



SIR THOMAS RICH'S

Child Protection and Safeguarding Children Policy (including allegations against members of staff)

This policy was drawn up in accordance with the *Area Child Protection Committee and the Education (prohibition from teaching and working with children) Regulations 2003*; the *Gloucestershire Safeguarding Children policies (all maintained up-to-date online at [Gloucestershire Safeguarding Children Partnership \(GSCP\) - Gloucestershire Safeguarding Children Partnership](#))*; *Working Together to Safeguard Children (DfE, June, 2018, updated December 2020)* and *Keeping Children Safe in Education (DfE, September 2023)*; together with *Information Sharing, Advice for practitioners providing safeguarding services to children, young people, parents and carers (DfE, July, 2018)* and *What to do if you're worried a child is being abused, Advice for practitioners (DfE, March 2015)*. This policy should be read in conjunction with these DfE statutory guidance documents: the Prevent duty (June 2019), and the following School policies: *Preventing Extremism and Radicalisation Policy*, the *Staff Code of Conduct, staff recruitment and induction protocols, the staff CPD policy, the Anti-bullying policy, the ICT policy and Acceptable Use agreements and the School's Behaviour and Discipline policy; the Relationship and Sex Education policy.*

Reviewed: September 2023

Next review: July 2024

Status: Statutory

Responsibility: The School's Senior Management Team (SMT) draws up and implements the Child Protection and Safeguarding Children Policy. It is the responsibility of the Governors' Personnel Committee to review the policy annually, monitor its implementation and recommend its approval to the Full Governing Body.

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1. Introduction

As well as their other statutory duties, schools have a pastoral responsibility towards their pupils. All children regardless of age, gender, culture, race, religion or sexual orientation are entitled to be protected from harm, abuse, exploitation and neglect. In any intervention, the emphasis is, first and foremost, on the **best** interests of the child.

We recognise that, because of the day-to-day contact with children, school staff are well placed to observe the outward signs of abuse. We recognise our moral and statutory responsibility to safeguard and promote the welfare of all pupils. We endeavour to provide a safe and welcoming environment where children are respected and valued. All staff have an equal responsibility to act on any suspicion or disclosure that a child is at risk. **Safeguarding is everyone's responsibility**. School staff **should not** assume that someone else will take action. Staff should share information that might be critical in keeping a child safe. The School will follow the procedures set out by the Gloucestershire Safeguarding Children Partnership and guidance issued by the Department for Education.

Safeguarding and promoting the welfare of children is defined as:

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

Children cannot learn effectively unless they feel safe and secure. This policy will help the School in:

- a) ensuring safe recruitment is practised in line with Government guidance by using at least one accredited “Safer Recruiter” on all interview panels and by checking the suitability of staff and volunteers to work with children and ensuring any unsuitable behaviour is reported and managed, using the allegations management procedures;
- b) developing a culture of safer working practice and vigilance, in which staff can exercise their professional judgement to keep children safe and act in a timely way;
- c) raising awareness of child protection issues and equipping children with the skills needed to keep themselves safe;
- d) developing, and then implementing procedures for identifying and reporting cases, or suspected cases, of abuse by referring to the Children's Helpdesk;
- e) supporting pupils who have been abused in accordance with his/her agreed Child Protection Plan;
- f) establishing a safe environment in which children can learn and develop;
- g) ensuring pupils have access to 'early help' in order to promote their wellbeing;
- h) ensuring the child's wishes and feelings are taken into account, where there is a safeguarding concern, when determining what action to take and what services to provide;
- i) putting in place systems that are well promoted, easily understood and easily accessible for children to confidently report any form of abuse, exploitation or neglect, knowing their concerns will be treated seriously, knowing they can safely express their views and give feedback and that they are never given the impression that they are creating a problem.

2. Roles and responsibilities

Governors (Trustees)

It is the responsibility of the governors to ensure that they:

- regularly update their safeguarding training to equip them with knowledge to provide strategic challenge;

- be aware of their obligation under the Human Rights Act 1998, the Equality Act 2010, the Public Sector Equality Duty (PSED) and the local multi-agency safeguarding arrangements.

It is the responsibility of the governors to ensure that the School:

- complies with its safeguarding duties under legislation;
- has a Safeguarding Policy in place which is updated annually;
- appoints a member of the Senior Management Team as Designated Safeguarding Lead (DSL) and a deputy DSL, who have received appropriate formal training which is updated every two years. Additionally, they should update their knowledge and skills at regular intervals and at least annually;
- delivers regular training to all staff including site staff on child protection issues;
- has a nominated governor for safeguarding who has been trained;
- creates a culture where the welfare of pupils is of paramount importance;
- ensures staff and pupils feel able to raise concerns, and that these are handled sensitively;
- ensures safeguarding issues are addressed within the curriculum;
- ensures online safety is a running and interrelated theme within whole school policies;
- contributes to interagency working and plans;
- has an appropriate response to children who go missing in education;
- has safe recruitment procedures, and that at least one person on the appointment panel is safer recruitment trained;
- has procedures for dealing with allegations of abuse against members of staff, including allegations against the Headmaster and other children;
- has procedures for dealing with children who go missing from education;
- takes a proportionate risk-based approach to safeguarding children;
- seeks assurance that where another body is providing services or activities, that they have appropriate safeguarding and child protection policies / procedures in place.

The two governors with specific responsibility for Safeguarding and Child Protection are: Jo Townsend (jt.gov@strs.org.uk) and Julia May (jmay.gov@strs.org.uk)

Headmaster

It is the responsibility of the Headmaster to ensure that:

- the Child Protection and Safeguarding Children policy is in place, updated annually and followed by staff;
- all staff receive Safeguarding training when they commence work at the School. The training will be regularly updated. Induction and training will be in line with advice from the Local Safeguarding Children's Board. Thereafter, all staff will receive, at least once a year, safeguarding and child protection updates e.g. via email, e-bulletins and staff meetings;
- all staff read Part 1 and Part 5 of Keeping Children Safe in Education September 2023, this policy, the Staff Code of Conduct, the Preventing Extremism and Radicalisation policy, Guidance for Safer Working Practice for Adults Who Work with Children and Young People, Working Together to Safeguard Children, the Behaviour and Discipline policy. In addition, they should read School's policies on wider safeguarding issues, i.e. Anti-Bullying, ICT (acceptable user policy) and be aware of the procedures for safeguarding children who go missing from education;
- all staff and volunteers understand their responsibilities in being alert to the signs of abuse, exploitation and neglect, and their responsibility for referring any concerns to the designated senior person responsible for safeguarding and child protection;

- all staff and volunteers recognise the specific needs of pupils with special educational needs or disabilities, or certain medical or physical health conditions, and understand that these pupils may face additional barriers to their understanding of safeguarding issues and appropriate behaviour;
- all staff (including temporary, supply staff, volunteers and site staff) and the Governing Body (Trustees and Members) know the name, and identity of the designated senior person and the deputy designated senior person responsible for safeguarding and child protection and their role;
- ensure that the Designated Safeguarding Lead (DSL) or Deputy Designated Safeguarding Leads (DDSLs) are always available to discuss safeguarding concerns;
- pupils are provided with opportunities in PSHE and across the curriculum to develop the skills they need to keep themselves safe from abuse including online;
- establish and maintain an environment in which children feel secure, are encouraged to talk, and are listened to, where their feelings and wishes are taken into account in any measures the School puts in place to protect them;
- children know that there are adults in the School who they can approach if they are worried;
- locally agreed procedures are followed where an allegation is made against a member of staff or volunteer, including supply or agency workers, contractors, governors or other pupils;
- safe recruitment practices are always followed, that at least one person on the appointment panel is safer recruitment trained, references are requested prior to interview and that references received are authentic, from someone with authority and both from the most recent employer and the most recent educational setting;
- the principles in the Staff Code of Conduct underpin the School's duty to safeguard and protect children and young people;
- parents have an understanding of the responsibility placed on the School and staff for child protection by setting out its obligations on the School website.

