



Safeguarding Policy (Short Courses)

Originally written by Deputy Head Pastoral, September 2023;

Adapted by Compliance Operations Manager, checked by Director of Short Courses: November 2023

Next Review: November 2024

This Policy should be read in conjunction with the:

- staff behaviour policy (Code of Conduct)
- e-safety policies for students and staff, which include use of mobile technology
- safer recruitment policy and procedures
- whistleblowing policy
- anti-bullying policy
- student behaviour policies which include *Behaviour Management Policy, Procedure for Conducting a Search, and Use of Force to Control or Restrain a Student*

The Designated Safeguarding Lead / Prevent Lead for Short Courses is:
David Shaw (Director of Short Courses)

Deputy DSLs are:
Simon Larkin (Academic Manager)
Samantha Belgeonne (Compliance Operations Manager)

The Designated Safeguarding Governor is Robin Leach

Contents

<i>For the avoidance of doubt: the term ‘Sherborne School’ includes Sherborne Short Courses, unless otherwise specified.</i>	4
Section One - Introduction	4
1.1 Introduction to Safeguarding	4
1.2 Statement, principles and aims	4
1.2.1 Statement	4
1.2.2 Principles	5
1.2.3 Aims	7
Section Two - Roles and responsibilities	10
2.1 Overview	10
2.2 All staff	11
2.3 The DSL	12
Section Three - Recognising abuse	15
3.1 Child protection	15
3.2 Significant harm	15
3.3 Child abuse	15
3.4 Recognising child abuse – signs and symptoms	16
Section Four - Procedures	18
4.1 Responding to the child who discloses (talks about) abuse	18
4.2 Action taken by the DSL	20
4.3 Responding to concerns reported by parents or others in the community	21
4.4 Referral guidelines	22
4.5 External Agencies	23
4.6 Response from Children’s Services Social Care to a School referral	23
4.7 Responding to allegations or concerns about staff or volunteers	24
4.8 Low level concerns: Responding to allegations or concerns about staff or volunteers that do not meet the harm threshold	28
4.9 Responding to allegations or concerns about former staff or volunteers	29
4.10 Responding to allegations or concerns about child on child abuse	29
4.11 Sexual harassment and sexual violence	32
4.12 Responding to suspicions of harm occurring outside of School	33
4.13 Early help	33
4.14 Domestic abuse	34
4.15 Students engaging in under-age sexual activity	35
4.16 Youth produced sexual imagery	35
4.17 Children absent from education	40
4.18 Child criminal exploitation (CCE): county lines	41
4.19 Child sexual exploitation (CSE)	42
4.20 Forms of abuse linked to culture, faith, or belief	42

4.21	'Honour-based' abuse (HBA).....	43
4.22	Female genital mutilation (FGM)	43
4.23	Forced marriage	43
4.24	Preventing radicalisation	44
4.25	Children with special educational needs and disabilities	47
4.26	Children and the court system.....	47
4.27	Children with family members in prison.....	47
4.28	Homelessness.....	47
4.29	Online safety	48
4.30	Safer working practice	48
4.31	Training	49
4.32	Record keeping	50
4.33	Monitoring of this policy.....	51
4.34	Visiting speakers.....	51
4.35	Raising concerns about safeguarding practice in School (Whistleblowing)	52
4.36	Information for parents	52
4.37	Further guidance.....	52
Appendix One - Responding to concerns summary		53
Appendix Two - Contact details.....		55
Appendix Three - Possible Indicators of Abuse		57
Appendix Four - Record Keeping: Best Practice		61
Appendix Five - Sexual Violence and Sexual Harassment		69
Appendix Six - Prevent within schools.....		72

For the avoidance of doubt: the term ‘Sherborne School’ includes Sherborne Short Courses, unless otherwise specified.

References to ‘parents’ includes anyone representing the student, including agents, guardians, carers.

Section One - Introduction

1.1 Introduction to Safeguarding

Sherborne School fully recognises that the welfare of the child is paramount and takes seriously its responsibility to safeguard and promote the welfare of the children and young people in its care. This means that we are committed to protecting children from maltreatment; preventing impairment of children’s health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children at Sherborne School to have the best outcomes. We will always endeavour to act in the best interests of the child.

Sherborne School appreciates that safeguarding and promoting the welfare of children is everyone's responsibility. Staff recognise that everyone has a role to play in identifying concerns, sharing information, and taking prompt action to safeguard and promote the welfare of the children and young people in its care. The approach taken throughout the School is coordinated and child-centred meaning that what is in the best interests of the child will be considered at all times.

