



**Hurst Lodge School
Yateley and Woodlands Campus'
Firgrove Road
Yateley Hall
Yateley
GU46 6HJ**

**Safeguarding and Child Protection Policy
Safeguarding Addendum**

This policy is applicable to all pupils at Hurst Lodge School

**This policy is available to parents and on request as hard copy from the
office.**

2024/2025

**This is live document and will be updated when necessary or as per government guideline,
but at least annually.**

Contents

Section		Page
	Safeguarding Contact Details	3
1	Introduction	4
2	Concerns about a child	8
2.1 / 2.2	Definition of abuse	8
2.3	Types of abuse	8
2.4	Child-on-child/Child-on-child abuse	9
2.5	Signs of abuse	10
2.6	Specific safeguarding issues	11
2.7	Special Needs and Disability	15
3	Response to Allegations of Abuse	16
3.11	Whistleblowing procedures	16
4	Staff Code of Conduct	17
5	Inappropriate advances	18
6	Confidentiality	18
7	Hearing a disclosure of child abuse	18
8	Safeguarding Advisor	20
9	Safer Recruitment	20
10	pwe(including Induction of new staff)	22
11	Early Years Foundation Stage (EYFS)	23
11.3	Use of telephones and cameras	24
11.5	EYFS procedures	25
12	Preventing Radicalisation	26
12.1	Visiting Speakers	27
12.2	Useful Contacts for Child Protection	27
Appendix 1	Safeguarding report form	29
Appendix 2	Child protection referral log	31
Appendix 3	Child protection flowchart	32
Appendix 4	Role of the Designated Safeguarding Lead	33
Appendix 5	Role of the Deputy Designated Safeguarding Leads	35

Special note:

The use of mobile phones by parents on site is prohibited for safeguarding reasons. Dispensation for school events may be granted by the Principal on a case-by case basis.

Safeguarding Contact Information

Our Executive Designated Safeguarding Lead is Simmi Kalsi skalsi@hurstlodeschool.co.uk 01252 227 002

Our Designated Safeguarding Lead (DSL Yateley Campus) Adam Nosworthy anosworthy@hurstlodeschool.co.uk

Our Deputy Designated Safeguarding Lead (DDSL) Sandra Allen sallen@hurstlodeschool.co.uk

Our Designated Safeguarding Lead (DSL Woodlands Campus) is Linda Hudson lhudson@hurstlodeschool.co.uk

Our Deputy Designated Safeguarding Lead (DDSL Woodlands Campus) is Clare Smith csmith@hurstlodeschool.co.uk

Designated Safeguarding Officers:

Laura Orme lorme@hurstlodeschool.co.uk (SENCO) with the support of the SEN Team under direction of the DSL.

Tanya Piek tpiek@hurstlodeschool.co.uk (Head of Behaviour)

Hurst Lodge is a proprietorial school with a board of advisors. The director (Vicky Smit) has appointed Claire Robinson as the advisory lead for Safeguarding. Mrs Robinson is not employed by the school but acts as an independent advisor and has many years of experience as she is the Head of an independent all through school. The school has a continuing commitment from the proprietor and all staff to ensure the safety and welfare of children is embedded in all of the school's processes and procedures and reflective practices and is consequently enshrined in the school's ethos.

The safeguarding advisor meets regularly with the Principal and the DSL to ensure that a programme of relevant inset training is undertaken. The safeguarding advisor also has insight over the Single Central Register and reviews the school's child protection policies annually including an update and review of effectiveness of procedure and their implementation. The school will work with the virtual Headteachers of the placing boroughs to promote the education of children who have a social worker. The SENCOs and the DSL will liaise with the virtual heads to ensure that students are supported both academically and emotionally.

Our Safeguarding Advisor is Claire Robinson crobinson@hurstlodeschool.co.uk

This policy is written in accordance with the statutory guidance from the Department for Education (DfE) 'Keeping Children Safe in Education, 2024 (KCSIE), and can be referred to for further information. The school also has regard to:

- Non-statutory interim supplements to KCSIE; Corona Virus (Covid-19); safeguarding in schools, colleges, and other providers (2021 subject to DfE updates) and safeguarding and remote education during Corona virus (Covid-19).
- Working Together to Safeguard Children (Feb 2024) which is the national guide to interagency working.
- KCSIE incorporates the additional statutory guidance, Disqualification under the Child Care Act 2006 (Sept 2018)
- KCSIE also refers to the non-statutory advice for practitioners: what to do if you are worried a child is being abused (March 2015)
- KCSIE refers to 'When to call the police' non-statutory guidance from the National Police Chiefs' Council
- Working Together to Safeguard Children (Feb 2024)
- WT to Safeguard Children refers to the non-statutory but important advice: 'Information sharing (2018)'
- Prevent duty guidance: for England and Wales (Dec 2023) (Prevent). Prevent is supplemented by non-statutory advice and briefing note: 'The prevent duty: departmental advice for schools and childminders (Dec 2023) and 'The use of social media for online radicalisation (Jan 2024)'

The above persons should ensure that all staff in the school read at least Part 1 and Annex A of the KCSIE guidance and that mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in Part 1 of KCSIE Guidance September 2024. Both the DSL and the deputy attend refresher courses as required, but at least annually to ensure they remain up to date with best practice and to keep up with developments relevant to their role.

Child protection and social care services

The **Multi-Agency Safeguarding Hubs (MASH)** respond to initial enquires about children, young people and adults. The locality where the individual concerned resides will determine which local authority will handle an enquiry, referrals or case. Hurst Lodge School enrolls pupils from a range of localities, and liaises with several safeguarding hubs, including:

Hampshire:	0300 5551384
Surrey:	0300 470 9100
Bracknell Forest:	01344 352005
Royal Borough of Windsor & Maidenhead:	01628 683150
Slough:	01753 875362
Wokingham:	0118 908 8002
Buckinghamshire:	01296 383962
Hounslow:	0208 583 6800 (When call press option 2 and then 3)

To confirm the relevant MASH to contact, enter the pupil's home postcode into this search facility:

<https://www.gov.uk/find-local-council>

The **Local Area Designated Officer (LADO)**, for cases involving allegations made against a member of staff, can be contacted on 01962 876364 or child.protection@hants.gov.uk.

Hampshire Safeguarding Children Partnership (HSCP) comprises of representatives from the County Council, the local NHS Clinical Commissioning Groups and Hampshire Police. It co-ordinates how children and young people in the county are safeguarded and protected from harm, and provides information, advice, guidance and training to those who work with them. The safeguarding partner will select the relevant agencies whose involvement they require. [Both systems feed into the new national child safeguarding practice review panel.](#) www.hampshirescp.org.uk 01962 876 876355 / hscp@hants.gov.uk
The school will follow the procedures set by Hampshire and liaise and engage as required.

For emergency cases, where a child is thought to be at immediate risk of harm, the police are contacted on **999**.

Where there is a suspicion or disclosure that a child has been subjected to Female Genital Mutilation (FGM), there is duty upon teachers to report to the police on **101**.

Other useful contacts

NSPCC helpline:	0808 800 5000
Prevent Duty helpline:	020 7340 7264
Disclosure and Barring Service:	0300 0200 190 customerservices@db.s.gov.uk
Non-Emergency Police:	101
DFE dedicated helpline and mailbox for non-emergency advice for staff and Advisors:	
0207 340 7264 and counter.extremism@education.gov.uk	
NSPCC whistleblowing helpline:	0808 800 5000. help@nspcc.org.uk
Ofsted whistleblowing helpline:	0300 123 3155

1 **Introduction**

- 1.1** Safeguarding is everyone's responsibility, and anyone can make a referral to children's social care. The Safeguarding Advisor and the staff are committed to the physical, emotional, and spiritual well-being of all the children in their care and will always act in the best interest of the child to enable all children to have the best outcomes. Both children and adults need a safe and secure environment in which to live and work. The policy applies to ALL staff and volunteers, both within and outside normal school hours and applies to the whole school. The safety and welfare of pupils is our highest priority. Our business is to know everyone as an individual and to provide a secure and caring environment so that every pupil can learn in safety. This policy is applicable to the whole School community. All members of staff have a duty to safeguard our pupils' welfare. They must therefore familiarise themselves with this policy and always comply with it. Safeguarding and promoting the welfare of children is everyone's responsibility. Staff are reminded regularly of the need to listen to children's concerns and act on them appropriately. This includes a duty both to children in need and to children at risk of harm. All staff should read at least Part 1 of KCSIE (Enforced September 2024). All School staff should be aware that child protection incidents can happen at any time and anywhere and are required to be alert to any possible concerns. All staff will receive a copy of KCSIE Appendix A and will be required to sign that they have read and understand their responsibilities. The School is committed to implementing good practice and the Child Protection and Safeguarding Policy is in accordance with inter-agency procedures, agreed with Hampshire County Council. Section 10 of the Children's Act 2004 requires the local authority to make arrangements to promote co-operation between itself and its relevant partners and other organisations who are engaged in activities relating to children. The school is committed to acting in the best interest of the child,
- 1.2** The School is committed to implementing good practice and the Child Protection and Safeguarding Policy is in accordance with inter-agency procedures, agreed with Hampshire County Council. Section 10 of the Children's Act 2006 requires the local authority to make arrangements to promote co-operation between itself and its relevant partners and other organisations who are engaged in activities relating to children. Furthermore, in all matters relating to child protection the School will follow the procedures laid down by our own policies (listed below) together with DfE guidance contained in 'Working Together to Safeguard Children' (2024) and 'Keeping Children Safe in Education' (2024): <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>
- 1.3** Safeguarding and promoting the welfare of children is defined as: protecting children from maltreatment; preventing impairments of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe effective care; and taking action to enable all children to have the best outcomes. The school takes responsibility for creating a culture of safety, equality, protection and a culture of vigilance. The school has a culture of listening that enable issues about safeguarding child welfare to be addressed.
- 1.35** At Hurst Lodge we are committed to safeguarding children and young people, and we expect everyone who works in our school to share this commitment. Adults in our school take all welfare concerns seriously and encourage children and young people to talk to us about anything that worries them. We will always act in the best interest of the child.
- 1.4** The term 'children' includes everyone under the age of 18.
- 1.5** To create this safe environment, the school has certain statutory duties and responsibilities set out within the following legislation and guidance:
- Keeping Children Safe in Education (KCSIE) (DfE, 2024)
<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>
 - Working Together to Safeguard Children (DfE, 2024). Includes advice on Information Sharing
<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>
 - Disqualification under the Childcare Act 2006 (DfE, 2018)
<https://www.gov.uk/government/publications/disqualification-under-the-childcare-act-2006>

- What to do if you're worried a child is being abused (HM Govt, 2015)
<https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2>
- Prevent Duty Guidance (HM Govt, 2024)
<https://www.gov.uk/government/publications/prevent-duty-guidance>
- The Prevent Duty: Departmental advice for schools and Childminders (DfE, 2024)
<https://www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty>
- The use of social media for online radicalisation (Home Office & DfE, 2015)
<https://www.gov.uk/government/publications/the-use-of-social-media-for-online-radicalisation>
- The Education Act 2011
<http://www.legislation.gov.uk/ukpga/2011/21/contents/enacted>
- Statutory DfE guidance for schools
<https://www.gov.uk/government/collections/statutory-guidance-schools>
- Children's Act 2006
<http://www.legislation.gov.uk/ukpga/2004/31/contents>
- Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism (HM Govt, 2023)
<https://www.gov.uk/government/publications/channel-guidance>
- Female Genital Mutilation Act 2003, Section 5B
<https://www.legislation.gov.uk/ukpga/2003/31/section/5B>
- Multi-agency statutory guidance on female genital mutilation (2016)
<https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation>
- Breast ironing
<https://www.safeguardingschools.co.uk/breast-ironing/>
- **Sharing nudes and semi-nudes: advice for education settings working with children and young people**
- Child Sexual Exploitation; definition and guide for practitioners (DfE, 2017)
<https://www.gov.uk/government/publications/child-sexual-exploitation-definition-and-guide-for-practitioners>
- Teacher's misconduct: the prohibition of teachers (DfE, 2015)
<https://www.gov.uk/government/publications/teacher-misconduct-the-prohibition-of-teachers--3>
- Mental Health and behavior in schools (March 2015)
<https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2>
<https://www.gov.uk/government/publications/counselling-in-schools>

1.6 Everyone who comes into contact with children and their families has a role to play in safeguarding children. School staff are particularly important as they are able to identify concerns early on and provide help for children, to prevent concerns from escalating. If, at any point, there is a risk of immediate serious harm to a child a referral will be made to children's social care services immediately. The school will also work closely with the police, health services and other services to promote the welfare of children and protect them from harm. Anybody can make a referral. * If a referral is made, the DSL (Designated Safeguarding Lead) and Safeguarding Advisor should be informed.

** Working together to Safeguard Children 2024*

**What to do if you are worried a child is being abused 2015 – Advice for practitioners*

**Keeping Children Safe in Education (2024)*

1.7 The School has trained designated persons to advise the Principal (Vicky Smit) and staff and to offer advice and information.