Designated Safeguarding Lead (DSL)

The School's DSL is the Deputy Headteacher, Mr Matthew Lynch, who is also the Child Protection Officer. It is his responsibility to:

- act as a source of support, advice and expertise on safeguarding;
- undertake formal training every two years. In addition, safeguarding knowledge and skills should be updated at regular intervals and at least annually e.g. by e-bulletins, meeting other DSL, reading and digesting safeguarding developments;
- undertake Prevent and Channel general awareness training and, as the School's Prevent Single Point of Contact (SPOC), be able to provide advice and support to staff on protecting children from radicalisation;
- ensure all staff receive appropriate safeguarding training when they commence work at the School and regularly thereafter;
- keep a record of staff attendance at child protection training;
- liaise with the Chair of Governors and the nominated governors for safeguarding;
- manage all referrals and work with other agencies and services to promote the welfare of children and protect them from harm and co-operate, as required, with their enquiries regarding child protection matters, including attendance at child protection conferences and core groups;
- have an understanding of the procedures of the Local Safeguarding Children's Board, and be able to attend and contribute to child protection review conferences, if required;
- ensure all records relating to safeguarding and child protection, when noted and reported by staff or disclosed by a child, are kept securely, separate from the main pupil file, and in locked locations;
- report to the Police any cases where Female Genital Mutilation (FGM) appears to have been carried out on a girl under 18;

- notify the relevant social worker if there is an unexplained absence of more than two days of a pupil who has a Child Protection Plan (previously known as being on the child protection register);
- ensure that, when a child with a protection plan leaves the School, their information is passed to their new school and social services notified;
- refer to the Disclosure and Barring Service anyone who has harmed or poses a risk to a pupil;
- provide appropriate support to pupils and staff involved in child protection issues;
- review the effectiveness of ICT filtering and monitoring systems and processes;
- make this policy available to parents.

In the absence of the DSL the Deputy Designated Lead, currently Peter Daniell, Assistant Headteacher, will carry out the duties of the DSL. The Deputy DSL is appropriately trained to fulfil the role. In the absence of both the DSL and Deputy DSL, concerns will be referred to Alun Williams, Assistant Headteacher. These staff have received the same level of training as the DSL.

Specifically, when a safeguarding issue is raised, the DSL will follow the procedures outlined below.

- Refer cases of suspected abuse, exploitation or neglect to Social Services. Make an immediate referral to Social Services and the Police where a child is in immediate danger or at risk of harm;
- In the event of an injury, arrange immediate treatment in whichever way seems most appropriate;
- If concerns are raised by a member of staff, ensure the member of staff has noted these concerns in writing and speak to the child as soon as is practically possible and no later than the end of the school day. Keep a written record of the conversation and any subsequent telephone calls or conversations. All concerns are recorded, even where there is no need to refer the matter immediately;
- Contact the Children’s Helpdesk at Shire Hall (01452 426565) to discuss concerns in principle with a social worker or social work manager and receive advice about whether a referral is appropriate, or whether there are alternative ways of addressing their concerns;
- Provide basic information to the Children’s Helpdesk and use the secure portal (Front Door) for referring concerns about a child. This is passed on to a social work team, and the DSL will be contacted by a social worker within 24 hours (unless there are immediate risks in which case the professional will be put through to a social work team straight away). The social work team will discuss whether the referral is appropriate and what action can/will be taken;
- Discuss the situation with the family of the pupil, if appropriate, and, where possible, seek their agreement to the referral. However, this only applies where such a discussion will not place the child at increased risk of significant harm;
- Make suitable arrangements if the child is felt to be in danger at home. He/she should not be allowed to go home;
- Where a child’s situation, following a referral, does not improve, press for reconsideration;
- If required, participate in further assessment, either through an early help assessment, through a child in need assessment or a child protection enquiry;
- If not forthcoming, request information of the timing of the strategy discussion between the statutory agencies which decides whether and how to investigate.

All Staff

It is the responsibility of **all** staff to:

- read and understand the statutory guidance on Safeguarding; Part 1 and part 5 of Keeping Children Safe in Education 2023 - [Keeping children safe in education - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/91221/Keeping-children-safe-in-education-2023.pdf);

- read and understand this policy, the Staff Code of Conduct, the Preventing Extremism and Radicalisation policy, Guidance for Safer working Practice for Adults who Work with Children and Young People, the School's Behaviour and Discipline policy and [Working Together to Safeguard Children](#) ;
- read the School's policies on wider safeguarding issues, i.e. Anti-Bullying, ICT (acceptable use policy), Staff Code of Conduct and be aware of the procedures for safeguarding children who go missing from education;
- understand the role of the DSL;
- risk manage any time spent 1:1 with pupils;
- attend training sessions on Safeguarding;
- be vigilant to changes in pupils' behaviour and to the signs of abuse, exploitation or neglect. See Appendices 2 and 4;
- inform immediately the DSL if they become suspicious of abuse or are told by a child that abuse has taken place;
- be aware of those pupils who may be the most vulnerable to abuse, exploitation or neglect. See Appendix 5;
- have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education and sexting (also known as youth produced sexual imagery) put children in danger;
- Ensure they are aware that safeguarding issues can manifest themselves via child-on-child abuse. This 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;
 - sexual violence and sexual harassment;
 - sexting (also known as youth produced sexual imagery and 'sharing nudes or semi-nudes'); and
 - initiation/hazing type violence and rituals.
- understand their role in the early help process e.g. by identifying emerging problems, liaising with the DSL, sharing information with other professionals to support early identification and acting as the lead professional in undertaking an early help assessment if required;
- be aware that children may not feel ready or find it easy to tell staff about their abuse, exploitation or neglect and may not be able to recognise their experience as harmful. Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report, e.g., a friend may make a report or a member staff may overhear a conversation that suggests a child has been harmed or a child's own behaviour might indicate that something is wrong;
- be aware that children who witness domestic abuse are also victims and that this can have a lasting impact on children;
- be aware of the importance of intra familial harms and the support required for siblings following incidents;
- be aware that children can be victims, and perpetrators of domestic abuse in their own relationships too. The domestic abuse can be physical, sexual, financial, psychological or emotional;
- record any concerns and/or disclosures in writing, accurately and legibly, and pass to the DSL, Mr Matthew Lynch, or in his absence the Deputy DSL, Mr Peter Daniell. In the absence of both, refer concerns to the Assistant Headteacher, Mr Alun Williams, or in his absence Pastoral Assistant, Mrs Galina Filipkova. They will keep the DSL informed at all times;
See DfE publication: ["What to do if you are worried that a child is being abused. Advice for Practitioners."](#) and [NSPCC guidance](#).
- deal sensitively with any disclosures by pupils of abuse, exploitation or neglect and follow the guidelines in Appendix 6;

- reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report;
- telephone the Children’s Helpdesk at Shire Hall (01452 426565) for advice if they feel that their concerns are not being addressed, (or they should refer to the School’s Whistleblowing policy or contact the Local Authority to implement social care’s escalation procedure, if appropriate);
- be aware that **anyone can make a referral. School staff should not assume that someone else will take action.** Staff should share information that might be critical in keeping a child safe. Staff must also ensure that they inform the DSL as soon as possible. The Local Authority will make a decision of what action to take within one working day and inform the referrer of the outcome. Staff must follow up on a referral if this information is not forthcoming. They may be required to work with social workers and other agencies following a referral;
- press for reconsideration if, after a referral, the child’s situation does not appear to be improving;
- report to the DSL any acts of Female Genital Mutilation (FGM). The DSL will inform Social Services and the Police;
- Be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside the school. All staff should consider the context within which such incidents and/or behaviours occur. Additional information regarding contextual safeguarding is available [here](#)

3. Procedures for Students to Report Concerns or Abuse

The School takes very seriously the need to have procedures in place so that students can confidently report concerns or abuse.

