed or left due to risk/harm to a child and/or the police if a crime may have been committed;
- support staff who make referrals to local authority children's social care and the Channel programme;
- refer cases to the Channel programme where there is a radicalisation concern as required;
- to liaise with the Proprietor for Safeguarding Issues along with informing SLT and key staff, alongside the DOFA_(via weekly safeguarding and SLT meetings, daily updates where applicable and by email);
- keep staff aware of child protection procedures and ensure staff are alert to changes in children's behaviour which could indicate that they may be in need of help or protection.

Work with others: The designated safeguarding lead is expected to:

- Liaise with the Principal regarding issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. Additionally, the DSL will liaise with the local authority in order to obtain 'early help' and support for pupils in accordance with Section 17 Children Act 1989.
- As required, liaise with the "case manager" (as per Part four) and the designated officer(s) at the local authority for child protection concerns (all cases which concern a staff member); and liaise with staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies. Act as a source of support, advice and expertise for staff.
- Ensure that all appropriate staff members have a working knowledge and understanding of their role in case conferences, core groups and other multi-agency planning meetings, to ensure that they attend and are able to effectively contribute when required to do so; where a report is required, this should be shared with the parents prior to the meeting.

Undertake training, which includes: The DSL and deputy DSLs undergo training specific to be updated every 2 years (including prevent awareness training). In addition, they continually (and at least annually) refresh their knowledge and skills in order to keep up with any developments relevant to their role (this might be through e-bulletins, meeting other DSLs or reading new safeguarding developments) in order to:

- understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments and social care referral arrangements;
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- understand when a crime may have been committed and at what stage to contact the police. (When to call the Police (NPCC))

- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at the school;
- can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online;
- ensure each member of staff has access to and understands the school's or college's child protection policy and procedures, especially new and part time staff; are alert to the specific needs of children in need, those with special needs and young carers; are able to keep detailed, accurate, secure written records of concerns and referrals;
- understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- obtain access to resources and attend any relevant or refresher training courses and
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.

Raise Awareness, which includes:

- ensuring the school's child protection policies are known, understood and used appropriately;
- ensuring the school's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the proprietor and advisory board regarding this;
- ensuring the policy is made available publicly and parents being made aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this;
- linking with the local SSCB to make sure staff are aware of training opportunities and the latest local policy of safeguarding;
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school and college leadership staff. Their role includes ensuring that the school, and our staff, know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children.
- following up unexplained absences of any child with a telephone call from the School on the morning of the first day of absence and raising awareness of the needs of pupils including those with special educational needs or disabilities, lesbian, gay, bisexual and transgender (LGBT) pupils.

Child protection File: Where children leave our school, we ensure their child protection file is transferred to the new school or college as soon as possible. This will be transferred separately from the main pupil file, ensuring secure transit and a conformation of receipt should be obtained. In addition to a pupil's child protection file, our Designated Safeguarding Lead will consider if it is appropriate to share any information with the new school or college in advance of the child leaving, such as details of support given to victims of abuse, so as to have this established for then the pupil arrives.

Availability: During term time the DSL (or deputy DSL) should always be available during school hours for staff to discuss any safeguarding concerns. Frewen College will organise adequate and appropriate cover arrangements for any out of hours/out of school time activities including when the school is closed

Governors (Proprietor): The Governors, who receive from the DSL a safeguarding report at each meeting has a corporate responsibility for all safeguarding matters relating to the pupils of the school. This includes specific responsibilities for ensuring that all who are employed, supply services or volunteer at the school, are informed of the content of this policy and any reviews and updates. To this end, the Governors are the named Proprietor who will:

- liaise with the senior leadership of the school, the DSL and Deputy DSL, holding them to account on matters relating to safeguarding and also liaise with the ESSCP and LADO as and when required by this policy;
- with the DSL, jointly produce the written annual review/audit and report where the minutes are sufficiently detailed to demonstrate both the breadth and the depth of the review, which is shared with the local authority;
- check the staff's understanding and implementation of the policy, ensuring that they are all aware of the referral process and how to implement safeguarding protocols; monitor the policy, procedures and the efficiency with which they are implemented;
- ensure that there are clear job specifications for the DSL and Deputy DSL who have the knowledge, skills and understanding