The DSL (Simmi Kalsi) is a member of the senior leadership team and is responsible, where necessary, for maintaining clear communications with children's social care services (contact details are given on page 3 of this document), Ofsted

and DfE, on all matters relating to child protection. The DSL has a specific job description for this role, a summary of which can be seen in Appendix 4. The DSL (Simmi Kalsi), along with the Principal (Vicky Smit), has Level 3 training as well as inter-agency training provided by the Local Authority. In addition, the school will contribute to inter-agency working in line with the 'Working Together to Safeguard Children' guidance, through effective implementation of the Safeguarding Policy and procedures, and with good co-operation with local agencies. The school will provide Level 2 advanced training for other colleagues as need requires and the opportunity for retraining on a two-year cycle is in place. In addition, the DSL will have training in the Local Safeguarding Children Partnership (LSCP) approach to Prevent Duties.

- 1.7.1** The Teachers Standards 2021 states that teachers, including directors, should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.
- 1.7.2** The School has an Advisor with specific responsibility for overseeing child safeguarding matters. At present, this role is fulfilled by Claire Robinson. The Safeguarding Advisor and the DSL will undertake an annual review of the school's safeguarding and child protection policies and procedures and of the efficiency with which they have been discharged. The designated director will receive training updates on a 2 to 3-year cycle, or if there are significant changes to national safeguarding policies and requirements.
- 1.7.3** The Safeguarding Advisor will ensure that the school contributes to inter-agency working in line with 'Working Together to Safeguard Children' guidance, through effective implementation of the Safeguarding Policy and procedures, and good co-operation with local agencies. An updated copy can be found on the school website, alternatively a hard copy is available on request to the school office.
- 1.7.4** If there are any disagreements between the safeguarding team the default position must be to discuss the concern in confidence with the local child social care services or the LADO.
- 1.7.5** Safeguarding of children is the responsibility of every member of staff and volunteers. Although referrals are managed by the DSL it is the legal responsibility for a member of staff to report an issue to the LADO if they are unhappy with the school process and outcomes. In addition to working with the DSL, staff members may be asked to support social workers to take decisions about individual children.
- 1.8** The School accepts responsibility for establishing procedures for responding to allegations of abuse and for providing guidelines for good practice, which will be updated when appropriate.
- 1.9** The School ensures that all staff that have substantial access to children are checked using procedures recommended by the Independent Schools Council and provided by the Disclosure and Barring Service (DBS), checks and safer workforce references, as detailed in our Recruitment Policy.
Disclosure and Barring Service (DBS) helpline: 0300 0200 190 customerservices@dbs.gov.uk
- 1.10** The Safeguarding Advisor undertakes to monitor the use of the procedures and guidelines and identify and remedy deficiencies or weaknesses in Child Protection and Safeguarding arrangements without delay. The School recognises the need for appropriate training and access to advice on Safeguarding for all staff. Level 1 Basic Training is part of the induction process for temporary staff as well as volunteers.
- 1.11** The school is committed to training the DSL, DSOs and others, with Level 2 Child Protection training and in Child Protection and Inter-Agency Work, every two years. The DSL, DDSL, DSO and the Principal are all trained to the same level. All other staff will receive appropriate basic awareness training (CP Level 1) at least every three years (but will be provided annually), prevent awareness training and online safety training, and the DSL and the Safeguarding Advisor Level 3 training every two years. Some senior members of staff will attend Group 2 training annually. All training will be supplemented with informal updates both through The National College, internal training and staff meetings. Induction for all new staff includes appropriate Child Protection training, identity of the DSL and Deputies, staff code of conduct include the whistle blowing procedure and the acceptable use of technology policy, the pupil behaviour policy, the school response to children who go missing in education (Children missing education policy), online safety, Part 1 and Annex A of KCSIE. They will be invited to attend basic training and will be informed of the school's safeguarding arrangements. All staff (both teaching and ancillary) will be issued with the policy and any further updates, this will happen initially as part of the induction process. All staff must read at least part 1 and Annex A of KCSIE. This applies not only to new staff but those already in post each time part 1 and Annex A of KCSIE is updated. All staff are asked to sign

to confirm part 1 has been read. Every time KCSIE is updated, the school will dedicate part of staff meeting to ensure that staff understand key information.

- 1.11.1** Staff members are aware of the systems within our school through training and the induction process. All staff receive initial induction training, this will include the Child Protection Policy, the Behaviour Policy, the Staff Code of conduct, the safeguarding response to children who go missing from education, the role of the DSL (including the identities of the DSL and DDSL). This includes the staff code of conduct and the role of the DSL. All staff receive regular safeguarding and child protection updates as required at least annually, to provide regular safeguarding skills and knowledge to safeguard children effectively. Safer recruitment training is available to all relevant staff who are involved in the recruitment process.
- 1.12** The School believes that the policy statement is necessary in the interests of the protection of both pupils and staff. The School has a protocol for such events.
- 1.13** All school staff are aware that when pupils are engaged in school supported activities outside the immediate school grounds, there is a need to ensure that all possible precautions are taken to safeguard their welfare. This is particularly important where overnight accommodation is included within the activity. In such cases the school would request evidence of external provider's Child Safeguarding Policy including the checking of their staff using the DBS. If the school is unhappy with any aspect of such external provision, the school would look to use an alternative external provider.
- 1.14** The school pays particular attention to safeguarding arrangements where children are engaged in close one-to-one teaching, such as specialist music and sports teaching.
- 1.15** All children have a right to achieve their potential and to be protected from all forms of harm, including abuse and neglect. The school recognises that there are particular groups within it who may be more susceptible to bullying or abuse, because of race, disability, gender, religion, sexual orientation, Special Educational Needs and/or English as an Additional Language. Even where safeguarding is not considered to be an issue, the school will draw on assistance from external services to support the pupil who is experiencing bullying or abuse, or to tackle any underlying issue which has contributed to the act of bullying or abuse.
- 1.16** All children have a right to feel safe within the school therefore through PSHE lessons and through the ICT curriculum pupils will be informed of safeguarding issues as well as on-line threats and risks. It is the responsibility of the staff to help pupils adjust their behaviour in order to reduce risk. The school will also work with parents to alert them to the dangers of internet risk. The school has an E-safety policy; an Anti-Cyber Bullying policy and all parents; pupils and staff are required to sign a computer use acceptance form before using school electronic equipment.

The school will help children to adjust their behaviours in order to reduce risk and build resilience, including radicalisation, with particular attention to the safe use of the internet and social media. The latest resources can be found at

UK safer Internet Centre www.saferinternet.org.uk

CEOP's www.thinkuknow.co.uk

www.safeynetkids.org.uk/personal-safety/staying-safe-online

www.nspcc.org.uk/preventing-abuse/keeping-children-safe/online-safety

2 Concerns about a Child / Management of Safeguarding

Whilst responsibility for referrals usually rest with the DSL, staff are reminded that anyone can make a referral if necessary. The job descriptions of both the DSL and Deputy DSL can be found in Appendix 4 and 5 of this document. The role of DSL has been given to Simmi Kalsi as a senior member of staff with independence from the school's owners. The DDSL are Adam Nosworthy and Sandra Allen. The DSL and DDSL have access to outside agencies for advice and support. The school will refer concerns about children in need and/or at risk in accordance with locally agreed inter agency procedures.

The school recognises the differences between children facing harm and those who are in need of additional support from one or more agencies. The former should be referred to children's social care services immediately and the latter should lead to inter agency assessment using locally agreed processes, including use of the 'Early Help Assessment' and 'Team around the Child' (TAC) approaches. The best interests of the child shall prevail. Once Early Help has been identified the school will form a team around the child with input from the MASH team to support the child and its' family.

Staff members are advised to maintain the attitude of 'it could happen here' where safeguarding is concerned. The school provides many opportunities to listen to children and implement Early Help. All children have form teachers, there is a worry box which is monitored, staff have an open door policy, students are advised that they may go to any member of staff if they are worried and the school fosters a culture of open discussion. Staff members will always act in the interest of the child. Knowing what to look for is vital for the early identification of abuse and neglect. If staff members are unsure they will speak to the DSL and make a written note of the conversation. A child going missing from school is a potential indicator of abuse or neglect.

It is important that children receive the right help at the right time to address risks and prevent issues escalating. The school will act on and refer early signs of abuse and neglect and radicalisation and liaise with the appropriate partnership. Ineffective action or poor practice can have serious results. Poor practice includes failing to act on and refer the early signs of abuse and neglect, poor record keeping, failing to listen to the views of the child, failing to re-assess concerns when situations do not improve, sharing information too slowly and a lack of challenge to those who appear not to taking action.

In the absence of the DSL, the DDSL or one of the DSO's should be approached.

Children going missing from education are given prominence in KCSIE 2024.

Definitions of Abuse

- 2.1** An abused child is a boy or girl who has suffered from (or is believed to be potentially at risk of suffering from) physical injury, neglect, emotional abuse or sexual abuse.
- 2.2** Abuse and Neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting; by those known to them or, more rarely, by a stranger. They may be abused by an adult or adults or another child or children.

The school recognises the particular vulnerabilities of those with SEND.

2.3 Types of Abuse and Neglect

Abuse and neglect are forms of maltreatment of a child.

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by other. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused an adult or adults or another child or children.

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

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only in so far as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

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

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- protect a child from physical and emotional harm or danger;
- ensure adequate supervision (including the use of inadequate caregivers);
- or ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

2.4 **Child-on-child/Child-on-Child Abuse:**

Children can abuse other children, and this can take many forms, including (but not limited to):

- **physical abuse** - such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- **sexual violence** - such as rape, assault by penetration and sexual assault;
- **sexual harassment** - such as sexual comments, remarks or jokes, which may be stand-alone or part of a broader pattern of abuse; it can occur online or in person;
- **up skirting** - which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or to cause the victim humiliation or distress. *It is now a criminal offence.*
- **sexting** (also known as youth produced sexual imagery) – the non-consensual sharing of sexual images and videos;
<https://www.gov.uk/government/publications/sexting-in-schools-and-colleges>
- **Initiation/hazing type violence and rituals**
- **Bullying** - such as cyberbullying, prejudiced based and discriminatory bullying
- **Abuse in interpersonal relationships between peers**
- **Online bullying**
- **Youth produced sexual imagery**
- **Online abuse** - children can also abuse their peers online this can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

All staff should be clear on the school's policy and its procedures with regard to child-on-child abuse. They have an important role to play in preventing it and responding where they believe a child may be at risk. The school recognises the gendered nature of child-on-child abuse (i.e. that it is more likely that girls will be victims and boys perpetrators), but is also aware that such abuse can be perpetrated and suffered by either sex. The school has a zero tolerance approach to abuse and it should never be passed off as banter as lead to lead to a culture of unacceptable behaviours and an unsafe environment for children. At Hurst Lodge we recognise that 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.

All child-on-child abuse is unacceptable and will be taken seriously. The needs of the victim are paramount (including being aware of the vulnerability of pupils with SEND), and all staff will act in the best interests of the child.

In the event of disclosures of abuse, the school will make a proportionate response, according to:

- the nature of the alleged incident(s), including: whether a crime may have been committed;
- the ages and developmental stages of the children involved (and any power imbalances therein);
- if the alleged incident is a one-off or a sustained pattern of abuse;
- any ongoing risks to the victim, other children, and staff

The school may seek advice from the statutory agencies on cases that are more appropriately managed internally. The school will refer to external services (e.g. Early Help services and / or social care services) if the referral threshold (set by the Local Safeguarding Children Partnership) is met. If a child is at an immediate risk of harm, the school will make an instant referral to the child protection services and/or the police. If it is necessary for a pupil to be interviewed by the police in relation to an allegation of abuse, the school will ensure that, subject to advice, parents are informed as soon as possible and that the pupils involved are supported during the interview, and throughout the investigation, by an appropriate adult. When referring to children's social care services, the schools will generally inform parents and guardians, unless there are compelling reasons not to (for example, if informing them is going to put the child at additional risk).

A full account of the incident(s) will be taken and then guidance will be sort from the appropriate duty team as to how the investigation should proceed. All parties will be kept informed.

All children involved in child-on-child abuse, whether victim or perpetrator, will be treated as being at risk. A pupil against whom an allegation of abuse has been made may be suspended from the school during the investigation.

The school will promptly make a risk and needs assessment and take swift and appropriate action to ensure the safety and welfare of pupils involved, and the wider community. The victim will be supported through the use of ELSA and through our pastoral system. The perpetrators will be helped to reintegrate through staff and mentor scaffolding. Any other child affected will also be supported through ELSA and staff scaffolding.

The risk of child-on-child abuse is minimised by (and will be dealt with in timely manner when reported):

- A comprehensive weekly PSHE programme
- Form teachers and form time
- Weekly assemblies (Covid depending)
- High level of Pastoral support including ELSA
- Focused weeks, e.g. Anti-bullying week
- Weekly Safeguarding and briefings
- Staff having lunch with pupils
- Staff supervision during break
- Encouraging pupils to share any concerns with staff and Safeguarding Team
- Having an open-door policy
- Clear Behaviour policy
- Regular review of record keeping and analysis of sexual harassment and sexual violence including online to identify patterns and intervene early to prevent abuse
- A behavioural approach, including sanctions where appropriate, to reinforce a culture where sexual harassment and online sexual abuse and bullying are not tolerated.
- Working closely with safeguarding partners so that students are aware of the range of support available to victim and those who perpetrate harmful sexual behaviour.

Children are taught that they may report abuse to any member of staff with whom they feel comfortable. They taught that their concerns will be treated seriously and will be investigated and acted upon. The children are made aware that they will be

supported to deal with the investigation, to understand the need for an investigation, and that the school will aid them to find their voice.