Any student can report safeguarding concerns or abuse by:

- sending an email to dsl@strs.org.uk;
- speaking to or emailing the Designated Safeguarding Lead (Mr Matthew Lynch) or Deputy Designated Safeguarding Leads (Mr Peter Daniell, Mr Alun Williams);
- speaking to or emailing the Headmaster;
- speaking to or emailing their Form Tutor, Head of Year or Head of Key Stage;
- speaking to or emailing a member of staff in the school whom they trust.

Teachers, support staff and volunteers are aware that students may not find it easy to tell staff about concerns or abuse. All reports will be taken seriously and staff will ensure that students are never given the impression that they should feel ashamed or are creating a problem for making a report. Staff will follow the safeguarding principles set out in this policy and give immediate consideration as to how best to support the welfare of all students concerned.

4. Children who are Absent from Education

- a) Children who are absent from school, particularly repeatedly and/or for prolonged periods, and children missing education can act as a warning sign of a range of safeguarding concerns. Children missing education are children of compulsory school age who are not registered pupils at a school and are not receiving suitable education otherwise than at a school. Children absent from education are at significant risk of underachieving, being victims of harm, exploitation or radicalisation, and becoming NEET (not in education, employment or training) later in life. The School recognises that a child who is absent or missing from education is a potential indicator of abuse and neglect which may include

sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage.

- b)** Where a child does not arrive at school, without prior notice from their parent(s), carer(s) or guardian(s), the School will alert their parent(s), carer(s) or guardian(s).
- c)** The School will notify the relevant social worker if there is an unexplained absence of a pupil who has a Child Protection Plan.
- d)** If a child's whereabouts is not known, the School's Designated Safeguarding Lead or Deputy Designated Safeguarding Lead will be informed. Together with the Attendance Officer, and after advice has been sought from other agencies, an action plan will be formulated and followed until the child is located.
- e)** If the School believes a child has "gone missing", the School will follow guidance given by the DfE: [Children Missing Education Statutory Guidance for Local Authorities September 2016](#)
- f)** The School will liaise with Gloucestershire Safeguarding Children Partnership, other agencies, where appropriate, and the Police.
- g)** The School will be alert to potential safeguarding concerns.
- h)** In cases of persistent absence and prolonged periods of absence, the School will work closely with parents, carers and guardians and other agencies, where appropriate, in order to endeavour to improve attendance.
- i)** Where a parent or carer has expressed their intention to remove a child from the School with a view to educating at home, the School will work in tandem with other agencies and the Local Authority to coordinate a meeting with parents or carers where possible. Ideally, before a final decision has been made, to ensure the parents or carers have considered what is in the best interests of the child. This is particularly important where a child has SEND, is vulnerable, and/or has a social worker.
- j)** The School will inform the Local Authority of any pupil who has been deleted from the register where they have been taken out of school by parents to be educated outside the school system; ceased to attend school and no longer lives within reasonable distance; certified as unlikely to be in a fit state of health to attend before ceasing to be of compulsory school age; is in custody for a period of more than four months and not expected to return afterwards or any pupil who has been permanently excluded.

5. Early Help and Intervention

The School recognises that vulnerable children may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation and some sense of blame. The School may be the only stable, secure and predictable element in the lives of children at risk. The School will work together with all relevant agencies to provide a coordinated offer of early help. The School will endeavour to support all pupils through the provision of early help by:

- a)** providing high quality learning and teaching in PSHE and RSE lessons and across the curriculum alongside robust pastoral support that promotes the well-being of pupils and gives them the skills and knowledge that they need to recognise and stay safe from all forms of abuse, exploitation or neglect;
- b)** having a school ethos that promotes a positive, safe and secure environment and gives pupils a sense of being valued;
- c)** actively encouraging the Pupil Voice where pupils can speak about any concerns they have to a member of staff. Pupils are encouraged to speak openly, and they are aware that staff take their concerns very seriously;

- d)** ensuring that the Behaviour policy, the Anti-bullying policy, the Anti-drugs policy, the ICT policy, the Sex and Relationships Education policy, the Supporting Pupils with Medical Needs policy and the Staff Code of Conduct support vulnerable pupils in the School;
- e)** minimising child-on-child abuse through the School curriculum, in particular PSHE, RSE, the pastoral system and compliance with the above policies;
- f)** ensuring staff are aware that **any** child may benefit from early help, but should be particularly alert to the potential need for early help for a child who:
- is disabled 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
 - is frequently missing/goes missing from care or from home
 - is at risk of modern slavery, trafficking or exploitation
 - is at risk of being radicalised or exploited
 - is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
 - is misusing drugs or alcohol themselves
 - has returned home to their family from care
 - is a privately fostered child
 - is persistently absent from education, including persistent absences for part of the school day
 - has a family member who is in or has recently been released from prison
 - is in the court system or has a family member in the court system
 - has experienced homelessness or displacement or has a family member who has experienced homelessness or displacement or is living away from home or in temporary accommodation
 - is living in chaotic and unsupportive home situations
 - is living transient lifestyles
 - has experienced and or witnessed domestic abuse or sexual violence
 - is vulnerable to being bullied, or engaging in bullying
 - is vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability or sexuality
 - does not have English as a first language
 - is at risk of sexual exploitation, female genital mutilation, forced marriage or being drawn into extremism.
- g)** ensuring that all unexplained absences are followed-up with a text or an email to parents within an hour and a response is given. Long-term or repeated absences will be investigated by the Form Tutor, Head of Year and Head of Key Stage (where a pupil's absence is unexplained, the School would follow the [Gloucestershire missing children protocol](#));
- h)** ensuring that, when a Looked After Child is enrolled at the School, a teacher is designated and trained to support and promote his/her achievements. The DSL or Deputy DSL will ensure staff have access to pertinent information and the child's needs are met;
- i)** ensuring staff are aware that signs of abuse, exploitation or neglect in pupils with special needs and disabilities (SEND) can be more difficult to recognise and erroneously attributed to their special needs or disability. Further exploration should always be undertaken;
- j)** alerting staff to specific types of abuse such as Honour Based Violence, Forced Marriage, Female Genital Mutilation, Domestic Abuse, Teenage Relationship Abuse, Faith Abuse, Gangs and Youth Violence, Gender Based Violence, Child Sexual Exploitation and Trafficking, Induced Illness, Child-on-

Child Abuse, Drug Abuse (*see Anti-drugs policy*) and Sexting/youth produced sexual imagery/nudes and semi-nudes.

