



THE LOUGHBOROUGH Schools Foundation

Policy Title: **Child Protection and Safeguarding Policy**

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Point of Contact (Reviewer): **Compliance Manager (Mr. G Leeson)**

LOUGHBOROUGH SCHOOLS FOUNDATION **CHILD PROTECTION AND SAFEGUARDING POLICY**

This policy is reviewed annually by the Governing Body and was presented and agreed at the meeting on 15TH September 2022.

Signed: Chair of Governors: (Mr R. Harrison)

CONTENTS

Item	Para.	Page
Named staff with specific child protection responsibilities & other contacts	-	4 – 7
Introduction	1 – 6	7 - 8
Preventing Radicalisation	7 – 9	9
‘Honour-Based’ Violence	10 – 15	9 - 10
Child Missing from Education	16 – 20	10 - 11
Child Sexual Exploitation	21	11
Domestic Abuse	22	11
Child Criminal Exploitation	23 - 24	11 - 12
Serious Violence	25	12
Mental Health	26 - 28	12
Upskirting	29	12
Substance Misuse	30	12
Non-mobile Children	31 - 36	13
Child Abduction and Community Safety Incidents	37 - 38	13 - 14
Children and the Court System	39 - 40	14
Children with Family Members in Prison	41	14
Modern Slavery	42	14
Cybercrime	43 – 44	14 – 15
Homelessness	45 – 46	15
Schools’ Commitment	47– 48	15 – 16
Roles and Responsibilities – General	49 – 50	16
Roles and Responsibilities of the Governing Body	51	16 – 19

Roles and Responsibilities of the Head teachers and Chief Operating Officer	52	19 - 20
Roles and Responsibilities of the Designated Safeguarding Lead and their Deputy	53	20 – 22
Records, Monitoring and Transfer	54 – 58	22 - 23
Early Help	59 - 60	23
Vulnerable Children – Supporting Pupils at Risk	61 - 62	23
Arrangements for dealing with Child-on-Child Allegations	63 - 67	23 – 25
Support for Staff	68 – 70	25
Other Relevant Policies	71	25 - 26
Guidance on the use of mobile phones and cameras in EYFS setting	72	26 - 27
Complaints or Concerns Expressed by Pupils	73 - 74	27
Recruitment and Selection of Staff	75 – 79	27 - 28
Operation Encompass	80 - 88	28 – 29
Appendix 1 – Procedure to follow in cases of possible, alleged or suspected abuse, or serious cause for concern about a child	-	30 – 33
Appendix 2 – Procedure for allegations against staff, supply staff, volunteers and contractors including low-level concerns	-	34 – 41
Appendix 3 - Information for Parents	-	42
Appendix 4 – Child Protection Concern Form	-	43 – 44
Appendix 5 – Boarding	-	45 – 46
Appendix 6 – Types and signs of abuse	-	47 – 50
Appendix 7 – Prevent Action Plan	-	51 – 53
Appendix 8 – Sexting (also known as youth produced sexual imagery)	-	54 – 62
Appendix 9 – Procedure to follow in cases of allegations of child-on-child abuse and how they will be recorded, investigated, and dealt with	-	63 - 64

**Named LSF staff with specific child protection responsibilities during 2022/2023
and their contact email**

Grammar School

- Designated Safeguarding Lead: Mrs. H. Foster (Senior Deputy Head)
h.foster@lsf.org

- Deputy Designated Safeguarding Leads:
 - Mr. R. Ward (Housemaster – Abney) r.ward@lsf.org
 - Mr. R. Parish (Assistant Head Wellbeing & Learning) r.parish@lsf.org
 - Mr. P. Moffett (Head of D of E) p.moffett@lsf.org
 - Mr. A. Morris (Housemaster – Yates) a.morris@lsf.org

- Other staff with child protection responsibilities:
 - Dr D. Koch (Headmaster) d.koch@lsf.org
 - Mr. P. Moffett (Prevent Lead) p.moffett@lsf.org

- Nominated Safeguarding Governor: Mr S. Morris s.a.morris@lsf.org
- Assistant Nominated Safeguarding Governor: Mr. S. Morris s.a.morris@lsf.org
- Chairman of Governors: Mr. R. Harrison*

High School

- Designated Safeguarding Lead: Mr. S. Thompson (Senior Deputy Head)
s.thompson@lsf.org

- Deputy Designated Safeguarding Lead:
 - Miss. V. Standing (Assistant Head Pastoral) v.standing@lsf.org

- Other staff with child protection responsibilities:
 - Dr. F. Miles (Headmistress) f.miles@lsf.org

- Nominated Safeguarding Governor: Mr. S. Morris s.a.morris@lsf.org
- Assistant Nominated Safeguarding Governor: Mrs. R. Limb r.limb@lsf.org
- Chairman of Governors: Mr R. Harrison*

Fairfield Preparatory School

- Designated Safeguarding Lead: Mrs. P. Barton (Deputy Head Pastoral)
p.barton@lsf.org

- Deputy Designated Safeguarding Lead:
 - Mrs. N. Young (Pre-Prep Coordinator) n.young@lsf.org
 - Mrs. N. Coombes (Learning Support Coordinator) n.coombes@lsf.org

- Other staff with child protection responsibilities:
 - Mr. A. Earnshaw (Headmaster) a.earnshaw@lsf.org

- Nominated Safeguarding Governor: Mr. S. Morris s.a.morris@lsf.org

- Assistant Nominated Safeguarding Governor: Mr. T. Jones t.jones@lsf.org
- Chairman of Governors: Mr. R. Harrison*

Loughborough Amherst School

- Designated Safeguarding Lead: Mrs. T. Demitriou (Assistant Head Pastoral) t.demitriou@lsf.org

Deputy Designated Safeguarding Leads:

Miss G. Davies (Senior Deputy Head) g.davies@lsf.org

Miss E. Winton (Head of Prep) e.winton@lsf.org

Miss. J. Molloy (Deputy Head of Prep School) j.molloy@lsf.org

Mr. T. Rees (Head of Upper School) t.rees@lsf.org

Mrs. P. Fender (Head of Middle School) p.fender@lsf.org

Miss. K. Alderman (School Nurse) k.alderman@lsf.org

- Other staff with child protection responsibilities:
 - Dr. J. Murphy (Headmaster) j.murphy@lsf.org
- Nominated Safeguarding Governor: Mr S. Morris s.a.morris@lsf.org
- Assistant Nominated Safeguarding Governor: Mrs. A. Murphy a.murphy@lsf.org
- Chairman of Governors: Mr. R. Harrison

The Nursery

- Designated Safeguarding Lead: Miss. C. Brindley (Nursery Manager) c.brindley@lsf.org

Deputy Designated Safeguarding Lead:

Miss Amber McAlear (Assistant Deputy Manager) a.mcalear@lsf.org

- Other staff with child protection responsibilities:
 - Dr. J. Murphy (Headmaster) j.murphy@lsf.org
- Nominated Safeguarding Governor: Mr. S. Morris s.a.morris@lsf.org
- Assistant Nominated Safeguarding Governor: Mrs. A. Murphy a.murphy@lsf.org
- Chairman of Governors: Mr. R. Harrison*

Central Services

- Mrs. K. James (HR Director) k.james@lsf.org

Mrs. J. Hodges (HR Officer) j.hodges@lsf.org

- Staff with child protection responsibilities:
 - Mr J.W. Doherty (Chief Operating Officer) j.doherty@lsf.org
- Nominated Safeguarding Governor: Mr. S. Morris s.a.morris@lsf.org

- Chairman of Governors: Mr. R. Harrison*

*can be contacted via Chair@lsf.org or alternatively by writing to Chair of Governors, Loughborough Schools Foundation, 3 Burton Walks, Loughborough, LE11 2DU and marked "Personal and Confidential".

'Leicestershire and Rutland Safeguarding Children Partnership (LRSCP) oversee the Multi-Agency Safeguarding Children arrangements as required by Working Together 2018. Their contacts are;

Service Manager – Safeguarding and Performance Service

Hayley Binley 01163057566 / 07538562293

Leicestershire Local Authority Designated Officers (LADO)

(Allegations Line 0116 305 4141 (0830-1700) CFS-LADO@leics.gov.uk)

Lovona Brown Lovona.Brown@leics.gov.uk

Kim Taylor Kim.Taylor2@leics.gov.uk

Shellie Miskella Shellie.Miskella@leics.gov.uk

Safeguarding Development Officers:

Ann Prideaux 0116 305 7317

Simon Genders 0116 305 7750

First Response Children's Duty (Tier 4 same-day referrals)

Telephone 0116 305 0005 (24-hour phone line)

Email childrensduty@leics.gov.uk

Address First Response Children's Duty, Room 100b, County Hall, Championship Way, Glenfield LE3 8RF

All other referrals including Early Help (Children & Family Wellbeing) services

<http://lrsb.org.uk/childreport>

Early Help queries and Consultation Line 0116 305 8727

Leicestershire Family Information Service 0116 265 6545 or family@leics.gov.uk

DBS - making a referral see <https://www.gov.uk/guidance/making-barring-referrals-to-the-dbs>

NSPCC whistleblowing helpline is available to staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled. Staff can call: 0808 800 5000 – line is available Monday to Friday 8:00am to 10:00 pm or 9:00am to 6:00pm at the weekends, email help@nspcc.org.uk at any time, or fill in an online form <https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/report/report-abuse-online/> It is free and you don't have to say who you are.

Prevent and for support and advice about extremism

Leicestershire and Rutland Prevent www.leicesterprevent.co.uk ,

https://lrsb.proceduresonline.com/files/sg_ch_extremism.pdf

Coordinator, Sean Arbuthnot, prevent@stphilipscentre.co.uk

Charnwood Community Safety Officer, 01509 634522,
community.safety@charnwood.gov.uk

Leicestershire Police 01162 222222 or 101 (the non-emergency police number)

DfE dedicated helpline for non-emergency advice: 0370 000 2288 or
Counter-extremism@education.gov.uk

Introduction

1. The Loughborough Schools Foundation (LSF) fully recognise the contribution and action it can take to promote the welfare of children and protect them from harm, including the prohibition of corporal punishment. The aim of the policy is to safeguard and promote pupils' welfare, safety, and health by fostering an honest, open, caring, and supportive climate. To fulfil this responsibility effectively, a child-centred approach is taken. We encourage children to talk about their worries and to report their concerns to us in several alternative ways. This always means that, consideration is given to what is in the best interests of the child.
2. This policy is consistent with the legal duty to safeguard and promote the welfare of children, as described in section 157 of the Education Act 2002, and has regard to:
 - *Department of Education (DfE) guidance 'Keeping Children Safe in Education' (2022) (KCSIE)*
 - a. KCSIE incorporates the additional statutory guidance, *Disqualification under the Childcare Act 2006* (August 2018)
 - b. KCSIE also refers to the non-statutory advice for practitioners: *What to do if you're worried a child is being abused* (March 2015)
 - c. KCSIE also refers to best practice advice, *Sexual violence, and sexual harassment between children in schools and colleges* (September 2021).
 - DfE guidance 'Working Together to Safeguard Children' (July 2018) (WT)
 - a. WT refers to the non-statutory advice: *Information sharing: advice for practitioners providing safeguarding services* (July 2018)
 - *Revised Prevent Duty Guidance: for England and Wales* (April 2021) (*Prevent*). *Prevent* is supplemented by non-statutory advice and a briefing note:
 - a. *The Prevent Duty: Departmental advice for schools and childminders* (June 2015)
 - b. *The use of social media for on-line radicalisation* (July 2015)
 - locally agreed multi-agency procedures and LSF operates safer recruitment procedures in line with part 3 of KCSIE, the legal duty to safeguard and promote the welfare of children, as described in section 175/157 of the Education Act 2002 and compliant with the Education (Independent School Standards) Regulations 2014. It also provides for and applies to the Early Years Foundation Stage (EYFS);
 - the Leicestershire and Rutland Safeguarding Children Partnership (LRSCP) Procedures, which contain the inter-agency processes, protocols and expectations for safeguarding children <https://lrsrb.proceduresonline.com/index.htm> ;
 - DfE 'Teachers' Standards' (July 2011 (introduction updated June 2013, latest terminology updated Dec 2021));
 - Boarding Schools National Minimum Standards (2022);
 - Female Genital Mutilation Act 2003 (as inserted by section 74 (of the Serious Crime Act 2015));
 - DfE guidance 'Children missing Education' (September 2016);

- Education (Pupil Registration) (England) (Amendment) Regulations 2016; and
 - Voyeurism (Offences) Act 2019
 - Relationships Education, Relationships and Sex Education (RSE) and Health Education (England) Regulations (2019)
 - Guidance for Safer Working Practice for those who work with children in education settings Feb 2022
3. There are four main elements to the LSF “Child Protection and Safeguarding” policy:
1. Prevention (e.g., positive school atmosphere, teaching and pastoral support to pupils);
 2. Protection (by following agreed reporting procedures, ensuring staff are trained and supported to respond appropriately and sensitively to Child Protection concerns);
 3. Support (to pupils and LSF staff and to children who may have been abused, through early-help, inter-agency assessment and use of CAF);
 4. Working with parents (to ensure appropriate communications and actions are undertaken).
4. Safeguarding is a term which is broader than ‘child protection’ and relates to the action LSF takes to promote the welfare of children and protect them from harm. Safeguarding and promoting the welfare of children is everyone’s responsibility. Everyone who meets children, and their families has a role to play in identifying concerns, sharing information, and taking prompt action. Children are at risk of harm inside and outside of school and staff should exercise professional curiosity. Safeguarding is defined in ‘Working Together to Safeguard Children’ (2018) as:
- protecting children from maltreatment;
 - preventing impairment of children’s mental and physical health and 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.
5. Due to the frequent interactions, shared use of resources and teaching of children between the separate elements of the Foundation, this single policy applies to all Foundation staff, governors, volunteers and visitors to the Schools and the Nursery. LSF recognises that child protection is the responsibility of everyone within LSF. LSF will ensure that all parents and other working partners are aware of the LSF “Child Protection and Safeguarding” policy by including it on the Schools’ websites, providing appropriate information in the Schools’ and Nursery reception and by raising awareness at initial meetings with parents of new pupils as well as at regular parent-teacher meetings. A proportional risk-based approach will be taken to the level of information that is provided to temporary staff and volunteers. All safeguarding policies and procedures will be transparent, clear, and easy for all parties to understand and follow.
6. Where the Governing Body provides services or activities directly under the supervision or management of LSF staff, the arrangements for child protection will apply. Where services or activities are provided separately by another body, the appropriate school and/or Foundation will seek assurances in writing that the body

concerned has appropriate policies and procedures in place (including inspecting these as needed) to safeguard and protect children and there are arrangements to liaise with the Schools and/or Foundation on these matters where appropriate.

