	The Gregg Schools Trust Proprietor of The Gregg School and The Gregg Preparatory School	Document Owner: TGSDSL
	Safeguarding and Child Protection Policy	Document Type: Regulatory Policy Updated: September 2024 <i>(Previously updated in November 2023)</i>
Applies to: The Gregg School <input checked="" type="checkbox"/> The Gregg Preparatory School <input checked="" type="checkbox"/>		
Critical ISI Policy? YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>	ISI Paragraph Reference: 7	
Reviewed by: Education and Safeguarding Committee To be ratified by: Board of Trustees	Date: 17 September 2024 Date: 01 October 2024	
Review frequency: 1 year <i>(or as necessary in line with updates issued)</i>	Date of next Review: July 2025 <i>(or as necessary in line with updates issued)</i>	

1. Regulatory status

- 1.1. This policy is a regulatory requirement.
- 1.2. It provides evidence of the Schools' compliance with the regulatory requirements, Part 3, Welfare, health and safety of pupils, paragraph 7 (a) & (b), Independent School Standards (England) August 2019.

This policy is available to parents from both schools via their websites and, upon request, will be made available in large print or other accessible format as required.

2. Introduction

- 2.1. The Gregg & The Gregg Preparatory Schools fully recognise the contribution they make to the safeguarding of children and the responsibility they have under Section 157 of the Education Act 2002 and the Education (Independent Schools Standards) (England) Regulations 2014 (as amended in 2019) to have arrangements in place to safeguard and promote the welfare of children.
- 2.2. The Gregg and The Gregg Preparatory Schools (the schools) recognise their responsibility to safeguard and promote the welfare of children and adhere to the most recent guidance on Safeguarding Children and Safer Recruitment in Education published 2011, updated 2012 and revised "Working Together" document, March 2015, updated 2023, together with the requirements of "Keeping Children Safe in Education" (KCSIE 2024) and the Prevent duty guidance 2015 updated 2024. Consideration is given to SEND 2015 updated 2020.
- 2.3. We aim to encourage children to be healthy, stay safe, enjoy, achieve and make a positive contribution to life in the 21st century. We recognise that these aims will only be realised if our school environments are those in which the safety and well-being of our children is of paramount importance.
- 2.4. The schools are committed to safeguarding and aim to create a culture of vigilance.

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3. THE POLICY

- 3.1. Our policy applies to Governors, all Staff, Supply Staff, Volunteers and Contractors working in our schools. All Children regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation have a right to equal protection from all types of harm or abuse.
- 3.2. The Staff and Governors will ensure that this Safeguarding and Child Protection Policy is made widely known and is adhered to.
- 3.3. We include our safeguarding concerns about the Prevent duty, so- called Honour Based Abuse (HBA) which includes Female Genital Mutilation (FGM) and Forced Marriage, Child-on-child abuse, Child Sexual Exploitation, Child Missing Education, Serious Violence including Gang Culture and Child Criminal Exploitation (County Lines), Sexual Violence and Harassment including Upskirting, and Domestic abuse. We recognise their presence in our locality.
- 3.4. This policy is reviewed annually by the Governors and its procedures apply wherever Staff, Governors, supply staff, Volunteers and Contractors are working with children, even where this is away from school, for example on an educational visit.
- 3.5. The Trust recognises that the schools play a significant part in the prevention of harm to our children by providing them with good lines of communication with trusted adults, supportive friends and an ethos of protection. All staff must be vigilant and aware of their duty to raise concerns, where they exist, about the attitude or actions of colleagues.
- 3.6. Both schools will always work in the best interests of the child and take all reasonable measures to promote the welfare and safety of our children by:
 - Establishing and maintaining an environment where children feel secure, are encouraged to talk, and are always listened to
 - Ensuring children know that there are adults in the school whom they can approach if they are worried or in difficulty
 - Including in the curriculum opportunities that equip children with the skills they need to recognise and stay safe from abuse by teaching children about safeguarding and to “recognise when they are at risk and how to get help when they need it”, for example through use of online resources, the wider curriculum and Personal, Social Development (PSD) programmes at The Gregg School and Personal, Social, Health Education (PSHE) at The Gregg Preparatory School
 - Ensuring we practise safer recruitment in checking the suitability of Staff, Governors, Supply Staff, Volunteers and Contractors; DBS (including staff employed by another organisation) to work with children and young people in accordance with: the guidance given in Keeping children safe in education 2024; the Education (Independent School Standards) (England) Regulations 2014 (as amended 2019)
 - Following the local inter-agency procedures of the HIPS – Hampshire, Isle of Wight and Portsmouth Safeguarding partnership and SSCP- Southampton Safeguarding Children Partnership
 - Being alert to signs of abuse, both in school and from the wider environmental factors in a child’s life that may be a threat to their safety and/or welfare. This is known as Contextual Safeguarding and is referred to in Working Together to Safeguard Children (2023) and in Keeping Children Safe in Education (2024) in order to protect each child from any form of abuse, whether from an adult or another child; Definition and signs of abuse can be found in Appendix 2, <http://www.nspcc.org.uk/signsofabuse> and KCSIE Part 1

- Supporting children who have been abused in accordance with their agreed child protection plan
- Raising awareness of child protection issues and equipping children with the skills needed to keep them safe, healthy and able to make a positive contribution to school life, enabling them to reach social, emotional and economic well-being
- Establishing a safe environment in which children can learn and develop and achieve their full potential including the school premises as circumstances permit
- Being alert to the medical needs of children with medical conditions.

4. SAFEGUARDING PROCEDURES FOR PROTECTING CHILDREN

4.1. The Trust and schools will follow the procedures set out by HIPS – Hampshire, Isle of Wight and Portsmouth Safeguarding partnership and SSCP- Southampton Safeguarding Children Partnership and take account of guidance issued by the Department for Education (DfE) and the local authority (LA) (see appendix 1 for the link)

4.2. The Trust will:

- Ensure both schools have a Designated Safeguarding Lead (DSL) who undertakes training every two years for this role, compliant with current legislation
- Remedy any deficiencies or weaknesses in Child Protection arrangements without delay
- Ensure both schools have a member of staff who will act in the absence of the DSL
- Ensure that both schools have a nominated Governor who oversees safeguarding children policies and procedures
- Ensure staff (including temporary, supply staff, volunteers and Contractors) know the name of the DSL in their school and understand their role; and that the Governors know this for both schools
- Provide suitable training for all staff, including online, relating to Safeguarding Children every year or as appropriate to include updates.
- Ensure staff (including temporary, supply staff, volunteers and Contractors) understand their responsibilities in being alert to the signs of abuse and for referring any concerns to the DSL
- Ensure that parents are made aware of the safeguarding procedures in both schools, by publishing this Policy on the Schools' Websites
- Develop effective links with relevant agencies and co-operate as required with their enquiries regarding safeguarding matters such as attendance at strategy meetings, initial case conferences, core group and `child in need` review meetings etc.
- Promote the duty of care towards our children and staff by raising awareness of issues and good practice, and to assist staff in monitoring their own standards and behaviour via appropriate training including online safety
- Be aware of and follow procedures set out by HIPS – Hampshire, Isle of Wight and Portsmouth Safeguarding partnership and SSCP- Southampton Safeguarding Children Partnership where an allegation is made against a member of staff or volunteer.

4.3. Our policy and procedures will be reviewed annually by the Governors and up-dated in accordance with current legislation. The Trust will also review the efficiency with which the related duties have been discharged. The Trust will be responsible for monitoring that takes place, and final approval of the annual review process.

- 4.4. As part of our recruitment process to ensure 'Safer Recruitment Procedures' are always followed; applicants will be informed of the arrangements in place for safeguarding children. They will also be given a copy of this policy.
- 4.5. The Trust's child protection procedures are not intended to prevent any person from making an immediate referral to children's social care, the Police or NSPCC if there is a risk of immediate serious harm to a child.

5. SAFEGUARDING INDUCTION AND TRAINING

5.1. Induction (in conjunction with our Safer Recruitment Policy)

- 5.1.1. All staff, including temporary staff, Supply Staff, regular visitors and volunteers, will be provided with induction training that includes:
 - child protection policy (which should amongst other things also include the policy and procedures to deal with child-on-child abuse 8.6 of this policy)
 - behaviour policy (which should include measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying)
 - staff behaviour policy (Code of conduct) should amongst other things, include low-level concerns, allegations against staff and whistleblowing (Guidance regarding staff communications with children may be found in Appendix 4 of this policy)
 - safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods 15.3 of this policy and
 - role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies).
 - A copy of Part 1 and Annex B- further information) of Keeping children safe in education 2024 detailing how to recognise the signs and symptoms of possible physical, emotional and sexual abuse along with neglect and to be aware of the local authority guidelines for making referrals must be read, understood and signed
 - The identity and contact details of the Designated Safeguarding Lead DSL (Appendix 1) and informed of the schools' procedure in reporting concerns
 - Acceptable use of IT policy
 - Our Whistleblowing policy
 - Guidance for safer working practice for those working with children and young people in education settings (2005, Revised 2015 updated 2019) available at http://www.thegrid.org.uk/info/welfare/child_protection/allegations/safe.shtml
- 5.1.2. After initial induction, all staff members will undertake appropriate Child Protection training, which usually takes place within the first few weeks of employment. This will relate to basic safeguarding information which includes signs and symptoms of abuse, guidance on Child-on-child abuse and how to manage a disclosure from a child, when and how to record a concern about the welfare of a child and the process for making a referral to Children's social care.
- 5.1.3. All staff will sign to confirm that they have read and understood these policies and undergone induction. A record of the signing sheet is kept by relevant person, the DSL or Health and Safety lead.