- k) being vigilant and considering links between mental health concerns, including self-harm, and possible abuse. See also Appendix 5, children who are particularly vulnerable to abuse.
- l) ensuring that staff recognise their duty to have due regard for the need to prevent people from being drawn into terrorism and following statutory guidance in order to fulfil its responsibility. The School will liaise closely with the Police in this respect. The School has a designated member of the Senior Management Team (Mr Matthew Lynch – Deputy Headteacher) with responsibility for the Prevent duty. (*See the School's Preventing Extremism and Radicalisation policy*)
- m) ensuring that staff are aware of Contextual Safeguarding (understanding, and responding to, young people's experiences of significant harm beyond their families) and they recognise that young people are vulnerable to abuse, exploitation or neglect in a range of social contexts.

For more information on Early Help, staff may refer to Gloucestershire Safeguarding Children Partnership's guidance on the [Graduated Pathway of Early Help and Support](#) including allocations meetings.

6. Child-on-Child Abuse (see also section 7)

The School recognises that children are capable of abusing their peers. Child-on-child abuse is any form of physical, sexual, emotional and financial abuse, and coercive control, exercised between children, and within children's relationships (both intimate and non-intimate), friendships and wider peer associations. Staff will be aware of the harm caused by bullying (including cyber bullying, prejudice-based and discriminatory bullying) and will use the School's anti-bullying procedures where necessary. All child-on-child abuse is unacceptable and will be taken seriously.

However, in seeking to ensure that children are free from harm, the School will be mindful that pupils' rights are not eroded in order to keep them 'safe'. The School will be alert to and monitor changes in students' behaviour and/or attendance as a way of identifying children who may be subject to child-on-child abuse. The School will endeavour to create conditions in which our students can aspire to, and realise, safe and healthy relationships and foster a whole-school culture:

- which is founded on the idea that every member of the school community is responsible for building and maintaining safe and positive relationships, and helping to create a safe school environment in which violence and abuse are never acceptable,
- in which students are able to develop trusting relationships with staff, and in which staff understand, through regular discussion and training, the importance of these relationships in providing students with a sense of belonging, which could otherwise be sought in problematic contexts,
- in which students feel able to share their concerns openly, in a non-judgmental environment, and have them listened to.

Child-on-child abuse can take many forms and can include ill treatment that isn't physical, as well as witnessing the ill treatment of others.

Types of child-on-child abuse include:

- **bullying** (including cyberbullying, prejudice-based and discriminatory bullying);
- **physical abuse** such as biting, hitting, kicking or 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 physical abuse);

- **sexual harassment** such as sexual comments, remarks, jokes and online sexual harassment which may be stand-alone or part of a broader pattern of abuse;
- **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;
- **upskirting** which typically involves taking a picture under a person's clothing without their permission with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress or alarm;
- **the consensual and non-consensual sharing of nude and semi-nude images and/or videos** (also known as sexting or youth produced sexual imagery), including pressuring another person to send a sexual imagery or video content. Sexting also includes the sending of explicit text messages. The School will make the distinction between incidents of sexting involving images/videos and/or text messages;
- **abuse in intimate personal relationships between children** - defined as a pattern of actual or threatened acts of physical, sexual or emotional abuse, perpetrated against a current or former partner (sometimes known as 'teenage relationship abuse');
- **initiation/hazing** - used to induct newcomers into an organisation such as a sports' team or school groups by subjecting them to a series of potentially humiliating, embarrassing or abusing trials which promote a bond between them (this could include activities involving harassment, abuse or humiliation and may also include an online element);
- **prejudiced behaviour** - a range of behaviours which causes someone to feel powerless, worthless or excluded and which relates to prejudices around belonging, identity and equality, in particular prejudices linked to disabilities, special educational needs, ethnic, cultural and religious backgrounds, gender and sexual identity.

Child-on-child abuse can happen inside and outside school and online and will never be tolerated or passed off as "banter", "part of growing up", "just having a laugh", or "boys being boys". The School will endeavour to provide a transparent and open and environment where young people feel safe to share information about anything that is upsetting or worrying them to minimise or prevent the risk of child-on-child abuse.

Assemblies are used to provide a moral framework outlining acceptable behaviour and stressing the negative effects of bullying. Tutor time, PSHE lessons and opportunities across the curriculum are used to reinforce the message through stories, role play, current affairs and other suitable activities. Staff will always endeavour to create surroundings where everyone feels confident and at ease and we will ensure that the school site and all school activities are well supervised, especially in areas where children might be vulnerable.

All staff should understand the importance of their role in challenging inappropriate behaviours between peers, outlined above, that are actually abusive in nature. **Staff should also be aware that even if there are no reports in the School it does not mean it is not happening.**

If a member of staff thinks for whatever reason that a child may be at risk of or experiencing abuse by their peer(s), or that a child may be at risk of abusing or may be abusing their peer(s), they should discuss their concerns without delay with the Head of Year who will inform the DSL or one of the DDSLs immediately. This will then be investigated and dealt with as follows (staff will refer to the School's protocol on undertaking investigations):

- **Information gathering** – children, staff and witnesses will be spoken with as soon as possible to gather relevant information quickly to understand the situation and assess whether there was intent to cause harm.

- **Decision on action** – if it is believed that any young person is at risk of significant harm, a referral will be made to children’s social care. The DSL will then work with children’s social care to decide on next steps, which may include contacting the police.
- **Involving parents** - as with other concerns of abuse, the School will normally seek to discuss concerns about a pupil with parents. Our focus is the safety and wellbeing of the pupil and so if the School believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children’s social care and/or the police before parents are contacted.

The School will treat all children involved as being at potential risk; while the child allegedly responsible for the abuse may pose a significant risk of harm to other children, s/he may also have considerable unmet needs and/or be at risk of harm themselves.

Where allegations of sexual violence or sexual harassment are made (see below), the School will act in accordance with the guidance set out in Part 5 of *Keeping Children Safe in Education 2023*. Where allegations of sexting are made, the School will follow the DfE guidance document: [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#).

In some instances, it may be necessary to refer the matter to the police. Once a report is made to the police, the report must be recorded and the police will investigate. This may include seizure of devices and interviews with the young people involved.

Information sharing

The School will act in accordance with HM Government advice on Information Sharing: [Information sharing advice for safeguarding practitioners - GOV.UK \(www.gov.uk\)](#) (updated in July 2018). The School will, as far as possible, ensure that the information sharing (a) does not prejudice any investigation(s); (b) keeps individuals’ personal sensitive data confidential unless it is not appropriate to do so (for example, where the School needs to share information in order to enable individuals to safeguard and support a child); (c) obtains that child’s parents’ consent unless there are legitimate reasons not to do so; and (d) keeps individuals updated on developments where possible and appropriate.

Supporting those involved

The support required for the pupil who has been harmed will depend on their circumstance and the nature of the abuse. Support could include counselling, mentoring, the support of family and friends and/or support with improving peer relationships or some restorative justice work.

Support may also be required for the pupil or pupils that caused harm. The School will seek to understand why the pupil(s) acted in the way they did and consider what support may be required to help the pupil(s) and/or change behaviours.

Disciplinary action (See Behaviour policy, Exclusion policy)

The School will consider whether disciplinary action may be appropriate for any child/children involved.

7. Child-on-Child Sexual Violence and Sexual Harassment (See also section 6)

Sexual violence and sexual harassment are not acceptable and will not be tolerated at Sir Thomas Rich's. Reports of sexual violence and sexual harassment are likely to be complex and require difficult professional decisions to be made, often quickly and under pressure. The School's zero tolerance approach will follow the advice in Keeping Children Safe in Education 2023, especially part 5.