Preventing Radicalisation

7. The Foundation recognises the duties placed on us by the Counter Terrorism and Security Act (July 2015) in the exercise of their functions, to have “due regard to the need to prevent people from being drawn into terrorism”. This duty is known as the Prevent duty. Being drawn into terrorism includes not just violent terrorism but also non-violent extremism.
8. LSF is committed to actively promoting the fundamental British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs; the pupils are encouraged to develop and demonstrate skills and attitudes that will allow them to participate fully in and contribute positively to life in modern Britain. LSF is mindful of its duties to forbid political indoctrination and will secure a balanced presentation of political issues.
9. LSF has regard to its statutory duties and that action is necessary in the areas of risk assessment, working in partnership, staff training and IT policies by following the ‘Prevent’ action plan (see Appendix 7) and will;
 - 9.1 Assess the risk of pupils being subject to radicalisation or being drawn into terrorism/extremist activity, based on an understanding, shared with partners, of the potential risk in the county and local area;
 - 9.2 Put in place means to identify individual children who may be at risk of radicalisation or being drawn into terrorism/extremist activity and include the level of risk to identify the most appropriate referral;
 - 9.3 Set out clear protocols for ensuring that any visiting speakers, whether invited by staff or pupils, or as hirers of facilities, are suitable and appropriately supervised;
 - 9.4 Provide all front-line staff with an appropriate level of training, based on the assessment of local risk, including Prevent awareness training in order to;
 - 9.4.1 – give them knowledge and confidence on how to identify a child at risk;
 - 9.4.2 – be able to challenge extremist ideas; and
 - 9.4.3 – to know how to refer pupils to Channel for further help.
 - 9.5 Establish ICT acceptable use policies and appropriate levels of filtering to ensure pupils are safe from terrorist and extremist material when accessing the internet in school; and
 - 9.6 Liaise and collaborate with Leicestershire’s Prevent Steering Group, the LRSCP and other local agencies and multi-agency forums to establish what advice and support they can provide and for their assessment of general levels of risk within the county and local area.

‘Honour-Based’ Abuse

10. So-called ‘honour-based’ abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage and practices such as breast ironing. All forms of so called HBA are abuse (regardless of the motivation) and should be handled and escalated as such.

11. If staff have a concern regarding a child that might be at risk of HBA they should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care.
12. Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long lasting harmful consequences.
13. Teachers and healthcare professionals have a specific legal duty to report to the police where they discover (either through disclosure by the victim or visual evidence, i.e., signs/symptoms like sexual abuse (see page 47)) that FGM appears to have been carried out on a girl under 18. An increase in awareness is needed following a foreign holiday or a holiday during term time. Those failing to report such cases will face disciplinary sanctions.
14. Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out (see page 6 for contact details). Unless the teacher has a good reason not to, they should still consider and discuss any such case with the appropriate Designated Safeguarding Lead (DSL) and involve children's social care as appropriate.
15. Forcing a person into a marriage is a crime in England. A forced marriage is one entered without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter a marriage. Staff can contact the Forced Marriage Unit if they need advice or information. Contact: 020 7008 0151 or email: fm@fcdo.gov.uk.

Child Missing from Education

16. All children, regardless of their circumstances, are entitled to an efficient, full-time education which is suitable to their age, ability, aptitude, and any special educational needs they may have. Children missing education are at significant risk of underachieving, neglect, being victims of harm, sexual and criminal exploitation-particularly county lines, or radicalisation, and becoming NEET (not in education, employment, or training) later in life.
17. All LSF pupils are placed on their school's admission register and attendance register. School staff should follow the school's procedures for dealing with pupils that are absent, or missing from education, particularly on repeat occasions.
18. The Schools have a legal duty to report certain attendance issues to the local authority Inclusion Service: pupils who are regularly absent from school or have missed 10 school days or more without permission (other than for reasons of sickness, unavoidable cause, religious holiday or leave of absence) and deletion from the school register when the next school is not known.
19. Schools must inform the local authority (where the pupil is resident) within five days when a pupil's name is added to the admission register at a non-standard transition point.

20. Schools must notify the local authority when a pupil's name is going to be deleted from the admission register at a non-standard transition point under any of the fifteen grounds set out in Regulation 8 of the Education (Pupil Registration) (England) (Amendment) Regulations 2016. These include, but are not limited to; when the pupil has been taken out of school to be educated outside the school system e.g. home educated; when the family has apparently moved away; when the pupil has been certified as medically unlikely to be in a fit state of health to attend school; when the pupil is in custody for more than four months due to a final court order and there is no belief that they will return to school at the end of that period or has been permanently excluded. The duty arises as soon as the grounds for deletion are met and, in any event, before deleting the pupil's name.

Child Sexual Exploitation (CSE)

21. Child sexual exploitation is a form of sexual abuse where children are coerced, manipulated or deceived into sexual activity for money, power or status. It may involve physical contact but can involve non-contact activities and can occur using technology. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge.

Domestic Abuse

22. The cross-government definition of domestic violence and abuse is:

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

Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on a child's health, well-being, development, and ability to learn. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life

Child Criminal Exploitation (CCE)

23. Child criminal exploitation is a form of abuse where children are coerced, controlled, manipulated or deceived into any criminal activity for money, power or status, or through violence or threat of violence to them or their families. The experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same. Both boys and girls being criminally exploited may be at higher risk of sexual exploitation.
24. Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential

involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs.

Serious Violence

25. Staff will be made aware of the key indicators which may signal that children are at risk from or are involved with serious violent crime and the risk factors which increase the likelihood of involvement. These may include increased absence, 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, signs of assault or unexplained injuries, or unexplained gifts that could be associated with criminal networks or gangs.

Mental Health

26. Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.
27. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, by speaking to the designated safeguarding lead or a deputy.
28. Each school has clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems as per DfE guidance 'Mental health and behaviour in schools' (November 2018).

Upskirting

29. The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019. 'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress, or alarm. It is a criminal offence. Anyone of any gender, can be a victim.

Substance Misuse

30. Schools have a clear role to play in preventing drug misuse as part of their pastoral responsibilities including developing a drugs policy which sets out their role in relation to all drug matters – this includes the content and organisation of drug education, and the management of drugs and medicines within school boundaries and on school trips. It should be consistent with the school's safeguarding policy.

Non-mobile Children

31. The aim of the policy is to safeguard non-moving babies (and older children who are unable to move because they are disabled) by putting a procedure into place to protect them if they are observed to have unexplained bruising or other injuries such as fractures, burns or head injuries which might suggest they have been subjected to abuse. Experts recognise that innocent bruising and other injuries might occur, especially in mobile babies. However, evidence states that it is highly unlikely that innocent bruising or other injuries will be observed in non-mobile babies.
32. LSF is required to keep babies and children safe from harm. We recognise that non-mobile babies (and older children who are disabled) are at risk of physical abuse. Evidence states that the younger the child the higher the risk that bruising on a baby is non-accidental.
33. If a non-mobile baby or older non-mobile disabled child arrives at LSF with a bruise or other mark it will be recorded on an "existing injury" form. If a reason has been given for the mark or injury by parents this will also be recorded. Parents will be asked to sign the form.
34. If a non-mobile baby or older non-mobile disabled child has an accident whilst in our care that causes a mark or other injury, details will be recorded on our accident forms. Parents will be asked to sign the forms.
35. LSF staff are not qualified to investigate the cause of bruises or other indications of abuse in babies and children and all Adults, including the Designated Safeguarding Lead (DSL), have a duty to refer all known or suspected cases of abuse to the relevant agency including Children's Social Care, or the Police, for further assessment and investigation of potential child abuse without delay.
36. It is essential that all bruises are noted in the child's records. For example: -
 - Another child passed a toy to Baby A a little roughly and caused a bruise on the Baby A's head –right temple just above the eye.
 - Dad reports that Baby A was sitting unstrapped in his car seat at home and his older sibling tipped him out causing a bruise/bump/injury to Baby A's arm/leg.
 - Baby A was picked up, carried and dropped by an older child and has a bruise on his arm/leg.
 - Baby A was being held he went rigid and threw himself backwards. The Key Person was unable to stop his head making contact with the wall and has a red mark on the top of his head.
 - Mum explained that the small bruise on Baby A's upper right arm was caused at the weekend by his brother who was being over-enthusiastic with a toy.

Child abduction and community safety incidents

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

38. Other community safety incidents in the vicinity of the schools can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation. Any such reports will be shared across the Foundation and with other schools in the borough. As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers.

Children and the court system

39. Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age-appropriate guides that should be used to support children 5-11 year-olds and 12-17 year-olds to help explain each step of the process, support and special measures that are available.

40. Making child arrangements via the family courts following separation can be stressful for children and entrench conflict in families. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service <https://helpwithchildarrangements.service.justice.gov.uk/> This may be useful for some parents and carers.

Children with family members in prison

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

Modern Slavery and the National Referral Mechanism (NRM)

42. Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance.

Cybercrime

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

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded;

- denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and,
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

44. Children with skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the Cyber Choices programme.

Homelessness

45. Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse, and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

46. In most cases school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16- and 17-year-olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's social care will be the lead agency for these children and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances.

Schools' Commitment

47. The Schools adopt an open and accepting attitude towards children as part of the responsibility for pastoral care. Staff hope that children and parents will feel free to talk about any concerns and will see the Schools as a safe place when there are difficulties. Children's worries and fears will be taken seriously, and children are encouraged to seek help from members of staff.

48. LSF will therefore:

- Establish and maintain an ethos where all children feel secure and are encouraged to report concerns, talk, and are listened to;
- Ensure that children know that there are adults in the Schools whom they can approach if they are worried or are in difficulty and that there are alternate ways to report concerns;

- Ensure that there are enough DDSLs to cover any absence and that a DSL is on site when key worker, disadvantaged pupils etc. are;
- Teach pupils and students to recognise and manage risk, make safer choices, understand democracy, government and the rule of law, safeguarding (including online safety and sexting), this is achieved through curriculum activities and PSHE and Citizenship lessons, which equip children with the skills they need to develop positive character traits, stay safe from abuse, build resilience to risks of radicalisation and to know to whom and how they can turn for help.
- Ensure every effort is made to establish effective working relationships with parents and colleagues from other agencies.
- Operate safer recruitment procedures and make sure that all appropriate pre-appointment checks are carried out on new Schools' staff, volunteers, staff of contractors and other individuals that are not school staff or supply staff which must be completed according to the requirements set out in 'Keeping Children Safe in Education' 2022, including references, Teaching Regulation Agency (TRA) Checks (including European Economic Area (EEA) checks when relevant), enhanced Disclosure and Barring Service (DBS) and Barred List checks and prohibition from teaching or managing in schools.
- Take the action that is necessary relating to the 'Prevent' duty in the areas of risk assessment, working in partnership, staff training and IT policies.
- Take the following steps to minimise risk of child-on-child abuse:
 - Ensure staff are trained to ensure an understanding of what it is and how to recognise signs;
 - Promote a supportive environment by teaching about acceptable and unacceptable behaviours (including online) in both assemblies and the wider curriculum;
 - Have clear procedures in place to govern the use of mobile phones in school; and
 - Have in place appropriate staff supervision of pupils/students and identify locations around the site that are less visible and may present more risk to pupils/students.

Roles and Responsibilities – General

49. All adults working with or on behalf of children have a responsibility to safeguard and promote their welfare. This includes a responsibility to be alert to possible abuse and to record and report concerns to staff identified with child protection responsibilities within the Schools. Furthermore, senior pupils will be briefed on how to respond to allegations of abuse or bullying.

50. There are, however, key people within the Schools, Foundation and the LRCSP who have specific responsibilities. The names of those carrying these responsibilities for the current year are listed at the start of this document.

Roles and Responsibilities of the Governing Body

51. In accordance with the Department for Education document '*Keeping Children Safe in Education*' (2022), the Governing Body will ensure that;

- 51.1 LSF facilitates a whole Foundation approach to child protection and safeguarding by ensuring that it is at the forefront and underpins all relevant aspects of process and policy development, with the best interests of the child at their heart. All systems will be child centric.
- 51.2 LSF has an effective Child Protection and Safeguarding policy and procedures in place for appropriate action to be taken in a timely manner to safeguard and promote children's welfare and that the policy is available publicly on the Schools' websites and updated annually, and whenever needed, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt. Information is provided to the Local Authority (on behalf of LRSCP) through the Safeguarding Annual Return.
- 51.3 The policy and procedures reflect local protocols for assessment and the LRSCP's threshold document and supply information as requested by LRSCP.
- 51.4 The importance of information sharing between professionals and local agencies is recognised and that fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children
- 51.5 The Foundation operate safer recruitment practices, (in accordance with the Education (Independent Schools Standards) Regulations 2014 as amended by SI 2012/2962, which includes DBS checks) including appropriate use of references and checks on new staff and volunteers. Furthermore, the Head Teachers, the Chief Operating Officer and a nominated Governor from each School Board have undertaken the DfE Safer Recruitment Training and assessment and other senior members of staff, if involved in leading on recruitment, have undertaken the DfE safer recruitment training and assessment, either on-line or off-line.
- 51.6 A requirement to report to the DBS promptly any employee, volunteer, student or contractor engaged by the Schools and/or Foundation whose services are no longer used because he or she is considered unsuitable to work with children.
- 51.7 A requirement to refer to the Teaching Regulation Agency (TRA) within one month of leaving the school any teacher that has been dismissed (or would have been dismissed had he/she not resigned) and to consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency).
- 51.7.1 Whilst allegations of serious misconduct against a teacher may be referred to TRA by the Disclosure and Barring Service (DBS), if a safeguarding issue also involves misconduct by a teacher, a referral should be made to both the DBS and TRA.
- 51.8 There are procedures for dealing with allegations of abuse against members of staff (including Head teachers) and volunteers (see Appendix 2).
- 51.9 There is a senior member of the Foundation and each School's leadership team who is appointed to take lead responsibility for safeguarding and child protection, including online safety (the "Designated Safeguarding Lead") and

there is always cover for this role with appropriate arrangements for before/after school and out of term activities. This should be explicit in the role-holder's job description.