The Sherborne School Safeguarding Policy reflects the Pan-Dorset Multi-Agency Safeguarding Children Partnership (PDSCP) procedures (<https://pandorsetscb.proceduresonline.com>) and national statutory guidance ‘Working Together to Safeguard Children’ (Jul 2018) including ‘Information Sharing’ (Mar 2015), ‘Keeping Children Safe in Education’, KCSiE (Sep 2023), ‘Prevent Duty Guidance for England and Wales’ (Jul 2015), ‘The Prevent Duty: Departmental advice for schools and childminders’ (Jun 2015), ‘The use of social media for on-line radicalisation’ (Jul 2015), ‘Disqualification under the Childcare Act 2006’ (Jun 2016), ‘Mental Health and Behaviour in Schools’ (Mar 2016), and ‘Counselling in Schools; a blueprint for the future’ (Feb 2016); ‘Sexual Violence & Sexual Harassment Between Children in Schools and Colleges’ (May 2018). The government guidance ‘What to do if you’re Worried a Child is Being Abused – Advice for Practitioners’ (Mar 2015) has also been consulted.

The Safeguarding Policy will be reviewed annually by the Governing Body, unless new legislation or an incident indicates that an intermediate review is necessary.

1.2 Statement, principles and aims

1.2.1 Statement

Sherborne School recognises that the welfare of the child is paramount: the needs and wishes of each child will be put first. Throughout this document, ‘child’ refers to a young person under the age of 18. All children have the right to be safeguarded from harm or exploitation whatever their age, health or disability, gender or sexual orientation, race, religion, belief or first language and political or immigration status. Safeguarding includes online safety. Within this document the term ‘must’ involves a legal requirement to do something and the term ‘should’ mean that the advice set out should be followed unless there is good reason not to.

Sherborne School is committed to actively promoting and ensuring the well-being of students in the broadest sense. Well-being is defined with reference to the Children Act 2004, which lists the following factors:

- physical and mental health and emotional well-being;
- protection from harm and neglect;
- education, training, and recreation;
- the contribution made by them to society;
- social and economic well-being.

We take seriously our duty to safeguard and promote the welfare of the children and young people in our care. The students and parents of Sherborne School have a right to expect that the School will provide a safe and secure environment where all are respected and valued. In addition, the School acts *in loco parentis* and recognises its moral responsibility towards those in its care.

Governors, staff, and regular volunteers in this School understand the importance of taking appropriate action and working in partnership with children, their parents, and other agencies in order to safeguard children and promote their welfare.

The purpose of this policy is to:

- afford protection for all students
- enable staff and volunteers to safeguard and promote the welfare of children
- promote a culture which makes this School a safe place to live and learn and in which children feel safe

1.2.2 Principles

Safeguarding children is everyone's responsibility and hence all staff have an equal responsibility to act. 'Working Together to Safeguard Children' (Jul 2018), HM Government statutory guidance, defines safeguarding as:

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

All children have the right to be safeguarded from harm or exploitation whatever their:

- age
- health or disability
- gender or sexual orientation
- race, religion, belief or first language
- political or immigration status

The Governors recognise also their responsibility to ensure that the staff have the skills, knowledge and understanding necessary to keep safe children who are looked after by the local authority, including ensuring that staff have the information they need about the child's status, contact

arrangements with parents, care arrangements and delegated authority to carers and information available to the DSL.

The Governing Body is accountable for ensuring that the School meets its statutory responsibilities for safeguarding and that all policies and procedures are in place and effective. The Governing Body will act in accordance with Section 175/Section 157 of the Education Act 2002 and the supporting statutory guidance 'KCSiE' (Sep 2023) to lead, safeguard and promote the welfare of children in this School.

The Governing Body recognises its legal responsibility for undertaking an annual review of this Policy and of the appropriateness with which the related duties have been completed. As part of this annual review the Governing Body will receive and carefully consider an annual Safeguarding Report which will be produced by the Designated Safeguarding Governor following interview with the Headmaster, Designated Safeguarding Leads (the Lead and at least one Deputy DSL) and other relevant members of staff which will be recorded in writing. This Report will include reference to the Dorset annual safeguarding audit, its associated action plan and will be used to ensure that the students are taught about safeguarding, through the curriculum and Wellbeing Programme, and other learning opportunities. Taking into account this Report, the Governors will then conduct its annual review in order to ensure that all members of the Governing Body, as part of their legal responsibilities, are satisfied that the Policy is fully appropriate and compliant, and that the related duties have been discharged fully and efficiently. The discussions by the Governors will be minuted in sufficient detail to demonstrate the breadth and depth of the annual review and to show the outcomes of the review. In addition, further review of the policies and procedures will be undertaken by the Governors whenever required to ensure compliance with new legislation or updated best practice guidelines or legislation.