5.2. Training for Staff – this is undertaken by the Designated Safeguarding Lead

- All new staff are trained when they take up their posts at the school within the first few weeks
- All staff have Safeguarding and Child Protection training including online safety at the start of every academic year in line with advice from HIPS – Hampshire, Isle of Wight and Portsmouth Safeguarding partnership and SSCP- Southampton Safeguarding Children Partnership with refresher training and updates as required during the year
- All staff read KCSIE Part 1 and Annex B further information 2024 at training and sign to say they have read and understood it. This includes the four main types of abuse, Child-on-child abuse, including Upskirting, serious violence, child criminal exploitation (county lines CCE), child sexual exploitation (CSE), domestic abuse, children absent from education (children missing education (CME)), children with family members in prison, homelessness, so-called honour-based abuse (HBA) such as FGM and Forced marriage and laws), preventing radicalisation, sexual violence and sexual harassment
- Staff are trained in how to recognise early signs of any abuse, exploitation or neglect and given the tools to report it as stated in 7.3.1 of this policy.
- Staff receive Prevent training in line with Prevent advice and online safety
- Staff are trained to manage Child-on-Child Sexual Violence and Harassment
- Staff undertake The National Online Safety CPD training for Prevent, Child-on-child Abuse and Online Safety
- All staff are trained in keeping safe online – E-safety Policy, Staff Code of Conduct.
- A record of the staff training in safeguarding and child protection is kept by the DSL.

5.3. Training for Safeguarding Designated Person(s)

The Safeguarding Designated Persons for each school are:

The Gregg School –

Cathy Goodchild (Assistant Headteacher), Principal DSL

Sheri Sellers (Headteacher) Deputy

Steve Gillespie (Deputy Headteacher), Deputy

If the Principal DSL is not available then the deputies Sheri Sellers, Steve Gillespie, will be contactable (all contact details can be found in Appendix 1)

The Gregg Preparatory School –

Anita Jolley (Headteacher), Principal DSL

Patrick McPhillips, Deputy

Trudi Shone, Deputy

If the Principal DSL is not available, then the deputies Patrick McPhillips, Trudi Shone will be contactable (all contact details can be found in Appendix 1)

The designated safeguarding lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated annually. The designated safeguarding lead should undertake Prevent awareness training. In addition to the formal training set out above, their knowledge and skills should be refreshed, with informal updates (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals,

as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- ensure each member of staff has access to, and understands, the school'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 educational needs and young carers;
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR)
- understand the importance of information sharing, both within the school, and with the three safeguarding partners, other agencies, organisations and practitioners.
- 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;
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college;
- 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;
- 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 may put in place to protect them.

6. ROLES and RESPONSIBILITIES

6.1. Duty of Staff, including Governors, temporary and Supply Staff, Volunteers and Contractors.

All Staff, including Governors, temporary and Supply Staff, Volunteers and Contractors of the School are under a general legal duty to protect children from abuse and:

- To be aware of the terms and procedures in this Policy and to follow them
- To have read Part 1 and Annex B further information of Keeping children safe in education 2024 and sign to say they have read and understood it
- To abide by the guidance given in the policy for Staff Behaviour and Code of Conduct relating to appropriate staff behaviour. This document gives clear guidance about behaviour so as to avoid placing children or staff at risk of harm, or at risk of allegations of harm
- To be aware of the signs of abuse and neglect, so that they are able to identify potential issues
- To report any matters of concern to the DSL in their school.

6.2. Role of the Designated Safeguarding Lead(s) (which includes responsibility for Online Safety)

- The designated safeguarding lead takes the lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place)
- Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the designated safeguarding lead, this lead responsibility should not be delegated.
- The Principal DSL for The Gregg and The Gregg Preparatory Schools is a member of their SLT

6.2.1. Manage referrals

The Designated Safeguarding Lead is expected to:

- Refer all cases of suspected abuse to the local authority children's social care as required;
- Support staff who make referrals to local authority children's social care;
- Refer cases to the Channel programme where there is a radicalisation concern as required;
- Support staff who make referrals to the Channel programme;
- Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- Refer cases where a crime may have been committed to the Police as required.

6.2.2. Work with others

The Designated Safeguarding Lead is expected to:

- act as a point of contact with the three safeguarding partners;
- Liaise with the Headteacher or principal to inform him or her of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- As required, liaise with the "case manager" (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 (especially pastoral support staff, school nurses, IT Technicians, and SENCOs) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies; and
- act as a source of support, advice and expertise for all staff

6.2.3. Raising awareness

The Designated Safeguarding Lead should:

- Ensure the details of the child protection policy are known, understood and used appropriately;
- Ensure that the child protection policy is reviewed annually and the procedures and implementation are updated and reviewed regularly, and work with the Governors regarding this

- Ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school or college in this; and
- Ensure that parents are aware that referrals about suspected abuse or neglect may be made to children's social care and the school's role in this. (Specific reference is made to this at our Parents' Safeguarding Evenings and on the Year 6 induction.)
- Maintain links with HIPS – Hampshire, Isle of Wight and Portsmouth Safeguarding partnership and SSCP- Southampton Safeguarding Children Partnership to ensure staff are aware of training opportunities and the local policies on safeguarding from HIPS – Hampshire, Isle of Wight and Portsmouth Safeguarding partnership and SSCP- Southampton Safeguarding Children Partnership

6.2.4 Child protection file

- Where children leave the school the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main pupil file, ensuring secure transit by recorded delivery or by hand to the Headteacher/DSL, marked "strictly confidential" and confirmation of receipt should be obtained.
- The names and contact information of the Safeguarding Designated Persons are set out in Appendix 1.

6.2.5 Availability

During term time the DSL (or a deputy) will be available (during school hours) for staff to discuss any safeguarding concerns.

It is a matter for the individual schools and the Designated Safeguarding Leads to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.

6.3 Role of the Trust

6.3.1 The Trust will:

- Ensure that the policies and procedures for Safeguarding and Child Protection are reviewed annually
- Ensure a Designated Safeguarding Lead(s) is in place; they recognise the importance of the role of the Designated Safeguarding Lead and support them, ensure the training necessary to be effective is undertaken
- Ensure that there are safe and effective recruitment policies and disciplinary procedures in place
- Recognise the contribution the school can make to helping children keep safe in the school environment and online through the teaching and encouragement of responsible attitudes to adult life through PSD/PSHE and other curriculum and co-curricular areas
- Ensure that the schools' safeguarding arrangements take into account the procedures and practice of HIPS – Hampshire, Isle of Wight and Portsmouth Safeguarding partnership and SSCP- Southampton Safeguarding Children Partnership)

6.3.2 In addition, they will ensure the designation of a Governor with responsibility for safeguarding for both schools who will advise on and manage safeguarding incidents on their behalf, and liaise with external agencies where this is required.

Mrs Carol Pulman - Safeguarding Governor for The Gregg Schools email-
clerk@thegreggschools.org

7 PROCEDURES

7.1 Guidelines for Staff Dealing with Concerns and Disclosure

- Staff should promptly share their concerns in writing with the DSL who sets out the procedure for doing so.
- All verbal conversations should be recorded promptly in writing.

7.1.1 Teachers and non-teaching staff working at The Gregg Schools have a vital role to play in both the prevention and detection of abuse. Detection of abuse often depends in the first instance, on suspicion. Staff are in a unique position to observe children's behaviour over time, and often develop close and trusting relationships with children. Staff may well be the first to suspect that something is amiss when an individual behaves atypically, withdraws from social contacts with others, exhibits anxiety or stress symptoms in school, appears unusually distressed, confused or disturbed.

7.1.2 It takes a lot of courage for a child to disclose that they are being abused. They may feel ashamed, particularly if the abuse is sexual; their abuser may have threatened what will happen if they tell; they may have lost all trust in adults; or they may believe, or have been told, that the abuse is their own fault.

7.2 Disclosures of abuse

7.2.1 Every disclosure or suspicion of abuse from within or outside the school will be taken seriously and action taken in accordance with this policy.

7.2.2 The child protection training provided to staff considers the types and signs of abuse staff should be aware of. Further details are set out in Appendix 2.

7.2.3 If a member of staff is concerned that a child may be suffering harm, the matter should be referred to the Designated Safeguarding Lead as soon as possible. Where a crime has been committed the police should be contacted immediately. If a member of staff suspects or hears a complaint of abuse, the procedures set out in the guidance below must be followed. If at any point there is a risk of immediate serious harm a referral should be made to children's social care and /or the police immediately.