- 51.10 The "Designated Safeguarding Lead" and any deputy undertake 'Prevent' training, in addition to basic child protection training, in inter-agency working that is provided by, or to standards agreed by, the LRSCP, and have refresher training at two-yearly intervals. In addition to this formal training, their knowledge and skills are updated at regular intervals (at least annually) via safeguarding e-briefings, etc. All deputy DSL's will be trained to the same standard as the DSL.
- 51.11 The Head Teachers, and all other staff and volunteers undertake appropriate training (including *Prevent* awareness training), which is regularly updated (in compliance with the LRSCP protocol); and that new staff, temporary staff and volunteers who work directly with children are made aware of the LSF arrangements for child protection and their responsibilities through induction training that includes:
- The latest LSF Child Protection and Safeguarding Policy, including the policy and procedure to deal with child-on-child abuse and low-level concerns;
 - The staff code of conduct/behaviour policy (incorporating all areas addressed in the 'Guidance for Safer Working Practice for those who work with Children in education settings Feb 2022') and covering acceptable use of technologies, staff/pupil relationships and communications, including on-line safety, use of social media, details on how to deal with low-level concerns and allegations against staff and whistleblowing procedures;
 - The identity and role of their respective Designated Safeguarding Lead and Deputy Designated Safeguarding Leads.
 - The risks of radicalisation, how to identify children at risk and procedures to follow.
 - The safeguarding response to children who go missing from education;
 - The pupil behaviour policy, including measures to prevent all types of bullying; and
 - A copy of part 1 (or Annex A if appropriate) and Annex B of KCSIE.

Each time Part One of KCSIE is updated by the DfE, all existing staff are updated via effective means (such as, electronic, or hard copy distribution and acknowledgement).

- 51.12 Any deficiencies or weaknesses identified or brought to the attention of the Governing Body are rectified without delay.
- 51.13 The Chair of Governors (or, in the absence of the Chair, the Nominated Safeguarding Governor) deals with any allegations of abuse made against a Head Teacher or the Chief Operating Officer in liaison with the Local Authority Designated Officer (LADO).
- 51.14 Effective policies and procedures are in place and reviewed annually by staff from across the Foundation and with expertise in this field, as is the efficiency with which the related duties have been discharged, and information is

provided on how the Governing Body discharges its duties regarding child protection and safeguarding.

- 51.15 There is an individual member of the Governing Body who will take leadership responsibility for issues relating to child protection and safeguarding children within the Schools, liaise with the “Designated Safeguarding Leads”, and provide information and an annual report to the Governing Body.
- 51.16 There are appropriate filters and appropriate monitoring systems in place to ensure children are safeguarded from potentially harmful and inappropriate online material, but that ‘over blocking’ does not lead to unreasonable restrictions for the purposes of education, as per UK Safer Internet Centre guidance.
- 51.17 All governors and trustees receive appropriate safeguarding and child protection (including online) training at induction, and which is regularly updated, appropriate to their role.
- 51.18 They are aware of their obligations under the Human Rights Act 1998, The Equality Act 2010 and their local multi-agency safeguarding partnership arrangements.

Roles and Responsibilities of the Head Teachers and Chief Operating Officer (COO)

52. The COO and Head Teacher of each school will ensure that:
- The policies and procedures adopted by the Governing Body (particularly the ones concerning referrals of cases of suspected abuse and neglect) are fully implemented, and followed by all staff and are available publicly;
 - Sufficient time, funding, training, resources and support are allocated to enable the “Designated Safeguarding Lead” and other staff to discharge their responsibilities to provide advice and support to other staff on child welfare and child protection matters, including taking part in strategy discussions and inter-agency meetings and/or to support other staff to do so, and contributing to the assessment of children;
 - All staff and volunteers feel able to raise concerns about poor or unsafe practice about children, and such concerns are addressed sensitively and effectively in a timely manner. The NSPCC whistle blowing helpline is also available.
 - Allegations of abuse or concerns that a member of staff or adult working at LSF may pose a risk of harm to a child or young person are notified to the Local Authority Designated Officer (LADO).
 - All staff are made aware that they have an individual responsibility to pass on safeguarding concerns and if all else fails to report these directly to Children’s Social Care (Children’s Services) or the Police.
 - Consider how and when pupils/students may be taught about safeguarding, including online safety, appropriate to their needs and age, and with consideration to the 4C’s (content, contact, conduct and commerce) and remote learning, through effective teaching and learning opportunities, such as the statutory Relationships Education, Relationships and Sex Education (RSE) and Health Education and as part of providing a broad and balanced curriculum and to assist with ‘preventative education’ and preparing pupils/students for life in modern Britain.

- Assess the risk profile of radicalisation in the school based on the local environment.
- A report is submitted annually to the Governing Body on child protection matters within their school (Head teachers only).

Roles and Responsibilities of the Designated Safeguarding Lead (DSL) and (in their absence) the Deputy DSL

53. The appointed “Designated Safeguarding Lead” takes the lead responsibility for safeguarding and child protection and is the first point of contact for liaison with and the provision of information to the LRSCP, to fulfil the duty of the Governing Body in this regard. The responsibilities of the “Designated Safeguarding Lead” and any Deputy are found in Annex C of KCSIE and include:

53.1 Working with others

- be the first point of contact with the designated officer(s) of the LRSCP;
- provide information on how the Governing Body discharges its duties regarding child protection and safeguarding (see section on Roles and Responsibilities of the Governing Body above);
- liaise between the Governing Body and the LRSCP on any deficiencies in policy and/or procedures and bring these to the attention of the Governing Body and how they should be rectified;
- liaise with the LRSCP on the needs of any child with a social worker;
- liaise with the Head teacher to inform him/her of any issues and on-going investigations and ensure there is always cover for this role;
- liaise with staff on matters of safety and safeguarding and act as a source of support, advice and expertise for staff;
- responsible for ensuring that pupils receive appropriate and adequate information, instruction, and training on ‘online safety’; and
- Share information readily with professionals and relevant agencies that do not stand in the way of the need to promote the welfare and protect the safety of children. Being aware of the requirement for children to have an appropriate adult, with reference to PACE Code C 2019, in enquiries under the Children Act 1989 and police investigations.

53.2 Referrals

- refer cases of suspected abuse to First Response Children’s Duty as required;
- refer cases to the Channel programme where there is a radicalisation concern as required;
- support staff who make referrals to First Response Children’s Duty or Channel programme;
- refer cases where a person is dismissed or left due to risk/harm to a child to the DBS as required;
- refer cases where a crime has been committed to the Police as required; and
- refer to the TRA within one month of leaving the school any teacher that has been dismissed (or would have been dismissed had he/she not resigned) and for whom a prohibition order may be appropriate because he or she is considered unsuitable to work with children

53.3 Training, Knowledge and Skills

- undergo formal training to provide them with the knowledge and skills required to carry out the role and update this training at least every two years;
- refresh their knowledge and skills at regular intervals, as required, but at least annually, to keep up with any developments relevant to their role;
- have a working knowledge of how the LRSCP operates, the conduct of a child protection case conference, and be able to attend and contribute to these effectively when required to do so;
- have a high level of training on the Prevent strategy to be able to assess the risk of children being drawn into terrorism, including being drawn into support for the extremist ideas that are part of terrorist ideology;
- ensure mechanisms are put in place so that each member of staff understands and discharges their role in the School's child protection and safeguarding policy, especially new or part-time staff who may work with different educational establishments;
- ensure all staff, volunteers and governors have induction training and appropriate and regular safeguarding and child protection training, including their role in the early help process, knowing what to do if a child tells them they are being abused, exploited, or neglected and knowing how to respond to child-on-child abuse and that they are known, understood and used appropriately;
- ensure all staff read Part 1 and Annex B of the latest edition of 'Keeping Children Safe in Education' on an annual basis (a condensed version of Part 1 (Annex A) can be provided to those staff who do not directly work with children);
- ensure all staff can understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online;
- ensure that all staff have attended or complete an annual e-learning Prevent training session;
- ensure all staff are aware of the process for making referrals to children's social care and trained to manage a report of child-on-child sexual violence and sexual harassment;
- be alert to the specific needs of children in need, those with special educational needs and young carers and the fact that additional barriers can exist when recognising abuse and neglect in this group of children including:
 - assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
 - children with SEN and disabilities can be disproportionately impacted by things like bullying- without outwardly showing any signs; and
 - communication barriers and difficulties in overcoming these barriers.
- encourage a culture of listening to all children (including those who are known to be disproportionately impacted by different forms of abuse e.g. LGBT pupils, disabled children or girls) among all staff, taking account of their wishes and feelings and any measures the School may put in place to protect them, noting that children may not feel ready or know how to tell someone they are being abused and encourage staff to build trusted relationships with their pupils/students to facilitate communication; and
- keep detailed, accurate and secure written records of referrals/concerns, discussions, decisions, and reasons for decisions.

53.4 Raising Awareness

- ensure the LSF child protection and safeguarding policy is updated and reviewed annually, and work with the Governing Body regarding this;
- ensure that a copy of the policy is publicly available, and that parents are alerted to the policy and the fact that referrals may be made and the role of the school in this (see appendix 3);
- where children leave the school, ensure their child protection file is handed to the “Designated Safeguarding Lead” and signed for in the new establishment as soon as possible, in accordance with the section on “Records and Monitoring” below; and
- link with the LRSCP to make sure staff are aware of training opportunities and the latest local policies on safeguarding.

53.5 Records of concerns and complaints

- maintain and monitor child protection records, including monitoring and acting upon individual and patterns of concerns or complaints, in accordance with section on “Records, Monitoring and Transfer” below.

53.6 Leicestershire and Rutland Safeguarding Children Partnership (LRSCP) Procedures and Policy and other related local and national documents

- maintain these in good order, e.g., according to any updates issued;
- ensure that relevant staff are aware that these procedures are also available on the LRSCP website: www.lrsb.org.uk

Records, Monitoring and Transfer

54. **All** concerns, discussions and decisions made, and the reasons for those decisions, will be recorded. Well-kept records are essential to good child protection practice. All staff are clear about the need to record, and report concerns about a child or children within the Schools. Records of concerns are written down (or typed in CPOMS), signed (possibly electronically) and dated and passed immediately to the Designated Safeguarding Lead (or a Deputy). The “Designated Safeguarding Lead” is responsible for such records and for deciding at what point these records should be passed over to other agencies.

55. Records relating to actual or alleged abuse or neglect and all concerns, discussions and decisions and the reason for those decisions, are stored apart from normal pupil or staff records. Each record shall detail a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved and a note of any action taken, decisions reached and the outcome. Normal records sometimes have markers to show that there is sensitive material stored elsewhere. This is to protect individuals from accidental access to sensitive material by those who do not need to know.

56. Child protection records are stored securely, with access confined to specific staff, i.e. the “Designated Safeguarding Lead”, the Deputy DSL and the relevant Head

teacher. All staff have due regard to the relevant data protection principles, the Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children. Further details on information sharing can be found at <https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>

57. Child protection records are reviewed regularly by the appropriate DSL to check whether any action or updating is needed. This includes monitoring patterns of complaints or concerns about any individuals and ensuring these are acted upon.
58. When children transfer school, if there is child protection material, their records are transferred as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of the new term. This is transferred in a physical handover and direct to the "Designated Safeguarding Lead" in the receiving school, with any necessary discussion or explanation. CPOMS records are automatically put up for transfer when a pupil leaves or arrives at another school with CPOMS. The records must be accepted by either institution. It is possible to change the settings on the records leaving LSF by using the guidelines on the Admin tab. A record is kept of the date of such transfer of sensitive files and of the person to whom they are transferred. In the event of a child moving out of area and a physical handover not being possible then the most secure method will be used to transfer the confidential records. This would include informing a senior member of the new school that the records are being sent and a photocopy kept when the new school confirms receipt of the records. Files requested by other agencies e.g., the Police are copied.

Early Help

59. Early help means providing support as soon as a problem emerges at any point in a child's life. All staff will be made aware of the school's early help process and understand their role in it. In the first instance, having identified an emerging problem, staff should discuss early help requirements with the DSL. Information may then need to be shared with other professionals and outside agencies, which staff may then be required to be involved in.
60. The Schools operate a strong Pastoral system and uses the Common Assessment Framework (CAF) with the aim of preventing pupils in need becoming pupils at risk. The Schools refer those pupils identified as needing intervention to external agencies such as CAMHS.

Vulnerable Children - Supporting Pupils at Risk

61. The Schools recognise that children who are abused or who witness violence may find it difficult to develop a sense of self-worth and view the world in a positive way. For such children school may be one of the few stable, secure, and predictable components of their lives. Other children may be vulnerable because, for instance, they have a SEN or disability*, a medical or physical health condition, are LGBT, are in care, or are experiencing some form of neglect. These children are recognised as being more prone to peer group isolation or bullying (including prejudice-based

bullying) than other children. LSF seeks to remove any barriers that may exist in being able to recognise abuse or neglect in pupils/students in these groups. LSF will seek to provide such children with the necessary support and to build their self-esteem and confidence.

62. All staff should be able to 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.

*It is recognised that children with SEND are three times more likely to be abused than their peers.