A bullying incident will be treated as a child protection concern if there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such abuse warrants a response under the school's child protection policy and procedures, rather than under the behaviour policy.

How the school deals with child-on-child abuse;

- Social stories
- PSHE
- ELSA
- Speech and Language for those with communication and interaction difficulties
- Mediation
- Peer scaffolding
- Tutor support

Records of concerns and incidents will be kept on the school's safeguarding file. Related conversations and communications (including those with parent and guardians), along with decisions, and the reasons for those decisions will also be recorded. The safeguarding team will re-assess concerns when situations do not improve, will share information quickly and challenge inaction.

The school recognises that even if there are no reported cases of child-on-child abuse such abuse may be still taking place and is simply not being reported.

Staff are reminded that they should not view or forward illegal images of a child.

<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

Child-on-Child Sexual Violence and Harassment

Sexual violence and sexual harassment can occur between two children of any age or sex. It can occur through a group of children sexually assaulting or sexually harassing a single child or a group of children. Sexual violence and sexual harassment exist on a continuum and may overlap. They can occur online and face-to-face (both physically and verbally) and are never acceptable. All staff are advised to maintain an attitude of 'it could happen here'. With all sexual violence and sexual harassment incident, advice will be sort for the MASH team. The DSL will take a leading role using their professional judgment supported by other agencies such as Children's Social Care and the police as required.

Children who are victims of sexual violence and sexual harassment, whenever it happens, will likely find the experience stressful and distressing. this will be exacerbated if the alleged perpetrator(s) attend the same school. The school is aware that safeguarding incidents and/or behaviours can be associated with factors outside the school.

Sexual violence and sexual harassment can happen outside of the school and online. All staff must respond appropriately to all reports and concerns. The school has a zero-tolerance approach to sexual violence and sexual harassment, it is never acceptable and will not be tolerated and it should never be passed off as banter. Challenging physical behaviour (potentially criminal in nature) such as grabbing bottoms, breast and genitalia, pulling down trousers, flicking bras and lifting up skirts should never be seen as normalized behaviours.

It is essential that all victims are reassured that they are being taken seriously regardless of how long it has taken them to come forward and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment nor should a victim ever be made to feel ashamed for making a report.

A child abusing another child may be a sign that they have been abused themselves or a sign of wider issues that require addressing within the school.

It is essential that victims are protected and offered appropriate support and every effort is made to ensure that education is not disrupted. It is also important that other children and adults are supported and protected as appropriate.

If the perpetrator is a member of the school body they provided with an education. Safeguarding support as appropriate and the school disciplinary sanctions may come into play.

On receipt of a report, ideally, the report will be taken two members of staff present, one of them being the DSL. Where the report includes an online element being aware of "searching, screening and confiscation" advice for schools and "UKCIS sharing nudes and semi nudes: advice for education settings working with children and young people". The key consideration is for staff not to view or forward illegal images of a child. In some cases it is appropriate to confiscate any device to preserve any evidence and hand them to the police for inspection. The person taking the report should keep in mind that certain children may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity and all sexual orientation. When taking a report listen carefully to the child, reflect back, use the child's language, be non-judgmental, be clear about boundaries and how the report will be progressed, do not ask leading questions where necessary use open questions such as where, when and what, staff may ask children if they have been harmed and what the nature of that harm was. The record maker should remain engaged with the child and where necessary write up the report immediately after the interview. The notes should not reflect the [personal opinions of the note taker.

Risk assessment - where there has been a report of sexual violence the DSL must make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment is considered on a case-by-case basis. Staff are guided towards part of the full version of KCSIE 2024.

Children with SEND are three times more likely to be abused than their peers. Any reports of abuse relating to SEND pupils will require closely liaison with the DSL and the SENCo. Additionally children who are lesbians, gay, bi or trans can be targeted by their peers. In some cases a child who is perceived to be LGBT by their peers whether they are or not, can be just as vulnerable.

Further guidance can be found in Sexual Violence and Sexual Harassment between Children in Schools and Colleges. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/719902/Sexual_violence_and_sexual_harassment_between_children_in_schools_and_colleges.pdf

2.5 Signs of Abuse (taken from the NSPCC guidance)

Under 5s

- Doesn't cry or respond to parent's presence or absence from an early age
- Reaches developmental milestones late, such as learning to speak, with no medical reason
- Significantly underweight but eats well when given food

5 – 11 year olds

- Becomes secretive and reluctant to share information
- Reluctant to go home after school
- Unable to bring friends home or reluctant for professionals to visit the family home
- Poor school attendance and punctuality, or late being picked up
- Parents show little interest in their child's performance and behaviour at school.
- Parents are dismissive and non-responsive to professional concerns.
- Is reluctant to get changed for sports etc
- Wets or soils the bed

11-16 Years old

- Drinks alcohol regularly from an early age
- Is concerned for younger siblings without explaining why.
- Becomes secretive and reluctant to share information
- Talks of running away
- Shows challenging/disruptive behaviour at school.
- Is reluctant to get changed for sports etc

2.6 Specific Safeguarding Issues

- bullying (including cyberbullying)
- child criminal exploitation (including 'county lines' drug trafficking)
- child sexual exploitation (CSE)
- child trafficking
- children missing in education
- domestic abuse
- drugs
- fabricated or induced illness
- faith abuse
- female genital mutilation (FGM)
- forced marriage
- honour based abuse, including breast ironing
- gangs and youth violence
- gender-based violence/violence against women and girls (VAWG)
- grooming
- homelessness
- mental health
- child-on-child abuse
- private fostering
- radicalization
- sexual abuse of children on children, including consensual and non-consensual sharing of nudes and semi-nudes
- sexual behavior
- Special Educational Needs and Disability
- young carers

Further information

Bullying (including cyberbullying)

Online abuse is any type of abuse that happens on the web, whether through social networks, playing online games or using mobile phones. Children and young people may experience cyberbullying, grooming, sexual abuse, sexual exploitation, or emotional abuse. Children can be at risk of online abuse from people they know, as well as from strangers. Online abuse may be part of abuse that is taking place in the real world (for example bullying or grooming). Or it may be that the abuse only happens online (for example persuading children to take part in sexual activity online). Children can feel like there is no escape from online abuse – abusers can contact them at any time of the day or night, the abuse can come into safe places like their bedrooms, and images and videos can be stored and shared with other people.

<https://www.gov.uk/government/publications/preventing-and-tackling-bullying>

Child criminal exploitation occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial and/or advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence.

The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

Some of the following can be the indicators of CCE:

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

County lines

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

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

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

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

- acquisition of money,
- clothes,
- mobile phones etc. without plausible explanations
- gang association and or isolation from peers/social networks
- exclusions or unexplained absences from school, college or work
- leaving home/care without explanation and persistently going missing or returning late
- excessive receipt of text/phone calls
- returning home under the influence of drugs/alcohol
- inappropriate sexualized behaviour for age/sexually transmitted infections
- evidence of/suspicious of physical or sexual assault
- relationships with controlling or significant older individuals or groups
- multiple callers (unknown adults or peers)
- frequenting areas known for sex work
- concerning use of internet or other social media
- increasing secretiveness around behaviours
- self harm or significant changes in emotional well-being

Potential vulnerabilities

Although the following vulnerabilities increase the risk of CSE, it must be remembered that not all children with these indicators will be exploited. CSE can occur without any of these issues. The issues include:

- having a prior experience of neglect
- physical and/or sexual abuse
- lack of a safe/stable home environment
- now or in the past (domestic abuse or parental substance misuse, mental health issues or criminality, for example)
- recent bereavement or loss
- social isolation or difficulties
- absence of a safe environment to explore sexuality
- economic vulnerability
- homeless or insecure accommodation status
- connections with other children and young people who are being sexually exploited
- family members or other connection involved in adult sex work
- having a physical or learning disability
- being care (particularly those residential care and those with interrupted care histories)
- sexual identity

More information can be found in: CSE: definition and guide for practitioner (DFE 2017).

Sexual exploitation involves degrees of coercion, intimidation, or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyber-bullying and grooming. The School recognises that children who are victims of child sexual

exploitation may go missing from education. School staff will be alert to possible indicators of child sexual exploitation and any concerns will be managed in accordance with this policy.

All staff are aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. All staff, but especially the designated safeguarding lead (and deputies) will 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

<https://www.gov.uk/government/publications/child-sexual-exploitation-definition-and-guide-for-practitioners>

Child trafficking and modern slavery are child abuse. Children are recruited, moved, or transported and then exploited, forced to work or sold for:

- sexual exploitation
- benefit fraud
- forced marriage
- domestic servitude such as cleaning, childcare, cooking
- forced labour in factories or agriculture
- criminal activity such as pickpocketing, begging, transporting drugs, working on cannabis farms, selling pirated DVDs and bag theft.
- Criminal activity, such as 'county lines' drug trafficking (see above)

Many children are trafficked into the UK from abroad, but children can also be trafficked from one part of the UK to another.

<https://www.gov.uk/government/publications/safeguarding-children-who-may-have-been-trafficked-practice-guidance>

Children missing from education

Children missing education are children of compulsory school age who are not registered pupils at a school and are not receiving suitable education otherwise than at a school. Children missing education are at significant risk of underachieving, being victims of harm, exploitation or radicalisation, and becoming NEET (not in education, employment or training) later in life. The school where reasonably possible will hold more than one emergency contact number for each pupil.

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

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

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

In response to the guidance in Keeping Children Safe in Education (2024) the school has:

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

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

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

<https://www.gov.uk/government/publications/children-missing-education>

Contextual Safeguarding

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and can occur between children outside of our school. All staff including the DSL should consider whether children are at risk of abuse or exploitation in situations outside their families. Risk and harm outside of the family can take a variety of different forms and children can be vulnerable to sexual exploitation, criminal exploitation and serious youth violence in addition to other risks.

As a school we will consider the various factors that have an interplay with life of any pupil about who we have concerns within the school and the level of influence that these factors have on their ability to protected and remain free from harm particularly when it comes to child exploitation or criminal activity.

What life is like for a child outside the school gates, within the home, within the family and within the community are key considerations when the DSL is looking at nay concerns.

Domestic abuse

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

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

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

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

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

(The definition can be found here: <https://www.legislation.gov.uk/ukpga/2021/17/part/1/enacted>)

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

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

<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

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

Drugs

<https://www.gov.uk/government/publications/drugs-advice-for-schools>

Fabricated and Induced Illness

Fabricated and induced illness is a rare form of child abuse. It occurs when a parent or carer exaggerates or deliberately causes symptoms of illness in the child. Behaviours include:

- persuading healthcare professionals that their child is ill when they're perfectly healthy
- exaggerating or lying about their child's symptoms
- manipulating test results to suggest the presence of illness
- deliberately inducing symptoms of illness with medications or other substances

<https://www.gov.uk/government/publications/safeguarding-children-in-whom-illness-is-fabricated-or-induced>

Faith Abuse

Faith and belief-based child abuse includes ritualistic physical, psychological or sexual abuse against children who are accused of being a witch or of being possessed by evil spirits.

<https://www.gov.uk/government/publications/national-action-plan-to-tackle-child-abuse-linked-to-faith-or-belief>

Female Genital Mutilation (FGM)

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

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

Risk factors for FGM include:

- low level of integration into UK society
- mother or a sister who has undergone FGM
- girls who are withdrawn from PSHE
- visiting female elder from the country of origin
- being taken on a long holiday to the country of origin
- talk about a 'special' procedure to become a woman

Symptoms of FGM

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

Indications that FGM may have already taken place may include:

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

FGM is practiced in thirty countries in Africa, the Middle East and Asia, but Egypt, Ethiopia, Nigeria, and Sudan account for about 42 percent of all known cases. Victims of FGM within the UK are likely to come from migrant communities from these countries. Professionals should be aware that the girls at risk of FGM may be unaware of the practice – so sensitivity must be shown when approaching the subject. Staff should activate local safeguarding procedures, using existing national protocols for multi-agency liaison with police and children's social care services. It is now mandatory for teachers to report to the police cases where they discover an act of FGM to have been or appears to have been carried out. **The non-emergency police phone line for reporting is 101.** The teacher should discuss such a case with the schools DSL and involve social care services as appropriate. Guidance on the warning signs of HBV can be found on pages 38-41 of the Multi-agency statutory guidance of FGM:

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

The Serious Crime Act 2015 sets out a duty on professionals (including teachers) to notify police when they discover that FGM appears to have been carried out on a girl under 18. In schools, this will usually come from a disclosure (unlike in the medical profession where an observation may have been made). Teachers (along with social workers and healthcare professionals) have a statutory duty to report to the police (via 101) where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases may face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils. Information on when and how to make a report can be found at <https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information>

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

Forced Marriage is when someone is made to marry another person who they don't want to. Forced marriages can happen in secret and can also be planned by parents, family or religious leaders. It may involve physical abuse, sexual abuse or emotional abuse. A forced marriage is different from an arranged marriage. In an arranged marriage, people have a choice about whether they get married or not. Arranged marriages are a cultural tradition for many people, but forced marriages are an abuse of human rights. Forced marriage is against the law in the UK and any concern that a child or young person may be being forced into marriage will be responded to as a child protection concern and referred to children's social care services.

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

Gangs and youth violence

Children and young people involved with, or on the edges of, gangs might be victims of violence or they might be pressured into doing things like stealing or carrying drugs or weapons. They might be abused, exploited or put into dangerous situations.