The Dorset Safeguarding Standards (recommended by the PDSCP) also include that each School and college completes and submits to the SCP an annual audit of its safeguarding and child protection arrangements, including an action plan. The audits are completed in the Lent Term each year.

This policy applies to all staff working in or for the School. The School defines a member of staff as: Any person working at the School whether under a contract of employment, under a contract for services or otherwise than under a contract as set down by the DfE. Staff includes teachers, supply and peripatetic teachers and coaches, trainee teachers, teaching assistants, part-time staff, gap students, administrative staff, support staff, caretakers and other ancillary staff, staff appointed from overseas and students paid to work at the School. It also applies to regular volunteers (i.e. those who come into School once a week or more, or on more than 3 days in a 30-day period), Governors or anyone working on behalf of the School.

This Policy, along with all the policies listed below, is available to all students, parents, prospective parents, members of staff and volunteers by its publication on the School's website. A hard copy is always available to view in the [Short](#) Course Management Team Office and Short Course Staff Rooms.

This Safeguarding Policy forms part of a suite of policies and other documents (listed on the front cover page of this Policy) which relate to the safeguarding responsibilities of the School. The Governing body ensures that there are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare.

1.2.3 Aims

We will endeavour to safeguard children and young people by:

- always acting in their best interests
- valuing them, listening to, and respecting them
- involving them in decisions which affect them
- maintaining a safe environment in which children can learn and develop, both on and off-site
- creating an environment where children know they can approach adults, are encouraged to talk, and are listened to
- never tolerating bullying, homophobic behaviour, racism, sexism, or any other forms of discrimination, including through the use of technology
- ensuring the curriculum affords a range of opportunities to learn about keeping themselves safe, particularly when using technology, helping the students to adjust their behaviours in order to reduce risks and build resilience, including to radicalisation
- safeguarding the students from potentially harmful and inappropriate online material by ensuring that appropriate filters and monitoring systems are in place
- operating robust and sensible Health and Safety procedures
- operating clear and supportive policies on drugs, alcohol, and substance misuse
- exercising our duties under the Counterterrorism and Security Act 2015 by ensuring all staff undergo 'Prevent' training in respect of radicalisation and extremist behaviour and by assessing the risk of our students being drawn into terrorism
- supporting attendance and taking action if a child is missing School regularly
- appointing a member of the Short Course Management Team as the Lead DSL and ensuring this person has the time, funding, training, resources, and support to perform the role effectively
- ensuring that there is always cover for the DSL role during School hours for staff to discuss any safeguarding concerns
- ensuring that all staff read at least KCSiE Part One and Annex B if they work directly with children
- putting in place mechanisms to assist staff to understand and discharge their role and responsibilities as set out in KCSiE Part One / Annex B
- making sure all staff and volunteers are aware of and committed to the Safeguarding Policy to ensure that staff are able to identify children at risk and understand their individual responsibility to take action
- providing appropriate training for staff, on an annual basis, to provide them with the relevant skills and knowledge to safeguard children effectively
- to establish an ethos of mutual support amongst all staff, so that any questions and concerns may be shared
- identifying any concerns early and ensuring that those children considered to be at risk are provided with the necessary care, support, and appropriate help to prevent those concerns from escalating. Such help includes working with parents, and other agencies as appropriate
- sharing information about child safeguarding concerns with agencies who need to know and involving children and their parents appropriately. Fears about sharing information

cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children

- to work with individual practitioners and agencies concerned with child protection
- acknowledging and actively promoting that multi-agency working is the best way to support children and their families to promote the welfare of children and to protect them from harm as no single professional can have a full picture of a child's needs and circumstances
- maintaining a close working relationship with Dorset Social Care ensuring open communication that facilitates the use of no name referrals where appropriate. The importance of information sharing between professionals and local agencies is recognised by the Governors
- taking the right action, in accordance with the PDSCP multi-agency safeguarding procedures, if a child discloses or there are indicators of abuse
- promoting a culture in which staff feel able to report to senior leaders what they consider to be unacceptable behaviour or breaches of the Code of Conduct at Sherborne School by their colleagues, having faith that they will be listened to and appropriate action taken
- dealing appropriately with any allegations/concerns about the behaviour of staff or volunteers in accordance with the process set out in statutory guidance
- keeping clear, accurate and contemporaneous safeguarding and child protection records
- recruiting staff and volunteers safely, ensuring all necessary checks are made in accordance with statutory guidance and legal requirements and also making sure that at least one appointment panel member has undertaken safer recruitment training. We check the suitability of staff and volunteers to work with children and ensure that other organisations who provide staff to the School also operate appropriate checks and procedures
- checking that appropriate child protection procedures are in place when students attend off-site activities. All staff are bound by the Offsite Visits Policy when arranging such trips.
- ensuring all the necessary checks are carried out on the suitability of people serving on the governing body of the School
- adopting a code of conduct for all staff and volunteers which includes acceptable use of technologies, staff/student relationships and communications including the use of social media
- ensuring staff and volunteers understand about 'whistleblowing' (*Whistleblowing Policy*) and how to escalate concerns about students or staff if they think the right action has not been taken to safeguard children
- providing effective management for the above through induction, support, and regular training appropriate to role
- making prompt and detailed reports to the Disclosure and Barring Service and the Teaching Regulation Agency when appropriate, having consulted the Local Authority Designated Officer (LADO)

We recognise that because of the day to day contact with children, all School staff are well placed to observe the outward signs of abuse. The School will therefore:

- establish and maintain an environment where children feel secure, are encouraged to talk, and are listened to
- ensure children know that there are many different adults in the School whom they can approach if they are worried

- include opportunities in the curriculum and through assemblies and House meetings for children to develop the skills they need to recognise and stay safe from abuse, particularly when using technology and where appropriate in respect of radicalisation and extremist behaviour
- be alert, in particular, to the potential need for early help for children who have additional needs (e.g. medical needs, family circumstances, disability, English as an Additional Language or specific learning needs)
- take account of the boys and girls, 8-17, age range, boarding environment provided by adjusting its staff and student safeguarding training to reflect the greatest risks posed to the students of our School

Section Two - Roles and responsibilities

2.1 Overview

All adults in the School have an individual responsibility to safeguard and promote the welfare of children by taking appropriate action. This includes taking action where there are child protection concerns.

The Governing Body is accountable for ensuring the School has an effective safeguarding policy which should be reviewed annually and available publicly. The PDSCP recommends that each governing body should nominate an individual member to work closely with the Lead DSL and to provide a link between the School and the governing body to take leadership responsibility for the School's safeguarding arrangements and to monitor whether mandatory policies, procedures and training are in place and are effective.

The Designated Safeguarding Governor for Sherborne School is Robin Leach

The School's safeguarding policies and procedures are reviewed annually by the Governing body and amended as appropriate to ensure full compliance with relevant legislation. Regular meetings between the nominated governor and the DSLs review the efficiency with which the relevant policies and procedures are operating, and any deficiencies or weaknesses are remedied without delay. These meetings and other safeguarding issues are discussed and appropriately recorded in the minutes of Governing Body meetings.

This School has a Lead DSL. This is the person who takes lead responsibility for safeguarding. Any concerns about children should be discussed with/reported to the DSL who will decide what action to take including referring to Children's Social Care or the Police as appropriate. In addition, the Dorset Family Support Teams (incorporating Children's Social Care and Early Intervention Services) can provide advice and guidance on safeguarding and child protection matters. See both Appendix One and Appendix Two for contact details.

The DSL takes lead responsibility for child protection and the prevention of radicalisation. The DSL will direct and provide advice and support to staff members in carrying out all their safeguarding duties and will liaise closely with other safeguarding services and agencies.

If the DSL is absent, such as through illness, his or her duties will be carried out by one of the Deputy DSLs who have all received appropriate training in child protection and inter-agency working and attend refresher training at two-yearly intervals.

Throughout this policy, reference to the DSL includes the Deputy DSLs where the DSL is unavailable.

The DSL is also the Prevent Lead.

The Designated Safeguarding Lead for Sherborne School is Allister Sheffield

On Sherborne Short Courses the Designated Safeguarding Lead is David Shaw.
The Deputy DSLs are Simon Larkin and Samantha Belgeonne

If the DSL is the subject of a complaint the DSL duties will be carried out by the Headmaster. The Headmaster will have received appropriate training in child protection and inter-agency working and attend refresher training at two-yearly intervals.