Sexual violence and sexual harassment can occur between two children of any age and sex although it is widely acknowledged that it is more likely girls are the complainants and boys the perpetrators. The School will ensure that **all** complainants are reassured that they are being taken seriously regardless of how long it has taken them to come forward and that they will be supported and kept safe. A complainant will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment, nor should a complainant ever be made to feel ashamed for making a report.

Sexual violence refers to sexual violence offences under the Sexual Offences Act 2003:

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

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

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

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

Consent

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

Further information about consent can be found [here](#):

Sexual consent

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

Sexual harassment means 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside school. In the context of child-on-child sexual harassment, it is likely to violate a child's

dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Sexual harassment can include:

- **Sexual comments:** telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names; sexual “jokes” or taunting.
- **Physical behaviour:** deliberately brushing against someone, interfering with someone’s clothes; displaying pictures, photos or drawings of a sexual nature.
- **Online sexual harassment:** consensual and non-consensual sharing of nudes and semi-nudes images and/or videos (taking and sharing nude photographs of under 18s is a criminal offence); sharing of unwanted explicit content; upskirting (a criminal offence); sexualised online bullying; unwanted sexual comments and messages including on social media; sexual exploitation; coercion and threats.

Reports of sexual violence and/or sexual harassment should be made to the DSL (or a deputy) who will undertake an immediate risk and needs assessment. The risk and needs assessment will consider:

- the complainant, especially their protection and support;
- the alleged perpetrator; and
- all the other children (and, if appropriate, adult students and staff) at the school especially any actions that are appropriate to protect them.

The School will work with children’s social care and specialist services as required. The School will consider carefully:

- the wishes of the complainant in terms of how they want to proceed. The complainant will be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered;
- the nature of the alleged incident(s), including: whether a crime may have been committed and consideration of harmful sexual behaviour;
- the ages of the children involved;
- the developmental stages of the children involved;
- any power imbalance between the children. For example, is the alleged perpetrator significantly older, more mature or more confident? Does the complainant have a disability or learning difficulty?
- if the alleged incident is a one-off or a sustained pattern of abuse;
- if there are ongoing risks to the complainant, other children, adult students or school staff; and
- other related issues and wider context.

As always, when concerned about the welfare of a child, all staff should act in the best interests of the child. In all cases, the School will follow the general safeguarding principles as set out throughout this policy.

Disciplinary action (See Behaviour policy, Exclusion policy)

The School will consider whether disciplinary action may be appropriate for any child/children involved. However, if there are police proceedings underway, or there could be, the School will work in partnership with the police and/or children’s social care. The decision to take disciplinary action will, therefore, be considered on a case-by-case basis.

8. Child Sexual Exploitation (CSE)

Child Sexual Exploitation is a form of sexual abuse and involves an individual or group of adults taking advantage of the vulnerability of an individual or groups of children or young people. Victims can be boys or girls. Children and young people are often unwittingly drawn into sexual exploitation through the offer of friendship and care, gifts, drugs and alcohol, and sometimes accommodation. Sexual exploitation is a serious crime and can have a long-lasting adverse impact on a child's physical and emotional health. It may also be linked to child trafficking.

The school includes the risks of sexual exploitation in PSHE lessons, across the curriculum and in tutor time. A common feature of sexual exploitation is that the child often does not recognise the coercive nature of the relationship and does not see themselves as a victim. The child may initially resent what they perceive as interference by staff, but staff must act on their concerns, as they would for any other type of abuse. 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.

All staff are made aware of the indicators of sexual exploitation and all concerns should be reported immediately to the DSL.

9. Child Criminal Exploitation (CCE)

Child Criminal Exploitation, like Child Sexual Exploitation (CSE), can occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. 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.

The abuse can be perpetrated by individuals or groups, males, females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

The School includes the risks of criminal exploitation in PSHE lessons, across the curriculum and in tutor time. Victims can be exploited even when activity appears consensual and it should be noted that, as well as being physical, exploitation can be facilitated and/or take place online. Staff are made aware that CCE can affect children both male and female and their experiences can be very different, and indicators may not be the same for every child. All concerns should be reported immediately to the DSL.

10. County Lines

County Lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line". Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money.

Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools. Children are also targeted and recruited online using social media.

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

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs when a referral through the [National Referral Mechanism](#) may be considered.

Should any staff member become concerned that a pupil is at risk of or involved in county lines, they should inform the DSL immediately. Further information on county lines is available from the [Home Office](#).

11. Serious Violence

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

All staff are made aware of risk factors which include 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. Further information on gangs and youth violence is available from the [Home Office](#).

All concerns should be reported immediately to the DSL.

12. Domestic Abuse

The Domestic Abuse Act 2021 defines abusive behaviour as: physical or sexual abuse; violent or threatening behaviour; controlling or coercive behaviour; economic abuse (including financial abuse); psychological; emotional or other abuse. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act) regardless of sexual identity, age, ethnicity, socioeconomic status, sexuality or background. Domestic abuse can take place inside or outside of the home.

The Act recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

The School recognises that young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as 'teenage relationship abuse'.

Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, staff should inform the DSL immediately (also see the procedures set out in Section 4 and Section 5 of this policy).

Operation Encompass

[Operation Encompass](#) operates in the majority of police forces across England including Gloucestershire. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the Designated Safeguarding Lead before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable support to be given to the child according to their needs.

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 for a call from the team can be booked. Additional advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

- [NSPCC- UK domestic-abuse Signs Symptoms Effects](#)
- [Refuge what is domestic violence/effects of domestic violence on children](#)
- [SafeLives: young people and domestic abuse](#)

13. Honour-Based Violence (including Female Genital Mutilation and Forced Marriage)

'Honour-based' violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of HBV are abuse.

FGM is the collective name given to a range of procedures involving the partial or total removal of external female genitalia for non-medical reasons. In England, Wales and Northern Ireland, the practice is a criminal offence under the Female Genital Mutilation Act 2003. The practice can cause intense pain and distress and long-term health consequences, including difficulties in childbirth.

FGM is carried out on girls of any age, from young babies to older teenagers and adult women, so school staff are trained to be aware of risk indicators. Many such procedures are carried out abroad and staff should be particularly alert to suspicions or concerns expressed by female pupils about going on a long holiday during the summer holiday period. Whilst **all** staff should speak to the DSL (or deputy) with regard to any concerns about FGM, there is a specific legal duty on teachers. If a teacher, during 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 and the DSL.

A forced marriage is a marriage in which a female (and sometimes a male) does not consent to the marriage but is coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse. In England and Wales, it is a criminal

offence to cause a child to marry before their eighteenth birthday, even if violence, threats or other forms of coercion are not used.

School staff receive training and are alert to suspicions or concerns raised by a pupil about being taken abroad and not be allowed to return to England. Staff should immediately report a suspected forced marriage to the DSL.

14. Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The Designated Safeguarding Lead and Deputy Designated Safeguarding Leads will be able to access contact details and referral routes to the Local Housing Authority so they can raise/progress concerns at the earliest opportunity.

Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

The Homelessness Reduction Act 2017 places a legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help. The following factsheets usefully summarise the new duties: [Homeless Reduction Act Factsheets](#). The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

In most cases, the School will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, the School recognises that in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support.