<https://www.gov.uk/government/publications/advice-to-schools-and-colleges-on-gangs-and-youth-violence>

Gender based violence / Violence Against Women and Girls (VAWG)

Gender based violence covers multiple forms of abuse against people linked directly to their gender.

<https://safeguarding.network/safeguarding-resources/peer-peer-abuse/gender-based-violence/>

Grooming is when someone builds an emotional connection with a child to gain their trust for the purposes of sexual abuse, sexual exploitation or trafficking. Children and young people can be groomed online or face-to-face, by a stranger or by someone they know - for example a family member, friend or professional. Groomers may be male or female. They could be any age. Many children and young people don't understand that they have been groomed or that what has happened is abuse. The signs of grooming aren't always obvious and groomers will often go to great lengths not to be identified.

If a child is being groomed they may:

- be very secretive, including about what they are doing online
- have older boyfriends or girlfriends
- go to unusual places to meet friends
- have new things such as clothes or mobile phones that they can't or won't explain
- have access to drugs and alcohol.

In older children, signs of grooming can easily be mistaken for 'normal' teenage behaviour, but you may notice unexplained changes in behaviour or personality, or inappropriate sexual behaviour for their age.

<https://www.gov.uk/government/publications/child-sexual-exploitation-definition-and-guide-for-practitioners>

Homelessness Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL (and any deputies) should be aware of contact details and referral routes in to the local housing authority so they can raise 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.

<https://www.gov.uk/government/publications/children-who-run-away-or-go-missing-from-home-or-care>

<https://www.gov.uk/government/publications/provision-of-accommodation-for-16-and-17-year-olds-who-may-be-homeless-and-or-require-accommodation>

Honour based abuse, including breast ironing

Honour based abuse is a collection of practices used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour. Such violence can occur when perpetrators perceive that a relative has shamed the family and / or community by breaking their honour code 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.

Where staff are concerned that a child might be at risk of HBA, they must contact the Designated Safeguarding Lead as a matter of urgency.

<https://www.hampshirescp.org.uk/professionals/fgm-breast-ironing-honour-based-violence/>

Mental health

Schools have a central role to play in enabling their pupils to be resilient and to support good mental health and wellbeing. Education about relationships, sex and health can be important vehicles through which schools can teach pupils about mental health and wellbeing. The Advisors, directors and school will ensure application filters and monitoring systems are in place to safeguard children online.

All staff are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals will 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.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. Staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action will be taken, following our child protection policy and procedure and speaking to the designated safeguarding lead or a deputy.

Please read this policy in conjunction with the Mental Health and Well-being Policy. The SEN department is able to make referrals to CAHMS.

Children with Social Workers

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

Social workers are welcome to visit the school to meet with the pupils in their care, they are able to discuss with teaching staff any support they feel necessary. The Principal and DSL are available to meet at any time. The Social worker will be invited to contribute to and/or attend annual review where a child has an EHCP.

Malicious Claims

All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing. Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behavior can be identified and addressed. If a report is determined to be unsubstantiated, unfounded, false or malicious the DSL should consider whether the child and/or person who made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate. If a report is shown to be deliberately invented or malicious the school will consider whether disciplinary action is appropriate against the individual who made it as per the school's own behaviour policy and code of conduct.

<https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2>

Child-on-child/ Child on Child abuse

Please see section 2.4, and refer to KCSIE 2023.

Private fostering

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.

A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.

Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.

Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases privately fostered children are affected by abuse and neglect, or be involved in trafficking, child sexual exploitation or modern-day slavery.

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

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

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

<https://www.safeguardingschools.co.uk/private-fostering/>

Radicalisation

Radicalisation is a process by which someone adopts extremist views, often after being influenced by someone they've met or by being exposed to propaganda. As adolescence in particular is a time of life when young people consider their cultural identity, beliefs and faith, it is a period when they can be vulnerable to being radicalised.

Schools have a central role in educating young people in the values that counter extremist ideology, and are a key partner in the government's Prevent Duty (part of the UK's counter-terrorism strategy). Decisions to seek support for a child in need, or about whom there are radicalisation concerns, would normally be taken in consultation with parents and pupils, however, the school will not seek consent for a referral when there are reasonable grounds to believe that a child is at risk of significant harm.

In the case of pupils being identified as being at risk of radicalization, depending on the level of risk identified, the school will refer to channel or social care.

For concerns that a child may be subject to radicalisation, the DfE operates a **Prevent Duty helpline** on 020 7340 7264 (alternatively, email: counter-extremism@education.gsi.gov.uk)

As part of the Counter Terrorism and Security Act 2015, schools have a duty to 'prevent people being drawn into terrorism'. This has become known as the 'Prevent Duty'. Where staff are concerned that children and young people are developing extremist views or show signs of becoming radicalized, they should discuss this with the Designated Safeguarding Lead.

The Designated Safeguarding Lead has received training about the Prevent Duty and tackling extremism and is able to support staff with any concerns they may have.

We use the curriculum to ensure that children and young people understand how people with extreme views share these with others, especially using the internet.

Staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection.

Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a Prevent referral.

We are committed to ensuring that our pupils are offered a broad and balanced curriculum that aims to prepare them for life in modern Britain. Teaching the school's core values alongside the fundamental British Values supports quality teaching and learning, whilst making a positive contribution to the development of a fair, just and civil society.

Recognising Extremism

Early indicators of radicalisation or extremism may include:

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

<https://www.nspcc.org.uk/what-you-can-do/report-abuse/dedicated-helplines/protecting-children-from-radicalisation/>

<https://www.gov.uk/government/publications/safeguarding-and-radicalisation>

Sexual abuse of children by children

Please see section 2.4 on child-on-child abuse

Sharing Nudes and Semi-Nudes (Previously known as sexting)

In cases where nudes and semi-nudes have been shared the school follows guidance given to schools and colleges by the UK Council for Internet Safety (UKCIS): Sharing nudes and semi-nudes (March 2024).

Sexual behaviour

Children and young people who develop harmful sexual behaviour harm themselves and others.

Examples of harmful sexual behaviour include:

- using sexually explicit words and phrases
- inappropriate touching
- using sexual violence or threats
- full penetrative sex with other children or adults

Sexual behaviour between children is also considered harmful if one of the children is much older, i.e. more than two years' age difference, or if one of the children is pre-pubescent and the other isn't. However, a younger child can abuse an older child, particularly if they have power over them – for example, if the older child has a learning disability

<https://www.nspcc.org.uk/preventing-abuse/keeping-children-safe/healthy-sexual-behaviour-children-young-people/#pageref2190>

Serious Violence

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

All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. Advice for schools and colleges is provided in the Home Office's Preventing **youth violence and gang involvement and its Criminal exploitation of children and vulnerable adults: county lines guidance**.

Special Educational Needs and Disability

Please see section 2.7

Young Carers

A young carer is someone aged up to 18 who provides unpaid care for a family member or friend who has a long-term physical or mental health problem or disability, or a drug or alcohol dependency.

Some young carers are the main carers in the household; others supplement the caring undertaken by other members of the family. The caring tasks include:

- Domestic tasks (e.g. cooking, cleaning, shopping)
- Personal care (e.g. helping with mobility; washing; dressing; giving medicine)
- Emotional support & supervision (e.g. watching over someone; providing company and a 'listening ear')
- Sibling care: Looking after an ill or disabled sibling (or a non-disabled sibling where a ill or disabled parent is unable to provide this care)
- Communication support (e.g. interpreting; answering phone or door)
- Financial management: (e.g. budgeting; paying bills)
- Self-care: Looking after themselves, where an ill or disabled parent is unable to provide this care

Difficulties with relationships, roles, routine and income are more likely to occur when a family member has a disability or long-term illness. Whilst some young people cope very well in these circumstances, there are many who experience stress-related problems and who struggle in their learning as a result.

<https://www.gov.uk/government/publications/the-lives-of-young-carers-in-england>

<https://www.hampshirescp.org.uk/children-and-young-people/young-carers/>

Looked After and Adopted Children

Mrs Simmi Kalsi, has the responsibility for looked after and adopted children. She will be responsible for their welfare and progress and will ensure she has up to date assessment information from the relevant local authority. She will liaise with the

relevant authorities, parents and social workers with regards to care plans. **Mrs Simmi Kalsi** will also liaise with adopted parents regarding any safeguarding issues related to their children's past that may impact the present and any triggers that the school should be aware of.

2.7 Special Educational Needs and Disability

Children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges.

The school, its advisors and the management team understand that additional barrier can exist when recognising abuse and neglect in this group of children. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration;
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
- the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in managing or reporting these challenges

At Hurst Lodge we provide a high level of pastoral support including form teachers, 1:1 support in classes and an open door policy to the leadership team. The Sencos are available to any child with SEND, there is breakout area where children are always welcome and a member of staff is on hand to discuss/aid the child to discuss issues.

All staff also need to be alert to the specific needs of those pupils who have special educational needs and/or disabilities. Those with SEND may not outwardly shown signs of abuse and/or may have difficulties in communication about abuse or neglect. Staff will support such pupils in expressing any concerns they may have and will be particularly vigilant to any signs or indicators of abuse, discussing this with the DSL as appropriate.

- We recognise that, statistically, children with emotional and behavioural difficulties and disabilities are most vulnerable to abuse. School staff who deal with children with complex and multiple disabilities and/or emotional and behavioural problems should be particularly sensitive to indicators of abuse.
- The school has pupils with emotional and behavioural difficulties and/or challenging behaviours. The school will support staff to decide appropriate strategies that will reduce anxiety for the individual child and raise self-esteem as part of an overall behaviour support plan agreed with parents/carers.
- As part of the PSHE curriculum staff will teach young people personal safety skills in an age-appropriate manner. Students will be taught on how to keep themselves safe online and the dangers of cyberbullying and consensual and non-consensual sharing of nudes and semi-nudes, peer pressure and appropriate relationships. This will be extended to beyond the classroom.
- The school has pupils who may have learning difficulties and we are aware that they are vulnerable to abuse because they may be unable to express themselves to others. Instead, such pupils may exhibit changes in behaviour or signs and indicators of abuse recognised by staff with a good knowledge of the child.
- Where necessary, the school will provide additional training to staff in the use of alternate communication systems. Supervision by senior managers will be vigilant to create a protective ethos around the pupil.
- We promote high standards of practice, including ensuring that children with disabilities know how to raise concerns, and have access to a range of adults with whom they can communicate

Please read this policy in conjunction with the SEND policy.

<https://www.gov.uk/topic/schools-colleges-childrens-services/special-educational-needs-disabilities>

<https://www.gov.uk/government/publications/safeguarding-disabled-children-practice-guidance>

3 - Response to allegations of abuse

3.1 All allegations of child abuse involving the School community will be taken seriously and dealt with speedily. Allegations may relate to matters within school or indeed outside school or at home. As stated in the Children Act 2006, the welfare of the child is of paramount concern. Any member of staff with concerns may contact the DSL or the LADO confidentially to discuss and seek advice. If an allegation is made against anyone working with children all unnecessary

delays should be eradicated, the school will not undertake its own investigations of allegations without prior consultation with the LADO or in the most serious cases the police so as not to jeopardise statutory investigations.

- 3.2** The school will make arrangements as appropriate to support the emotional and mental health of children and staff affected by a child safeguarding issue. The school has in place time for reflection.
- 3.3** The DSL, or Safeguarding Advisor if appropriate, will make sure that a referral of allegations or suspicions of abuse has been made to the children's social care services within 24 hours, (in writing or with written confirmation of a telephone referral) and will liaise with that department and the police during any child protection investigation. In the case of an urgent concern, an immediate referral must be made.
- 3.4** Any allegation of abuse made against a member of staff including supply staff or volunteer in a school, or another adult who works with children should immediately be referred to the Principal or, in their absence, the Safeguarding Advisor and immediate contact will be made with the LADO to discuss any allegation, consider the nature, content and context of the allegation and agree a course of action including any involvement of the police. GDPR cannot be allowed to stand in the way of safeguarding children. Discussion will be recorded in writing and any communication with both the individual and the parents of the child/children will be agreed. The school will consider carefully whether the circumstances of the case warrants suspension or whether alternative arrangements should be put in place. The school will give due weight to the views of the LADO, KCSIE and WTTSG when making a decision about suspension. Records concerning allegation of abuse will be preserved for the term of the independent inquiry into child sexual abuse and at least until the accused has reached normal pension age or for 10 years from the date of the allegation if it is longer. The school will make every effort of maintain confidentiality and guard against unwarranted publicity up to the point where the accused person is charged with an offence or the DFE/TRA publish information about an investigation or decision in a disciplinary case. If the allegation is against the Principal, the Principal must not be informed about the allegation prior to the contact with the Safeguarding Advisor and the Local Authority Designated Officer (LADO). The LADO must be informed without delay. LADO: Barbara Piddington - 01962 876364. Where an allegation is made against supply staff, the school will take the lead while keeping the supply agency fully informed and involved. In no circumstances with the school simply cease to use supply staff for safeguarding reasons. The situation must not be discussed with any other colleague. If the Safeguarding Advisor is contacted first, she will inform the LADO on the same day. In the case of serious harm, the police will also be informed from the outset.
- 3.5** Following the outcome of any advised investigation, or a school-initiated investigation, appropriate actions will be taken. These may include disciplinary procedures, risk assessments, suspension of staff or students and/or relocation of involved staff if they are resident within the school.
- 3.6** The Safeguarding Advisor will be responsible for informing Ofsted and ISI, DBS/TRA and the DFE of any information that is required to go on its register. The Safeguarding Advisor will also inform the Disclosure and Barring Service if a member of staff is deemed unsuitable to work with children. Where a teacher is dismissed for misconduct (or would have been dismissed had he/she not resigned first) the TRA (Teaching Regulation Agency) will be informed. The reasons for such an order would be considered re unacceptable professional conduct, conduct that by bring the profession into disrepute or a conviction at any time for a relevant offence. The school will be guided by the TRA and its documentation, teacher misconduct: The Prohibition of Teachers October 2015. The school is committed to reporting promptly to the DBS any person (whether employed, contracted, a volunteer or student) whose services are no longer used for regulated activity and the DBS referral criteria are met, that is, they have caused harm or posed a risk of harm to a child.
- 3.7** The result of an investigation may be inconclusive, there may or may not be a prosecution, or it may be decided that a person's behaviour has been ill-advised and foolish rather than criminal.
- 3.8** Allegations may be shown to be unfounded or malicious. In these cases, the Safeguarding Advisor will find appropriate means to make clear that the person has been exonerated.
- 3.9** The DSL is required to keep a central confidential record of all reported incidents including the original notes of the first conversation with the complainant.
- 3.10** Staff who, in good faith, report any concern or allegation about school practices or behaviour of colleagues which prove to be unfounded will be provided with immunity from retribution or disciplinary action for such "whistle blowing".