Frewen College is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. It is our aim that all children fulfil their potential

- necessary to keep safe children who are looked after by a local authority;
- find out, on each visit to the school, if the policy is known in practice by talking to a number of staff and volunteers right across the school to see if they would know who to go to in the case of a suspected abuse and what they would do in terms of comments they might make to the child;
- review how children are taught about safeguarding, including online, through the curriculum and PSHEE;
- ensure the school contributes to interagency working in line with the Working Together to safeguard children (WT) (HM Government: March 2015) through effective communication and cooperation with local agencies.

The Principal and the DSL will:

- ensure that the safeguarding and child protection policy and procedures adopted by the Proprietor are implemented and followed by all staff;
- allocate sufficient time and resources to enable the DSL and Deputy DSL to carry out their roles effectively, including the assessment of pupils and attendance at strategy discussions and other necessary meetings;
- ensure that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively. Reporting wrongdoing by staff in the workplace that does not involve safeguarding and welfare of pupils is dealt with in accordance with the school's Whistleblowing procedures;
- provide immunity from retribution or disciplinary action against staff in the event of them 'whistleblowing' in good faith; ensure that pupil's safety and welfare are addressed through the curriculum and
- be able to understand safer recruitment procedures and processes and deal with allegations against members of staff and volunteers.

APPENDIX 3 - THE ROLE OF THE LOCAL AUTHORITY DESIGNATED OFFICER (LADO)

The role of the LADO is set out in *Working Together to Safeguard Children (2018)* and is governed by the Authorities duties under section 11 of the Children Act 2004 and ESSCB Inter-Agency Policy and Procedures. This guidance outlines procedures for managing allegations against people who work with children who are paid, unpaid, volunteers, casual, agency or anyone self-employed.