All action is taken in line with KCSiE (Sep 2023), 'Working Together to Safeguard Children' (2018), the PDSCP procedures and 'What to do if you're Worried a Child is Being Abused – Advice for Practitioners' (Mar 2015).

2.2 All staff

Sherborne School is committed to taking all reasonable measures to safeguard and promote the welfare of each student in its care and expects all staff and volunteers to share this commitment by:

- reading, understanding, and applying policies and procedures within the School which support safeguarding
- knowing how to implement the safeguarding procedures as everyone who comes into contact with children and their families has a role to play in identifying concerns, sharing information, and taking prompt action regarding any concerns
- considering at all times what is in the best interests of the child
- protecting each student from any form of abuse, whether from an adult or another student
- being alert to changes in behaviour of students remembering that abuse could happen here
- being alert to signs of abuse both in the school and from outside
- being alert to the medical needs of children with medical conditions
- recognising that the majority of students attending Sherborne Short Courses are not native speakers of English and may have difficulties in communicating safeguarding issues
- ensuring that their behaviour and actions do not place students or themselves at risk of harm or allegations of harm to a student, for example, in one-to-one tuition, sports coaching or transporting a student by car
- reporting any matters of concern to the DSL or, if the complaint involves the DSL or an allegation is made against a member of staff or volunteer, to the Headmaster
- keeping a full record of any significant complaint, conversation, or event
- all evidence (including scribbled notes, text messages, clothing etc.) must be preserved
- working with the DSL as no single professional can have a full picture of a child's needs and circumstances
- identifying children who may benefit from early help i.e. those who would benefit from support as soon as a problem emerges
- attending appropriate safeguarding training upon appointment and subsequent annual school training
- ensuring that we practise safe recruitment procedures in checking the suitability of all staff and volunteers (including staff employed by another organisation) working with our students. The School's recruitment procedures are set out in the recruitment policy. This Policy outlines the appropriate checks to be carried out to confirm the suitability of a member of staff for appointment including:
 - satisfactory checks concerning identity, self-declaration of medical fitness, right to work in the UK, previous employment history, character references, professional references (where appropriate) and qualifications (where appropriate);

- satisfactory completion of an enhanced disclosure with barred list information or an enhanced disclosure check for regular volunteers and others as required, such as third-party employees, by the DBS. The DBS disclosure certificate which is the subject of the application is obtained before appointment. In accordance with the National Minimum Standards for Boarding Schools (NMSBS) guidance a successful applicant will not be permitted, under any circumstances, to commence employment which involves boarding duties until the School is in receipt of the successful applicant's satisfactory DBS disclosure certificate;
- in the case of any person for whom, by reason of living or having lived outside the UK, obtaining a DBS disclosure certificate is not sufficient to establish suitability to work in a school, such further checks are made as the School considers appropriate;
- where the appointee is a foreign national or has lived or worked overseas for a period of three months or more in the previous five years, the appointee will be required to provide a Certificate of Good Conduct from the relevant country/countries;
- in accordance with DBS guidelines the DBS disclosure certificate must be obtained before or as soon as practicable after appointment. The original DBS disclosure certificate must be provided to the School within one week of it being received by the applicant;
- satisfactory checks that anyone employed as a teacher (including sports coaching) is not subject to a Prohibition Order issued by the Secretary of State;
- satisfactory checks to ensure that individuals from countries in the European Economic Area (EEA) who will be carrying out teaching work are not subject to a sanction or restriction imposed by another EEA professional regulating authority for teachers;
- satisfactory checks that anyone appointed to management positions after 12 August 2015 is not subject to a section 128 direction. Since May 2018 this also applies to staff promoted internally. The School considers a management position to include the Headmaster, members of a School Senior Leadership Team (including support staff), housemasters, teaching positions with departmental headship, Director of Short Courses and all Governors;
- ensuring that we carry out all necessary checks on the suitability of people who serve as volunteers;
- making a direct referral to Dorset Children's Services immediately, if at any point, there is an immediate risk of harm.

2.3 The DSL

The Designated Safeguarding Lead (DSL) for Short Courses must be an appropriate senior member of staff, from the Short Course Management team. They have a legal responsibility for dealing with safeguarding issues, providing advice and support to staff, liaising with the Local Authority, and working with a range of other agencies. The DSL need not be a teacher but must have the status and authority within the management structure to carry out the duties of the post.