Arrangements for dealing with Child-on-Child Allegations

63. The Schools recognise that children sometimes display abusive behaviour to other children and that this can happen both inside and outside of school and online. It is recognised that it is more likely that girls will be victims and boys perpetrators, but that all child-on-child abuse is unacceptable and will be taken seriously. Such incidents or allegations must be referred on for appropriate support and intervention. This is most likely to include, but not limited to: bullying (including cyberbullying, prejudice-based and discriminatory bullying); abuse within intimate personal relationships; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse); sexual violence, assault by penetration and sexual assault; sexual harassment; consensual and non-consensual sharing of nude and semi-nude images and/or videos; 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 and initiation/hazing type violence and rituals. Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Behaviours linked to issues such as drug taking and alcohol misuse, deliberately missing education and consensual and non-consensual sharing of nudes and semi-nude images and/or videos can be signs that children are at risk. Abuse is abuse and will **never** be tolerated or passed off as 'banter', 'just having a laugh' or 'part of growing up'. Staff must challenge inappropriate behaviours between peers. There are separate school and Foundation policies and procedures to minimise risk of child-on-child abuse (see 71. *Other Relevant Policies*).
64. It is recognised that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and is simply not reported. The schools minimise the risks of child-on-child abuse by adopting an open, zero tolerance attitude to bullying. Their PSHEE programs reinforce strategies for pupils and the Schools pastoral assembly programmes also support this. Where an issue of pupil behaviour or bullying gives 'reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm', staff should follow the procedures below rather than the School's 'Anti-Bullying' and 'Behaviour' policies.
65. If staff have **any** concerns regarding child-on-child abuse, they must speak to their DSL (or deputy) immediately. A pupil against whom an allegation of abuse has been made may be segregated from the School during the investigation. The School will take advice from LRSCP on the investigation of such allegations and will take appropriate action to ensure the safety and welfare of all pupils involved, including the alleged victim and alleged perpetrator. If it is necessary for a pupil to be interviewed by the Police in

relation to allegations of abuse, the School will ensure that, subject to the advice of LRSCP, parents are informed as soon as possible and that the pupils involved are supported during the interview by an appropriate adult and until the investigation is completed. Confidentiality will be an important consideration and advice will be sought as necessary from LRSCP and/or Police as appropriate.

66. In the event of disclosures about child-on-child abuse, all children involved (both victim and alleged perpetrator) will be treated as being at risk. Safeguarding procedures (see Appendix 9) in accordance with this policy will be followed. Victims will be supported by relevant school staff such as the class/form tutor, Key stage leader or Head of Year, Deputy Head and Head. Support from external agencies will be sought, as appropriate.
67. A sexting (and there are a few different types) incident, involving a pupil(s) will be treated on its own merits. What staff should do if they become aware of a sexting incident, the circumstances in which such incidents should be referred externally and any work around education and prevention are to be found in Appendix 8.

Support for Staff

68. Staff as part of their duty to safeguard and promote the welfare of children and young people may hear information, either from the child as part of a disclosure or from another adult that will be emotionally upsetting.
69. Where a member of staff is distressed because of dealing with a child protection concern, he/she should in the first instance speak to the relevant Designated Safeguarding Lead about the support he/she requires.
70. The relevant "Designated Safeguarding Lead" will seek to arrange support for the member of staff. Alternatively, the "Designated Safeguarding Lead" can refer the member of staff to Victim Support, a national charity which helps people affected by crime and which provides free and confidential support, and/or "Health Matters Assistance Programme", confidential information and counselling service offered to all LSF staff.

Other Relevant Policies

71. The Governing Body's statutory responsibility for safeguarding the welfare of children goes beyond pure child protection. The duty is now to ensure that safeguarding permeates all activity and functions. This policy therefore complements and supports a range of other LSF and School policies, for instance:
 - Staff Code of Conduct/Behaviour
 - Anti-Bullying
 - Complaints
 - Physical Interventions/Restraint (including DfE guidance on "Use of Reasonable Force" and "Screening, searching and confiscation")
 - Learning Support
 - Out-of-School-Visits
 - Work experience

- First aid, Medical Arrangements and accident reporting procedures
- Health and Safety
- Relationships Education (primary schools)
- Relationships and Sex Education (secondary schools)
- Security
- Equality & Diversity
- Early Years Foundation Stage
- Data Protection
- Toileting/Intimate care
- E-Safety
- Co-curricular school's activities
- Actions to be taken in the event of a missing boarding pupil
- Music - Physical Contact
- Sport - Physical Contact
- Boarding - Visitors
- Resident/Overnight staff
- Use of Mobile Technology in School
- Whistleblowing
- Visitors/Contractors/Venue Hire
- Curriculum, specifically subjects like PSHEE, RE, Citizenship and History

The above list is not exclusive but when undertaking development or planning of any kind the schools need to consider safeguarding aspects.

Where any potential conflict or contraindication exists between any other relevant school policy and the Child Protection and Safeguarding policy, the Child Protection and Safeguarding policy will always take precedence.

Guidance on the use of mobile phones and cameras in EYFS setting

72. To ensure the safety and welfare of the EYFS children in our care this policy outlines the protocols for the use of personal mobile phones and cameras in the setting.
- All staff must ensure that their mobile phones, personal cameras and recording devices are stored securely during working hours on school premises or when on outings. (This includes visitors, volunteers and students).
 - Mobile phones must not be used in any teaching area in school or within toilet of changing areas.
 - Only school equipment should be used to record classroom activities. Photos should be put on the school system as soon as possible and not sent to or kept on personal devices.
 - In an emergency, personal mobile phones may be used with the approval of the person's line manager, and this should be in a separate area and out of the sight of EYFS children.

- In circumstances such as out-of-school visits e.g., during a visit to the Forest School and in the event of an emergency, nominated staff are permitted to use their personal mobile phones.
- All telephone contact with parents or guardians must be made on the school phone and a note kept.
- Parents/guardians are permitted to take photographs of their own children during a school production or event. The school protocol requires that photos of other people's children are not published on social networking sites.

Complaints or Concerns Expressed by Pupils

73. LSF recognises that listening to children is an important and essential part of safeguarding them against abuse and neglect. To this end any expression of dissatisfaction or disquiet in relation to an individual child will be listened to and acted upon to safeguard his/her welfare. LSF staff will also seek to ensure that the individual child who makes a complaint is informed not only about the action the Schools will take but also the length of time that will be required to resolve the complaint. The Schools will also endeavour to keep the child regularly informed as to the progress of his/her complaint.
74. In accordance with the LSF policy on 'Whistleblowing' an adult or pupil will not be penalised for making a complaint in good faith.

Recruitment and Selection of Staff

75. The Schools' Policy and processes conform to the Department for Education Guidance: *Keeping Children Safe in Education (2022)*, Part Three: Safer recruitment. The Schools will provide all the relevant information in references for a member of staff about whom there have been concerns about child protection / inappropriate conduct. In accordance with DfE guidance, cases in which the conclusion of an allegation has been unsubstantiated, unfounded, false, or malicious will not be included in employer references. A history of repeated concerns or allegations, which have all been found to be unsubstantiated, malicious etc. will also not be included in a reference. If they are unsure of how to do this, the individual schools must contact the COO or the HR department.
76. The Schools have an open safeguarding ethos regularly addressing safeguarding responsibilities during staff meetings and fostering an on-going culture of vigilance. All new staff and volunteers receive a safeguarding induction, and all staff must adhere to the staff behaviour policy/code of conduct so as not to place pupils or themselves at risk of harm or of allegations of harm to a pupil. The content being tailored to the school, or department and supplemented by other relevant policies (see section 71).
77. On every interview panel to recruit an external candidate, at least one member (teacher/manager or governor) will have undertaken safer recruitment training either online or by attending the local authority one-day training course. This training is valid for five years.

78. All staff must exercise constant care to ensure that their behaviour and actions do not place pupils or themselves at risk of harm or allegations of harm. If a member of staff is not certain about aspects of their behaviour or actions, they should consult their "DSL" for advice.
79. Staff and volunteers who provide early years or later years' childcare during and outside school hours and any managers of such childcare are covered by the disqualification regulations of the Childcare Act 2006 and are required to declare relevant information - see statutory guidance: Disqualification under the Childcare Act 2006 (July 2018).

As a registered provider, Ofsted will be notified within 14 days of any allegations of serious harm or abuse by a person living, working, or looking after children at the premises (whether the allegation relates to harm or abuse committed on the premises or elsewhere).

Operation Encompass

80. Loughborough Schools Foundation is part of Operation Encompass. This is a police and education early intervention safeguarding partnership which supports children and young people who experience Domestic Abuse.
81. Operation Encompass means that the police will share information about Domestic Abuse incidents with our Schools PRIOR to the start of the next school day, or during a holiday period as required, when they have been called to a domestic incident.
82. Once a Key Adult (DSL) has attended at an Operation Encompass briefing they will cascade the principles of Operation Encompass to all other relevant DSL's and their own school DDSL's.
83. Our parents have been made aware that our Schools are part of Operation Encompass.
84. The Operation Encompass information is stored in line with all other confidential safeguarding and child protection information.
85. The Key Adults have also led training for all their school staff and their respective School Board about Operation Encompass, the prevalence of Domestic Abuse and the impact of this abuse on children. We have also discussed how we can support our children following the Operation Encompass notification.
86. We are aware that we must do nothing that puts the child/ren or the non-abusing adult at risk.
87. The Safeguarding Governor will report on Operation Encompass in the annual report to the governing body, or sooner as required. All information is anonymised for these reports.

88. The Key Adults have used the Operation Encompass Toolkit to ensure that all appropriate actions have been taken by their School.

APPENDIX 1

PROCEDURE TO FOLLOW IN CASES OF POSSIBLE, ALLEGED OR SUSPECTED ABUSE, OR SERIOUS CAUSE FOR CONCERN ABOUT A CHILD

Contents

A	General	
B	Individual Staff/Volunteers/Other Adults - main procedural steps	
C	Designated Safeguarding Lead – main procedural steps	
D	Guidelines for the Protection of Children and Staff	
E	Child Protection and Child Abuse Guidelines for Staff Handbook	

A. General

- 1) The Leicestershire & Rutland Safeguarding Children Partnership procedures contain the inter-agency processes, protocols and expectations for safeguarding children (available on LRSCP website www.lrsb.org.uk). The Designated Safeguarding Lead (DSL) is expected to be familiar with these, particularly referral processes.
- 2) It is important that all parties act fairly, swiftly and in a consistent way and avoid delays.
- 3) All staff may seek advice and guidance from the First Response Children's Duty Professionals Consultation Line, particularly if there is doubt about how to proceed (see contacts at the start of this policy document). Any adult, whatever their role, can act in his/her own right to ensure that an allegation or concern is investigated and can report to the appropriate investigating agencies.
- 4) Written records, dated and attributed (see Appendix 4), must be made to what has been alleged, noticed, and reported, and kept securely and confidentially.
- 5) In many cases of concern there will be an expectation that there have already been positive steps taken to work with parents and relevant parties to help alleviate the concerns and effect an improvement for the child. This is appropriate where it is thought a child may be in need in some way and require assessment to see whether additional support and services are required. An example might be where it is suspected a child may be the subject of neglect. In most cases, the parents' knowledge and consent to the referral are expected, unless there is reason for this not being in the child's interest. However, there will be circumstances when informing the parent/carer of a referral might put the child at risk and in individual cases, advice from Children's Social Care (see contact on page 6) will need to be taken.

B. Individual Staff/Volunteers/Other Adults – main procedural steps

- 1) When a child makes a disclosure, or when concerns are received from other sources, do not investigate, ask leading questions, examine or photograph children, or promise confidentiality. Children making disclosures should be reassured and if possible, at this stage should be informed what action will be taken next.

- 2) As soon as possible write a dated and timed note of what has been disclosed or noticed, said or done and report to the appropriate “Designated Safeguarding Lead” (or a ‘Deputy’ in their absence).
- 3) **If, at any point, a child is in immediate danger or is at risk of harm a referral should be made to Children’s Social Care and/or the police immediately. Anybody can make a referral to the necessary external agencies and parental consent is not required. Inform the police if a crime may have been committed.**
- 4) If the concern involves the conduct of a member of staff (including the DSL) or volunteer, a visitor, a governor, a trainee or another young person or child, the Head teacher and/or Chief Operating Officer (COO) must be informed. If a safeguarding issue also involves misconduct by a person involved in regulated activity, a referral should be made to the DBS and if they are a teacher, to the TRA.
- 5) If the allegation is about a Head teacher or the Chief Operating Officer, the information should be passed to the Chair of Governors or the Local Authority Designated Officer (LADO) without the Head teacher or COO being informed.
- 6) If this has not already been done, inform the child (or other party who has raised the concern) what action you have taken.

C. Designated Safeguarding Lead – main procedural steps

- 1) Begin an individual case record, which will hold a record of communications and actions in a coherent order, to be stored securely (see Section on Records, Monitoring and Transfer).
- 2) Provide and act as a source of advice, support and expertise when they have been notified of a disclosure or concern. Where initial enquiries do not justify a referral to the investigating agencies, inform the initiating adult and monitor the situation. If in doubt, seek advice from the First Response professional’s consultation line.
- 3) Share information confidentially with those who need to know.
- 4) Where there is a child protection concern requiring immediate, same day, intervention from Children’s Social Care (Priority 1), the First Response Children’s Duty should be contacted by phone. Written confirmation should be made within 24 hours on the LRSB Agency Referral Form to Children’s Social Care. All other referrals should be made using the online form (see link <http://lrsb.org.uk/childreport>).
- 5) If the concern is about children using sexually abusive behaviour, be mindful of the guidance given during initial training and update training from LRSCP and refer to the relevant section in the LRSCP procedures.
- 6) If it appears that urgent medical attention is required arrange for the child to be taken to hospital (normally this means calling an ambulance) accompanied by a member of staff who must inform medical staff that non-accidental injury is suspected. Parents must be informed that the child has been taken to hospital.
- 7) Exceptional circumstances: If it is feared that the child might be at immediate risk on leaving school, take advice from the First Response Professionals Consultation line

(for instance about difficulties if the school day has ended, or on whether to contact the police). Remain with the child until the Social Worker takes responsibility. If in these circumstances a parent arrives to collect the child, the member of staff has no right to withhold the child, unless there are current legal restrictions in force (e.g., a restraining order). If there are clear signs of physical risk or threat, First Response Children's Duty should be updated, and the Police should be contacted immediately.