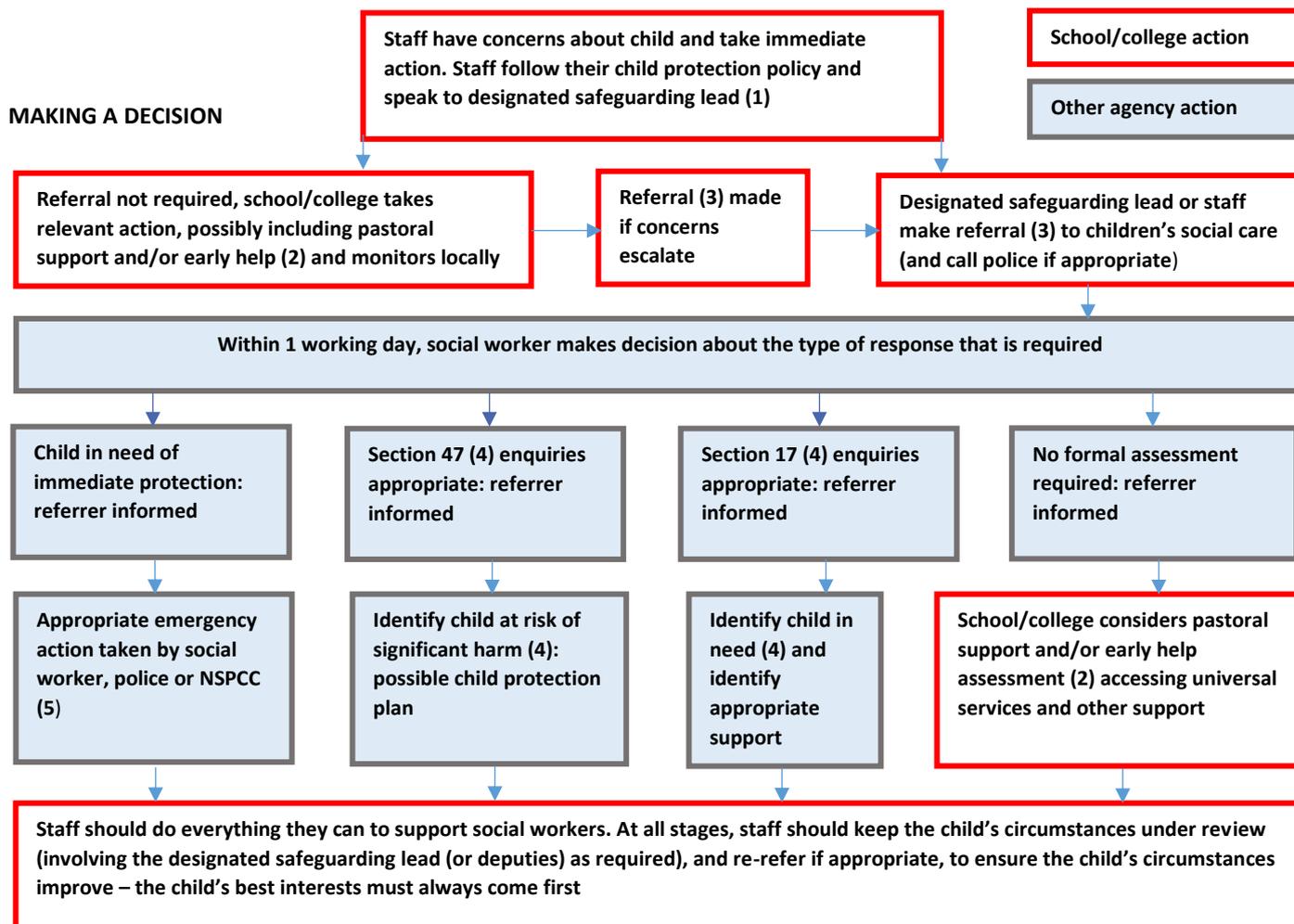
The LADO must be contacted within one working day in respect of all cases in which it is alleged that a person who works with children has: behaved in a way that has harmed, or may have harmed a child; possibly committed a criminal offence against or related to a child; or behaved towards a child or children in a way that indicates they may pose a risk of harm to children. There may be up to three strands in the consideration of an allegation: These area police investigation of a possible criminal offence; enquiries and assessment by children's social care about whether a child is in need of protection or in need of services and consideration by an employer of disciplinary action in respect of the individual.

The LADO is responsible for:

- Providing advice, information and guidance to employers and voluntary organisations around allegations and concerns regarding paid and unpaid workers.
- Managing and overseeing individual cases from all partner agencies; ensuring the child's voice is heard and that they are safeguarded.
- Ensuring there is a consistent, fair and thorough process for all adults working with children and young people against whom an allegation is made. Monitoring the progress of cases to ensure they are dealt with as quickly as possible.
- Recommending a referral and chairing the strategy meeting in cases where the allegation requires investigation by police and/or social care.

The LADO is involved from the initial phase of the allegation through to the conclusion of the case. The LADO is available to discuss any concerns and to assist the school in deciding whether there is a need to make a referral and/or take any immediate management action to protect a child.

APPENDIX 4 – ACTIONS REQUIRED BY KCSIE WHERE THERE ARE CONCERNS ABOUT A CHILD



(1) In cases which also involve a concern or an allegation of abuse against a staff member, see Part Four of this guidance.
 (2) Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from coordinated early help, an early help inter-agency assessment should be arranged. Chapter one of Working Together to Safeguard Children provides detailed guidance on the early help process.
 (3) Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of Working Together to Safeguard Children.
 (4) Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of Working Together to Safeguard Children.
 (5) This could include applying for an Emergency Protection Order (EPO).