Gloucestershire Children's services will be the lead agency for these young people and the Designated Safeguarding Lead (or a Deputy Designated Safeguarding Lead) will ensure appropriate referrals are made based on the child's circumstances. The department and the Ministry of Housing, Communities and Local Government have published joint statutory guidance on the provision of accommodation for 16 and 17 year olds who may be homeless and/or require accommodation: [here](#).

15. Mental Health

All staff should also 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, exploitation or neglect.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. However, staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse, exploitation or neglect, or other potentially traumatic adverse childhood experiences (ACEs), this can have a lasting impact throughout childhood, adolescence and into adulthood.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken.

The School will follow the advice and resources contained in the following links alongside the resources provided by Gloucestershire Healthy Living and Learning (GHLL) to inform the PSHE curriculum and to promote children's mental health and wellbeing.

The Department of Education has published advice and guidance on [Preventing and Tackling Bullying](#) and [Mental Health and Behaviour in Schools](#). In addition, Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among young people including its guidance: [Promoting children and young people's emotional health and wellbeing](#). Its resources include social media, forming positive relationships, smoking and alcohol.

16. Private Fostering Arrangements

A private fostering arrangement occurs when someone other than a parent or a close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16, or aged under 18 if the child is disabled. By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify children's services as soon as possible. Where a member of staff becomes aware that a pupil may be in a private fostering arrangement they will raise this with the DSL and the school will notify the Local Authority of the circumstances.

17. Online Safety (Please see ICT policy, Data Protection policy and ICT Acceptable Use policy)

The School is aware that technology often provides a platform that facilitates harm such as child sexual exploitation, radicalisation and sexual predation.

A senior leader (Assistant Headteacher, Mr Dave Dempsey) together with the DSL (Deputy Headteacher, Mr Matthew Lynch) ensures that the School has an effective approach to online safety which protects and educates pupils and staff in their use of technology taking into consideration the four categories of risk:

Content: being exposed to illegal, inappropriate or harmful material such as pornography, fake news, racist or radical and extremist views;

Contact: being subjected to harmful online interaction with other users such as commercial advertising as well as adults posing as children or young adults;

Conduct: personal online behaviour that increases the likelihood of, or causes, harm such as making, sending and receiving explicit messages (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography) or online bullying;

Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams.

Appropriate filters and monitoring systems are in place to manage the content available to pupils, who can contact our pupils and the personal conduct of our pupils online.

Our filtering system ensures that pupils can only access age-appropriate content that is suitable for an educational setting. Our monitoring system reviews user activity and ensures that incidents, whether of a malicious, technical, or safeguarding nature are picked up by the relevant member of staff and acted on accordingly. Our filtering and monitoring systems and processes are reviewed each year by the DSL, Trustees and the ICT Manager.

All staff should make a report to the DSL and ICT manager if they witness or suspect unsuitable material has been accessed by pupils, if there is a failure in the software or abuse of the system, they notice abbreviations or misspellings that allow access to restricted material, or they are teaching topics or completing administrative tasks which could create unusual activity on the filtering logs. Staff should also raise concerns if they perceive internet restrictions to be unreasonably affecting teaching and learning or administrative tasks.

Pupils are educated about online safety in assemblies, as part of tutor time, in computing lessons and in PSHE. Concerns regarding online safety should be reported to the Head of Year who will immediately report the matter to the DSL.

They will then be investigated and dealt with as follows:

- **Information gathering** – children, staff and witnesses will be spoken with as soon as possible to gather relevant information quickly to understand the situation and assess whether there was intent to cause harm.
- **Decision on action** – if it is believed that any young person is at risk of significant harm, a referral will be made to children's social care. The DSL will then work with children's social care to decide on next steps, which may include contacting the police.
- **Involving parents** - as with other concerns of abuse, exploitation or neglect the School will normally seek to discuss concerns about a pupil with parents. The School's focus is always on the safety and wellbeing of child.

In an investigation, staff will follow the [guidance from the DfE when carrying out any searching, screening or confiscation of items belonging to pupils](#)

18. Further Safeguarding Issues

Site security

- Visitors are required to enter via one entrance and sign in and are given a badge. Those without enhanced DBS clearance will be escorted and supervised during the school day while on site.
- Volunteers will undergo checks commensurate with their role in the School and contact with pupils.
- The identity of contractors working on site will be checked if they work in regulated activity or unsupervised.
- The School is mindful of its Prevent duty and has systems in place to deal with intruders. *See the School's Preventing Extremism and Radicalisation policy.*

Off-site visits, extracurricular activities and work experience placements

Staff must consider and put in place appropriate strategies to ensure the safeguarding of children when planning and conducting educational visits, extended services and extra-curricular activities and work experience placements. They should refer to the following guidance:

The Gloucestershire Safeguarding Children policies (all maintained up-to-date online at [Gloucestershire Safeguarding Children Partnership \(GSCP\) - Gloucestershire Safeguarding Children Partnership](#)); Working together to Safeguard Children (DfE March 2018); Keeping Children Safe in Education (DfE September 2023); Information Sharing, Advice for practitioners providing safeguarding services to children, young people, parents and carers (DfE March 2015) and What to do if you are worried a child is being abused. Advice for practitioners (DfE March 2015) and the School's Offsite Visits policy.

Foreign Exchanges

Particular attention is paid to the placing of pupils in suitable homes on foreign exchanges. Staff will ensure that arrangements are made so that they have regular, direct contact with pupils and that pupils have a clearly established means of contacting staff at all times, especially in an emergency. Contingency plans will also be in place which may include alternative accommodation arrangements, for example if it becomes necessary to move a pupil from their host family.

When families host overseas pupils on foreign exchanges, the School requires parents and family members over the age of 18 to obtain DBS certification.

Photography and images

The School seeks consent from parents to publish images of their child in School publications or on the School website. The child's name is not published with the image. Images are stored securely. Personal data is not shared.

Showers and changing

- a)** Young people are entitled to respect and privacy when changing clothes or taking a shower. However, there needs to be an appropriate level of supervision in order to safeguard young people, satisfy health and safety considerations and ensure that bullying or teasing does not occur. This supervision should be appropriate to the needs and age of the young people concerned and sensitive to the potential for embarrassment. *See also Staff Code of Conduct.*
- b)** Staff should be vigilant about their own behaviour and mindful of the needs of the pupils.
- c)** It is recommended that, wherever possible, two members of staff of the same gender as the children should supervise a group as this will ensure cover in the event of an accident or incident or if one supervisor is called away. In this context, it is important that staff balance the need for adult supervision with the rights of children to privacy.
- d)** When using facilities that are open to the public, such as a swimming pool or leisure centre, staff should endeavour to make arrangements so that pupils have sole use of changing facilities. For example, it may be possible to negotiate specific time slots for the group so they have exclusive use of the changing rooms or an area within the changing facility could be designated to the group. Alternatively, young people could be given the option to change at school or at home before the activity. This will obviate any risks and potential vulnerability associated with pupils mixing with adults or other young people whether they be known or unknown to them.

Staff should refer to the NSPCC Child Protection in Sport briefing: [Safe use of changing facilities](#).

Use of premises for non-school activities

Where the School hires or rents out its facilities and premises to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) the School will ensure that appropriate arrangements are in place to keep children safe.

The School's Commercial Lead, James Foylan, will seek assurances that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed). Safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; failure to comply with these requirements would lead to termination of the agreement. Please see Premises Hire Policy and Hirer's Agreement.