Further detail is given in the '**Whistleblowing**' Policy which can be found in the staff handbook and on the school website.

3.11 Whistleblowing procedures

Hurst Lodge School has a whistleblowing policy and procedures – which is introduced during the induction of new staff and is referred to during INSET. The key principles are

- A culture of safety and raising concern
- Valuing of staff
- Reflective practice

There are procedures for reporting and handling concerns, including poor or unsafe practice and potential failures in the schools safeguarding regime. There is provision for mediation and dispute resolution. Training and support are given to staff on how use the whistleblowing procedures. There is transparency and accountability in relation to how concerns are received and handled.

A whistleblowing disclosure must be about something that affects the general public such as:

- a criminal offence has been committed, is being committed or is likely to be committed
- a legal obligation has been breached
- there has been a miscarriage of justice
- the health or safety of any individual has been endangered
- the environment has been damaged
- information about any of the above has been concealed

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

- General guidance can be found at <https://www.gov.uk/whistleblowing> (Advice on Whistle blowing)
- The NSPCC Whistle blowing helpline on 0808 800 5000. Lines open 8am to 8pm, Monday to Friday. Email: help@nspcc.org.uk
<https://www.nspcc.org.uk/what-you-can-do/report-abuse/dedicated-helplines/whistleblowing-advice-line>

4 Staff Code of Conduct/Behaviour and Good Practice.

4.1 The School considers it good practice to seek advice from Local Authority Social Services where they consider a child could be at risk.

4.2 The School requires all staff to maintain the highest professional standards in their work and relationships with children. The following recommendations provide a framework within which children should be safe from harm and adults protected from false allegations.

Be prepared for your colleagues to remind you if you forget one of these guidelines and be prepared to help a colleague by advising them in return. The more trusting and open the relationships between staff, the safer our children and young people will be. However, if a colleague fails to amend inappropriate behaviour to meet the guidelines, colleagues should be prepared to report them in the interests of safeguarding children. We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so.

The Children Act stresses the importance of children being able to share their concerns with adults and being able to confide in them. All staff involved in the care of pupils should strive to create a supportive and caring environment. The following list constitutes the school's recommended good practice guidelines:

- Treat children and young people with the respect and dignity befitting their age.
- Be aware of your speech, tone of voice and body language.
- Control and discipline children without physical punishment. The school has a separate policy on the use of corporal punishment which is prohibited at Hurst Lodge.
- Don't permit abusive peer activities e.g. initiation ceremonies, ridiculing, bullying.
- Advise another member of staff if you need to see a child on his or her own for a lengthy period, use a space where you are both visible. Do not position yourself between the child and the exit. Do not invite a child to your home alone. Invite a group and make sure someone else is around and aware where the children are. Avoid meetings after 11.00pm.

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- When in a private meeting with a child, try to leave the door ajar and position furniture appropriately (table or desk between you and the child). Inform another adult of the meeting where possible.
 - Respect a child's privacy, particularly in lavatories, showers and changing rooms.
 - Do not engage in playing rough physical or sexually provocative games with children.
 - Do not be sexually suggestive about or to a child.
 - Do not touch a child in an inappropriate or intrusive manner.
 - Avoid scapegoating, ridiculing or rejecting a child.
 - Avoid showing favouritism to any one child.
 - Avoid allowing children to involve you in excessive attention-seeking that is overtly physical or sexual in nature.
 - Try to avoid giving lifts to children on their own. If this is unavoidable, consider asking the child to sit in the back of the car.
 - Do not share sleeping accommodation with children.
 - Do not allow unknown adult's access to children. Visitors should be accompanied by a known person.
 - Do not contact a student from a personal e-mail account, own mobile phone (other than a mobile phone device provided by the school), or via a social networking site or means of instant messaging.
- 4.3** Staff are required to keep a diary of all out-of-school-hours encounters with pupils. If a child seeks a private meeting with a member of staff on more than three occasions within a short period of time (within a month), this should be reported to the DSL.
- 4.3** Staff are monitored and reviewed regularly, through meetings, appraisals and performance review. New staff are provided with a mentoring system from a more experienced staff member to ensure the correct policies are known and understood. Also that key figures are identified, e.g. DSL.
- 4.4** Staff must be aware of the abuse of one pupil by another pupil. When there is 'reasonable cause to suspect that a child is suffering, or likely to suffer significant harm' the local agencies must be referred to. It would be expected that in the event of disclosures about pupil-on-pupil abuse that all children involved, whether perpetrator or victim are treated as 'at risk'. Staff must refer if necessary to Anti-Bullying Policy. It is important that staff differentiate between safeguarding children who have suffered or likely to suffer significant harm and those who are in need of additional support from one or more agencies. The school will follow local safeguarding procedures, the former will be reported to children's social care immediately, the latter will lead to early help, interagency assessment and intervention and will include the use of common assessment framework and team around the child approaches.
- 4.5** At Hurst Lodge pupils are taught about safeguarding, including online through teaching and learning opportunities, as part of providing a broad and balanced curriculum. Children are taught to recognise when they are at risk and how to get help when they need it (for example, when they inadvertently enter a chat room or they are subjected to bullying on line or on social platforms, they are advised to speak to member of staff who together with the DSL will provide help and guidance). The school's PSHE programme and during ICT lessons pupils will be made aware of safeguarding issues (as detailed later in this policy) and the need for e-safety. The school's ICT utilizes software that monitors and filters inappropriate use and content. Introduction or discussion of e-safety will be age appropriate. Through PSHE and Relationship and Sex Education, the school teaches children how to stay safe in school and beyond and how to stay safe online including the dangers of cyber bullying and consensual and non-consensual sharing of nudes and semi-nudes. Particular attention is given to help children adjust their behaviours in order to reduce risk and build resilience, including to radicalisation, with a particular attention to safe use of electronic equipment and the internet.
- 4.6** Under section 16 of The Sexual Offences Act 2003, it is an offence for a person over the age of 18 (e.g. teacher, youth worker) to have a sexual relationship with a child under 18 where that person is in a position of trust and respect of that child, even if the relationship is consensual.
- 5** **Low Level Concerns of Staff**

At Hurst Lodge, we recognise the possibility that adults working in the school may harm children, including advisors, visitors, volunteers, supply teachers and agency staff. Any concerns about the conduct of other adults in the school should be taken to the principal without delay; any concerns about the principal should go to the Hampshire LADO and the Safeguarding Advisor should be informed.

Any concerns about the conduct of a member of staff, supply teachers, volunteers or contractors should be reported to the principal.

Concerns may come from various sources, for example, a suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

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

Allegations

It is an allegation if the person 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 he or she may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children (also includes behaviour outside the school).

Allegations should be reported to the LADO 'without delay'.

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

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

Low-level Concerns

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

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

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

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

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

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

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

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

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

Records must be kept confidential, held securely and comply with the Data Protection Act 2018. The school will retain this information until the individual leaves the school's employment.

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

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

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

Guidance in KCSIE will be followed where it is alleged that anyone working in the school, including supply teachers and volunteers has:

- behaved in a way that has harmed a child, or may have harmed a child
- possibly committed a criminal offence against or related to a child
- behaved towards a child or children in a way that indicates he/she may pose a risk of harm to children
- behaved or may have behaved in way that indicated they may not be suitable to work with children (this is in regard to a person's conduct outside school and need not include a child, for example, domestic abuse of a partner)

5 - Inappropriate advances

5.1 Children can sometimes make suggestive approaches to an adult. For whatever reason, they may act in an inappropriate manner. Sometimes, inappropriate physical contact can be made either intentionally or accidentally.

5.2 It is vital that members of staff take the responsibility to:

- Tell the child that his or her language or behaviour is unacceptable.
- Tell a DSL about the incident, however embarrassing this is.
- Record the incident, indicating what was said and/or done. This is a necessary safeguard if accusations are made at a later stage.

The member of staff and the DSL should decide on the appropriate course of action. It may be necessary for the DSL and/or the member of staff to discuss the incident with the Safeguarding Advisor and/or to seek advice from the children's social care services.

6 - Confidentiality, Sharing and Withholding Information

All matters relating to child protection will be treated as confidential and only shared as per the 'Information Sharing Advice for Practitioners' (DfE 2018) guidance. Hurst Lodge has a information sharing policy which is based on the guidance document information sharing: Advice for practitioners providing safeguarding services (DFE 2018). The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. As per KCSIE 2023, this includes allowing practitioners to share information about consent.

Information will be shared with staff within the school who 'need to know'.

Relevant staff have due regard to Data Protection principles which allow them to share (and withhold) information.

6.1 The highest level of confidentiality should be maintained at all times in relationships with both adults and children. You should, however, make it clear that there are certain circumstances, such as if a crime has been committed, as a result of an emergency incident, or if a child is suffering or is likely to suffer harm, when other people will need to be told so that the child can be protected.

6.2 It is important not to agree to blanket confidentiality in any discussion or counseling. If an allegation has been made against someone it is very important that as few people as possible, know whilst the allegation is being investigated. This protects both the accuser and the accused.

7 - Hearing a child abuse disclosure

- 7.1** The School is committed to liaising with the statutory child protection agencies when dealing with allegations of abuse. If possible, you should refer any allegation as soon as possible to the DSL, who will follow appropriate procedures for hearing a child protection disclosure. However, any member of staff may be in a position where a child wishes to disclose to them issues relating to abuse. **Make a record of any conversations appropriately.**
- 7.2** The following procedures should be adopted when hearing a child abuse disclosure:
- If the listener (member of staff) feels a disclosure is likely to be made, then they must ask another member of staff to be present – first checking that the pupil accepts the additional presence. However, if the pupil is reluctant to speak in front of that third person, it is better for the listener to hear the disclosure alone, rather than for no disclosure to be made.
 - Where appropriate the listener will take steps to protect the complainant from immediate harm e.g. by contacting the DSL, Safeguarding Advisor or children’s social care services directly.
 - As soon as reasonably possible, preferably immediately after the conversation has taken place, the listener will make a statement of the conversation. Such a statement will include a note of the date and time and will be signed by the author. The content must be verified with the child to ensure it is an accurate account of the disclosure.
 - All concerns forms should be handed to the DSL personally or placed a designated safeguarding box in the DSL's office and an email should be send to advise her that a concern form has been raised. The school has purchased CPOMS and all staff have access and have received training to use CPOMS to log concerns.
 - Do not give a guarantee of confidentiality. You have a duty to tell the appropriate people if you are told of incidents of abuse. Do explain that you will only tell those who have to know. If possible, refer the complainant directly to a DSL.
 - **Do not ask leading questions.** Limit any questioning to the minimum necessary to seek clarification only. Stick to questions of the type ‘What is it you want to tell me?’ don’t ask questions like ‘Why do you think this happened?’
 - Tell the DSL immediately. If they are not available the Safeguarding Advisor immediately (unless they themselves are being accused – in which case refer directly to the LADO of Hampshire County Council. Do not tell anyone else.
 - Discuss with the DSL or Safeguarding Advisor whether steps need to be taken to protect the complainant.
 - Do not carry out an investigation yourself. Children’s social care services and police staff are specifically trained in appropriate procedures and you could damage or prejudice criminal proceedings by interviewing people yourself.
 - Any member of staff may make a referral to external agencies.
- 7.3** It is crucial never to assume that an accusation of abuse against someone you know well and whom you trust is bound to be wrong. Children and young people often tell their peers, rather than staff or other adults, about abuse. It is important to make sure that senior pupils (e.g. prefects and young people leading activities for others) as well as responsible adults are aware of these points. Senior students will be advised through their PSHE programme. If you suspect that a child is at risk of immediate harm, follow the same procedures that are appropriate in the case of a disclosure that is made.
- 7.4** Pupils are advised of the opportunity to speak to an independent listener through the Anti-Bullying Board within the school.