Further guidance on making a decision is provided in the Children's Social Care, Thresholds and Practice Standards, available at:

<https://www.eastsussex.gov.uk/media/5443/continuum-a4-poster.pdf>

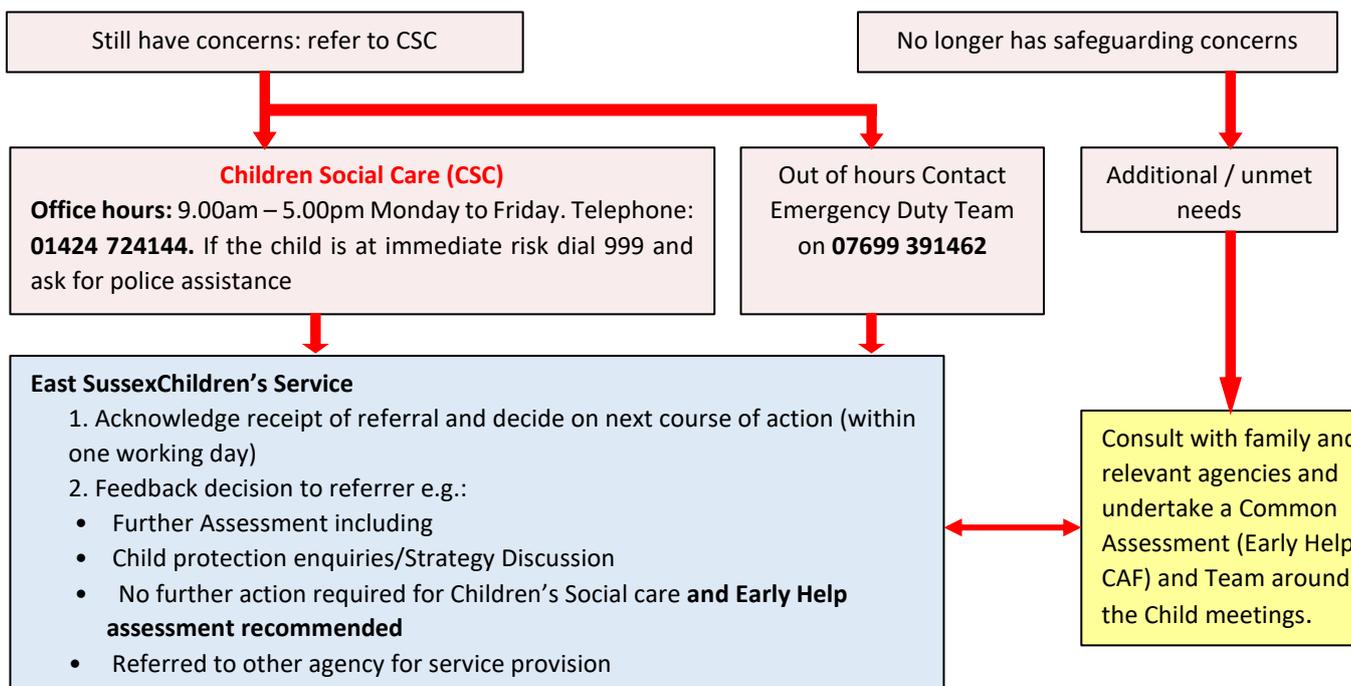
APPENDIX 5 - WHAT TO DO IF YOU ARE WORRIED A CHILD IS BEING ABUSED OR NEGLECTED

Member of staff has concerns about a child’s welfare (including children in need and children at risk)
 Be alert to signs of abuse and question unusual behaviours

Where a young person discloses abuse or neglect

- Listen; take their allegation seriously; reassure that you will take action to keep them safe.
- Inform them what you are going to do next. Do not promise confidentiality
- Do not question further or approach/inform the alleged abuser

Discuss concerns with Mr Gregoire Godin (Designated Safeguarding lead for the School)
 The **Safeguarding Lead** will consider further actions required, including consultation East Sussex Children’s Services, immediately (number below) or the police if a crime has been committed, immediately. Concerns and discussion, decisions and reasons for decision should be recorded in writing by agency /organisation. In **exceptional** circumstances or in the absence of a safeguarding lead the individual may contact children’s social care directly