The DSL is expected to:

Manage referrals

- Be the first point of contact for parents, students, teaching and non-teaching staff, external agencies and any other in all matters of child protection

- refer cases of suspected abuse to the local authority children's social care (Pan-Dorset Multi-Agency Safeguarding Children Partnership – PDSCP) as required;
- support staff who make referrals to local authority children's social care;
- refer cases to the Channel programme* where there is a radicalisation concern as required;
- support staff who make referrals to the Channel programme*;
- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- refer cases where a crime may have been committed to the Police as required.

(Note: The Channel process is unlikely to be needed in the context of students from overseas attending Sherborne International as it exists to deal with local residents rather than visitors to the UK).

Work with others

The DSL is expected to:

- liaise with the headteacher to inform him or her of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- as required, liaise with the "case manager" and the designated officer(s) at the local authority for child protection concerns in cases which concern a staff member;
- liaise with staff (especially pastoral support staff, Matrons, IT Technicians, Academic Manager with oversight for EAL, and SENCOs or the named person with oversight for SEN in the School) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies; and
- act as a source of support, advice, and expertise for all staff.

Training

The DSL (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The DSL should undertake Prevent awareness training.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other DSLs, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements.
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- ensure each member of staff has access to, and understands, the School's child protection policy and procedures, especially new and part time staff;
- are alert to the specific needs of children in need, those with special educational needs and young carers;
- are able to keep detailed, accurate, secure written records of concerns and referrals;
- understand and support the School with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;

- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at School;
- obtain access to resources and attend any relevant or refresher training courses; and
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school may put in place to protect them.

Raise Awareness

The DSL should:

- ensure the School's child protection policies are known, understood, and used appropriately;
- ensure the school's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors 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; and
- link with the PDSCP to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.

Child protection files

Where children leave the School ensure their child protection file is transferred to the new school or college as soon as possible. This should be transferred separately from the main student file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools and colleges should ensure key staff such as designated safeguarding leads and SENCOs or the named person with oversight for SEN in colleges, are aware as required.

In addition to the child protection file, the DSL should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.

Availability

At times when Short Courses are running, the DSL (or a deputy) should always be available (during School) for staff in the School to discuss any safeguarding concerns. Whilst generally speaking the DSL (or deputy) would be expected to be available in person, it is a matter for individual schools and colleges, working with the DSL, to define what "available" means and whether in exceptional circumstances availability via phone and or video call or other such media is acceptable.

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

Section Three - Recognising abuse

Sherborne School recognises the importance of all staff having an awareness of safeguarding issues including: bullying including cyberbullying, children missing education, child missing from home or care, child sexual exploitation (CSE), domestic violence, drugs, fabricated or induced illness, faith abuse, female genital mutilation (FGM), forced marriage, gangs and youth violence, gender-based abuse/violence against women and girls (VAWG), hate, mental health, private fostering, preventing radicalisation, relationship abuse, sexting and trafficking. It is recognised that behaviours linked to activities such as drug taking, alcohol abuse, truanting and sexting put children in danger.

3.1 Child protection

Child protection is one very important aspect of safeguarding. It refers to the activity which is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

3.2 Significant harm

The Children Act 1989 introduced the concept of significant harm as the threshold that justifies compulsory intervention by statutory agencies in family life in the best interests of children. There are no absolute criteria on which to rely when judging what constitutes significant harm. Sometimes it might be a single traumatic event but more often it is a compilation of significant events which damage the child's physical and psychological development. Decisions about significant harm are complex and, in each case, require discussion with the statutory agencies: Children's Social Care and Police.

3.3 Child abuse

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

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

It is generally accepted that there are four main forms of abuse. It is accepted that in all forms of abuse there are elements of emotional abuse, and that some children are subjected to more than one form of abuse at any one time. The following definitions are from Working Together to Safeguard Children (July 2018).

i) Physical abuse

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

ii) Emotional abuse

The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may

feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the 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, though it may occur alone.

iii) Sexual abuse

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

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

3.4 Recognising child abuse – signs and symptoms

KCSiE (Sep 2023) is clear: 'All School and college staff members should be aware of the signs of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection'. Recognising child abuse is not always easy, especially in the context of Sherborne Short Courses where little is known about the backgrounds and normal behaviours of its students, and it is not the responsibility of School staff to decide whether or not child abuse has definitely taken place or if a child is at significant risk. We do, however, have a clear responsibility to act if we have a concern about a child's welfare or safety or if a child talks about (discloses) abuse. We must maintain an attitude of 'it could happen here'.