Further guidance

- When to suspect child maltreatment (National Institute for Health and Care Excellence, 2009)
<https://www.nice.org.uk/guidance/cg89/resources/child-maltreatment-when-to-suspect-maltreatment-in-under-18s-pdf-975697287109>
- Information Sharing – Advice for practitioners providing safeguarding services (2015)
<https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>

Safeguarding Education

All children are taught about safeguarding including online safety. The school recognises that same approach may not be appropriate for all children and a more personalised or contextualised approach for more vulnerable children, victims of abuse and some SEND children might be necessary.

The school provides safeguarding training as part of its balance curriculum. Relevant issues are taught through relationship education for primary pupils and relationships and sex education, for secondary pupils. In PSHE lessons children are taught about staying safe online and this is reiterated in lessons where IT is used. The school participates in national initiatives such as anti-bullying week and safer internet day.

Whilst the school has appropriate filters and monitoring systems, we endeavour to ensure that this does not lead to unreasonable restrictions as to what children can be taught with regard to online teaching and safeguarding.

At the start of each year children receive safeguarding training which sets out the system that are in place in easily understood and accessible manner. Safeguarding and the identities of the DSL and the safeguarding team are promoted regularly to enable children to confidently report abuse, knowing that their concerns will be treated seriously, enabling them express their view and give feedback.

8 Safeguarding Advisor

- 8.1** The Safeguarding Advisor must be informed by the DSL of any on-going Child Protection issues ensuring that confidentiality is maintained.
- 8.2** A termly report will be sent to the Safeguarding Advisor from and the DSL which will include any items of Child Protection. The Safeguarding Advisor will not conduct any internal investigations.
- 8.3** The Safeguarding Advisor will ensure that the child's wishes and feelings are taken into account when determining what action to take and what services to provide to protect individual children.
- 8.4** The policy and procedures will be reviewed by the Safeguarding Advisor annually.
- 8.5** Furthermore, the Safeguarding Advisor is responsible for:
- reviewing the procedures for and the efficiency with which the safeguarding duties have been discharged;
 - ensuring that any deficiencies or weaknesses in safeguarding arrangements are remedied without delay;
 - approving amendments to safeguarding arrangements in the light of changing Regulations or recommended best practice.
- 8.6** The Safeguarding Advisor will have responsibility of the annual safeguarding review of policies and procedures. She will set the agendas and arrange for the minutes to be discussed at board level. The director will receive Level 3 training in order to ensure the skills, knowledge and expertise to take leadership responsibility.

The Safeguarding Advisor will also have an overview of that all staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children. He will ensure that staff feel supported in the school environment. In addition, through the annual performance review system will identify weaknesses or gaps in knowledge.

9 Safer Recruitment Procedures

The TRA took over the regulation of the teaching profession and the handling of misconduct hearings from the National College of Teaching and Leadership. The school will make referrals in a timely fashion to TRA. The TRA is an executive agency of the DfE.

- 9.1** All new appointments will be made following the good practice outlined in our Recruitment Policy which reflects the Government's recommendations for the safer recruitment and employment of staff who work with children. The policy also complies with the Independent School Standards Regulations on this matter. Decisions about the suitability of prospective employees are based on checks and evidence including: criminal record checks (DBS checks), barred list checks and prohibition checks, together with references and interview information; all new employees are subject to DBS checks at the Enhanced Disclosure level. Similarly, all volunteers who are likely to come into contact with pupils, are checked at the same level. In order to verify the validity of written references, the school will make direct contact with a referee to ensure the written reference is genuine. In addition, as recommended in the 'Working Together to Safeguard Children' guidance there will be on-going safe working practices for those who work with children. Information can be found at <https://www.saferrecruitmentconsortium.org>
- 9.2** In line with Part 3 of the DfE's guidance 'Keeping Children Safe in Education' (KCSIE), the School prevents people who pose a risk of harm from working with pupils by adhering to statutory responsibilities to check all staff who work with children, taking proportionate decisions on whether to ask for any checks beyond the minimum required, and ensuring volunteers are appropriately supervised. Organisations providing contractors or consultants working on site are asked for assurances that where relevant and required, their staff have been suitably vetted in line with legal requirements.
- 9.3** As part of carrying out our safer recruitment procedures under KCSIE, members of the teaching and non-teaching staff at the School including part-time staff, temporary and supply staff, and visiting staff, such as musicians and dance teachers are subject to the necessary statutory child protection checks before starting work, for example, right to work checks, additional overseas checks (if necessary), verifying identity, taking up references and confirming medical fitness for the role. For most appointments, an enhanced DBS check with 'barred list' information will be appropriate. A DBS certificate will be obtained from the candidate before or as soon as practicable after appointment. Alternatively, if the

applicant has subscribed to it and gives permission, the School may undertake an online update check through the DBS Update Service.

Further to the DBS check, anyone appointed to carry out teaching work will require an additional check to ensure they are not prohibited from teaching by order of the Secretary of State. Further checks will also include a check for information about any teacher sanction or restrictions that an EEA professional regulating authority has imposed. Those undertaking management posts will be subject to prohibition from management of independent school's checks.

- 9.5** All volunteers, staff of contractors and contractors working regularly during term-time are also subject to the statutory DBS checks. Confirmation is obtained that appropriate child protection checks and procedures apply to any staff employed by another organisation and working with the School's pupils at School.
- 9.6** Should the School develop concerns about an existing staff member's suitability to work with children; it will carry out all relevant checks as if the individual were a new member of staff.
- 9.7** Early Year's provision includes education and any supervised activity for a child from birth until the 1 September following their fifth birthday. It applies to all provision for children in that age range during and outside school hours, including in school nursery and reception classes. Later years' provision covers childcare that is provided outside of school hours including breakfast clubs and after school care.
- 9.8** Staff can be disqualified under the Childcare Act 2006 which was subject to changes with the introduction of the Childcare (Disqualification) and Childcare (Early Years Provision Amendment) Regulations 2018 and is concerned with staff working with children under the age of 8. <https://www.gov.uk/government/publications/disqualification-under-the-childcare-act-2006/disqualification-under-the-childcare-act-2006>

The guidance applies to employees; volunteers; supply / agency staff; self-employed people; staff and other organisations contracted to provide childcare. Company directors who volunteer are also potentially within the scope of the guidance

The grounds for disqualification include in summary:

- being on the DBS Children's Barred List
- being cautioned for, convicted of or charged with certain violent and sexual criminal offences against children and adults, at home or abroad
- any offence involving death or injury to a child
- being the subject of certain other orders relating to care of children
- refusal of cancellation of registration relating to childcare or children's homes or private fostering.

Records will be kept of staff employed to work in or manage childcare including the dates the disqualification checks. The school is legally obligated to inform staff of the legislation and keep a record of the date the information was provided. The school will not knowingly employ people to work in childcare or allow them to be directly concerned in its management if they themselves are directly disqualified from childcare.

To ensure best practice the school will follow the safer recruitment processes of KCSIE fully. We will ensure policies, procedures and expectations of staff are clear. The school has a culture of listening and we hope the staff will feel comfortable to discuss matters outside school. The school looks to safeguard the welfare of their staff which in turn leads to increased children's safety.

- 9.9** The Childcare (Disqualification) Regulations 2009 apply to those providing early years childcare or later years' childcare, including before school and after school clubs, to children who have not attained the age of 8 AND to those who are directly concerned in the management of that childcare.
- 9.10** The School takes its responsibility to safeguard children very seriously and any staff member who is aware of anything that may affect his/her suitability to work with children must notify the Safeguarding Advisor immediately. This will include notification of any convictions, cautions, court orders, reprimands or warnings he/she may receive. He/she must also notify the School immediately if he/she is living in a household where anyone lives or works who has been disqualified from working with children or from registration for the provision of childcare.

- 9.11** Staff who are disqualified from childcare or registration, may apply to Ofsted for a waiver of disqualification. Such staff may not be employed in the areas from which they are disqualified, or involved in the management of those settings, unless and until such waiver is confirmed.
- 9.12** As a result of their knowledge, position and/or the authority invested in their role, all adults working with children and young people in education settings are in positions of trust in relation to the young people in their care. A relationship between a member of staff and a pupil cannot be a relationship between equals. There is potential for exploitation and harm of vulnerable young people and all members of staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification. Wherever possible, staff should avoid behaviour which might be misinterpreted by others, and report and record any incident with this potential.

Please read this in conjunction with our Safer Recruitment Policy.

10 Staff Training

The training for all staff is in line with the Local Safeguarding Children Partnership's requirements in terms of content and frequency.

- 10.1** It is vital that all school and organisation staff members are provided with adequate training. All staff are expected to complete level 1-basic awareness training (as in 1.10). An up-to-date record is kept of this information. Several staff are in the process of being trained to an advanced level, so that in the event of sickness or absence there is a member of staff equipped to deal with any situation. **All staff** including temporary staff and volunteers are issued with and are required to read the DfE document 'Keeping Children Safe in Education' (2024). Staff are required to sign the Policy Record Document to confirm the reading of any DfE or policy document relating to Safeguarding issues and updates in conjugation with all relevant school policies. All staff will receive training in Part 5 KCSIE 2024 dedicated to child-on-child abuse and how to manage child-on-child sexual violence and sexual harassment. Staff should not view or forward illegal images of a child.

<https://www.gov.uk/government/publications/searching-screening-and-confiscation>

- 10.2** All staff are provided with the school's 'Cue Card' which details safeguarding procedures and contact information, and is reviewed and updated with this policy.
- 10.3** Staff receive regular updates through the National College system and updates are provided to staff during weekly briefings as well as staff inset.
- 10.4** During the induction of new staff the school Code of Conduct is discussed. The details of this are found in the staff handbook. The Code of Conduct makes reference to the physical contact that dance and music teachers may make with pupils in these lessons, as a necessary part of their instruction.

New Staff Training/Induction

All new staff will be provided with an induction prior to them beginning work. In the event that this does not occur the member of staff will be risk assessed and supervised.

The induction programme will include

- The schools safeguarding and child protection policy including the Prevent Duty (this may be delivered through the National College)
- Identity and role of the DSL and DDSL
- Dealing with disclosures
- Staff coded of conduct – including whistleblowing and acceptable use of IT policy
- Pupil behaviour policy
- Schools safeguarding response to children missing from education including policy
- On-line safety
- CPOMS Training
- Copy of Part 1 KCSIE and Annex A sent electronically prior to the induction programme. During the induction these sections will be explained

Staff Contractors

Where a contractor works regularly within the school with the opportunity for pupil contact basic safeguarding training will be offered – either on site or through the National College.

11. The Use of Telephones and Cameras

Hurst Lodge School allows staff to bring in personal mobile telephones and devices for their own use but must ensure that these are left inside their bag or locker throughout contact time with children. Under no circumstances may staff contact a current parent/carer or pupil using their personal device.

Staff bringing personal devices into the nursery school must ensure there is no inappropriate or illegal content on the device. Mobile phone calls may only be taken at staff breaks or in staff members' own time and in an area where children are not present. If staff have a personal emergency, they are free to use the school telephone or make a personal call from their mobile in an area where children are not present. If any staff member has a family emergency or similar and needs to keep their mobile phone to hand, prior permission must be sought from the Safeguarding Advisor. It is the responsibility of individual staff to ensure that the Data Manager has up to date contact information of their families, children's schools etc. and know their emergency work telephone number.

During group outings nominated staff will have access to the school's nominated mobile phone, which is to be used for emergency purposes only. It is the responsibility of all members of staff to be vigilant and report any concerns to the Safeguarding Advisor.

Concerns will be taken seriously, logged and investigated appropriately (see policy on allegations against a member of staff). The Safeguarding Advisor reserves the right to check the image contents of a member of staff's mobile phone should there be any cause for concern over the appropriate use of it. Should inappropriate material be found then the Local Authority Designated Officer (LADO) will be contacted immediately. The school will follow any appropriate disciplinary measures informed by the guidance of the LADO. These measures may result in staff member's dismissal.

The management of access to 3G and 4G mobile technology is managed by the IT Manager. Mobile phones are not permitted on site unless specific dispensation has been given by the Principal for security or medical reasons.

Photographs taken for the purpose of recording a child or groups of children participating in activities or celebrating their achievements is an effective form of evidence for progression. However, it is essential that photographs are taken and stored appropriately to safeguard the children in our care. Under no circumstance may staff use their mobile phone or personal camera to take photographs within the school. Should a member staff fail to comply with this it will result in disciplinary action.

Only the designated school's camera may be used to take any photograph within the school or on outings. Images taken must be deemed suitable and must never put the child/children in any compromising positions that could cause embarrassment or distress or harm. All staff are responsible for the location of the camera. Camera must be locked away at the end each day. Images taken and stored on the camera must be downloaded as soon as possible, ideally once a week and the images deleted from the camera's memory card.

Please read this in conjunction with our Forensic Monitoring Policy.

11.1 Taking children to the toilet

When taking children to the toilet staff should ensure they tell a colleague what they are doing and who they are supervising. Where possible, an adult to child ratio of 2:1 is recommended.

ALL allegations will be reported to the Local Authority Designated Person (LADO) for advice before any investigation takes place. (In borderline cases, the DSL may first discuss the concern and seek advice from the LADO.) Within 24 hours of a disclosure or suspicion of abuse, the school's reporting arrangements will include contact with the relevant welfare agency.

- In the case of serious harm, the police will be informed at the outset.