MAKING A DECISION

Further guidance on making a decision is provided in the Children’s Social Care, Thresholds and Practice Standards, available at:

<https://www.eastsussex.gov.uk/media/5443/continuum-a4-poster.pdf>

APPENDIX 6 - ALLEGATIONS AGAINST ADULTS/SCHOOL STAFF/VOLUNTEERS

Risk of Harm to Pupils

If you become aware that a member of staff/volunteer may have:

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 they may pose a risk of harm to a child

Report immediately to Mr N. Goodman (Principal)

Any concern or allegation against the DSL or Trustees will be reported to the LADO Amanda Glover on 07825 782793 (direct line) unless there is clear evidence to prove that the allegation is incorrect. In cases where the allegation is not against the DSL/Principal/Proprietor, the Principal must:

Report the allegation within one working day to the **Local Authority Designated Officer (LADO)*** for East Sussex: **Amanda Glover** who can be telephoned on: **07825 782793** or email: amanda.glover@eastsussex.gov.uk.

If the LADO unavailable, please contact the Safeguarding Children's Team and ask to speak to a Duty IRO who can take your referral or assist with your inquiry on: **01424 724144**.

The emergency team number (for outside of office hours and at weekends) is: 07699 391462 Email: dateast@eastsussex.gov.uk

The LADO will:

1. Consider the relevant facts and concerns regarding the adult and child or children, including any previous history
2. Decide on next course of action - usually straight away, sometimes after further consultation with other multi-agency parties such as the Police and HR.

If the allegation threshold is NOT met, the LA Designated Officer will agree with you an appropriate response

(e.g. for the agency to undertake further enquiries or undertake an internal investigation)