7.3 Guidance for staff, including temporary, supply staff and volunteers on suspecting or hearing a disclosure of abuse

7.3.1 Action staff must take

A member of staff, including temporary, supply staff and volunteers suspecting or hearing a disclosure of abuse including Child-on-child abuse, which may be online:

- Must listen carefully to the child and keep an open mind
- Should not take a decision as to whether or not the abuse has taken place
- Must not ask leading questions which may be considered to suggest what might have happened, or who has perpetrated the abuse, e.g. 'Did your dad hit you?'
- Ask the 4 W's Who, What, When, Where
- Must reassure the child but not give a guarantee of absolute confidentiality. The member of staff should explain that they need to pass the information to the DSL who will ensure that the correct action is taken
- Should not force the child to repeat what he/she said in front of another person
- Must keep a sufficient written record of the conversation using a Log of Concern about a Child's Safety and Welfare (Appendix 3).

7.3.2 The record should include:

- The child's name
- The child's address
- The age of the child
- The date and time of the observation or the disclosure
- The place of the conversation
- An objective record of the observation or disclosure
- The exact words spoken by the child
- The essence of what was said and done by whom and in whose presence
- The record should be signed by the person making it and should use names, not initials. The record must be kept securely and handed to a DSL as soon as possible
- All evidence, for example, scribbled notes, mobile phones containing text messages and or screen shots, clothing and computers, must be safeguarded and preserved and passed to a DSL.

7.3.3 All suspicions or disclosures of abuse must be reported to the DSL as soon possible and with a written record. (Appendix 3 logging sheet). If an allegation is made against a member of staff alternative procedures should be followed (see allegations against staff).

If there is a risk of immediate serious harm to a child and it is not possible to report to a DSL, a referral should be made to children's social care and/ or the police immediately. (See Appendix 1)

7.4 Action by the Designated Safeguarding Lead(s) once a concern has been raised

7.4.1 Referrals will be carried out by the DSL.

7.4.2 The DSL will decide whether the concerns should be referred to Children's Services: Safeguarding and Specialist Services and /or police.

Where a crime has been committed the police should be contacted immediately.

7.4.3 If it is decided to make a referral to Children's Services: Safeguarding and Specialist Services (Section 17 of the Children Act 1989) this will be discussed with the parents, unless to do so would place the child at further risk of harm. However, a referral does not require parental consent.

7.4.4 While it is the DSL's role to make referrals, any member of staff can make a referral to Children's Services. (See KCSIE part 1 for a flow chart setting out the process for staff when they have concerns about a child) but they must inform the Designated Safeguarding Lead.

7.4.5 If, after a referral, the child's situation does not appear to be improving, the DSL (or the person that made the referral) should press for reconsideration to ensure their concerns have been addressed and, most importantly, that the child's situation improves.

7.4.6 If a child is in immediate danger or is at risk of harm a referral should be made to Children's Services and/or the Police immediately. (Section 47 Children Act 1989). Where referrals are not made by the DSL, the DSL should be informed as soon as possible.

7.4.7 If a **teacher**, in the course of their work, discovers that an act of Female Genital Mutilation (FGM) appears to have been carried out on a girl under the age of 18 the **teacher** must report this to the police. **This is a mandatory reporting duty.** See Appendix 1 and Keeping children safe in education 2024 Annex B further information for further details

7.4.8 The school will keep all child protection records confidential, allowing disclosure only to those who need the information in order to safeguard and promote the welfare of children. The school will cooperate with the police and social services to ensure 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 (2015 updated 2023) Duties of confidentiality, so far as applicable.

7.4.9 We will ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. We will allow children to express their views and give feedback. Ultimately any systems and processes are operated with the **best** interests of the child at their heart.

7.4.10 The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. This includes allowing practitioners to share information without consent.

7.4.11 If there is room for doubt as to whether a referral should be made, the DSL will consult with Children's Social Care on a "no names" basis without identifying the family.

Southampton and Hampshire contact details can be found in appendix 1

However, as soon as sufficient concern exists that a child may be at risk of significant harm and in immediate danger, a referral to children's social care is to be made and /or police immediately (section 47 of the Children Act 1989)

- 7.4.12 Parents should be informed prior to referral, unless it is considered to do so might place the child at increased risk of significant harm by:
- The behavioural response it prompts e.g., a child being subjected to abuse, maltreatment or threats / forced to remain silent if alleged abuser informed;
 - Leading to an unreasonable delay;
 - Leading to the risk of loss of evidential material;
 - (The school may also consider not informing parent(s) where this would place a member of staff at risk).
- 7.4.13 If the initial referral is made by telephone, the DSL will confirm the referral by completing an online referral form. If no response or acknowledgment is received within three working days, the DSL will contact the Children's Social Care again.
- 7.4.14 The DSL will ensure a Safeguarding File is opened and kept up-to-date.
- 7.4.15 In circumstances where a child has not suffered and is not likely to suffer significant harm but is in need of additional support from one or more agencies, the DSL will liaise with Children's Social Care and where appropriate an inter-agency assessment will take place, including use of the Common Assessment Framework and Team around the Child approaches, as necessary.
- 7.4.16 Conversations with DSLs from non-Trust schools (e.g. sharing concerns or asking for information about sibling groups) are perfectly acceptable. Any relevant safeguarding information coming to light should be carefully logged.
- 7.4.17 Full local procedures may be found on the following websites:

SSCP -Southampton Safeguarding Children Partnership
<http://southamptonlscb.co.uk/>

HIPS – Hampshire, Isle of Wight and Portsmouth Safeguarding Partnership
<https://www.hampshirescp.org.uk/>

Key Contacts information is detailed in Appendix 1 of this policy

7.4.18 Whistleblowing

Where a staff member feels unable to raise an issue with their employer or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them:

- General guidance can be found at – Advice on whistleblowing
<https://www.gov.uk/whistleblowing>
- 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 8:00 AM to 8:00 PM, Monday to Friday and email: help@nspcc.org.uk
<https://www.nspcc.org.uk/what-you-can-do/report-abuse/dedicated-helplines/whistleblowing-advice-line/>

8 ALLEGATIONS AGAINST STAFF

8.1 Dealing with allegations made against/concerns raised in relation to members of Staff (including the DSL and deputy DSL's), the Headteacher, Governor, temporary and supply staff and volunteers and contractors

- 8.1.1 The Schools' actions will be informed by reference to the Statutory Guidance from the Department for Education contained in Part 4 of Keeping Children Safe in Education (2024). All staff should take care not to place themselves in a vulnerable position with a child. Guidance relating to staff behaviour and conduct can be found in the Staff handbook. Consideration will be given to the Trust's Whistleblowing Policy if applicable.
- 8.1.2 The schools' procedures for dealing with allegations are enacted where the behaviour of a member of Staff (including the DSL and deputy DSL's), Headteacher, Governor, temporary and Supply Staff, Volunteer or contractor meets any of the following criteria:
- Behaved in a way that has harmed a child, or may have harmed a child
 - Possibly committed a criminal offence against or related to a child
 - Behaved towards a child or children in a way that indicates he or she would pose a risk of harm if he or she worked regularly or closely with children.
- 8.1.3 All allegations will be taken seriously and a full procedure for dealing with such allegations can be found below.
- Allegations against any member of staff (including the DSL and Deputy DSLs), Governor, temporary and Supply Staff, Volunteer or contractor, should be immediately reported to the Headteacher of the relevant school or in their absence to The Chair of the Trust (Jo Preston) and in their absence the Governor responsible for Safeguarding (Carol Pulman). Where appropriate, the Headteacher will consult with a DSL and the allegation will be discussed with the Local Authority Designated Officer (LADO) for advice on the best course of action.
 - Should the Headteacher also be the DSL then the allegation should be reported to The Chair of the Trust (Jo Preston) and in their absence the Governor responsible for Safeguarding (Carol Pulman) who will consult with the Local Authority Designated Officer (LADO) for advice on the best course of action.
 - The LADO is a team manager within Social Services and they oversee the social care aspect to allegations against people in positions of trust where children are involved. The name and contact information for the LADO can be found in Appendix 1.
 - If the allegation concerns either Headteacher, The Chair of the Trust (Jo Preston) should be informed without notifying the Headteacher. She may be contacted via chairofgovernors@thegreggschools.org
 - and in their absence; the Governor responsible for Safeguarding (Carol Pulman) should be informed via the same process (clerk@thegreggschools.org). Again, the allegation will be discussed with the Local Authority Designated Officer (LADO) for advice on the best course of action
 - If it is not possible to report to the Headteacher or Trust in the circumstances set out above, a report should be made immediately to the DSL. The DSL will take action in accordance with

these procedures and will as soon as possible inform the Headteacher or, where appropriate, The Chair of the Trust.

- If the allegation concerns a DSL (except the Headteacher of each school where the process above applies), it must be immediately reported to the Headteacher of the relevant school or in their absence to The Chair of the Trust.
- The person taking action in accordance with the procedures is known as the "Case Manager".
- In all cases, if the behaviour meets the established criteria (see above), the Case Manager will contact the LADO without delay (within one working day). In cases of serious harm, the police will be involved from the outset. The schools will not undertake their own investigation until after advice is sought from the LADO.
- Discussions with the LADO will consider the nature of the allegation and decide a course of action. The school will give due weight to views of the LADO when making a decision about suspension. Discussions should be recorded in writing.
- Any allegations not meeting the above criteria will be dealt with in accordance with HIPS – Hampshire, Isle of Wight and Portsmouth Safeguarding partnership and SSCP- Southampton Safeguarding Children Partnership
- Advice from the LADO will be sought in borderline cases.