12 Preventing Radicalisation

Normal referral processes are also available when there are concerns about children who may be at risk of being drawn into terrorism. Staff must follow the normal safeguarding procedures and contact the appropriate agencies mentioned on page. The local police force can be contacted on 101 and the DfE dedicated telephone helpline and mail box for non-emergency advice telephone 020 7340 7264, email: counter.extremism@education.gov.uk. For emergencies dial 999.

Preventing Radicalisation – the Counter-Terrorism and Security Act 2015 places a duty on specific authorities, including education, in the exercise of their functions to have due regard to the need to prevent people from being drawn into terrorism (The Prevent Duty). The local authority is responsible to ensure a Channel panel is in place. This panel will assess any referral to which identified individuals are vulnerable to being drawn into terrorism.

Terrorism is an action that endangers or causes serious violence to a person/people; causes serious violence to a person/people; causes serious damage to property; or seriously interferes with an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause

We recognise that it is a key role of the School to support children and that School may provide stability in the lives of children who may be at risk of harm. We also recognise that our pupils can be vulnerable and exploited by others. Staff will be alert to the signs of vulnerability and/or susceptibilities to any extremist indoctrination.

We recognise that the School plays a significant part in the prevention of harm to our pupils by providing good lines of communication with trusted adults, supported friends and an ethos of protection. We include within this the emotional wellbeing of our pupils and recognise the role school plays in recognising and protecting our children who may be vulnerable to radicalisation or exposed to extremist views.

Staff acknowledge the need for a culture of vigilance to be present in the School to support safeguarding. This includes awareness and sensitivity to attitudinal changes of pupils which may indicate they are at risk of radicalisation and may need help or protection. However, staff acknowledge that there is no single way of identifying an individual who is likely to be susceptible to an extremist ideology and family, friends and online influences can all play a major factor in the radicalisation of young people. The school will respond to pupils who may be targeted or influenced to participate in radicalism or extremism, it offers the opportunity to talk and be put in touch with the appropriate support agencies. The school will contact prevent line to gain help.

Where the suspicion or complaint is in relation to terrorism or extremism ideas involving a pupil, staff must raise this with the Safeguarding Advisor or DSL without delay. The Safeguarding Advisor or DSL will consult with external agencies/ or LADO in relation to allegations of someone working in the school/or with the police if a criminal offence is suspected, as appropriate in accordance with this policy. Where the level of risk is such that there is an immediate risk of harm or staff have a genuine concern that there is an immediate risk of harm, any member of staff may make a referral directly to children's social care services or the police. The School will not discuss any concerns in relation to possible radicalisation without first agreeing with social care services or the police what information can be disclosed.

Staff will consider the level of risk to identify the most appropriate referral, which could include reference to Channel or children's social care services. Contact details for support and advice on the Prevent Duty can be found below. The Home Office statutory Prevent duty guidance can be accessed on:

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

The Department for Education non-statutory Prevent duty guidance can be accessed on:

www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty

The School, in recognition that pupils may be at risk of being drawn into terrorism, carries out appropriate risk assessments (following consultation with local partners, such as the police) of the potential risk in the local area. Such risk assessments are discussed with the Safeguarding Advisor, the Heads, and the DSL to ensure the School's safeguarding arrangements are sufficiently robust to help prevent and protect children from being drawn into terrorism and are regularly revised.

12.1 Visiting Speakers

The Prevent statutory guidance requires schools to have clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable. The School's responsibility to our pupils is to ensure that they can critically assess the information that they receive as to its value to themselves, and that the information is aligned to the ethos and values of the School and British values.

The School is required to undertake a risk assessment before agreeing to a Visiting Speaker being allowed to attend the School. This will take into account any vetting requirements that are considered appropriate, and may include a DBS check, if appropriate.

Visiting speakers will be expected to understand that where appropriate their session should actively promote the British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs and at no point undermine these. In some cases, the School may request a copy of the Visiting Speaker's presentation and/or footage in advance of the session being provided.

Visiting Speakers, whilst on the School site, will be supervised by a School employee. On attending the School, Visiting Speakers will be required to show original current identification document including a photograph such as a passport or photo card driving licence. The School shall also keep a formal register of visiting speakers retained in line with its Data Protection Policy.

The use of Hurst Lodge for non-school activities

Where services or activities are provided by the school under the direct supervision or management of the school's staff, the arrangement of child protection as state in this policy will apply. However, where services or activities are provided by another body, the proprietor will seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place. The safeguarding arrangements will be included in any hire agreement as a condition of use and that failure to comply will lead to a termination of the agreement.

Elective Home Education

Where a parent/carer expresses their intention to remove a child from the school with a view to educating at home, then school will endeavour to coordinate a meeting with the parents, local authority and other key professionals ideally prior to a final decision having been made. This is particularly important where a child has SEND, is vulnerable, and has a social worker.

12.2 Useful Contacts for Child Protection

Childline - 0800 1111

ChildLine is the free helpline for children and young people in the UK. www.childline.org.uk/

NSPCC helpline – for advice or to report a concern of neglect or abuse **0808 800 5000**

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

Free resources and information for Child Protection Professionals

<https://learning.nspcc.org.uk/>

Stop It Now! helpline– for concerns of child sexual abuse **0808 1000 900**

www.stopitnow.org.uk/

12.3 Further reading

Schools and colleges can also access broad government guidance on the issues listed below via the search facility on the Government website <https://www.gov.uk/>

- child sexual exploitation (CSE)

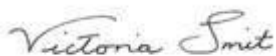
- bullying including cyberbullying
- domestic violence
- drugs
- fabricated or induced illness
- faith abuse
- female genital mutilation (FGM)
- forced marriage
- gangs and youth violence
- gender-based violence/violence against women and girls (VAWG)
- grooming
- harmful sexual behaviour
- mental health
- private fostering
- preventing radicalisation
- sexual abuse
- consensual and non-consensual sharing of nudes and semi-nudes
- teenage relationship abuse
- trafficking

This policy should be read in conjunction with these related school policies:

- Anti-Bullying Policy
- Abuse against staff Policy
- Behaviour Policy
- Children Missing in education Policy
- Complaints Policy and Procedures
- Educational Visits Policy
- E Safety Policy
- Health and Safety Policy
- Intimate Care Policy
- ICT Usage and the use of mobile technologies
- Staff recruitment Policy
- Whistle Blowing Policy
- Parents interaction with Childre other than their own
- Physical contact in Dance, Drama, Music, Sport and Forest School
- Conveying a pupil by car
- Restraint Policy
- Policy on violence and aggression towards staff
- Teaching in one-to-one situations

The person for monitoring and updating this policy is Simmi Kalsi DSL

Effective from September 2023



Victoria Smit
Principal

Appendix 1 – CONFIDENTIAL SAFEGUARDING REPORT FORM

NAME OF STUDENT: _____

FORM: _____

DATE OF BIRTH: _____

REASON for REFERRAL:

Please be exact as possible; state clearly when, where, names of others present during disclosure and to whom this information was shared. Attach any relevant notes.

SIGNED: _____

DATE: _____

POSITION: _____

ACTION TAKEN:

CONTACTS/AGENCIES

DATE

NAMES

FOLLOW-UP:

ACTION

DATE

BY WHOM

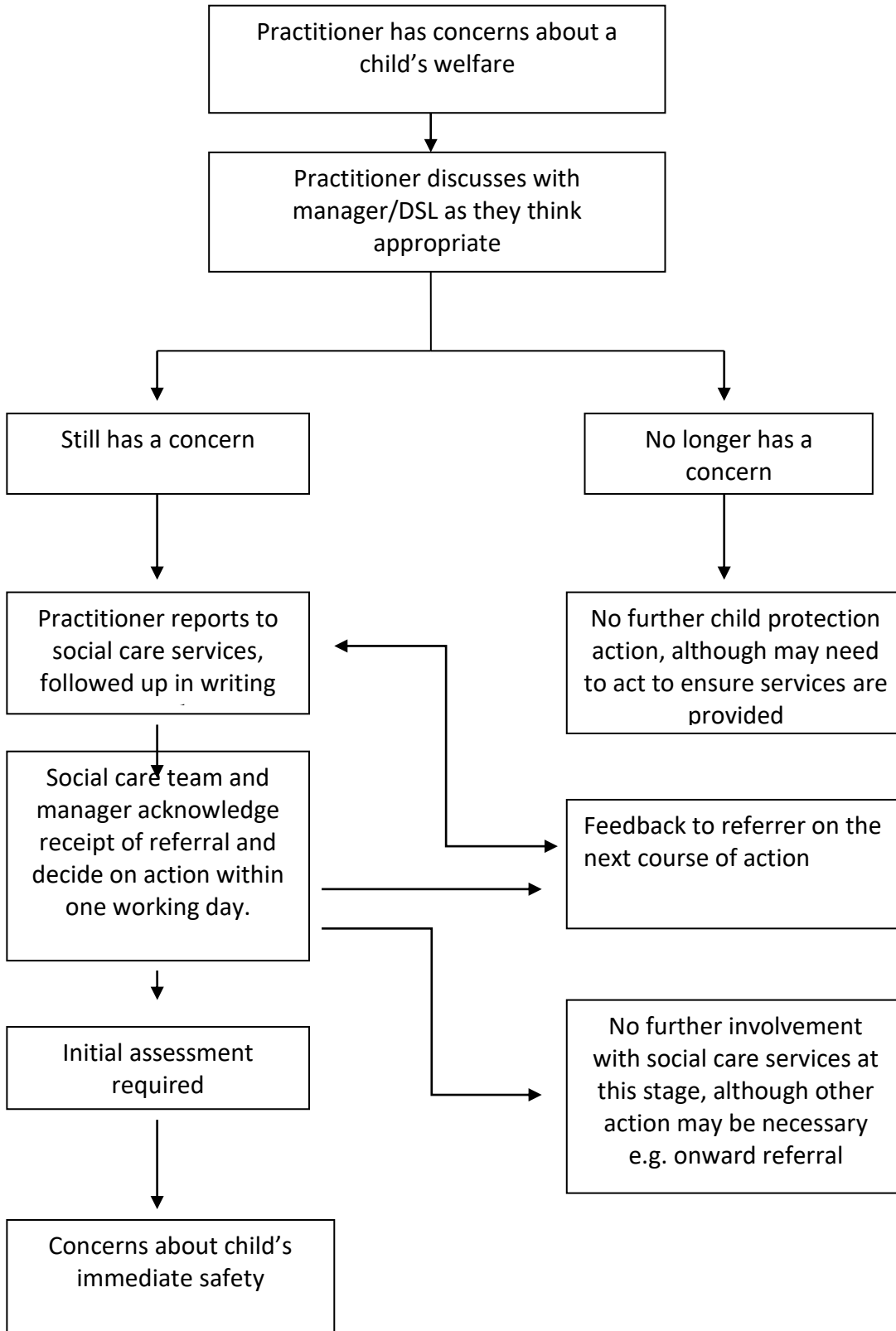
SIGNED:

DATE:

Appendix 2 – CONFIDENTIAL CHILD PROTECTION REFERRAL LOG

NAME	FORM	REASON for REFERRAL	BY WHOM	DATE	ACTION TAKEN	DATE & BY WHOM

Appendix 3 Child protection flowchart (Ref: 'What to do if you're worried a child is being abused, 2006')





Role of the Designated Safeguarding Lead

The Director should ensure that the school or college designates an appropriate senior member of staff to take lead responsibility for child protection. This person should have the status and authority within the school to carry out the duties of the post including committing resources and, where appropriate, supporting and directing other staff. The DSL has sufficient independence particularly if an allegation is made against a Director/Proprietor to contact the LADO on any matter that the DSL considers cannot be dealt properly with internally. She also has access to the Safeguarding Advisor who is independent of the running and management of the school. The school will work with the virtual Headteachers of the placing boroughs to promote the education of children who have a social worker. The DSL will liaise with the virtual heads to ensure that students are supported both academically and emotionally.

The designated safeguarding lead oversees all safeguarding and child protection practices at the school, including being responsible for online safety. The DSL should help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school leadership staff. Their role could include ensuring that the school, and their staff, know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children. The DSL will liaise with the appropriate SENCo regarding mental health. Where available she will also liaise with the mental health support team where safeguarding concerns are linked to mental health. The DSL has regular reviews of their own practice and opportunities to discuss any concerns both with the Principal and the independent Safeguarding Advisor.

Part of the DSL's role is to ensure that children feel heard and understood. She will encourage a culture of listening to children and taking account of their wishes and feelings, amongst all staff, and in any measures the school may put in place to protect them. She will endeavour to understand the difficulties that children may have in approaching staff about their circumstances and will consider how to build trusted relationships which facilitate communication.

When a child moves school, in addition to handing over any child protection file securely, the DSL will share information proactively with the new school to enable the new school to have support in place when a child arrives and to ensure that key staff such as the SENCo are aware of any needs. The DSL will transfer any safeguarding records.

The broad areas of the DSL's responsibilities are:

Managing referrals

- Refer all cases of suspected abuse to the local authority children's social care services and:
- The local authority designated officer (LADO) for child protection concerns relating to a staff member. The DSL will call/email the LADO and seek guidance as to the next steps;
- Disclosure and Barring Service (cases where a person is dismissed or left due to risk/harm to a child); and/or
- Police (cases where a crime may have been committed).
- Liaise with the Safeguarding Advisor or Principal to inform them of issues - especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations
- Act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies
- Work with external agencies and professional on matters of safety and safeguarding.