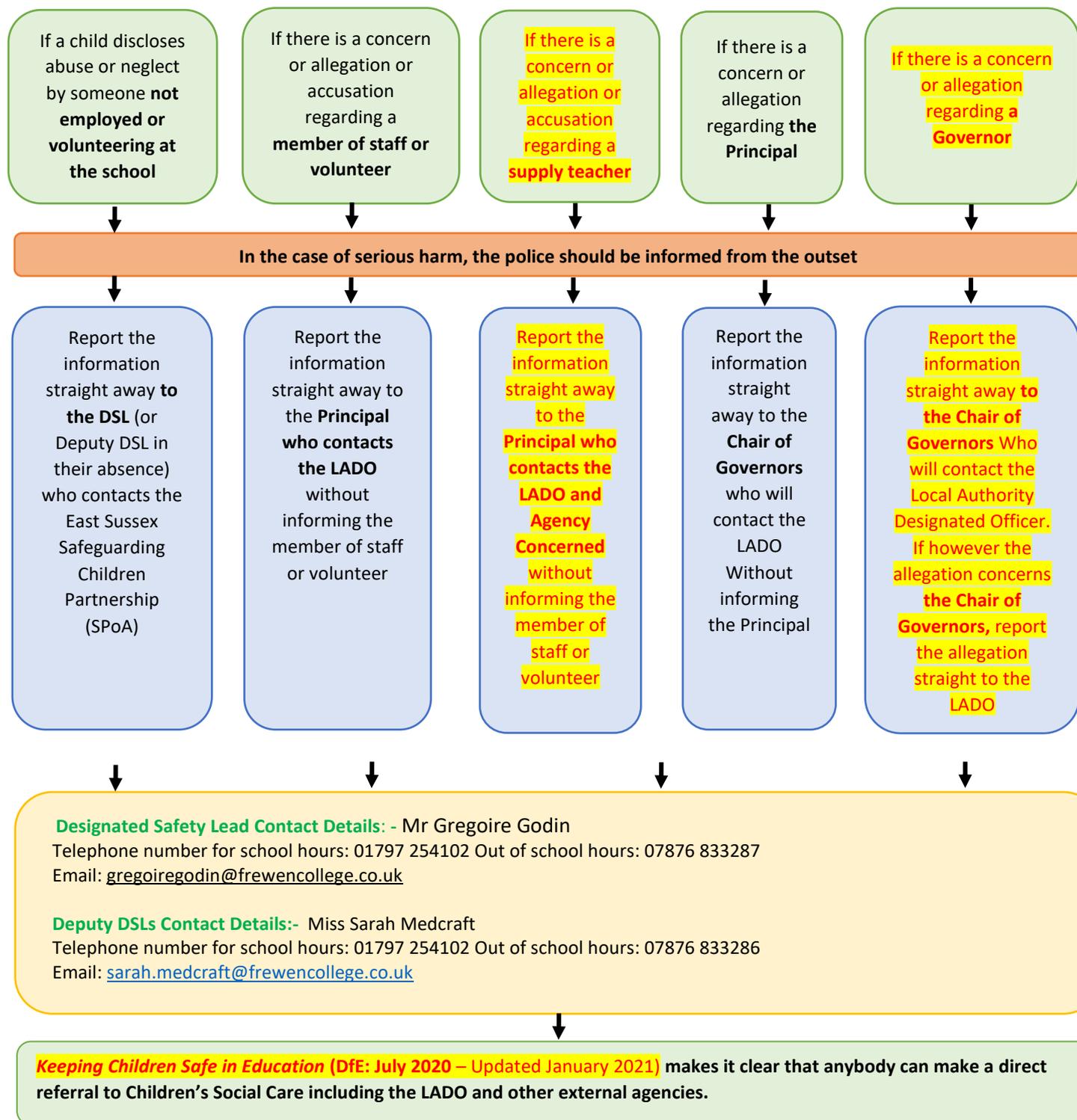
If the allegation threshold is met a strategy meeting will normally be held either by phone or in person. Normally a senior manager / safeguarding lead, the LA Designated Officer, HR, Police and social care are invited to attend. Relevant information is shared, risks to children are considered and appropriate action agreed –e.g. child protection and other enquiries, disciplinary measures or criminal proceedings. A record of the meeting will be made, and regular reviews will take place until a conclusion is reached.

Keeping Children Safe in Education (DfE: September 2020 – Updated January 2021) makes it clear that anybody can make a direct referral to Children's Social Care (CSC) including the LADO and other external agencies.

APPENDIX 7 - SAFEGUARDING CONCERNS OR ALLEGATION OF ABUSE ON A CHILD

A FLOWCHART FOR ALL STAFF, VOLUNTEERS AND PROPRIETORS

The following safeguarding procedures apply where you become aware a member of staff/volunteer has, or a child discloses to you that an adult has behaved in a way that has, 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 they may pose a risk of harm to a child.



Co-operation with the Local Authority: We cooperate entirely with any investigation carried out by the Local Authority, including those involving the LADO, in conjunction with the police. Our policy is in accordance with the guidance provided in KCSIE (DfE: September 2020 – Updated January 2021).

Availability: During term time the DSL (or deputy DSLs) should always be available during school hours for staff to discuss any safeguarding concerns. Our school will organise adequate and appropriate cover arrangements for any out of hours/out of time activities and also during school holidays.

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APPENDIX 8 – WHEN A YOUNG PERSON DISCLOSES ABUSE OR NEGLECT, A FLOW CHART FOR ALL STAFF, VOLUNTEERS AND PROPRIETORS

The following sequence of events should be adhered to:

Create a safe environment

Create a safe environment by offering the child a private and safe place if possible. Stay calm and reassure the child and stress that he/she is not to blame. Tell the child that you know how difficult it must have been to confide in you.

Listen

Listen to what the child has to say and take them seriously; reassure the child but advise that you cannot promise to keep a secret. Do not make promises you cannot keep. If there is a requirement for immediate medical intervention, assistance should be called for. Tell the child what you are going to do next after the disclosure. Depending on circumstances the child may then return to class or be offered time out of class with support from the DSL.