19. Record Keeping

All concerns, discussions and decisions made, and the reasons for those decisions, are recorded in writing. Information is kept confidential and stored securely in CPOMS with specific reference made to whether it is a safeguarding and child protection concern. Records normally include a clear and comprehensive summary of the concern; details of how the concern was followed up and resolved; a note of any action taken, decisions reached and the outcome. Safeguarding and child protection documents are only accessed by those who need to see them such as the School's safeguarding team and the relevant Head of Year.

20. Inter-agency Working

The School is committed to contributing to inter-agency working in line with statutory guidance and [Gloucestershire's multi-agency safeguarding arrangements](#) where a 'shared and equal duty' is placed on the three safeguarding partners (NHS Gloucestershire Clinical Commissioning Group, Gloucestershire Constabulary and Gloucestershire County Council) to safeguard children and young people. This includes providing a co-ordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children subject to child protection plans such as:

- a) liaison with other agencies, which support the pupil including social care, the police, Child and Adult Mental Health Service, education welfare service and educational psychology service;
- b) ensuring that where a pupil who has a child protection plan leaves, their information is transferred to the new school immediately and that the child's social worker is informed.

21. Sharing Information

The School is aware that where there are concerns about the safety of a child, the sharing of information in a timely and effective way is vital in identifying and tackling all forms of abuse, exploitation or neglect, and in promoting children's welfare, including their educational outcomes. The School is aware of its powers to share, hold and use information for these purposes. NB - Child protection records are exempt from disclosure under the Data Protection Act which means that pupils and parents do not have an automatic right to see them.

- a) The Safeguarding and Child Protection policy alongside the Behaviour and Discipline policy, the Anti-bullying policy, the Anti-drugs policy, the Exclusion policy, the Data Protection policy and the Freedom of Information policy facilitate the School's duty to contribute to interagency working.
- b) Information about pupils' academic progress and well-being is shared routinely with relevant staff by Form Tutors, Heads of Year and the SMT. This is done verbally and through the use of CPOMS and through the Cyclone system. In addition to this, information about vulnerable pupils is shared with

SMT, all Heads of Year, Form Tutors, teaching staff and relevant support staff. Wherever possible, staff are open and honest with pupils and parents, where appropriate, as to why, what, how and with whom, their information will be shared.

- c) When making decisions on what information to share, staff should refer to the Designated Safeguarding Lead, currently the Deputy Headteacher, Mr Matthew Lynch. Staff should also refer to the principles set out in the DfE publication: [Information Sharing, Advice for practitioners providing safeguarding services to children, young people, parents and carers \(July, 2018\)](#) However, the most important consideration is whether sharing information is likely to safeguard and protect a child.
- d) Where a pupil leaves the School (including in year transfers) the DSL is responsible for ensuring that safeguarding and child protection documents including information about any ongoing support needs are transferred to the new school as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This information is transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt is obtained.

22. Allegations

Where a parent or child makes a complaint about poor practice towards a child that does not reach the threshold for child protection action, the School's Complaints Policy will be followed. If staff members have concerns about another staff member, they should speak to the Headmaster, and these will be dealt with through the School's disciplinary and grievance procedures. Concerns about the conduct of the Headmaster should be addressed to the Chair of Governors. All staff may raise concerns about unsafe safeguarding practice which will be taken seriously by Senior Management. *See the School's Whistleblowing Policy.*

Allegations against staff that may meet the harms threshold

If a member of staff including supply staff, volunteers and contractors has behaved in a way which has harmed or may harm a child, possibly committed a criminal offence relating to a child or behaved in a way that indicates they could pose a risk of harm to children including outside school (where there is a transferable risk) that indicates they may not be suitable to work with children, the following procedures will be followed:

- a) If an allegation has been made against a member of staff, volunteer or contractor including where the School is not the direct employer, the Headmaster (and in his absence the Deputy Head) will contact the Local Authority Designated Officer for Allegations (01452 426994). The LADO will offer advice on any immediate action required and will assist with employment and safeguarding issues.
- b) If, after the Initial Discussion with the LADO, it is agreed that a child is suffering, or likely to suffer significant harm, a multi-agency meeting will be convened, and the Headmaster will be invited. This might result in a criminal investigation, a Social Care investigation and/or an investigation to inform whether disciplinary action is required. If it is agreed that the allegation does not meet the criteria, the LADO will record the Initial Discussion and send it to the Headmaster for our records. Any further action will be taken within the School if necessary. Procedures for dealing with allegations against staff are laid out in the Gloucestershire Safeguarding Children Partnership's allegations management guidance ([allegations-management.pdf \(gloucestershire.gov.uk\)](#)):
- c) If an allegation is made about the Headmaster, the member of staff, to whom the information has been disclosed, must contact the Chair of Trustees who will contact the Local Authority Designated Officer for Allegations (01452 426994).

The LADO will offer advice on any immediate action required and will assist with employment and safeguarding issues.

- d) An allegation will always be acted upon even if the accused resigns or ceases to provide his/her services. No compromise or settlement agreement will be entertained.
- e) The School recognises its duty of care to its employees and will provide support to ~~victims~~ the person subject to the allegation and a named contact, if suspended.
- f) The School is aware that it must maintain confidentiality during an investigation and guard against unwanted publicity while an allegation is being investigated or considered. The Education Act 2011 amended the Education Act 2002, to introduce reporting restrictions. These provisions made it an offence (except in the limited circumstance expressly permitted by the legislation), for any person to publish any material that may lead to the identification of a teacher in a school who has been accused by, or on behalf of, a child from the same school (where that identification would identify the teacher as the subject of the allegation) until the point the accused person is charged or information about the investigation or decision arising from the allegation is published by the Secretary of State. The accused may also waive their right to anonymity themselves.
- g) Detailed records of the allegation will be kept, which the School will retain until the accused is of normal pension age or for a period of ten years from the date of the allegation, if that is longer. Details of false and malicious allegations will be removed from personnel files and not included in references. The School has an obligation to preserve records which contain information about allegations of sexual abuse for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry (further information can be found on the [IICSA website](#)).

If an allegation is made or information is received about *any* adult who works or volunteers at the School which indicates that they may be unsuitable to work or volunteer with children, the member of staff receiving the information should inform the Headmaster immediately. This includes concerns relating to agency and supply staff and volunteers. Concerns may arise in several ways and from a number of sources e.g. 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.

Concerns that do not meet the harms threshold or 'Low level concerns'

The School recognises that an open and transparent culture in which all concerns about adults (including allegations that do not meet the harms threshold) are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. This culture should enable concerning, problematic or inappropriate behaviour to be identified early; minimise the risk of abuse; and ensure that adults working in or on behalf of the School are clear about professional boundaries, and act within these boundaries, and in accordance with the ethos and values of the School.

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold set out in the section above. 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 work;
- and does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

The [Staff Code of Conduct](#) sets out what low level concerns are, the importance of sharing these concerns appropriately, how the School addresses unprofessional behaviour and supports the individual to correct it at an early stage. This includes when staff should self-refer, where, for example, they have found

themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

The School understands the importance of recording low-level concerns and the subsequent actions taken. The records will be kept confidential and stored securely. Records can be reviewed to identify potential patterns. Where a child, parent or carer or member of staff makes an allegation of harm, this will not be considered as a 'low level' concern without consultation with the Local Authority Designated Officer for Allegations (LADO).

The School recognises that low level concerns should not be included in references unless they relate to issues which would normally be included in a reference, e.g., misconduct or poor performance. However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it should be referred to in a reference.

Unsubstantiated, unfounded, false or malicious allegations

If an allegation or a report is determined to be unsubstantiated, unfounded, false or malicious, the Headmaster, the DSL or DDSLs and the LADO (in the instance of an allegation that meets the harms threshold) should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate.