8.2 Disclosure of information

- 8.2.1 The schools will observe the reporting restrictions that prevent the identification of a member of staff, including temporary and supply staff and volunteers who is subject to an allegation. The schools have a duty of care towards their employees and unless advised otherwise by outside agencies, they will inform the person against whom the allegation has been made as soon as possible after the LADO has been consulted; and they will be kept informed of developments.
- 8.2.2 Parents or guardians of a child concerned will be told about the allegation as soon as possible, if they do not already know, and will be kept informed of the progress of the case, including the outcome, but not the details of any disciplinary process.
- 8.2.3 Where the LADO advises that a strategy discussion is needed, or the Police or Children's Social Care need to be involved, the Case Manager will not inform the accused or the parents or carers until these agencies have been consulted, and it has been agreed what information can be disclosed.

8.3 Further action to be taken by the schools

Each school has a duty of care towards its employees and as such, it must ensure that effective support is provided for anyone facing an allegation. They will take action in accordance with Part four of KCSIE 2024 and The School's employment procedures.

8.4 Ceasing to use staff

- 8.4.1 If either school ceases to use the services of a member of staff, Supply Staff or volunteer because they are unsuitable to work with children a referral to the Disclosure and Barring Service (DBS) will be required.

- 8.4.2 If a member of staff, including temporary and Supply Staff or volunteer tenders his or her resignation, or ceases to provide his or her services, any child protection allegations will still be followed up by the school in accordance with this policy and a referral will be made to the Disclosure and Barring Service as soon as possible if the criteria are met.
- 8.4.3 Where a teacher has been dismissed, or would have been dismissed had he / she not resigned, a referral to **The Teaching Regulation Agency** (which came into effect on 1 April 2018 in place of the National College for Teaching and Leadership (NCTL)) will be made.
- 8.4.4 **The Bursar** reports to the **Disclosure and Barring Service (DBS)** and **The Teaching Regulation Agency (TRA)** within one month of leaving either school any person (whether employed, contracted, a volunteer or a college/PGCE student) whose services are no longer used because s/he is considered unsuitable to work with children. Failure to do so constitutes an offence. (Contacts/addresses for referrals see Appendix 1)
- 8.4.5 The Independent Schools Council/Independent Schools Association will be informed of any allegations of serious harm or abuse by any person working or looking after children in either school (whether that allegation relates to harm or abuse committed on school premises or elsewhere), or any other abuse which is alleged to have taken place on school premises, and of the action taken in respect of these allegations.
The Independent Schools Council /Independent Schools Association will be informed of any such allegations as soon as is reasonably practicable, but at the latest within 14 days.
- 8.4.6 In the case of an EYFS registered setting, Ofsted needs to be informed of allegations against people working at the premises, or of any other abuse alleged to have taken place on the premises- as soon as is practicable and within 14 days at the latest.

8.5 Low-level concerns- Concerns or allegations that do not meet the harm threshold in part 4 of Keeping Children Safe in Education.

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold

8.5.1 What is a low-level concern?

A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ - that an adult working in or on behalf of the school may have acted in a way that:

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

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

- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone, contrary to school policy
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
- humiliating children.

Low-level concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

8.5.3 Responding to low level concerns

All low-level concerns should be shared initially with the Head teacher/ Deputy/DSL. The headteacher/deputy should collect as much evidence as possible by speaking:

- directly to the person who raised the concern, unless it has been raised anonymously, and to the individual involved and any witnesses.
- The information collected will help them to determine what further action may need to be taken.
- This information needs to be recorded in writing along with the rationale for their decisions and action taken.
- The headteacher should be the ultimate decision maker in respect of all low-level concerns, although the head teacher may wish to consult with the DSL and or deputy before a decision is reached.
- If the school is in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, they should consult with their LADO.

Low-level concerns which are shared about supply staff and contractors should be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified.

8.5.4 Recording low-level concerns

- All low-level concerns should be recorded in writing. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.
- Records will be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).
- Records should be reviewed and where a pattern of behaviour moves from a low-level concern to meeting the harm threshold, it should be referred to the LADO.

References- will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance.

8.6 Allegations against children (Child-on-child abuse) including online abuse

8.6.1 Education settings are an important part of the inter-agency framework not only in terms of evaluating and in terms of referring concerns to Children's Services and the Police, but also in the assessment and management of risk that the child may pose to themselves and others in the education setting.

8.6.2 If one child causes harm to another, this should not necessarily be dealt with as abuse. When considering whether behaviour is abusive, it is important to consider whether:

- there is a large difference in power (for example age, size, ability, development) between the young people concerned; or
- the perpetrator has repeatedly tried to harm one or more other children; or
- there are concerns about the intention of the alleged perpetrator.

8.6.3 Child-on-child abuse (children abusing other children) can manifest itself in many ways and different gender issues can be prevalent this includes peers of different genders or the same. It can happen both inside and outside of school and online.

All staff should understand that even if there are no reports in our schools it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding child-on-child abuse they should speak to their designated safeguarding lead (or a deputy).

It is important that all staff recognise the indicators and signs of Child-on-child abuse and know how to identify it and respond to reports.

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

Child-on-child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice- based and discriminatory bullying);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- sexual violence such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- abuse in intimate personal relationships between children (sometimes known as “teenage relationship abuse”)
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nudes and semi nudes, images and or videos (also known as sexting or youth produced sexual imagery);
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).
- 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)

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

8.6.4 Children who are lesbian, gay, bisexual, or gender questioning (LGBT)

The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff.

Abuse is abuse and should not be tolerated or passed off as “banter” or “just having a laugh” or “part of growing up”.

8.6.5 Extra-familial harms/ Contextual Safeguarding

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside school and/or can occur between children outside of this environment

All staff should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life. Children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content

8.6.6 Procedure to manage an allegation of Child-on-child abuse, including online abuse

- When an allegation is made by a child against another child, members of staff should consider whether the complaint raises a safeguarding concern. If there is a safeguarding concern the DSL should be informed.
- A factual record should be made of the allegation, but no attempt at this stage should be made to investigate the circumstances.
- The DSL should contact the Children’s Services to discuss the case. The DSL will follow through the outcomes of the discussion and make a referral where appropriate.
- If the allegation indicates that a potential criminal offence has taken place, Children’s Services will refer the case to the multi-agency safeguarding hub where the police will become involved.
- Parents, of both the child being complained about and the alleged victim, should be informed and kept updated on the progress of the referral.
- The DSL will make a record of the concern, the discussion and any outcome and keep a copy in the files of both children.
- It may be appropriate to exclude the child being complained about for a period of time according to The Schools’ behaviour policy and procedures.

- Where neither social services nor the police accept the complaint, a thorough school investigation should take place into the matter using The Schools' usual disciplinary procedures.
- In situations where the school considers a safeguarding risk is present, a risk assessment should be prepared along with a preventative, supervision plan particularly important with potential Child-on-child abuse.
- The plan should be monitored and a date set for a follow-up evaluation with everyone concerned.

8.6.7 Notifying Parents

Parents will normally be kept informed as appropriate of any action to be taken under these procedures. However, there may be circumstances when the DSL will need to consult the Head Teacher, the Designated Officer (LADO), Children's Social Care and / or the police before discussing details with parents.

8.6.8 Victim Support and Perpetrator Support for Child-on-child abuse

Support will be tailored on a case-by-case basis. The needs of the victim and the perpetrator will be looked at on an individual basis and appropriate support will be sought.
(Note that not all students who have been subjected to abuse see themselves as victims)

Should a student need to be interviewed by the police, an appropriate adult/parent shall be present.

8.6.9 Procedures to minimise the risks of Child-on-child abuse including Online

- The Personal, Social Development (PSD) curriculum at The Gregg School and the Personal, Social, Health Education (PSHE) curriculum at The Gregg Preparatory School.
- LGBT inclusion is part of the RSE programme within the PSD/PHSE curriculum
- Respect programme
- Tutor time
- Computing Curriculum
- All class teaching as appropriate
- Staff training
- Assemblies
- Visiting speakers
- Outside agencies
- Organised workshops

9 Children with Special Educational Needs and Disabilities:

Children with special educational needs and disabilities can face additional safeguarding challenges.

9.1 Additional barriers can exist when recognising abuse and neglect in this group of children.

This can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's impairment without further exploration
- Assumptions that children with SEN and disabilities can be disproportionately impacted by things like bullying without outwardly showing any signs
- Communication barriers and difficulties
- Reluctance to challenge carers, (professionals may over-empathise with carers because of the perceived stress of caring for a disabled child)
- Disabled children often rely on a wide network of carers to meet their basic needs and therefore the potential risk of exposure to abusive behaviour can be increased
- A disabled child's understanding of abuse, including online abuse
- Lack of choice/participation
- Isolation

10 Early Help Process

10.1 It is important for children to receive the right help at the right time to address risks and prevent issues escalating.