D. Guidelines for the Protection of Children and Staff

How to minimise risks to staff and to pupils

All members of the School are encouraged to demonstrate exemplary behaviour when working with children to protect children from abuse and themselves from false allegations. The following are common-sense examples of how to create a positive climate:

Always	Never
Always put the welfare of the child first.	Never engage in rough, physical or sexually-provocative games.
Always treat all children equally, with respect and dignity.	Never share a room overnight with a child.
Always maintain a safe and appropriate distance with children. It is not appropriate for staff or pupils to have an intimate relationship with a child.	Never go into a child's room unless absolutely necessary. <i>(If it is necessary, two members of staff should enter together.)</i>
Always ensure that, if any form of physical contact is required, it should be provided openly. In sporting situations this should be in accordance with guidelines provided by the appropriate national Governing Body.	Never allow or engage in any form of inappropriate touching.
Always keep a written record of any injury that occurs, along with the details of any treatment given.	Never allow children to use inappropriate language without challenge.
Always keep the door open or sit in front of a window if a private conversation with a pupil is considered important and the room does not have glass in the door.	Never make sexually suggestive comments to a child, even in fun.
Always ensure that another adult is aware that such an interview is taking place.	Never deliberately reduce a child to tears as a form of control.
Always be as unobtrusive as possible if required to supervise pupils changing or showering. Such supervision must focus on the safety of pupils. Wherever possible, ensure that two adults are present.	Never allow allegations made by a child to go without challenge, unrecorded or not acted upon.
	Never invite or allow children to stay with you at home unsupervised. <i>(Think carefully before arranging any meetings with individual pupils away from school premises.)</i>
	Never observe pupils changing or showering unless you have specific responsibility for supervision.

Child Protection and Child Abuse Guidelines for Staff Handbook

Guidelines to follow if you suspect, or are told of abuse

These guidelines represent a summary of the Child Protection Policy and Procedures to which your attention is drawn.

Adults looking after children or young people in schools should be aware of the risks of abuse (by adults or other young people) and take steps to reduce those risks. Adults in charge of children or young people should know what to do if they suspect that someone is being physically or sexually abused, or if someone tells them that it is happening.

The following key points give a guide on what to do and what not to do.

1. Always stop and listen straight away to someone who wants to tell you about incidents or suspicions of abuse. Reassure them that they are being taken seriously and that they will be supported and kept safe. They should never be given the impression that they are creating a problem nor should they ever be made to feel ashamed for making a report.
2. If you can, once you are sure the child is settled, write brief notes of what they are telling you while they are speaking, if not, try to do so immediately after speaking to the child.

These may help later if you have to remember exactly what was said – and to keep your original note, however rough and even if you wrote it on the back of something else (it is what you wrote at the time that may be important later – not a tidier and improved version you wrote up afterwards).

3. Either attach your original notes to a Child Protection Concern Form or write up your notes immediately after speaking to the child on a concern form. Copies of these forms are found _____. Ensure you sign and date the forms
4. Do not give a guarantee that you will keep what is said confidential or secret
If you are told about abuse you have a responsibility to tell the right people to get something done about it (see below). If asked, explain that if you are going to be told something very important that needs to be sorted out, you will need to tell the people who can sort it out, but that you will only tell people who absolutely have to know.
5. Don't ask leading questions that might give your own ideas of what might have happened.
Not "He did do X to you?" – just ask "what have you to tell me?" or "is there anything else you want to say?"
6. Immediately tell the Designated Safeguarding Leads (DSL), OR their deputy, unless one of them is accused or suspected of abusing, in which case tell the Head.
Don't discuss what you have been told with a wider audience, you may seek advice from your HOY.
7. Discuss with the DSL (or the Head) whether any steps need to be taken to protect the person who has told you about the abuse (this may need to be discussed with the person who told you)
8. Never attempt to carry out an investigation of suspected or alleged abuse by interviewing people etc.
Social Services staff and the Police are the people trained to do this – you could cause more damage and harm possible criminal proceedings.
9. As soon as possible (and certainly the same day) the DSL (or the Head) should refer the matter to the local Social Services Department (helped by your notes)
Follow their requests about what to do next. They will set up any necessary investigations and can inform you on any action under consideration – that is their statutory job.
10. Never think that abuse is impossible in your school or group or that the accusation against someone you know well and trust is bound to be wrong.
11. Make sure that your senior young people know the points on this sheet as well as the responsible adults e.g. Prefects, NCOs, patrol leaders.
Children and young people often tell other young people, rather than staff or other adults about abuse.
12. If any accusation is made about a member of staff, please pass your notes onto the Headmaster directly and not the DSL. Accusations against the Headmaster must be reported directly to the Chairman of Governors or the Chief Operating Officer.

APPENDIX 2

PROCESS FOR DEALING WITH ALL ALLEGATIONS AGAINST STAFF (INCLUDING DSL'S, HEAD TEACHERS and COO), SUPPLY STAFF, VOLUNTEERS AND CONTRACTORS, INCLUDING LOW-LEVEL CONCERNS (References to staff in this process include staff in schools, The Nursery and Central Services). These procedures include descriptions of action undertaken by the Foundation, the local authority services, and the Police.

These procedures should be followed in all cases in which there is a concern or an allegation or suspicion that a person working with children has:

- behaved in a way that has harmed a child, or may have harmed a child and/or;
- possibly committed a criminal offence against or related to a child and/or;
- behaved towards a child or children in a way that indicates s/he would pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Relevant documents:

- LRSCP Procedures Section 7, Making a Referral.
- DfE "Keeping Children Safe in Education" 2022, part 4: Allegations made against/Concerns raised in relation to teachers, including supply teachers, other staff, volunteers, and contractors'.

1) Individual Staff/Volunteers/Other Adults:

- i. Write a dated and timed note of what has been disclosed or noticed, said, or done.
- ii. Report immediately to the relevant Head teacher or Chief Operating Officer (COO), or in their absence, the Chair of Governors.
- iii. Pass on the written record.
- iv. If the allegation concerns the conduct of a DSL, report immediately to the respective Head teacher or COO (where any conflict of interest may exist in reporting a matter to a Head or the COO, referral should be made direct to the LADO); or the Head teacher or the COO, report immediately to the Chair of Governors without the Head or COO being informed. Pass on the written record. (If there is difficulty reporting to the Chair of Governors, contact the LADO, Safeguarding Unit as soon as possible).

2) Head Teacher and Chief Operating Officer

- i. If there is no written record, write a dated and timed note of what has been disclosed or noticed, said, or done.
- ii. Before taking further action notify and seek advice from the LADO, Safeguarding Unit on the same day. The Head teacher and DSL may have an informal discussion with the LADO without naming an individual.
- iii. You may be asked to clarify details or the circumstances of the allegation, but this must not amount to an investigation.
- iv. Report to First Response Children's Duty if the LADO, Safeguarding Unit so advises or if circumstances require a referral concerning a child.

v. Ongoing involvement in cases includes:

- Liaison with the LADO, Safeguarding unit.
- Co-operation with the investigating Agencies' enquiries as appropriate.
- Consideration of employment issues and possible disciplinary action where the investigating Agencies take no further action.

vi. Keeping a written record of all communications and agreed actions

vii. Possible referral to the DBS or TRA, depending on the outcome.

3) Chair of Governors (only relevant in the case of an allegation against a Head teacher or the COO)

i. If there is no written record, write a dated and timed note of what has been disclosed or noticed, said, or done.

ii. Notify the Local Authority Designated Officer (LADO), Safeguarding Unit on the same day.

iii. The Chair may be asked to clarify details or the circumstances of the allegation, but this must not amount to an investigation.

iv. Report to First Response Children's Duty if the LADO, Safeguarding Unit so advises; in cases concerning Head teachers, the report to First Response Children's Duty is sometimes undertaken by the LADO, Safeguarding Unit on behalf of the Chair of Governors, following discussion.

v. Ongoing involvement in cases includes:

- Liaison with the Local Authority Designated Officer (LADO);
- Co-operation with the investigating Agencies' enquiries as appropriate;
- Consideration of employment issues and possible disciplinary action where the investigating Agencies take no further action.

vi. Keeping a written record of all communications and agreed actions

4) Local Authority Designated Officer (LADO), Safeguarding Unit

i. Identifies an officer to liaise further with the Head teacher or COO (or Chair of Governors if the allegation concerns the Head teacher or COO), in consultation with the relevant Assistant Director of Education, and provides advice on how to proceed.

ii. Monitors cases through its Casework Monitoring Group

iii. Keeps written records, to ensure an appropriate investigation is carried out.

iv. Liaises with children's social care and the Police in relevant cases.

v. Makes summary reports to the Department for Education on request on the number and sorts of allegations which have occurred.

5) Initial action (First Response Children's Duty team): usually same day or next day if key staff are not immediately available

Discussion involving the COO or the Personnel Unit (HR Department), the Local Authority Designated Officer (LADO) and the Safeguarding Unit to:

- i. Share what information is available, both from the source of the allegation and also from the Personnel and child protection files.
- ii. Identify what other information might be needed.
- iii. Come to a view on the seriousness of the allegation.
- iv. Consider whether the alleged perpetrator should continue working or remain in contact with children.
- v. Consider whether suspension is appropriate advice to the Schools on this aspect.
- vi. Decide what information and/or advice is to be given to the Head teacher (or Chair of Governors if the allegation is about the Head teacher or COO), including whether the member of staff should be informed of the allegation at this stage.
- vii. Decide what action is needed, and who needs to be involved and informed.

6) Initial action and discussions (inter-agency)

The Head teacher, or COO, will in the first instance contact the Local Authority Designated Officer (LADO). If it is then decided, based on the referral or subsequent initial assessment, that child protection enquiries are required, a strategy meeting must be held. The timescales are as for any referral – 24 hours to decide that an initial assessment is required, and up to 7 working days to complete an initial assessment. Once an investigation is under way and it has been agreed that the member of staff should be informed, agencies should identify clear and named points of contact for regular updates, advice, and support to the member of staff and their representatives in individual cases.

7) From the above discussions, there are three possible courses of action:

- i. it may be the subject of a Police and/or joint Police and children's social care investigation and possible action through the courts (see 8 below)
- ii. it may be the subject of a disciplinary investigation (see 10, 11 below); or
- iii. the matter may be remitted to the Schools to be dealt with

If children's social care and the Police decide to take no action the schools will generally still need to consider further investigation. The LADO will notify the schools in these circumstances. The Personnel Unit (HR Department) will work with the School in these circumstances.

8) Case subject to police investigation

If the initial action discussions and/or Strategy Meeting conclude that a Police or Police/children's social care investigation is required, the Department for Education expects that the Police will:

- i. consider whether to consult the CPS about the evidence that will need to be obtained in order to charge the person with an offence without delay;
- ii. consult the CPS if the person has not been charged, to consider whether to proceed with the investigation or refer the case back to the employer; (The DfE expects that where possible a review date should be set **no later than 4 weeks** after the initial action meeting, with subsequent reviews at least every 4 weeks.) If the decision is not to prosecute or caution the individual, the Police will pass all relevant and appropriate information they have to the LADO, Safeguarding Unit, if practicable, **usually within 3 working days**. Sections 10 and 11 below then apply.

- 9) **If the case comes to trial**, the Crown Prosecution Service is responsible for the timescales, but the **Department for Education** expects that:
- i. If the person is charged with an offence, the case will be scheduled to be heard **as soon as possible**.
 - ii. Immediately after a trial the Police will provide a report and in the case of an acquittal will provide all relevant information they have.
- 10) **Where the matter is remitted to the Schools** to resolve with appropriate action, it is expected that initial action will be taken **usually within 3 working days**. The COO or the Personnel Unit (HR Department) will support the Schools in these circumstances and ensure the timescales are kept.
- 11) **Where a disciplinary investigation is required** the COO or the Personnel Unit (HR Department) will support the Schools. If the allegations involve a Head teacher or the COO, the Personnel support is given to the Chair of Governors. The COO or the Personnel Unit (HR Department) may support the Schools in various ways, for instance by arranging for an investigation to be conducted by a person independent of the Schools. An investigating officer should aim to provide a report within 10 working days. If possible, a disciplinary hearing should be held within a further 15 working days.

12) GENERAL

Monitoring casework

Allegations against staff and volunteers will be monitored in the local authority through the regular casework-monitoring meeting.

Further Local Authority action:

- i. The Casework Monitoring Group will then:
 - ~ share what information is available from the Police
 - ~ identify what other information might be needed
 - ~ come to a view on what advice should be given to the Schools regarding a course of action
 - ~ consider again whether the alleged perpetrator should be in post
 - ~ pass the case to the Personnel Unit (HR Department) to contact the Schools.
- ii. The COO or Personnel Unit (HR Department) will discuss the information with the Head teacher (or the Chair of Governors alone if the information is about a Head teacher or the COO) to help decide whether a disciplinary hearing or further investigation is needed, **usually within 3 working days**. See below.

Records

Details of allegations that are found to have been malicious should be removed from personnel records. However, for all other allegations, it is important that a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken, and decisions reached, is kept on the confidential personnel file of the accused, and a copy provided to the person concerned.

Transfer of Records

The purpose of the record is to enable accurate information to be given in response to any future request for a reference, where appropriate. It will provide clarification in cases where future DBS checks reveal information from the police about an allegation that did not result in a criminal conviction and it will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation re-surfaces after a period. The record should be retained at least until the accused has reached normal retirement age or for a period of 10 years from the date of the allegation if that is longer.