Talking to the child

When talking to the child, do not interview the child and keep questions to a minimum. Do not display shock or disbelief. Encourage the child to use his/her own words and do not ask leading questions, interrupt their dialogue, or make assumptions which might give particular answers. Do not repeat the disclosure over and over.

Record

Record in detail the circumstances and timings of the disclosure including the nature and extent of any injuries, explanations given by the child and the action taken (which may be used in any subsequent court proceedings), within 24 hours of the disclosure. Record the child's name, address and date of birth along with the child's behaviour, emotional state.

Do not take responsibility

- Only tell those people that it is necessary to inform.
- Do not try to investigate the allegation yourself.
- Immediately consult our Designated Safeguarding Lead so that any appropriate action can be taken to protect the pupil if necessary.
- The Designated Safeguarding Lead will consider the information and decide on the next steps.
- Do not approach or inform the alleged abuser.

APPENDIX 9 - A CHILD PROTECTION GUIDE - CUE CARD

(The document below is given to staff and volunteers to be carried at all times as folded A6, two sided, crib card)

A Child Protection Guide - A Cue Card

We are committed to safeguard and promoting the welfare of all at our school.

A code of good practice for staff and volunteers designed for you to keep with you – Carry it.

A Code of Practice is intended to provide a readily accessible reference promoting the principle of our Child Protection Policy.

What happens if:

You suspect a child is being abused or neglected:

1. Immediately inform the Designated Safeguarding Lead (DSL).
2. Record and date any facts which are relevant to your concern and pass these onto the DSL.
3. Do not investigate the issue yourself.

A child discloses to you abuse by someone else

1. Allow the child to speak without interruptions, accepting what is said and without investigating further or asking leading questions.
2. Reassure the child that 'it is not their fault' and that they were right to tell you.
3. Record in the child's own words details of the disclosure and refer this immediately to the DSL. Do not investigate the issue yourself.

You receive an allegation about a member of staff or yourself

1. Immediately inform the DSL of the allegation.
 2. Record and date the details of the allegation in writing.
- Do** treat everyone with respect
- Do** provide an example of behaviour you wish others to follow
- Do** plan activities which involve more than one other person being present, or at least which are within sight or hearing of others
- Do** respect a young person's right to personal privacy
- Do** provide access for young people to talk to others about any concerns they may have.
- Do** recognise, and allow for, the special needs of young people with disabilities and learning difficulties
- Do** encourage young people with disabilities and learning difficulties
- Do** encourage children and adults to point out attitudes and behaviour that they do not like
- Do** avoid inappropriate physical or verbal contact with young people
- Do** remember that someone else might misinterpret your actions
- Do** respect the cultural, religious and ethnic backgrounds of others
- Do** recognise that caution is required even in sensitive moments of counselling
- Do** avoid situations that compromise your relationship with young people

- Do NOT** permit abusive peer activities (e.g. bullying racism or others)
- Do NOT** judge or jump to conclusions about others
- Do NOT** show favouritism to any individual
- Do NOT** be drawn into attention seeking behaviour, such as crushes/tantrums
- Do NOT** make inappropriate remarks or gestures
- Do NOT** rely on good reputation
- Do NOT** believe 'it could never happen to me'
- Do NOT** interview or meet with children in private or outside of school
- Do NOT** let concerns or allegations of abuse go unrecorded
- Do NOT** play physical contact games with young people.

APPENDIX 10: THE ORGANISATION AND RELATIONSHIP OF SAFEGUARDING AND PASTORAL CARE POLICIES AND PROCEDURES AT FREWEN COLLEGE

Ensuring that our community is collectively responsible and able to ensure that we keep our pupils safe at all times is fundamental aim for our School. Frewen College has developed a series of Policies and Procedures that are intended to support this endeavour. The following diagram illustrates the inter-relationship of these Policies.