10.1.1 All staff should be aware of the **early help process**.

10.1.2 Staff must understand that they have a role to play in identifying emerging problems with children. This can be done by:

- Sharing information about concerns and feelings with other professionals and colleagues to support early identification and assessment of a child's needs.
- Monitoring the situation and feeding back to the DSL any ongoing/escalating concerns so that consideration can be given to a referral to Children's Services (Safeguarding and Specialist Services) if the child's situation does not appear to be improving.

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

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

11 SUPPORTING CHILDREN AND STAFF

11.1 Supporting Children

We recognise that children who are abused or witness violence may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation and some sense of blame. School may be the only stable, secure and predictable element in the lives of children at risk. Children's behaviour may be challenging and defiant or they may be withdrawn.

11.1.1 We support children through:

- The content of the curriculum by raising awareness/educating children to respect each other and to recognise healthy and non-healthy relationships including Child on child abuse through PSHE/PSD, assemblies, guest speakers, circle time, timely intervention at an age-appropriate level.
- The ethos of our schools
- The Schools' Behaviour and Discipline Policies
- Liaison with other agencies that support the student such as Children's Services, Child and Adolescent Mental Health Services (CAMHS), Education Welfare Service and Educational Psychology Service and those agencies involved in the safeguarding of children
- Notifying Children's Social Services immediately any allegation or disclosure is made
- Providing information about a child, about whom there have been concerns who transfers to another school, by ensuring that secure transfer information is forwarded under confidential cover to the child's new school.
- Staff Code of Conduct
- E -Safety
- Appropriate support if required
- "Open door" policy to experienced pastoral staff
- Emotional Support Team (EST)

11.2 Supporting Staff

We recognise that staff working in our schools who have become involved with a child who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting. We will support such staff by providing an opportunity to talk through their anxieties with the DSL and to seek further support as appropriate.

12 INFORMATION SHARING (2018) AND CONFIDENTIALITY

We recognise that all matters relating to Child Protection are confidential. The Headteacher or DSL in each school will disclose any information about a child to other members of staff on a "need to know" basis only. All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children. All staff must be aware that they cannot promise a child to keep secrets.

The Data Protection Act 2018 and GDPR do not prevent or limit the sharing of information for the purpose of keeping children safe. This includes allowing practitioners to share information without consent as is appropriate

13 RECORD KEEPING

13.1 Safeguarding files

13.1.1 Safeguarding records containing all reports, notes and correspondence referring to a child are kept securely from the main child's file and in a locked location.

- If a safeguarding file has been started for a child who then moves school, the entire contents of the file should be sent to the receiving school/college. The information should be sent under separate cover to the school file, as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term, in a sealed envelope by recorded delivery or by hand to the Headteacher/DSL, marked "strictly confidential" and a receipt given.

13.1.2 Not all safeguarding information results in a referral. A record is made of any information, including hearsay and nagging doubts. This should be passed onto the designated person so that it can all be kept together.

13.1.3 All verbal conversations should be promptly recorded in writing

13.2 Access to safeguarding files

13.2.1 Access to the information on file should be on a need-to-know basis among the staff. This can only be decided on a case-by-case basis. The confidentiality of the child and family should be respected as far as possible, but the welfare of the child is paramount. **Parents do not have automatic access to the safeguarding file.**

13.2.2 All information must be shared with Children's Services and/or Police, as appropriate, where there is concern that a child is at risk of significant harm. Safeguarding information should not ordinarily be shared with agencies other than these statutory agencies e.g. information should not be released to solicitors etc.

14 SAFER RECRUITMENT AND SELECTION OF STAFF

14.1 The Trust has a written a Staff Recruitment, Selection and Disclosure Policy and Procedures linking explicitly to this Policy.

14.2 In line with "KCSIE" 2024 all interview panels will contain an appropriately qualified member of staff.

14.3 The recruitment process is robust in seeking to establish the commitment of candidates to support The Schools measures to safeguard children and to deter, reject or identify people who might abuse children or are otherwise unsuited to work with them. A statement to this effect is included in all job advertisements, publicity material, recruitment websites, and candidate information packs.

As part of the shortlisting process schools should consider carrying out an online search as part of their due diligence on the shortlisted candidates.

15 OTHER ACKNOWLEDGEMENTS

15.1 Preventing radicalisation (the Prevent Duty)

- 15.1.1 It is possible to protect people from extremist ideology and intervene to prevent those at risk of radicalisation being drawn to terrorism. 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 a deputy) making a Prevent referral.
- 15.1.2 The Trust and staff acknowledge the need for a culture of vigilance to be present in both schools to support safeguarding. This includes awareness and sensitivity to attitudinal changes of children which may indicate they are at risk of radicalisation.
- 15.1.3 Staff in both schools who have concerns should refer to the appropriate DSL who will then keep a log.
- 15.1.4 The DSL in both schools will consider the level of risk and will make a referral using the link below.

https://www.southampton.gov.uk/media/l2bns0qv/prevent_national_referral_form_tcm63-437066.docx

<https://documents.hants.gov.uk/adultservices/safeguarding/Prevent-national-referral-form.docx>

- 15.1.5 The Department of Education Statutory Prevent Duty guidance can be accessed on:

<https://www.gov.uk/government/publications/prevent-duty-guidance>

<https://www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty>

The Channel General Awareness course/ information can be accessed on the link below:

<https://www.gov.uk/guidance/prevent-duty-training>

<https://www.support-people-vulnerable-to-radicalisation.service.gov.uk/>

- 15.1.6 Detailed arrangements on our actions to prevent the radicalisation of children can be found in the Schools' Extremism and Anti-Radicalisation guidance.

Where a student is at severe risk a referral will be made to the appropriate authorities using the online form and inform children's services/police Tel 101 immediately

https://www.southampton.gov.uk/media/l2bns0qv/prevent_national_referral_form_tcm63-437066.docx

<https://documents.hants.gov.uk/adultservices/safeguarding/Prevent-national-referral-form.docx>

15.2 Visiting Speakers

- 15.2.1 The Prevent statutory guidance requires schools to have clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable. Both schools have a responsibility to their children to ensure that they can critically assess the information they receive as to its value to themselves, and that the information is aligned to the ethos and values of the Trust, each school and British values.
- 15.2.2 Each school is required to undertake a risk assessment before agreeing to a Visiting Speaker being allowed to attend the schools. This will take into account any vetting requirements considered appropriate in the circumstances, and may include a DBS check if relevant.
- 15.2.3 Visiting speakers will be expected to understand that, where appropriate, their session should actively promote the British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs; and at no point undermine these. In some cases, the Schools may request a copy of the Visiting Speaker's presentation and/or footage in advance of the session being provided.
- 15.2.4 Visiting Speakers, whilst on the school sites, will be supervised by a school employee. On attending the schools, visiting speakers will be required to show original current identification document including a photograph such as a passport or photo card driving licence. Each school will also keep a formal register of visiting speakers (retained in line with Data Protection requirements).

15.3 Children who are absent from education (**Children Missing Education (CME)**)

Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines.

All schools must inform their local authority of any child who is going to be removed from the admission register where the child:

- has been taken out of school by their parents and the school has received written notification from the parent they are being educated outside the school system e.g. home education;
- has ceased to attend school and no longer lives within reasonable distance of the school at which they are registered;
- has been certified by the school medical officer as unlikely to be in a fit state of health to attend school before ceasing to be of compulsory school age, and neither he/she nor his/her parent has indicated the intention to continue to attend the school 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 the proprietor does not reasonably believe they will be returning to the school at the end of that period; or,
- has been permanently excluded.

When children have poor attendance (following our diamond threshold) or are regularly missing school both schools will monitor all children absences and promptly address concerns about irregular attendance with the parent/carer. In the circumstances listed above the school has a legal duty to report absences to the Local Authority.

The Schools have at least two emergency contacts for each child.

Contact for CME officer in Appendix 1

15.4 Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)

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

- can take place in person or online, 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;

Child Criminal Exploitation: (CCE)

- Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others
- Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to
- It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation

Child Sexual Exploitation (CSE)

- CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include noncontact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.
- CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge for example through others sharing videos or images of them on social media.
- CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. Some children may not

realise they are being exploited for example they believe they are in a genuine romantic relationship

- CSE- can still be abuse even if the sexual activity appears consensual;

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

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

Some of the following can be indicators of both CCE and CSE where children:

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

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

15.5 Serious Violence

Indicators, which may signal that children are at risk from, or are involved with serious violent crime 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 and may be at risk of criminal exploitation.

The likelihood of involvement in serious violence may be increased by factors such as:

- being male
- having been frequently absent or permanently excluded from school
- having experienced child maltreatment and having been involved in offending, such as theft or robbery.

A fuller list of risk factors can be found in the Home Office's Serious Violence Strategy.

We should also be aware that violence can often peak in the hours just before or just after school, when pupils are travelling to and from school. These times can be particularly risky for young people involved in serious violence.

15.5.1 Child Criminal Exploitation- County Lines

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered.

Like other forms of abuse and exploitation, county lines:

- can affect any child (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.

15.5.2 Gang violence- Will be treated in accordance to the Government document- Preventing youth violence and gang involvement- Practical advice for schools and colleges March 2015

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/418131/Preventing_youth_violence_and_gang_involvement_v3_March2015.pdf

15.6 **Consensual and non-consensual sharing of nudes and semi nudes, images and or videos** (also known as Sexting or “youth-produced sexual imagery.”)