Where there have been concerns about a member of staff and he/she leaves the Schools/authority to work elsewhere, the Casework Monitoring Group will consider the question of passing the concerns to the new employer/authority.

Reporting to the Department for Education

Each term the Local Authority Designated Officer (LADO) completes a statistical return for the Department for Education (Anonymised data). If on the conclusion of a case the Schools cease to use the person's services, or the person ceases to provide his/her services, the Schools should consult the local authority about whether a referral to the Department for Education is required.

Contacts and support for staff that are the subject of allegations

Where allegations are made against staff or volunteers support may be available from their own trade union, Local Authority welfare, COO or LSF HR.

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

Abuse of Trust

Abuse of trust: The Sexual Offences Act 2003, makes it an offence for a person over 18 to have a sexual relationship with a child under 18 where the person is in a position of trust (e.g., teacher, youth worker), even if the relationship is consensual.

Non recent Allegations

Where an adult alleges that they were abused whilst a child at the school, they will be advised to report the allegation to the Police.

13) Low-level Concerns

This procedure sets out the framework whereby staff are expected to report concerns, no matter how small, about their own behaviour or that of another member of staff, volunteer, supply teacher, contractor or other person working in the Foundation. A safeguarding concern or an allegation that does not meet the harm threshold is dealt with as a low-level concern. Its purpose is to help create and embed a culture of openness, trust, and transparency in which the clear values and expected behaviour set out in the “Guidance for safer working practice for those working with children and young people in education settings” (May 2019) (sometimes called the safeguarding code of conduct) are lived, monitored, and reinforced.

Definition of a low-level concern

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

- is inconsistent with the “Guidance for safer working practice” (May 2019), including inappropriate conduct outside of work, and
- does not meet the allegations threshold or is otherwise not considered serious enough to make a referral to the LADO.

(If there is any doubt as to whether the information shared as a low-level concern in fact meets the harm threshold, the LADO will be consulted)

Reporting low-level concerns

Where a low-level concern has been identified this will be reported as soon as possible to the **appropriate Lead DSL** or Deputy DSL. However, it is never too late to share a low-level concern if this has not already happened. Where the DSL or deputy is not available, the information will be reported to the Head/COO. Where the low-level concern has been reported to the Designated Safeguarding Lead, they will inform the Head/COO of the details as soon as possible, who will be the ultimate decision maker either solely, or in collaboration with the DSL.

Low-level concerns about a Designated Safeguarding Lead (or a Deputy) will be reported to the Head and those about a Head or the COO will be reported to the Chair of Governors.

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

Recording concerns

A summary of the low-level concern should be written down, with details of the concern, the context in which it arose, and action taken, signed, timed, dated and shared by the person bringing the information forward. Where concerns are reported verbally to a Head or the COO, a record of the conversation will be made which will be signed, timed, and dated.

Responding to low-level concerns

Where a low-level concern has been raised this will be taken seriously and dealt with promptly. The Head/COO will:

- Speak to the person reporting the concern to gather all the relevant information
- Speak to the individual about the concern raised to ascertain their response, unless advised not to do so by the LADO or Police (HR advice may also need to be taken).
- Where necessary further investigation will be carried out to gather all relevant information. This may involve speaking to any potential witnesses.
- The information reported and gathered will then be reviewed to determine whether the behaviour,
 - i) is consistent with the “Guidance for safer working practice for those working with children and young people in education settings” (May 2019): no further action will be required,
 - ii) constitutes a low-level concern: no further action is required, or additional training/guidance/support may be required to rectify the behaviour via normal day to day management processes. The staff member should understand that failure to improve or a repeat of the behaviour may lead to further action being taken, e.g., either via the Performance Management Policy or Disciplinary Policy.
 - iii) is serious enough to consult with or refer to the LADO: a referral should be made to the LADO and advice taken from HR. In this case the Foundation’s ‘Process for dealing with Allegations...’ and Disciplinary Policy will be followed.
 - iv) when considered with any other low-level concerns that have previously been raised about the same individual, should be reclassified as an allegation, and referred to the LADO or Police: a referral should be made to the LADO and advice taken from HR. In this case the Foundation’s ‘Process for dealing with Allegations.’ procedure and Disciplinary Policy will be followed.
- Records will be made of, i) all internal conversations including any relevant witnesses, ii) all external conversations e.g., with the LADO iii) the decision and the rationale for it, iv) any action taken

Can the reporting person remain anonymous?

The person bringing forward the concern will be named in the written record. Where they request to remain anonymous this will be respected as far as possible. However, there may be circumstances where this is not possible e.g., where a fair disciplinary investigation is needed or where a later criminal investigation is required.

Should staff report concerns about themselves (i.e., self-report)?

It may be the case that a person finds themselves in a situation which could be misinterpreted or might appear compromising to others; or they may have behaved in a manner which on reflection they consider falls below the standard set out in the “Guidance for safer working practice”. In these circumstances they should self-report. This will enable a potentially difficult situation to be addressed at an early opportunity if necessary.

Where behaviour is consistent with the “Guidance for safer working practice” (May 2019)

Feedback will be given to both parties to explain why the behaviour was consistent with the “Guidance for safer working practice”.

Should the low-level concerns file be reviewed?

The records will be reviewed periodically, and whenever a new low-level concern is added, so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and responded to with the appropriate course of action. This might be internal disciplinary procedures, or referral to the LADO if the harms threshold is met. A review must consider if any wider cultural issues enabled the behaviour to occur and if appropriate policies could be revised or extra training delivered to minimise the risk of recurrence. A record of these reviews will be retained.

References

Low-level concerns will not be included in references unless a low-level concern, or group of concerns, has met the threshold for referral to the LADO and found to be substantiated.

What is the role of the Governing Body?

The Head/COO will regularly inform the Governing Body about the implementation of the low-level concerns procedure including any evidence of its effectiveness e.g., with relevant data. The Nominated Safeguarding Governor may also review an anonymised sample to ensure that these concerns have been handled appropriately.

APPENDIX 3

Information for Parents

Suggested wording for an insertion in the Schools' websites/parental booklets

Child Protection: Safeguarding children – Information for Parents

Our Schools feel it is of the utmost importance to have good systems for protecting children and safeguarding their welfare, throughout all the activities, which the Schools undertake. This means that staff and volunteers must be alert to possible concerns about every pupil, and to report these in a proper fashion. The Schools have a child protection and safeguarding policy.

It is important for parents to be aware that:

- Staff and volunteers in the Schools have a duty to report concerns about a child, whether this means the child may need additional support or help of some kind or whether it is thought that a child may have been abused or be at risk of abuse.*
- There are four categories of abuse: physical, sexual, emotional, neglect.*
- In some cases, the Schools are obliged to refer children to First Response Children's Duty staff, for children to be assessed for their needs or if an investigation into possible child abuse is required. In many cases there will already have been discussions between school staff and the parents of the child, and the situation and concerns will not be a surprise to the parents. However, parents may not be told that the school have referred their child to First Response Children's Duty if it is thought that this might put the child at risk.*
- First Response Children's Duty tries to carry out its enquiries in a sensitive fashion. It must gather information and generally it can be open with parents about the steps being taken.*
- If you think your child may have been abused, you can contact the First Response Children's office. If you think the abuse may have happened in school, contact the relevant Head teacher. If you think your child has been hurt, arrange to visit your doctor. Comfort and reassure your child.*
- If LSF staff need to express concerns about a child or refer a child to First Response Children's Duty, it is understood that this can cause distress or anger for the child's parents. It is important that all parties – parents and LSF staff – try to discuss these matters as calmly and sensibly as possible.*
- Anyone who has a concern about a child's wellbeing can make a referral at any time.*

Child Protection Concern (Stage 2)

Name of Pupil: _____

Tutor Group: _____

Name of Reporting Adult: _____

Internal Reference (DSL): _____

Initial Follow Up Action:

On-going Relevant Information (with dates):

Date: _____ Signature: _____ Time: _____

Internal Reference (DSL): _____

APPENDIX 5

Boarding

Loughborough Grammar School and Loughborough Amherst School have and implement an appropriate policy on child protection and safeguarding and response to allegations or suspicions of abuse, which is consistent with LRSCP procedures, and is known to staff and known, as appropriate, to older boarders in positions of responsibility.

In addition to the existing LSF Child Protection and Safeguarding Policy, both Schools acknowledge their responsibilities as a boarding school in accordance with the National Minimum Standards for Boarding Schools.

1. House Prefects and senior boarding pupils are provided with a briefing on the appropriate action to take should they receive any allegations of abuse, including written instructions of how to contact the school's DSLs and how to use the pupil confidential reporting system.
2. The telephone contacts for the DSLs, an 'Independent Person', The Children's Rights Director and Childline are displayed in house.
3. The School has a policy for the search and reporting of any boarder missing from school that is known to all boarding house staff. A written record is made of any boarder missing from school, the action taken, and any reasons for the pupil being missing.
4. It is understood that all staff and pupils have immunity from retribution or disciplinary action for 'whistle blowing' in good faith.
5. The School adheres to the National Minimum Standards in instigating appointment checks for all staff in accordance with acknowledged safe recruitment practices.

In addition to the requirements for all staff it should be noted that:

- For all persons over 16 (including staff children), who after April 2002 begin to live on the same premises as children/students but are not employed by the School, there is a verifiable Disclosure and Barring Service (DBS) check completed at the standard level.
- The school has taken reasonably practicable checks to carry out Disclosure and Barring Service checks on taxi drivers booked by the school to drive boarders unaccompanied by staff.
- The School has instigated measures to ensure that all boarders are protected from unsupervised contact at school with adults who have not been subject to the school's complete recruitment checking procedures and there is supervision of all unchecked visitors to the boarding premises.
- The School does not allow any member of staff (including ancillary staff, sessional/contract staff and volunteers) to work unsupervised with boarders unless that member of staff has been satisfactorily checked with the Disclosure and Barring Service.

- The welfare of boarders placed in lodgings is safeguarded and promoted. Any lodgings arranged by the school to accommodate pupils provide satisfactory accommodation and supervision, are checked by the school before use, and are monitored by the school during use.
- In a case where a member of boarding staff is suspended pending an investigation of a child protection nature, arrangements will be made for the member of staff of alternative accommodation away from children.

APPENDIX 6

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the Foundation and/or can occur between children outside of these environments. All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

All staff must 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.

There are several warning indicators which might suggest that a child may be being abused or neglected.

Types and Signs of Abuse

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment to others, e.g., domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

Some of the following signs might be indicators of abuse or neglect:

- Children whose behaviour changes – they may become aggressive, challenging, disruptive, withdrawn or clingy, or they might have difficulty sleeping or start wetting the bed;
- Children with clothes which are ill-fitting and/or dirty;
- Children with consistently poor hygiene;
- Children who make strong efforts to avoid specific family members or friends, without an obvious reason;
- Children who don't want to change clothes in front of others or participate in physical activities;
- Children who are having problems at school, for example, a sudden lack of concentration and learning or they appear to be tired and hungry;
- Children who talk about being left home alone, with inappropriate carers or with strangers;
- Children who reach developmental milestones, such as learning to speak or walk, late, with no medical reason;
- Children who are regularly missing from school or education;
- Children who are reluctant to go home after school;
- Children with poor school attendance and punctuality, or who are consistently late being picked up;
- Parents who are dismissive and non-responsive to practitioners' concerns;
- Parents who collect their children from school when drunk, or under the influence of drugs;
- Children who drink alcohol regularly from an early age;

- Children who are concerned for younger siblings without explaining why;
- Children who talk about running away; and
- Children who shy away from being touched or flinch at sudden movement.

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 cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Some of the following signs may be indicators of emotional abuse:

- Children who are excessively withdrawn, fearful, or anxious about doing something wrong;
- Parents or carers who withdraw their attention from their child, giving the child the 'cold shoulder';
- Parents or carers blaming their problems on their child; and
- Parents or carers who humiliate their child, for example, by name-calling or making negative comparisons.

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. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and **all** staff should be aware of it and the policy and procedures for dealing with it.

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

- Children who display knowledge or interest in sexual acts inappropriate to their age;
- Children who use sexual language or have sexual knowledge that you wouldn't expect them to have;
- Children who ask others to behave sexually or play sexual games; and
- Children with physical sexual health problems, including soreness in the genital and anal areas, sexually transmitted infections or underage pregnancy.

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

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

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 because of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing, and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

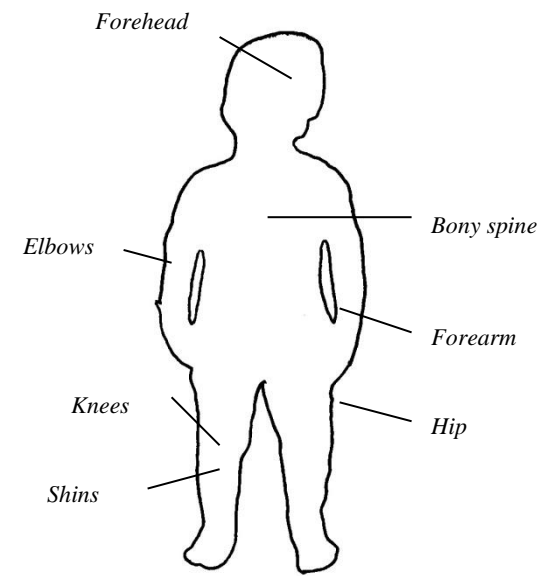
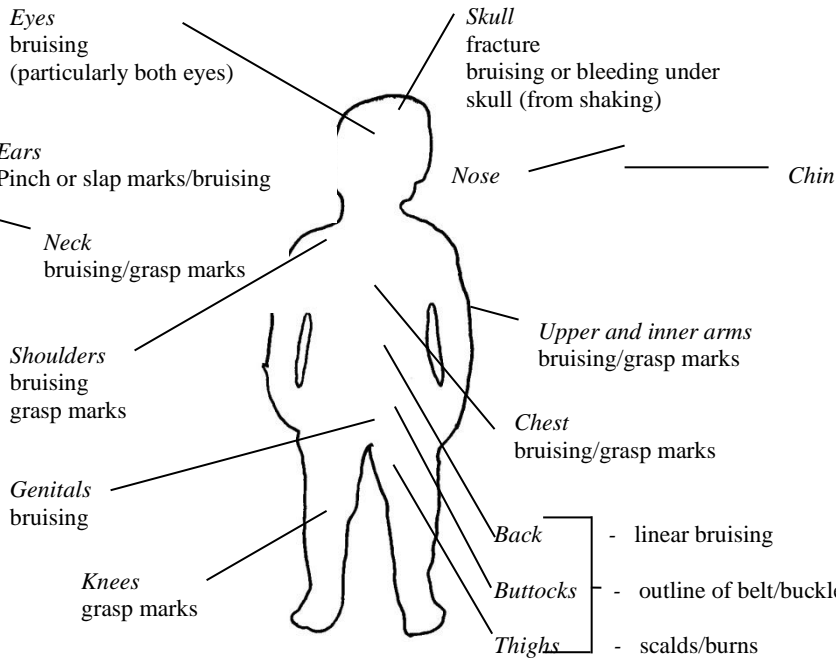
Some of the following signs may be indicators of neglect:

- Children who are living in a home that is indisputably dirty or unsafe;
- Children who are left hungry or dirty;
- Children who are left without adequate clothing, e.g., not having a winter coat;
- Children who are living in dangerous conditions, i.e., around drugs, alcohol or violence;
- Children who are often angry, aggressive or self-harm;
- Children who fail to receive basic health care; and
- Parents who fail to seek medical treatment when their children are ill or are injured.