Staff should be concerned (on questioning) when:

- explanation for injuries is superficially plausible, but may be inappropriate, or inaccurate in detail
- given varying explanations of an injury
- vague explanations are offered, e.g.: "fell off bike", "bruises easily"
- a history of repeated episodes is evident.

Appendix Three details examples of possible indicators of each of the four kinds of abuse. The government guidance 'What to do if you're worried a child is being abused' (March 2015):

(<https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2>) provides more information on understanding and identifying abuse and neglect. The NSPCC website (<https://www.nspcc.org.uk/>) provides information upon the types and indicators of abuse. Knowing what to look for is vital to the early identification of abuse and neglect. If staff are unsure, they should always speak to the DSL.

Section Four - Procedures

These procedures explain what action should be taken if there are concerns that a child is or might be suffering harm. A 'child' is a person under 18 years, but the principles of these procedures apply to all students at this School, including those over 18.

4.1 Responding to the child who discloses (talks about) abuse

All staff, volunteers and senior students will:

- listen carefully to what is said, keeping an open mind and not making a decision as to whether or not abuse has taken place even if unsubstantiated allegations have been made previously
- maintain an attitude of 'it could happen here' and act in the best interests of the child
- avoid showing shock or disbelief
- observe the child's demeanour
- find an appropriate opportunity to explain that the information will need to be shared with others to ensure that the correct action is taken and state who that will be. They will not promise to keep the information confidential or a 'secret'. If you are told about abuse, you have a responsibility to report it, so that action can be taken
- allow the child to continue at his/her own pace and do not interrupt if the child is freely recalling events. They will not stop him/her in order to find a 'witness' as this could inhibit the child from saying more
- avoid asking questions or pressing for more information. Ask for clarification only. If questions are necessary, they should be framed in an open manner and not 'lead' the child in any way. Remember TED: Tell me.... Explain.... Describe...
- reassure the child, if necessary, that he/she has done the right thing in telling
- explain what will happen next and with whom the information will be shared
- not ask the child to repeat the disclosure to anyone else in School – including the DSL – or ask him/her or any other children who were present to write a written account or 'statement'
- not make a judgement about whether or not abuse has occurred and will not conduct an 'investigation' to establish whether the child is telling the truth. That is a task for social workers and the Police following a referral to them of concern about a child. The role of School staff is to act promptly on the information received
- make an immediate, careful record of what has been said using the child's actual words wherever possible (not an interpretation of them). The written record will ideally be made on the standard School 'concern' form (this is available in Appendix Seven). The record should include the date, time, place, and those present during the conversation and be signed by the person taking the record. The record will be kept securely and handed to the DSL unless the allegation involves the Headmaster or a member of staff, including the DSL
- preserve all evidence, for example scribbled notes, text messages, clothing, and mobile devices
- where physical injuries have been observed, these will be carefully noted but not photographed. The staff member will not ask to see injuries that are said to be on an intimate part of the child's body
- immediately tell the DSL unless someone has made an accusation about a member of staff in which case the Headmaster will be informed. If someone has made an accusation about the Headmaster, the Chair of Governors and the LADO will be informed.

In all cases, this information will not be discussed with other adults (this includes the parents / carers) or young people. The Chair of Governors, David Leakey, can be contacted via David Cole, Bursar, and the Clerk to the Governors. Staff should state that the contact is required as the result of an allegation against a member of staff / volunteer; no details of that allegation will be sought by the Clerk to the Governors