UKCCIS Guidance (The UK Council for Child Internet Safety)

<https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people>

Although illegal, police involvement may not always be necessary and the incident managed in school.

15.6.1 Incidents covered by this guidance:

- Children under 18 creates a sexual image of themselves and shares it with another child under 18.
- A child under 18 shares an image of another under 18 with another child under 18 or an adult.
- A child under 18 is in possession of sexual imagery created by another child under 18.

15.6.2 Response to Consensual and non-consensual sharing of nudes and semi nudes, images and or videos:

The response should be guided by the ‘principle of proportionality’.

‘The primary concern at all times should be the welfare and protection of the children involved.’

15.6.3 The Law

Making, possessing, and distributing any imagery of a child under 18 which is indecent is illegal. This includes imagery of yourself if you are under 18.

Indecent is not definitively defined in law, but images are likely to be considered indecent if they depict:

- a naked young person
- a topless girl
- an image which displays genitals, and
- sex acts including masturbation
- indecent images may also include overtly sexual images of young people in their underwear

15.6.4 Managing a disclosure

- Refer to the DSL as soon as possible
- The DSL should hold an initial review meeting with appropriate school staff
- There should be subsequent interviews with the young people involved (if appropriate)
- Parents should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm
- At any point in the process if there is a concern a young person has been harmed or is at risk of harm a referral should be made to children's social care and/or the police immediately.
- Do not view the image unless it is unavoidable

15.6.5 An immediate referral to police and/or children's social care should be made if at this initial stage the incident involves:

- an adult
- coercion, blackmail, or grooming
- concerns about capacity to consent, [e.g., SEN]
- images show atypical sexual behaviour for the child's developmental stage
- violent acts are depicted
- image shows sex acts and includes a child under 13
- a child is at risk of immediate harm as a result of the disclosure (for example, self-harm or suicide)

The decision to respond to the incident without involving the police or children's social care would be made in cases when the DSL is confident that they have enough information to assess the risks to pupils involved and the risks can be managed within the school's pastoral support and disciplinary framework and if appropriate local network of support.

15.6.6 Assessing the risks

- Has the child taken part in producing sexual imagery before?
- Why was the imagery shared? Was the young person coerced or put under pressure to produce the imagery?
- Who has shared the imagery? Where has the imagery been shared? Was it shared and received with the knowledge of the child in the imagery?
- Are there any adults involved in the sharing of imagery?
- What is the impact on the children involved?
- Do the children involved have additional vulnerabilities?
- Does the young person understand consent?
- Has the young person taken part in this kind of activity before? DSLs should always use their professional judgement in conjunction with their colleagues to assess incidents.

15.6.7 Viewing images

- Avoid viewing youth-produced sexual imagery. Instead, respond to what you have been told the image contains.
- If it is felt necessary to view, discuss with the Headteacher first.
- Ensure viewing is undertaken by the DSL or another member of the safeguarding team with delegated authority from the Headteacher.
- Ensure viewing takes place with another member of staff present in the room, ideally the Headteacher or a member of the senior leadership team. This staff member does not need to view the images.
- Wherever possible ensure viewing takes place ideally in the Headteacher or a member of the senior leadership team's office.
- Ensure wherever possible that images are viewed by a staff member of the same sex as the young person in the imagery.
- Never copy, print, or share the image (it's illegal)
- Record the fact that the images were viewed along with reasons and who was present. Sign and date.

15.6.8 Deleting images (from devices and social media)

- If the school has decided that involving other agencies is not necessary, consideration should be given to deleting the images.
- It is recommended that children are asked to delete the images themselves and confirm they have done so. This should be recorded, signed, and dated.
- Any refusal to delete the images should be treated seriously, reminding the children that possession is unlawful.

15.7 Sexual Violence and Sexual Harassment between children in school (Part 5 KCSIE 2024)

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single

child or group of children. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk.

Evidence shows girls, children with SEND and LGBT children are at greater risk.

Staff should be aware of the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and
- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

15.7.1 Sexual violence

- Rape:
- Assault by Penetration:
- Sexual Assault:

15.7.2 Sexual Harassment

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual “jokes” or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature.

15.7.3 The response to a report of sexual violence or sexual harassment.

The initial response to a report from a child is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. (not all victims see themselves as a victim) A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

If staff have a concern about a child or a child makes a report to them, they should follow the referral process as set out in Part 1 of KCSIE 2024. As is always the case, if staff are in any doubt as to what to do, they should speak to the DSL (or a deputy).

15.7.4 Online Sexual Harassment.

This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:

- non-consensual sharing of sexual images and videos;

- sexualised online bullying;
- unwanted sexual comments and messages, including, on social media; and
- sexual exploitation; coercion and threats

The immediate response to a report, follow KCSIE 2024 Part Five

It is important that if the alleged perpetrator does move to another educational institution (for any reason), that the new educational institution is made aware of any ongoing support needs and where appropriate, potential risks to other children and staff

15.7.5 Upskirting

'Upskirting' 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. It is now a criminal offence.

15.8 Information on so-called 'Honour Based' abuse

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes, which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of so-called HBA are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt, staff should speak to the DSL. 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.

15.8.1 Indicators

There is a range of potential indicators that a child may be at risk of HBA

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.

<https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation>

15.8.2 Actions

If staff have a concern regarding a child who might be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding lead (or a deputy). As appropriate, the designated safeguarding lead (or a deputy) will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with the police and local authority children's social care. Where FGM has taken place, since 31 October 2015 there has been a

mandatory reporting duty placed on **teachers** that requires a different approach (see following section).

15.9 Female Genital Mutilation ("FGM")

15.9.1 Whilst all staff should speak to the designated safeguarding lead (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific **legal duty on teachers**. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police.

All teachers have a **statutory duty** to report **personally** to the police where they discover (either through disclosure by the victim or visual evidence) that an act of 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 children.

15.9.2 For the purposes of the mandatory reporting duty, a teacher is someone who undertakes teaching work as follows (including through distance learning or computer aided techniques):

- planning and preparing lessons and courses for children
- delivering lessons to children
- assessing the development, progress and attainment of children
- reporting on the development, progress and attainment of children

15.9.3 These activities are not teaching work if the person carrying out the activity does so (other than for the purposes of induction) subject to the direction and supervision of a qualified teacher or other person nominated by the Headteacher to provide such direction. The mandatory reporting duty will not therefore apply to supervised teaching assistants.

15.9.4 If staff have concerns that FGM has taken place, as well as reporting this to the police, they should also activate local safeguarding procedures using existing and national and local protocols. Unless the teacher has a good reason not to, they should still consider and discuss any case of FGM with the DSL and involve Children's Social Care as appropriate. Information on when and how to make a report can be found at- [Mandatory reporting of female genital mutilation procedural information](#)

<https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information>

Some signs when FGM is imminent

- reference to FGM in conversation,
- confide that she is to have a 'special procedure' or to attend a special occasion to 'become a woman'.
- Parents state that they or a relative will take the child out of the country for a prolonged period
- FGM in the UK- when a female family elder is around, particularly when she is visiting from a country of origin.

Symptoms

- may have difficulty walking, sitting or standing and may even look uncomfortable.
- may spend longer than normal in the toilet due to difficulties urinating.
- may spend long periods of time away from a classroom during the day with bladder or menstrual problems
- may have frequent urinary, menstrual or stomach problems.

15.10 Forced marriage

15.10.1 Forcing a person into a marriage is a crime in England and Wales.

Since February 2023 it has been a crime to carry out any conduct whose purpose is to cause a child to marry before their 18th birthday, even if violence, threats or another coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial “marriages” as well as legal marriages.

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 perpetrators use perceived cultural practices to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

15.10.2 The Forced Marriage Unit has published Multi-agency guidelines, with pages 32-36 focusing on the role of schools and colleges.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/322307/HMG_MULTI_AGENCY_PRACTICE_GUIDELINES_v1_180614_FINAL.pdf

Staff can contact the Forced Marriage Unit if they need advice or information.

<https://www.gov.uk/guidance/forced-marriage>

Contact: 020 7008 0151 or email: fm@fco.gov.uk.

(The local police non-emergency number is 101)

15.11 Domestic Abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents.

That abuse can be, but is not limited to,

- psychological
- physical
- sexual
- financial
- emotional

Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (**teenage relationship abuse**). All of which can have detrimental and long-term impact on their health, well-being, development, and ability to learn. Children who witness violence are treated as victims

Operation Encompass

Operation Encompass operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when the police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead (or a deputy)) in school before the child or children arrive at school the following day.

Operation Encompass provides an advice and helpline service for all staff members from educational settings who may be concerned about children who have experienced domestic abuse. The helpline is available 8AM to 1PM, Monday to Friday on 0204 513 9990 (charged at local rate).

National Domestic Abuse Helpline Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked.

Additional advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

NSPCC- <https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/domestic-abuse/>

Refuge- <https://refuge.org.uk/what-is-domestic-abuse/>

Safe young lives- <https://safelives.org.uk/research-policy-library/safe-young-lives-report/>

Domestic abuse specialist support -<https://www.gov.uk/government/publications/domestic-abuse-get-help-for-specific-needs-or-situations/domestic-abuse-specialist-sources-of-support>

Home: operation Encompass- <https://www.operationencompass.org/>

15.12 Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity.