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.

Common sites for non-accidental injury

Common sites for accidental injury



<u>Non-accidental injuries</u>	<u>Accidental injuries</u>
<p>Bruises likely to be: frequent patterned, e.g., finger and thumb marks old and new in same place (note colour), in unusual position (see chart) consider: developmental level of the child and their activities may be more difficult to see on darker skins</p>	<p>Bruises likely to be: few but scattered no pattern same colour and age consider: age and activity of child, e.g., learning to walk may be confused with birthmarks or other skin conditions</p>
<p>Burns and scalds likely to have: clear outline splash marks around burn area unusual position, e.g., back of hand indicative shapes, e.g., cigarette burns, bar of electric fire</p>	<p>Burns and scalds likely to be: treated easily explained may be confused with other conditions e.g., impetigo, nappy rash</p>
<p>Injuries suspicious if: bite marks fingernail marks large and deep scratches incisions, e.g., from razor blade</p>	<p>Injuries likely to be: minor and superficial treated easily explained</p>
<p>Fractures likely to be: numerous - healed at different times consider: age of child, always suspicious in babies under two years or old delay in seeking treatment</p>	<p>Fractures likely to be: of arms and legs seldom on ribs except for road traffic accidents rare in very young children may rarely be due to 'brittle bone syndrome'</p>
<p>Sexual abuse may result in: unexplained soreness, bleeding, or injury in genital or anal area sexually transmitted diseases, e.g., warts, gonorrhoea</p>	<p>Genital area injury may be accidental (seek expert opinion) soreness may be nappy rash or irritation, e.g., from bubble bath, anal soreness may be due to constipation or threadworm infestation</p>

Parental attitude is important in assessing all of the above - when a child is suffering a severe and painful injury most would seek medical help.

Staff should only view those parts of the body that are normally visible.

APPENDIX 7

Prevent Action Plan

Loughborough Schools Foundation recognises that it has a duty under Section 26 of the Counter-Terrorism and Security Act 2015, in the exercise of its functions, to have due regard to the need to prevent people from being drawn into terrorism. To fulfil our Prevent Duty, each School and the Foundation will undertake to do the following:

Duty	What this means	Action	By whom	Date Completed
Risk Assessment				
Assess the risk of children being drawn into terrorism	Staff can demonstrate a general understanding of the risks affecting children and young people	All staff to read Part One of "Keeping Children Safe in Education 2022" and Annex B. The Prevent Lead informs staff of their duties as set out in "The Prevent Duty" (DfE, June 2015)	All Staff Prevent Lead	
	Staff can identify individual children who may be at risk of radicalisation and how to support them.	The Prevent Lead informs staff about signs and indicators of radicalisation.	Prevent Lead	
	There is a clear procedure in place for protecting children at risk of radicalisation.	All staff to read the LSF Safeguarding Policy which includes a statement regarding the School's "Prevent" duty. All staff understand how to record, and report concerns regarding risk of radicalisation.	All staff All staff	
	The school identifies a Prevent Lead.	All staff know who the Prevent Lead is, and that this person acts as a source of advice and support.	All staff	
Prohibit extremist speakers and events in the school	The school exercises "due diligence" in relation to requests from external speakers and organisations using school premises.	Prior to any external visitor speaking, the School actively. Requests an outline of what the speaker intends to cover Researches the person/organisation to establish whether they have demonstrated extreme views/actions. Denies permission for people/organisations to use school premises if they have links to extreme groups or movements. Provides justification for their decisions in writing.	Prevent Lead	

Working in Partnership				Date completed
The school is using existing local partnership arrangements in exercising its Prevent duty.	Staff record and report concerns in line with existing policies and Procedures.	All staff record and report concerns on the usual "Child Protection Concern" form.	All staff	
	The Prevent Lead makes appropriate referrals to other agencies including the Channel Panel.	Records of referrals are kept in the Welfare File. Referrals are followed up appropriately.	Prevent Lead	
Staff training				Date Completed
Equip staff to identify children at risk of being drawn into terrorism and to challenge extremist ideas.	Assess the training needs of staff in the light of the school's assessment of the risk to pupils at the school of being drawn into terrorism.	As a minimum the school: Ensures that the designated safeguarding lead undertakes Prevent Awareness Training. Ensures that the Designated Safeguarding Lead can provide advice and support to other members of staff on protecting children from the risk of radicalisation. Relevant staff to complete the Home Office online "General Awareness Training on Channel". (Referred to in the DfE guidance cited below). * All front-line staff have attended a Workshop Raising Awareness of Prevent (WRAP) session or completed the Home Offices online training version.	Designated Safeguarding Lead/Prevent Lead Relevant staff identified by the Prevent Lead	
IT Policies				Date Completed
Ensure that children are safe from terrorist and Extremist material when accessing the internet in School.	The school has policies in place which refer to the "Prevent" duty.	<ul style="list-style-type: none"> • E safety policy • Acceptable use policy • Anti-bullying policy 	Prevent Lead	
	Children are taught about online safety with specific reference to the risk of radicalisation.	The curriculum reflects this duty.	Head	

Building children's resilience to radicalisation				Date Completed
Ensure that pupils have a "safe environment" in which to discuss "controversial issues".	Pupils develop "the knowledge, skills and understanding to prepare them to play a full and active part in society".	Through PSHE/Citizenship, and other curriculum activities, pupils can explore political, religious, and social issues. Pupils are taught about the diverse national, regional, and ethnic identities in the UK and the need for mutual respect. Relevant staff are aware of the government guidance	Head of PSHE Other relevant staff	

References:

"Keeping Children Safe in Education: Information for all school and college staff" DfE, September 2022

"The Prevent Duty: Departmental advice for schools and childcare providers", DfE, June 2015

APPENDIX 8

Sexting

Introduction

'Sexting' is one of several 'risk-taking' behaviours associated with the use of digital devices, social media, or the internet. It is accepted that young people experiment and challenge boundaries and therefore the risks associated with 'online' activity can never be eliminated. However, Loughborough Schools Foundation takes a pro-active approach in its ICT and Enrichment programmes to help students to understand, assess, manage and avoid the risks associated with 'online activity'. The Schools recognise its duty of care to its young people who do find themselves involved in such activity as well as its responsibility to report such behaviours where legal or safeguarding boundaries are crossed.

Whilst there may be no clear definition of 'sexting', for the purposes of this Policy sexting is defined as 'youth produced sexual imagery' (UKCCIS,2016):

- Imagery, covering both still photos and moving videos
 - by children under the age of 18, or
 - of children under the age of 18, that are of a sexual nature.

- These images are shared between young people and/or adults via a mobile phone, handheld device, computer, 'tablet' or website with people they may not even know.

Some of the legalities of 'sexting' are outlined in Addendum 1.

There are many different types of sexting (see Addendum 2) and it is likely that no two cases will be the same. It is necessary to carefully consider each case on its own merit. However, it is important that Loughborough Schools Foundation applies a consistent approach when dealing with an incident to help protect young people and the School(s). The response to these incidents should be guided by the principle of proportionality and the primary concern at all times should be the welfare and protection of the young people involved. Guidance on responding to incidents is available at <https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people> For this reason, the Designated Safeguarding Lead (or Head teacher in the absence of the DSL) needs to be informed of any 'sexting' incidents. All front-line staff are expected to be aware of this procedure. The decisions made by the Designated Safeguarding Lead will be guided by a pathway (Addendum 3).

Steps to take in the case of an incident

Step 1 - Disclosure by a pupil/student

Sexting disclosures can happen in a variety of ways. Any disclosure must be referred to the DSL as soon as possible and should follow normal safeguarding practices and protocols.

A pupil/student is likely to be very distressed especially if the imagery has been circulated widely and if they don't know who has shared it, seen it or where it has ended up. They will need pastoral support during the disclosure and after the event. They may even need immediate protection or a referral to police or social services; parents should be informed as soon as possible unless there is good reason to believe that this may put the young person at risk of harm (police advice permitting).

The DSL should hold an initial review meeting where the following questions will help decide upon the best course of action:

- Is the pupil/student disclosing about themselves receiving an image, sending an image or sharing an image?
- What sort of imagery is it? Is it potentially illegal or is it inappropriate?
- Is the Schools' Child Protection and Safeguarding policies and practices being followed?
- How widely has the imagery been shared and is the device in their possession?
- Is it a School device or a personal device?
- Does the pupil/student need immediate support and/or protection?
- Are there other pupils/students and/or young people involved?
- Do they know where the imagery has ended up?

Step 2- Searching a device – what are the rules?

Please refer to the DfE advice on 'Searching, screening and confiscation' (January 2018).

The guidance allows for a device to be examined, confiscated and securely stored if there is good reason to believe it contains sexual imagery or extreme pornography. When searching a mobile device, the following conditions should apply:

- The action is in accordance with the school's policies regarding Safeguarding and Searching and Confiscation.
- The search is conducted either by the head teacher or a person authorised by them.
- A member of the safeguarding team is present.
- The search should be conducted by a member of the same gender as the person being searched. However, if the imagery being searched for is likely to be of a different gender to the person 'in possession' then the device should only be viewed by a member of the same gender as the person whose image it is.

If any illegal imagery of a young person is found the Designated Safeguarding Lead should consider whether to inform the police.

It will almost always be proportionate to refer any incident involving 'aggravated' sharing of imagery to the Police, whereas purely 'experimental' conduct may be proportionately dealt with without such referral, most particularly if it involves the young person sharing images of themselves (see Addendum 2).

'Experimental conduct' commonly refers to that shared between two individuals (e.g., girlfriend and boyfriend) with no intention to publish the imagery further (see Addendum 2). Coercion is not a feature of such conduct, neither are requests for images sent from one person to multiple other young persons.

Any conduct involving, or possibly involving, the knowledge or participation of adults should always be referred to the police.

If an 'experimental' incident is not referred to the Police, the reasons for this should be recorded in the School's 'Safeguarding Incidents Log'.

Always put the young person first. Do not search the device if this will cause additional stress to the pupil/student whose image has been distributed. Instead rely on the description by the young person.

Never...

- Search a mobile device even in response to an allegation or disclosure if this is likely to cause additional stress to the student/young person UNLESS there is clear reason to do so.
- Print out any material for evidence.
- Move any material from one storage device to another

Always...

- Inform and involve the Designated Safeguarding Lead (or their Deputy) so that they are able to take any necessary strategic decisions.
- Record the incident. The Schools employ a systematic approach to the recording of all safeguarding issues.
- Act in accordance with the Schools' Safeguarding and search and confiscation policies and procedures

If there is any sexual imagery of a child on a website or a social networking site, then the Designated Safeguarding Lead will report the imagery to the site hosting it. Under normal circumstances the DSL would follow the reporting procedures on the respective website; however, in the case of a sexting incident involving a child/person where it may be felt that they may be at risk of abuse then the DSL will report the incident directly to CEOP www.ceop.police.uk/ceop-reporting, so that law enforcement can make an assessment, expedite the case with the relevant provider and ensure that appropriate action is taken to safeguard the child.

Step 3 - What to do and not do with the imagery

If the imagery has been shared across a personal mobile device:

Always...

- Confiscate and secure the device(s). Close down or switch the device off as soon as possible. This may prevent anyone removing evidence 'remotely'.

Never...

- View the imagery unless there is a clear reason to do so or view it without an additional adult present (this additional person does not need to view the imagery and certainly should not do so if they are of a different gender to the person whose image has been shared). The viewing of any imagery should only be done to establish that there has been an incident which requires further action.
- Send, share or save the imagery anywhere.
- Allow students to do any of the above.

If the imagery has been shared across a school network, a website or a social network:

Always...

- Block the network to all users and isolate the imagery

Never...

- Send or print the imagery
- Move the material from one place to another
- View the imagery outside of the protocols in the Schools' Safeguarding and Child Protection policies and procedures.

Step 4 - Who should deal with the incident

Whoever the initial disclosure is made to she/he must act in accordance with the Schools' Child Protection and Safeguarding policy, ensuring that the Designated Safeguarding Lead (or their Deputy) are involved in dealing with the incident.

The Designated Safeguarding Lead should always record the incident. The Head teacher should also always be informed- usually by the DSL. There may be instances where the image needs to be viewed and this should be done in accordance with protocols.

Step 5 - Deciding on a response

The response should be pupil/student focused and 'solution' focused.

There may be many reasons why a pupil/student has engaged in sexting – it may be a romantic/sexual exploration scenario, or it may be due to coercion.