Where a report is shown to be deliberately invented or malicious, the school may consider whether any disciplinary action is appropriate against the individual who made it and will refer to the School's behaviour policy and/or the School's staff disciplinary procedure.

23. Safer Recruitment

- a)** Safer recruitment training became mandatory for the recruitment of school staff from 1 January 2010. This means a recruitment panel must have at least one member who has completed the training; or where an individual is in charge of recruitment, that individual must have completed the training (Mr Matthew Morgan, Mr Matthew Lynch, Mr Dave Dempsey and Mrs Nicky Binning have successfully completed this training.)
- b)** A single Central Record is maintained in accordance with Keeping Children Safe in Education 2023.
- c)** The Child Protection and Safeguarding Policy, together with the Employment of Ex-offenders Policy will be included in the advertisement for all new posts.
- d)** DBS checks will be made for all staff working with children. All new staff must be checked as well as those who change jobs or who have had a break in service for longer than three months. In addition to DBS checks, the School will undertake 'prohibition' checks with the Department for Education in order to ensure staff have not been prohibited from the profession for reasons of unacceptable conduct. The School will use the checklist provided by Gloucestershire Safeguarding Children Partnership in order to ensure it follows safer recruitment practices.
- e)** The School will request references from a legitimate source of authority and the authenticity of electronic references will be checked. Additionally, the School will ensure that references are sought from the most recent employer and the most recent educational setting. References will be sought from internal vacancies.
- f)** All short listed candidates will be asked to sign a self-declaration (self-disclosure form) before interview.

- g)** Where a staff member has been dismissed due to safeguarding concerns, or would have been had they not resigned, a referral will be made to the Teacher Regulation Agency.
- h)** Where an individual is removed or dismissed from a regulated activity due to safeguarding concerns, or would have been dismissed or removed had they not left, the School will make a referral to the Disclosure and Barring Service in accordance with its legal duty.

Please see Staff Recruitment and Selection Policy and Recruitment of Ex Offenders Policy.

Appendix 1:

Types of abuse and neglect

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

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

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 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 a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

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

Appendix 2:

Indicators of abuse or neglect

A child who is being abused and/or neglected may:

- have bruises, bleeding, burns, fractures or other injuries
- show signs of pain or discomfort
- keep arms and legs covered, even in warm weather
- be concerned about changing for PE or swimming
- look unkempt and uncared for
- change their eating habits
- have difficulty in making or sustaining friendships
- appear fearful
- be reckless with regard to their own or other's safety
- self-harm
- frequently miss school or arrive late
- show signs of not wanting to go home
- display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn
- challenge authority
- become disinterested in their school work
- be constantly tired or preoccupied
- be wary of physical contact
- be involved in, or particularly knowledgeable about drugs or alcohol
- display sexual knowledge or behaviour beyond that normally expected for their age.

Appendix 3:

Types of exploitation

Child Sexual Exploitation (CSE)

Child Sexual Exploitation is a form of sexual abuse and involves an individual or group of adults taking advantage of the vulnerability of an individual or groups of children or young people. Victims can be boys or girls. Children and young people are often unwittingly drawn into sexual exploitation through the offer of friendship and care, gifts, drugs and alcohol, and sometimes accommodation. Sexual exploitation is a serious crime and can have a long-lasting adverse impact on a child's physical and emotional health. It may also be linked to child trafficking.

Child Criminal Exploitation (CCE)

Child Criminal Exploitation, like Child Sexual Exploitation (CSE), can occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. 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.

The abuse can be perpetrated by individuals or groups, males, females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

County Lines

County Lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line". Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools. Children are also targeted and recruited online using social media.

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

Appendix 4:

Indicators of exploitation

A child who is being exploited may:

- show unhealthy or inappropriate sexual behaviour
- have an older boyfriend or girlfriend
- have older friends
- be secretive
- show changes in mood or character
- have unexplained money or possessions
- show signs of physical abuse
- misuse drugs or alcohol
- be frightened of some people, places or situations
- become pregnant
- have a sexually transmitted infection
- have low attendance or miss single lessons on a regular basis
- have a significant change in wellbeing
- show signs of self harm
- have physical injuries
- have falling attainment in school

Appendix 5:

Children who may be particularly vulnerable

Some children may have an increased risk of abuse, exploitation or neglect. It is important to understand that this increase in risk is due more to societal attitudes and assumptions, and child protection procedures that fail to acknowledge children's diverse circumstances, rather than the individual child's personality, impairment or circumstances. Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse can occur. To ensure that all our pupils receive equal protection, we will give special consideration to children who:

- need a social worker and are designated Child in Need (CIN) or who have a Child Protection Plan (CPP)
- require mental health support
- are missing education/missing from education
- are frequently missing/go missing from care or from home
- are disabled and have specific additional needs
- have special educational needs (whether or not they have a statutory Education, Health and Care Plan)
- are young carers
- are Looked After Children or previously Looked After Children
- are care leavers
- are privately fostered children
- are affected by mental health issues including self-harm and eating disorders
- are showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- are affected by adult mental health issues
- have experienced and or witnessed domestic abuse or sexual violence
- are affected by substance misuse/drug use in their home environment
- are misusing drugs or alcohol themselves
- are at risk of modern slavery, trafficking or exploitation
- are affected by poor parenting
- are at risk of Fabricated or Induced Illness
- are at risk of being radicalised or exploited
- are asylum seekers
- have a family member who is in or has recently been released from prison
- are in the court system or has a family member in the court system
- have experienced homelessness or displacement or has a family member who has experienced homelessness or displacement or is living away from home or in temporary accommodation
- are living in chaotic and unsupportive home situations
- are living transient lifestyles
- are vulnerable to being bullied, or engaging in bullying including cyber, homophobic, racist etc.
- are LGBT (lesbian gay bisexual transgender)
- are vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability or sexuality
- are vulnerable to faith abuse
- are involved directly or indirectly in child sexual exploitation CSE or trafficking
- do not have English as a first language
- are at risk of female genital mutilation (FGM)
- are at risk of forced marriage.

This list provides examples of additional vulnerable groups and is not exhaustive.

Appendix 6:

Guidelines for responding to disclosure of abuse, exploitation or neglect by a pupil.

During your conversation with the pupil:

- Allow them to speak freely.
- Remain calm and do not overreact – the child may stop talking if they feel they are upsetting you.
- Give reassuring nods or words of comfort.
- Do not be afraid of silences.
- Do not ask the child leading questions as this can later be interpreted as putting ideas into the child's mind and have an effect on the evidence which might be put forward if there are subsequent criminal proceedings.
- Ask open questions focusing on: What? When? Who? Where?
- Do not start your own investigation by asking for more detail e.g. by asking how many times this has happened,
- Do not offer your own opinion either verbally or in any written reports.
- **Do not give undertakings of absolute confidentiality.** At an appropriate time tell the child that in order to help them you have a responsibility to must pass the information on to the appropriate agencies.
- Do not automatically offer any physical touch as comfort. It may be anything but comforting to a child who has been abused.
- Avoid admonishing the child for not disclosing earlier. The child may interpret this as having done something wrong.
- Tell the child what will happen next. The child may agree to go with you to see the designated person. Otherwise let them know that someone will come to see them before the end of the day.
- Report verbally to the DSL.
- Write up your conversation as soon as possible and hand it to the DSL.
- Seek support if you feel distressed.