Indicators that a family may be at risk of homelessness include

- household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property.

Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into local authority children's social care where a child has been harmed or is at risk of harm.

15.13 Mental Health

- All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation
- Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem
- Staff however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one
- Schools and colleges can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies
- Where children have suffered abuse, neglect, exploitation or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education
- ***If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy and speaking to the designated safeguarding lead or a deputy***

15.14 School trips

This policy and procedures will apply during school trips and visits. Any incident amounting to an allegation or suspicion of abuse which occurs whilst on the trip or visit must be reported to the DSL immediately or to the Headteacher if the disclosure involves a member of staff.

To make a referral to children's services, the following link should be used:

<https://www.gov.uk/report-child-abuse-to-local-council>

15.15 Use of Mobile Phones and Cameras/including the EYFS setting

Through the training programme for staff and volunteers it is made clear that:

- 15.15.1 Staff mobile phones should not be used for personal communication during lessons/contact time with children unless part of their employment such as in the case of trip leader or minibus driver for keeping in contact with school, or in the case of an urgent or emergency situation.
- 15.15.2 Children's personal contact information should not normally be held on a member of staff's mobile phone. A child's contact information may be held on member of staff's mobile phone for work purposes only where this supports the welfare and safety of that child or a group of children; such as where a child is carrying the designated safety phone for a Duke of Edinburgh's Award group on expedition. Permission to do this will be granted by the Headteacher of either school as part of the off-site visit planning and risk assessment process. The child's contact details must be deleted by the member of staff immediately the activity is complete.
- 15.15.3 The Gregg and The Gregg Preparatory Schools make it clear to children and parents through their arrangements for behaviour and discipline how mobile phones/devices are to be

managed in school. In the case of The Gregg School where a child does bring their phone to school, it should not be switched on during the working school day. If any Gregg Preparatory children need to bring a phone in to school, it must be given to the school office upon entry into school.

- 15.15.4 As part of the admission process for any child at The Gregg Schools their parents are given the opportunity to state that they do not give consent for images of their child to be taken/used by the School via a reply slip. The list of children who have “opted-out” must be consulted before any image or video of any child is used publicly, particularly in news letters or social media.
- 15.15.5 As part of the admission process for any child at The Gregg Preparatory School including EYFS-their parents are given an essential information form which they have to either give or not give consent for photos to be taken of their child and whether their image or video can or cannot be used on various forms of media including social media.
- 15.15.6 Wherever possible, the Trust prefers that staff use a school device for taking images of children. However, where this is not possible, staff may use their personal mobile phone/camera for taking photos of children during school activities. It is the member of staff’s responsibility to ensure that these are uploaded to the school system and deleted from their phone within 48 hours.

For further information on the Trust’s approach to the management of other aspects of E-Safety, please refer to each school’s E-Safety Policy.

15.16 Physical intervention

Staff must only ever use physical intervention as a last resort or to protect the child, themselves or others from harm and that at all times it must be the minimal force necessary to prevent injury or damage to property.

When considering the use of reasonable force towards children with SEND or medical conditions, the risks should be carefully considered. Individual behaviour plans and other forms of proactive behaviour support can reduce the need for reasonable force.

We understand that physical intervention of a nature that causes injury or distress to a child may be considered under safeguarding children or disciplinary procedures.

15.17 Abuse of trust

Staff recognise that as adults working in a school:

- We are in a relationship of trust with the children in our care and acknowledge that it is a criminal offence to abuse that trust.
- That the principle of equality embedded in the legislation of the Sexual Offences Act 2003 (Remedial) order 2012, applies irrespective of sexual orientation.
- That the legislation is intended to protect young people in education who are over the age of consent but under 18 years of age.

15.18 Racist incidents

The approach to dealing with racist incidents in each school is set out in their Behaviour and Discipline Policy and acknowledges that repeated racist incidents or a single serious incident may lead to consideration under safeguarding children's procedures.

15.19 Bullying

Each school's policy on bullying is set out in a separate policy and acknowledges that to allow or condone bullying may lead to consideration under safeguarding children procedures.

15.20 E-Safety

15.20.1 The arrangements for E-safety in each school recognise that internet safety is a whole school responsibility (staff, children, parents).

15.20.2 Children may expose themselves to danger, whether knowingly or unknowingly, when using the internet and other technologies. Additionally, some young people may find themselves involved in activities, which are inappropriate, or possibly illegal these include child sexual exploitation, radicalisation, and sexual predation. There are three risk areas – content, contact, and conduct. We therefore recognise our responsibility to educate children through Personal Development Learning / PSHE opportunities, ICT/Computing lessons and assemblies, teaching them the appropriate behaviours and critical thinking skills to enable them to remain both safe and legal when using the internet and related technologies. Parents are educated through workshops in school, school communications.

15.20.3 The schools recognise the importance of filtering and monitoring systems and limit the use of mobile technology during the school day. We recognise that many children have unlimited and unrestricted access to the internet via 3G/4G and 5G. At the Gregg School children are expected to switch their phones off at the start of the day. At The Gregg Preparatory School, children are only allowed to bring in mobile phones with parental permission and given in at the school office during the day. All staff are trained to remain vigilant with regard to mobile phone use.

15.20.4 Our approaches to protecting children whilst working online and technical details of the filtering and monitoring systems used are found in the E-Safety policy for each school

15.21 Health and Safety

Our Health & Safety Policy, set out in a separate document, reflects the consideration we give to the safeguarding of our children both within the school environment and when away from the school when undertaking school trips and visits.

15.22 Looked after children

Special consideration needs to be given to safeguarding the needs of children who are looked after by the LA. Such children should have a designated member of staff who is responsible for their welfare and progress. This member of staff should be provided with up-to-date information from the LA such as the care plan, contact arrangements etc.

15.23 Private fostering

The school has a mandatory duty to inform the Local Authority in such arrangements.

15.24 Specialist settings

Staff should be aware that they have a duty to safeguard children and themselves when the education of that child happens in specialist settings.

Consideration should be given to:

- Teaching children in isolation (for example, music lessons)
- One to one tuition
- After school clubs
- School transport
- Performance outside school
- School visits
- Where possible staff should try to avoid being alone on a one- to-one with a child in isolated parts of the school. Consider moving clubs/students to main school working near to or alongside other staff with the door open. Staff should always inform Reception and other staff about where you are and who you are with if not in a regular lesson.

16. Organisations or Individuals using school premises

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

17. OTHER RELEVANT POLICIES/GUIDANCE

The Trust's legal responsibility for safeguarding the welfare of children goes beyond basic child protection procedures. The duty is now to ensure that safeguarding permeates all activities and functions. This policy therefore complements and supports a range of other policies and procedures in both schools, for instance:

- **Anti-Bullying Policy**
- **Behaviour Policy**
- **Equal Opportunities Policy and arrangements**
- **EYFS Policy and arrangements**
- **E-Safety Policy and arrangements**
- **IT Acceptable use policy**
- **Extremism and Anti Radicalisation Guidance**
- **Health and Safety Policy and arrangements**
- **Recruitment and selection of staff (safer recruitment)**
- **SEN Policies and Provision**
- **Staff Behaviour and Conduct Policy and Guidance**

The above list is not exhaustive but when undertaking development or planning of any kind the school will need to consider safeguarding matters.

APPENDIX 1 - CONTACTS

Mrs Cathy Goodchild- The Gregg School - 023 8047 2133
Designated Safeguarding Leader of Staff for Child Protection, and in her absence/alongside her:
Mrs Sheri Sellers, Mr Steve Gillespie

Mrs Anita Jolley- The Gregg Preparatory School 023 8055 7352
Designated Safeguarding Leader, of staff for Child Protection, and in her absence/alongside her:
Mr Patrick McPhillips, Mrs Trudi Shone

Mrs Carol Pulman- Safeguarding Governor for The Gregg Schools

Mrs Jo Preston- Chair of the Trust

Ms Hayley Cooke- Safer Recruitment Procedures (Bursar)

DBS referrals

Paper referral forms to DBS Barring, PO Box 3963, Royal Wootton Bassett, SN4 4HH.
Phone 03000 200 190 if you need help or advice DBS@dbs.gov.uk

Teaching Regulation Agency (TRA)

Ground Floor, South
Cheylesmore House
5 Quinton Road
Coventry
CV1 2WT
United Kingdom

Teacher misconduct:

Email misconduct.teacher@education.gov.uk
Telephone 020 7593 5393

Misconduct Referral Form

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/738301/Teacher Misconduct Referral Form for Employers.docx](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/738301/Teacher_Misconduct_Referral_Form_for_Employers.docx)

Safeguarding Contacts

SOUTHAMPTON

Southampton Children's Resource Service- Professional's line-

- Monday- Thursday 8.30-5.00 and Friday 8.30-4.30- **02380 83 2300**
- Weekends/bank holidays and outside of office hours- **02380 23 3344**
- Online referral form- <https://www.southampton.gov.uk/health-social-care/children/child-social-care/childrens-resource-service/>