It is important to remember that it won't always be appropriate to inform the police; this will depend on the nature of the incident (see Addendum 1 for definitions). However, as a school it is important that incidents are consistently recorded. It may also be necessary to assist the young person in removing the imagery from a website or elsewhere.

If sexual imagery of a young person is found:

- Act in accordance with the Child Protection and Safeguarding policy i.e., inform the Designated Safeguarding Lead
- Store the device securely
- The Designated Safeguarding Lead will carry out a risk assessment in relation to the young person (Use Addendums 2 and 3 for support)
- The Designated Safeguarding Lead will make a referral if needed, e.g., Children's Social Care if the nature of the incident is high-risk
- The Designated Safeguarding Lead will contact the police (if appropriate).
- The Designated Safeguarding Lead will put the necessary safeguards in place for the pupil/student, e.g., they may need counselling support or immediate protection
- The Designated Safeguarding Lead will inform parents and/or guardians about the incident and how it is being managed.

Step 6 - Containment and Prevention

The young persons involved in 'sexting' may be left feeling sensitive and vulnerable for some time. They will require monitoring by and support from their Pastoral teams.

Where cases of 'sexting' become widespread or there is thought to be the possibility of contagion then the School will reinforce the need for safer 'online' behaviour using a variety of resources (see Addendum 4).

Other staff may need to be informed of incidents and should be prepared to act if the issue is continued or referred to by other pupils/students. The School, its students and parents should be on high alert, challenging behaviour and ensuring that the victim is well cared for and protected. The pupil's/students' parents should usually be told what has happened so that they can keep a watchful eye over the young person especially when they are online at home.

Creating a supportive environment for pupils/students in relation to the incident is very important. Preventative educational programmes on sexting can be found on CEOP's advice-giving website www.thinkunknow.co.uk and the South West Grid for learning have developed advice for young people at www.swgfl.org.uk/sextinghelp.

Step 7 - Review outcomes and procedures with the aim of preventing future incidents

The frequency or severity of such incidents may be such that the school will need to review its approach. Where this is the case Loughborough Schools Foundation will adopt the 'PIES' model where:

P= Policies and Practices - ensuring that key policies e.g., Child Protection and Safeguarding, Anti- Bullying, Authorised User, Searching and Confiscation Policies are still relevant and can meet emerging issues.

I= Infrastructure - ensuring that the School's infrastructure and technologies are robust enough to meet new challenges and that the DSL's are well supported and well resourced.

E= Education - ensuring that both adults and young persons are alerted to the issues such as safety mechanisms, support mechanisms and the legal implications of such behaviour.

S = Standards - the ISI framework for Behaviour and Welfare provides a good benchmark to test the strength of the school's approach.

'SEXTING' - ADDENDUM 1

The Legal Position

It is important to be aware that young people involved in sharing sexual videos and pictures may be committing a criminal offence. Specifically, crimes involving indecent photographs (including pseudo images) of a person under 18 years of age fall under Section 1 of the Protection of Children Act 1978 (England and Wales) as amended by the Sexual Offences Act 2003 (England and Wales). Under this legislation it is a crime to:

- take an indecent photograph or allow an indecent photograph to be taken;
- make or copy an indecent photograph (this includes downloading or opening an image that has been sent via email);
- distribute or show such an image;
- possess with the intention of distributing images;
- advertise; and
- possess such images

While any decision to charge individuals for such offences is a matter for the Crown Prosecution Service, it is unlikely to be considered in the public interest to prosecute children (Outcome 21). However, children need to be aware that they may be breaking the law. Although unlikely to be prosecuted, young people who send or possess images may be visited by police and on some occasions media equipment could be removed. This is more likely if they have distributed images.

The decision to criminalise young people for sending these kinds of images is a little unclear and may depend on local strategies. However, the current Association of Chief Police Officers (ACPO) position is that:

'ACPO does not support the prosecution or criminalisation of children for taking indecent images of themselves and sharing them. Being prosecuted through the criminal justice system is likely to be upsetting and distressing for children especially if they are convicted and punished. The label of sex offender that would be applied to a child or young person convicted of such offences is regrettable, unjust and clearly detrimental to their future health and wellbeing.'

However, there are cases in which children and young people have been convicted and sent to prison. The important thing to remember is that whilst, as a school, we will want to consider the implications of reporting an incident over to the police, it is not our responsibility to make decisions about the seriousness of the matter; that responsibility lies with the Police and the CPS hence the requirement for the school to refer.

The National Police Chiefs Council (NPCC) has made it clear that incidents involving youth produced sexual imagery should primarily be treated as safeguarding issues.

In summary sexting is classed as illegal as it constitutes sharing and/or possessing an indecent image of a child.

'SEXTING' - ADDENDUM 2

Different Levels of Sexting

The following is adapted from Wolak and Finkelhor '*Sexting: A Typology*'. March 2011

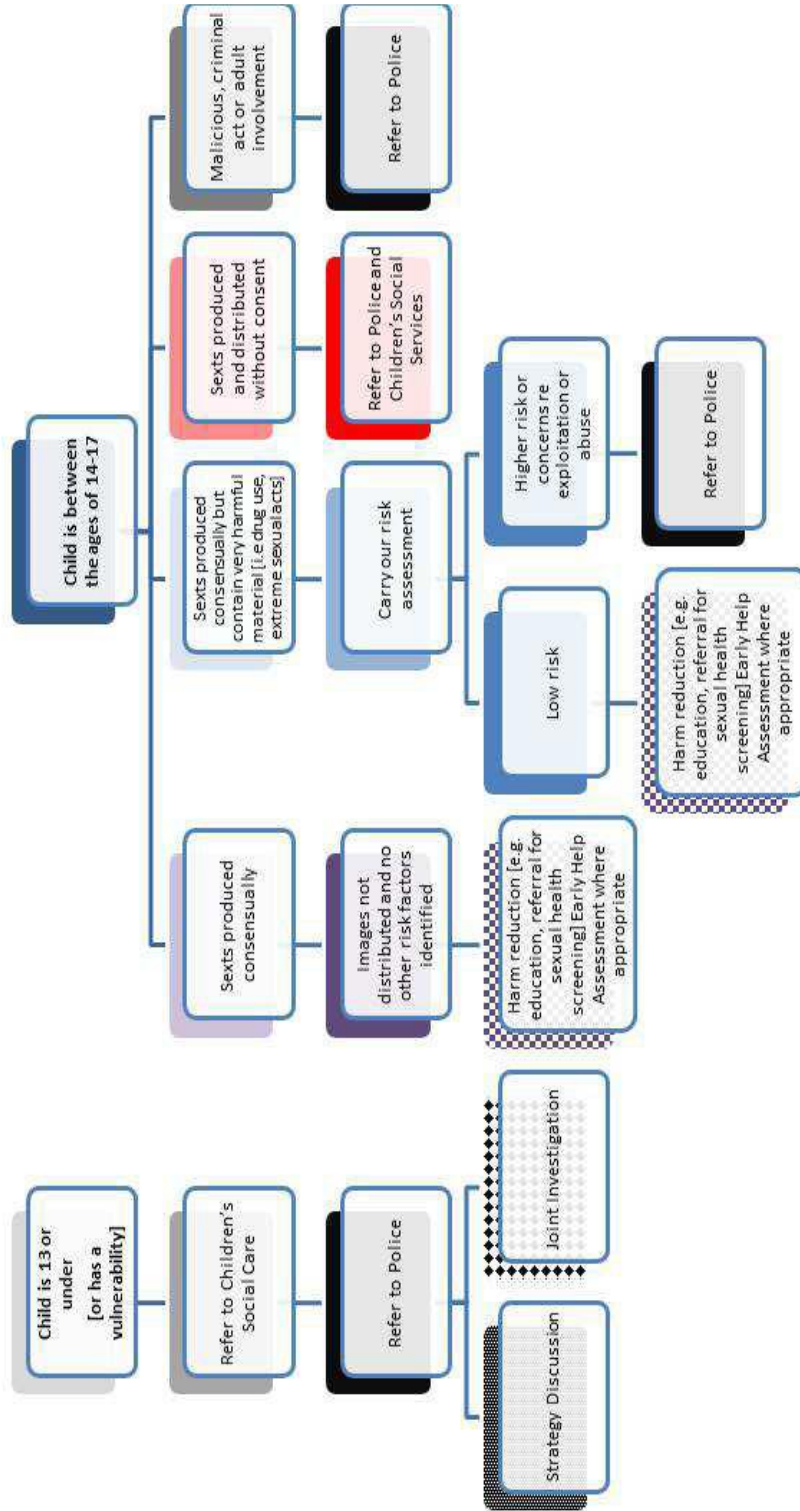
<p>Aggravated incidents involving criminal or abusive elements beyond the creation, sending or possession of youth-produced sexual images</p>	<p>Adult offenders develop relationships with and seduce underage teenagers, in criminal sex offences even without the added element of youth-produced images. Victims may be family friends, relatives, community members or contacted via the Internet. The youth produced sexual images generally, but not always, are solicited by the adult offenders.</p> <p>Youth Only: Intent to Harm cases that:</p> <ul style="list-style-type: none">• arise from interpersonal conflict such as break-ups and fights among friends• involve criminal or abusive conduct such as blackmail, threats or deception• involve criminal sexual abuse or exploitation by juvenile offenders. <p>Youth Only: Reckless Misuse no intent to harm but images are taken or sent without the knowing or willing participation of the young person who is pictured. In these cases, pictures are taken or sent thoughtlessly or recklessly, and a victim may have been harmed as a result, but the culpability appears somewhat less than in the malicious episodes.</p>
<p>Experimental incidents involve the creation and sending of youth produced sexual images, with no adult involvement, no apparent intent to harm or reckless misuse</p>	<p>Romantic episodes in which young people in ongoing relationships make images for themselves or each other, and images were not intended to be distributed beyond the pair.</p> <p>Sexual Attention Seeking in which images are made and sent between or among young people who were not known to be romantic partners, or where one youngster takes pictures and sends them to many others or posts them online, presumably to draw sexual attention.</p> <p>Other: cases that do not appear to have aggravating elements, like adult involvement, malicious motives or reckless misuse, but also do not fit into the Romantic or Attention Seeking sub-types. These involve either young people who take pictures of themselves for themselves (no evidence of any sending or sharing or intent to do so) or pre-adolescent children (age 9 or younger) who did not appear to have sexual motives.</p>

'SEXTING' – ADDENDUM 3

Sexting in Schools

Sexting Response Process for Professionals

This flowchart [adapted from 'Medway Local Authority Response Process for Professionals] and will help the Designated Safeguarding Lead to make a decision about the next steps.



'SEXTING' - ADDENDUM 4

Education and Training

Sexting incidents often relate to self-generated images on personally owned devices, generally outside of school, and it is recommended that schools will adopt preventative education strategies for its young people and put in place appropriate staff training to identify and manage incidents. The following are resources currently available:

- Check the CEOP resources at www.thinkuknow.co.uk . There is a film called *Exposed* and accompanying lesson plans for 11–16-year-olds.
- The children's charity Childnet www.childnet-int.org have developed a drama for secondary school-aged children on the issue of sexting.
- The Southwest Grid for Learning have developed a resource for young people: 'So you got naked online' www.swgfl.org.uk/sextinghelp which supports them in knowing what to do if things have gone wrong online

(Adapted from;

"Sexting in School and Colleges: Responding to incidents and safeguarding young people"
UK Council for Child Internet Safety (UKCCIS), 2016 and

"'Sexting' in schools: advice and support around self-generated images What to do and how to handle it" www.parentsprotect.co.uk)

APPENDIX 9

PROCEDURE TO FOLLOW IN CASES OF ALLEGATIONS OF CHILD-ON-CHILD ABUSE AND HOW THEY WILL BE RECORDED, INVESTIGATED AND DEALT WITH

General

It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting child on child abuse. Nor should a victim ever be made to feel ashamed for making a report. It is important to explain to the 'victim' that the law is in place to protect children and not criminalise them and should be explained to them in such a way that it avoids alarming or distressing them.

Leaders should ensure the child's wishes and feelings are considered when determining what action to take and what services to provide. The systems in place should be well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

All staff should be trained to manage a report. Local policies (and training) will dictate exactly how reports should be managed. However, effective safeguarding practice includes:

- if possible, managing reports with two members of staff present, (preferably one of them being the Designated Safeguarding Lead or a Deputy);
- where the report includes an online element, being aware of searching screening and confiscation advice (for schools). **The key consideration is for staff not to view or forward illegal images of a child.** The advice provides more details on what to do when viewing an image is unavoidable. In some cases, it may be more appropriate to confiscate any devices to preserve any evidence and hand them to the police for inspection;
- not promising confidentiality at this initial stage as it is very likely a concern will have to be shared further (for example, with the Designated Safeguarding Lead or Children's Social Care) to discuss next steps. Staff should only share the report with those people who are necessary to progress it. It is important that the victim understands what the next steps will be and who the report will be passed to;
- recognising that a child is likely to disclose to someone they trust. It is important that the person to whom the child discloses recognises that the child has placed them in a position of trust. They should be supportive and respectful of the child;
- recognising that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory and so children may not be able to recall all details or timeline of abuse;
- keeping in mind that certain children may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity and/or sexual orientation;
- listening carefully to the child, reflecting, using the child's language, being non-judgmental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions – where, when, what, etc. It is important to note that whilst leading questions should be avoided, staff can ask children if they have been harmed and what the nature of that harm was;

- considering the best way to make a record of the report. Best practice is to wait until the end of the report and immediately write up a thorough summary. Allowing you to devote your full attention to the child and to listen to what they are saying. It may be appropriate to make notes during the report (especially if a second member of staff is present). However, if making notes, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking. Either way, **it is essential a written record is made;**
- only recording the facts as the child presents them. The notes should not reflect the opinion of the note taker. Notes of such reports could become part of a statutory assessment by children's social care and/or part of a criminal investigation; and
- informing the Designated Safeguarding Lead (or Deputy), as soon as practically possible, if the Designated Safeguarding Lead (or Deputy) is not involved in the initial report.