Training

The designated safeguarding lead should receive appropriate training carried out every two years and in addition to formal training their knowledge and skills are refreshed at regular intervals at least annually in order to:

- Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments
- Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so
- Ensure each member of staff has access to and understands the school's or college's child protection policy and procedures, especially new and part time staff
- Be alert to the specific needs of vulnerable children (please refer to section 2.7 of this policy for a list of vulnerable groups)
- Be able to keep detailed, accurate, secure written records of concerns and referrals
- Obtain access to resources and attend any relevant or refresher training courses
- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them
- The DSL is encouraged to participate with the local safeguarding network team.

Raising Awareness

The Designated Safeguarding Lead should:

- Ensure the school's policies are known and used appropriately
- Ensure the school's child protection policy is reviewed annually and the procedures and implementation are updated and reviewed regularly, and work with the Principle and the Advisory Board regarding this.
- Ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this
- Link with the Local Safeguarding Children Partnership to make sure staff are aware of training opportunities and the latest local policies on safeguarding
- Where children leave the school, ensure their child protection file is transferred to any new school or college as soon as possible but transferred separately from the main pupil file.
- Establish or review current systems for reporting and monitoring children's progress, both within the school and with relevant external agencies, as appropriate

Staff Name _____

Signed _____ Date _____



Role of the Deputy Designated Safeguarding Lead

The deputy designated safeguarding lead, supports the DSL (and takes the lead in their absence) in the following areas of responsibility:

Policy and procedure:

- Act as a champion of the school's safeguarding policy and procedures by supporting all staff to have access to and understand them.
- Contribute to the school safeguarding policy and review process
- Ensure that all staff are aware of their responsibility to challenge behaviour which breaches the Guidance for Safer Working Practice (Code of Conduct).

Reporting concerns:

- Recognise how to identify signs of abuse and when to make a referral
- Respond appropriately and promptly to disclosures or concerns relating to the well-being of a child
- Refer allegations or cases of suspected abuse to the relevant investigating agencies, ensuring they have access to the most relevant up to date information
- Liaise with the Principal and DSL to inform them of any issues and ongoing investigations
- Refer cases to the Channel programme where there is a radicalisation concern as required
- Support staff who make referrals to the Channel programme
- Refer cases to the police as and when necessary
- It is not the role of the Deputy DSL to investigate allegations of abuse or neglect by members of staff working or volunteering with children in school. This falls to the Principal (or to the Safeguarding Advisor where the allegation is against the Principal).

Multi Agency working:

- When the Principal or DSL is unavailable attend and contribute effectively to welfare meetings, Child Protection conferences, Early Help, and planning and review meetings; including those taking place out of normal working hours.
- Liaise with the LA and follow up any referrals made.

Training:

- Attend relevant training on an annual basis. In addition, attend staff meetings/briefings forums/roadshows to reinforce and enhance safeguarding knowledge and practice
- Be pro-active in identifying training needs and inform DSL or Principal
- Keep up to date with safeguarding guidance and policies
- Contribute to safeguarding training for staff as appropriate

Record Keeping:

- Understand the policy and procedures in relation to record keeping
- Ensure that relevant, detailed and accurate written records of referrals/concerns are kept and that these are shared with the Principal and DSL and are stored securely
- Maintain an appropriate level of confidentiality whilst at the same time liaising with relevant professionals.

Staff Name _____

Signed _____ Date _____

Appendix 5

Hurst Lodge School has a Designated Safeguarding Lead (DSL) a Deputy DSL and a Team of DSO's.

The Designated Safeguarding Lead is: Mrs Simmi Kalsi (Yateley Campus) Mrs Linda Hudson (Woodlands)

The Deputy Designated Safeguarding Lead is: Mr Adam Nosworthy and Mrs Sandra Allen (Yateley) Mrs Clare Smith (Woodlands)

The Designated Safeguarding Officers are : Laura Orme (SENCO) and Tanya Piek

Any allegations against staff, volunteers or supply staff or staff of contractors should be referred to Vicky Smit.

Any allegations against the Principal should be referred to Claire Robinson or the LADO.

It is important that all school staff and volunteers have access to a trained DSL (or one of the deputies). On each day staff on site will be made aware of who that person is and how to speak to them. The DSL will continue to engage with social workers, and attend all multi-agency meetings, which can be done remotely. Best practice is to have a trained DSL (or one of the deputies) available on site. Where this is not the case a trained DSL (or one of the deputies) will be available to be contacted via phone or online video - for example when working from home. Where a trained DSL (or one of the deputies) is not on site, in addition to the above, a member of the senior leadership team will assume responsibility for co-ordinating safeguarding on site. This might include updating and managing access to child protection files and liaising with the offsite DSL (or one of the deputies) and as required liaising with children's social workers where they require access to children in need and/or to carry out statutory assessments at the school.

Reporting a concern

Where staff have a concern about a child, they should continue to follow the process outlined in the school Safeguarding Policy. Staff are reminded of the need to report any concern immediately and without delay.

Where staff are concerned about an adult working with children in the school, they should report immediately to the DSL and the Principal. Concerns around the Principal should be directed to the Designated Safeguarding Advisor Claire Robinson. The DSLs will continue to report concerns to the local safeguarding partnerships MASH Team in the usual way.

Contact details for the safeguarding contacts are as follow:

crobinsonson@hurstlodgeschool.co.uk

Hampshire MASH

- Phone 0300 555 1384 during office hours 8.30am to 5pm Monday to Thursday, 8.30am to 4.30pm on Friday
- Phone 0300 555 1373 at all other times to contact the Out of Hours service

Surrey MASH

- Phone: 0300 470 9100 during office hours 9am to 5pm Monday to Friday
- Out of hours phone: 01483 517898 to speak to our emergency duty team

Safeguarding Training and induction DSL training has been suspended whilst there remains a threat of the COVID 19 virus. For the period COVID-19 measures are in place, a DSL (or deputy) who has been trained will continue to be classed as a trained DSL (or deputy) even if they miss their refresher training. All existing school staff have had safeguarding training and have read part 1 of Keeping Children Safe in Education (2024). The DSL will communicate with staff any new local arrangements, so they know what to do if they are worried about a child.

Free online Safeguarding training is available for staff working from home through the National College. New passwords are available if necessary from Philippa Moorby. Where new staff are recruited, or new volunteers enter the school, they will continue to be provided with a safeguarding induction.

If staff are deployed from another education or children's workforce setting to our school, we will take into account the DfE supplementary guidance on safeguarding children during the COVID-19 pandemic and will accept portability as long as the current employer confirms in writing that:-

- the individual has been subject to an enhanced DBS and children's barred list check
- there are no known concerns about the individual's suitability to work with children
- there is no ongoing disciplinary investigation relating to that individual Upon arrival, they will be given a copy of the receiving setting's child protection policy, confirmation of local processes and confirmation of DSL arrangements.

Safer recruitment/volunteers and movement of staff

It remains essential that people who are unsuitable are not allowed to enter the children's workforce or gain access to children. When recruiting new staff, Hurst Lodge School will complete pre-appointment checks on 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 KCSIE. Also Hurst Lodge will continue to follow the relevant safer recruitment processes for our setting, including, as appropriate, relevant sections in part 3 of Keeping Children Safe in Education (2024) (KCSIE). In response to COVID-19, the Disclosure and Barring Service (DBS) has made changes to its guidance on standard and enhanced DBS ID checking to minimise the need for face-to face contact. If the school are utilising volunteers, we will continue to follow the checking and risk assessment process. Under no circumstances will a volunteer who has not been checked be left unsupervised or allowed to work in regulated activity.

Hurst Lodge School will continue to follow the legal duty to refer to the DBS anyone who has harmed or poses a risk of harm to a child or vulnerable adult. Full details can be found in Part 3 of the full version of KCSIE.

Hurst Lodge School will continue to consider and make referrals to the Teaching Regulation Agency (TRA) as per paragraph 166 of KCSIE and the TRA's 'Teacher misconduct advice for making a referral. During the COVID-19 period all referrals should be made by emailing Misconduct.Teacher@education.gov.uk.

Whilst acknowledging the challenge of the current National emergency, it is essential from a safeguarding perspective that any school is aware, on any given day, which staff/volunteers will be in the school or college, and that appropriate checks have been carried out, especially for anyone engaging in regulated activity. As such, Hurst Lodge School will continue to keep the single central record (SCR) up to date as outlined in paragraphs 148 to 156 in KCSIE.

Hurst Lodge School will continue to provide a safe environment, including online. This includes the use of an online filtering system, provision of our E-Safety policy, our Code of Conduct and Acceptable Use Policies.

Where students are using computers in school, appropriate supervision will be in place.

Children and online safety away from school

It is important that all staff who interact with children, including online, continue to look out for signs a child may be at risk. Any such concerns should be dealt with as per the Child Protection Policy and where appropriate contact should still be made to the DSL and/or the Surrey Mash Team.

Safeguarding Policy Addendum COVID-19 1st April 2020 Hurst Lodge School will ensure any use of online learning tools and systems is in line with privacy and data protection/GDPR requirements.

Hurst Lodge School has a Remote Learning Policy which must be adhered to.

However, it is important to understand the following:

- Whilst live online lessons aren't to be recommended ordinarily from a Safeguarding aspect, as it can blur the usual explicit lines about contacting pupils via webcam, and leaves pupils vulnerable to exploitation and abuse, it is understood that an education has to be delivered so staff must always behave according to the Code of Conduct. Explicit safeguarding guidelines are contained within the Schools' Remote Learning Policy, which includes the recording of all Zoom lessons to provide an audit trail if necessary.

All staff at Hurst Lodge School should remind themselves of the following policies:

- Staff code of conduct policy
- ICT/Acceptable use policy
- Social media guidance.
- Behaviour and discipline policy
- Remote Learning policy

Supporting children not in school

Hurst Lodge School is committed to ensuring the safety and wellbeing of all of its children and young people. Where the DSL has identified a child to be on the edge of social care support, or who would normally receive pastoral-type support in school, they should ensure that a robust communication plan is in place for that child or young person. Details of this plan must be recorded on the pupils file.

The communication plans can include; remote contact, phone contact, and door-step visits (observing social distancing). Other individualised contact methods should be considered and recorded.

Online safety in schools

Hurst Lodge School and its DSL will work closely with all stakeholders to maximise the effectiveness of any communication plan. This plan must be reviewed regularly (at least once a fortnight) and where concerns arise, the DSL will consider any referrals as appropriate. The school will share safeguarding messages on its website and social media pages.

It is essential that children are safeguarded from potentially harmful and inappropriate online material. Our school policy empowers us to protect and educate students and staff in their use of technology and allows us to identify, intervene in, and escalate any concerns where appropriate.

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

- content: being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
- contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes'.
- conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and
- commerce - risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>).

Online safety is taught throughout the school and teachers should consider the schools policies and online safety while planning their lessons. where possible staff should seek parental engagement when setting work. We should ensure online safety is a running and interrelated theme whilst devising and implementing policies and procedures. This will include considering how online safety is reflected as required in all relevant policies and considering online safety whilst planning the curriculum, any teacher training, the role and responsibilities of the designated safeguarding lead and any parental engagement.

The school's policies will reflect the fact many children have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G). This access means some children, whilst at school may sexually harass their peers via their mobile and smart technology, share indecent images: consensually and non-consensually (often via large chat groups), and view and share pornography and other harmful content. The school does not permit mobile phones except for medical monitoring reasons however laptops are more difficult to monitor and forensic safeguarding is being implemented across the range of mobile technology with parental engagement.

It should be noted that children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber dependent crime. The school is aware of those with higher level skills and will endeavour to monitor these students particularly.

Hurst Lodge School recognises that school is a protective factor for children and young people, and the current circumstances, can affect the mental health of pupils and staff

Policy Addendum COVID-19 1 st April 2020 parents/carers. Teachers need to be aware of this in setting expectations of pupils' work where they are at home. Hurst Lodge School will ensure that where we care for children of critical workers and vulnerable children on site, we ensure appropriate support is in place for them. This will be bespoke to each child and recorded appropriately.

Supporting children in school

Hurst Lodge School is committed to ensuring the safety and wellbeing of all its students. Hurst Lodge School will continue to be a safe space for all children to attend and flourish. The Principal will ensure that appropriate staff are on site and staff to pupil ratio numbers are appropriate, to maximise safety.

Hurst Lodge School will refer to the Government guidance for education and childcare settings on how to implement social distancing and continue to follow the advice from Public Health England on handwashing and other measures to limit the risk of spread of COVID19.

Hurst Lodge School will ensure that where we care for children of critical workers and vulnerable children on site, we ensure appropriate support is in place for them. This will be bespoke to each child and recorded appropriately.

Child on Child Abuse

Hurst Lodge School recognises that during a closure a revised process may be required for managing any report of such abuse and supporting victims. Where a school receives a report of child-on-child abuse, they will follow the principles as set out in part 5 of KCSIE and of those outlined within the school's Safeguarding and Child Protection Policy. The school will listen and work with the young person, parents/carers and any multiagency partner required to ensure the safety and security of that young person. Concerns and actions must be recorded, and appropriate referrals made. All staff will be sent this additional policy to read and will be asked to confirm that they have read and understood the content. If staff are working from home they will be asked to email confirming the above.