HAMPSHIRE

Hampshire- Children's Services Professionals line-

- Monday- Thursday 8.30-5.00 and Friday 8.30-4.30- **0300 555 1384**
- Weekends/bank holidays and outside of office hours- **0300 555 1373**

APPENDIX 1 - CONTACTS

- Online Referral Form:- https://forms.hants.gov.uk/en/AchieveForms/?form_uri=sandbox-publish://AF-Process-7e6115a7-b0ba-484d-991f-084c1248ac72/AF-Stage-52cf8e73-0daf-47d4-bb55-0fdad856d3e6/definition.json&redirectlink=/en&cancelRedirectLink=/en
- Southampton Police, general enquiries 101
- Southampton Police, emergencies 999

LADO for Southampton: lado@southampton.gov.uk

Jemma Swann- Mon-Thurs Jo Williams- Friday

Jemma.swann@southampton.gov.uk

TEL: 023 80 915535/ 02380 833889
Mobile: 07500952037

LADO for Hampshire:

Mrs Barbara Piddington- barbara.piddington@hants.gov.uk
07903 649503

Children Missing Education

Children Missing Education Officer:

Eliza Johnston/ Sophie Bains

Southampton City Council

Civic Centre

Southampton SO14 7LY

02380 833666

eliza.johnston@southampton.gov.uk

sophie.bains@southampton.gov.uk

SSCP -Southampton Safeguarding Children Partnership

<http://southamptonlscb.co.uk/>

HIPS – Hampshire, Isle of Wight and Portsmouth Safeguarding Partnership

<https://www.hampshirescp.org.uk/>

National Contacts

NSPCC Child Protection Helpline	0808 800 5000
Child-Line	0800 1111
The Police (for FGM/ up skirting)	101

Prevent referrals:

https://www.southampton.gov.uk/media/l2bns0qv/prevent_national_referral_form_tcm63-437066.docx

<https://documents.hants.gov.uk/adultservices/safeguarding/Prevent-national-referral-form.docx>

APPENDIX 2 - DEFINITIONS

There are four types of child abuse.

1. Physical abuse
2. Emotional abuse
3. Sexual abuse
4. Neglect

<https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/>
<https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/child-sexual-exploitation/>

KCSIE Part 1 2024

Abuse, neglect and exploitation

All staff should be aware of the indicators of abuse, neglect and exploitation (see below), understanding that children can be at risk of harm inside and outside of the school/college, inside and outside of home, and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection.

All school and college staff should be aware that abuse, neglect, exploitation, and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap.

All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation.

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content.

In all cases, if staff are unsure, they should always speak to the designated safeguarding lead or a deputy.

Indicators of abuse and neglect

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

APPENDIX 2 - DEFINITIONS

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

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

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

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

APPENDIX 3 - FORM FOR LOGGING A CONCERN ABOUT A CHILD'S SAFETY OR WELFARE

Student's Name:	d.o.b.
Date:	Time:
Name:
Print	Signature
Position:	
Note the reason(s) for recording the incident.	
Record the following factually:	Who?
	What?
	Where?
	When?
Offer an opinion where relevant (how and why might this have happened?)	
Substantiate the opinion. Note action taken, including names of anyone to whom your information was passed.	

Check to make sure your report is clear now - and will also be clear to a stranger reading it next year.

PLEASE PASS THIS FORM TO YOUR DESIGNATED PERSON FOR CHILD PROTECTION.

APPENDIX 4 – COMMUNICATION WITH STUDENTS

In the light of staff discussion and in accordance with Local Authority guidance, we have produced a checklist for staff:

Guidance for All Staff – a Checklist

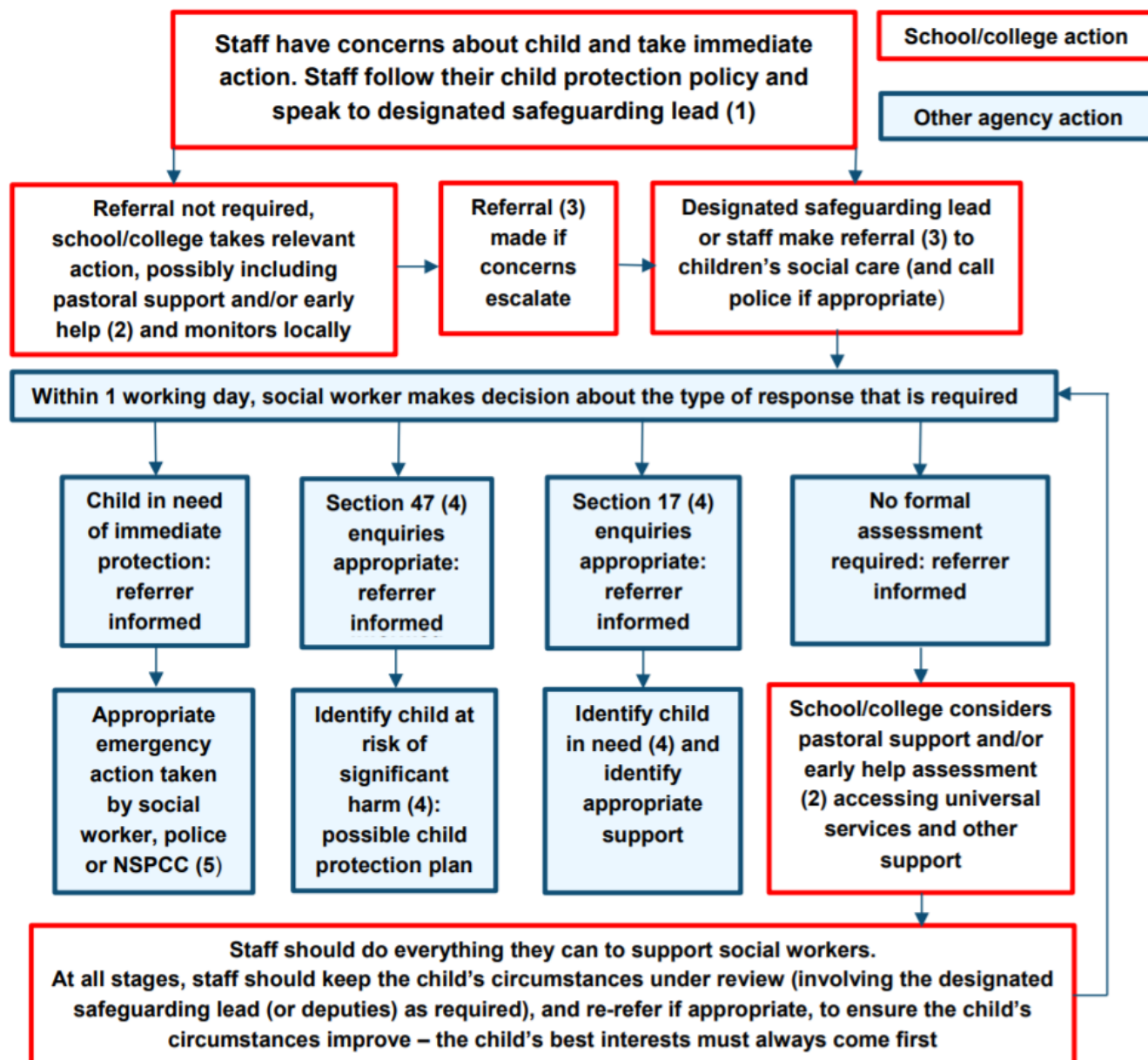
- Never give your mobile phone number out to student/students, use school mobile phones for trips and visits.
- Use of personal mobile phones is not allowed in the presence of children.
- Never text a child.
- Do not become 'friends' or interact with any current student/students, or student/students with a younger sibling in school on any social media
- Ex-students/student may be added on social networking sites after 18 years of age unless they have siblings in the school.
- If staff use social networking, edit account settings so that general, personal information is not visible or ensure what is visible is appropriate.
- Do not publish comment on any media that has been uploaded by students/students
- Do not have any communication/conversation with any current student/students in school via social media
- If there is a need to communicate with a student/students electronically then staff should use their school email or Firefly, never a personal email address.
- As a member of staff, do not publish anything online that could bring your professionalism into question (questionable pictures / inappropriate language etc.)
- Be aware that anything published or written online may be visible to a greater audience than has been anticipated
- Do not upload media of any nature onto the Internet without permission of those that it might affect.
- Staff must inform the SLT immediately if there is any cause for concern with a student/students or member of staff's use of the Internet.
- Understand that unprofessional behaviour / issues regarding staff use of the Internet are treated seriously.
- ***Understand that school would only be able to support staff against any serious allegation providing these rules have been followed.***

APPENDIX 5 – ACTIONS WHEN A CHILD HAS SUFFERED OR IS LIKELY TO SUFFER HARM

This diagram illustrates what action should be taken and who should take it where there are concerns about a child. If, at any point, there is a risk of immediate serious harm to a child a referral should be made to children’s social care immediately. **Anybody can make a referral.**

Excerpt from KCSIE, September 2024,

Actions 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 co-ordinated 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.

APPENDIX 5 – ACTIONS WHEN A CHILD HAS SUFFERED OR IS LIKELY TO SUFFER HARM

- (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)