- discuss with the DSL whether any steps need to be taken to protect the person who has told you about the abuse. This may need to be discussed with the person who disclosed.
- liaise as necessary with all relevant professionals including the DSL and Children's Social Care
- understand that such issues necessitate a high degree of confidentiality, not only out of respect for those concerned but also to ensure that evidence is not compromised by discussion in the public domain
- never attempt to carry out an investigation of suspected or alleged abuse by interviewing people or asking other people, such as parents. Social Care and Health and Police staff are the people trained to do this. Such action could cause more damage and interfere with possible criminal proceedings
- remember that anyone can make a referral if necessary. Staff have a right and duty to refer potential or actual child abuse direct to the Local Authority Children's Services or the Police if the situation is an emergency and the DSL, the Headmaster, Chair of Governors or the Safeguarding Governor are not available and they are convinced that a direct report is the only way to ensure the student's safety or if they feel that senior staff action is/has been inadequate and/or inappropriate
- Dorset Social Care (Help and Protection Teams) telephone number is:
 - PDSCP Multi Agency Safeguarding Hub (Mash Team) – 01305 228558
 Where a member of staff makes a referral directly, s/he should inform the DSL as soon as possible thereafter
- the LADO can be contacted on 01305 221122. Sherborne Police Station is 01305 222222. Where a member of staff makes a referral directly, s/he should inform the DSL as soon as possible thereafter.
- **if a child is in immediate danger or is at risk of harm a referral should be made to Children's Social Care and / or the Police immediately.** Anyone can make the referral. Where a member of staff makes a referral directly, s/he should inform the DSL as soon as possible thereafter
- remember that any suspicion or concern that a child or young person may be suffering or at risk of suffering significant harm, **MUST** be acted on. Doing nothing is not an option, safeguarding and promoting the welfare of children is everyone's responsibility. Any suspicion or concerns will be reported without delay to the DSL or Deputy. During term time the DSL should always be available to discuss any safeguarding concerns. However, if for whatever reason they are not available the staff member will discuss their concerns as soon as possible with either another senior member of staff or the duty worker in the Help and Protection Team (contact the MASH team or their local team for advice 01305 228558)
- if a staff member has concerns about a child (as opposed to a direct disclosure or a child who is in immediate danger) a decision will need to be made as to the most appropriate action. Staff should seek advice from the DSL in such situations as options such as referral to social care, referral to specialist services or early help services are available.

4.2 Action taken by the DSL

Any disclosure or indicators of abuse will be reported verbally to the DSL or Deputy straight away. Within 24 hours, the DSL will refer the matter to Dorset Social Care or the Police without further investigation within the School. The School will follow their guidance about what to do next. Their statutory responsibility is to initiate any necessary investigations, and they will want relevant School staff to assist in the way appropriate to the circumstances and will advise on this. Anyone who feels that their concerns have not been dealt with seriously must contact Dorset Social Care.

Where the child already has an allocated social worker, that person or a manager or duty worker in the same team will be contacted promptly.

The DSL will keep a record of the conversation with the duty worker and other social workers, noting what actions will be taken and by whom, giving the date and time of the referral. The referral will be confirmed in writing on the inter-agency referral form (available on the PDSCP website) as soon as possible and at least within 24 hours. Any pre-existing assessments such as through the Common Assessment Framework will be attached.

A School child protection file will be started in the child's name, where the child is not already known to social workers. If a file already exists, the new information will be added to the chronology.

Appendix Four contains detailed record keeping guidance.

If the child can understand the significance and consequences of making a referral to social workers, they will be asked for their views. It will be explained that whilst their views will be taken into account, the School has a responsibility to take whatever action is required to ensure the child's safety and that of other children.

The DSL will decide whether to contact parents at this stage, judging whether do so is likely to place the child at risk of harm from their actions or reactions - for example in circumstances where there are concerns that a serious crime such as sexual abuse, domestic violence or induced illness has taken place. If in any doubt, the DSL or staff member will call the duty worker first and agree with him/her when parents/carers should be contacted and by whom. The reason for the decision not to contact parents first will be recorded in the child's School child protection file.

A child protection referral from a professional cannot be treated as anonymous.

It is important to ensure that even allegations that appear less serious are followed up and taken seriously, and that they are examined objectively by someone independent of the School. Consequently, the LADO will be informed of all child protection allegations or suspicions against a member of staff or volunteer at the School that come to the School's attention and appear to meet the criteria for referral, so that he or she can consult Police and social care colleagues as appropriate.

Any child protection allegation or suspicion against anyone outside the School will be referred to PDSCP. The relevant criteria are that one or more persons have: behaved in a way that has caused a child to suffer or are at risk of suffering serious harm to a child or may have caused serious harm to a

child; or possibly committed a criminal offence against or related to a child; or behaved towards a child or children in a way that indicates that they are unsuitable to work with children.

When deciding whether to make a referral, following an allegation or suspicion of abuse, the Headmaster and DSL should not make their own decision over what appear to be borderline cases, but rather the doubts and concerns should be discussed with the LADO/PDSCP. This may be done tentatively and without giving names in the first instance. What appears trivial at first can later be revealed to be much more serious, and an allegation of child abuse or neglect may lead to a criminal investigation. Thus, the School should not do anything that may jeopardise a Police investigation, such as asking a child leading questions or attempting to investigate the allegations of abuse but should discuss their doubts and concerns with the LADO on a no names basis without identifying the family. If the LADO advises that sufficient concern exists that a child may be at risk of significant harm, a referral will be made without delay. If the initial referral is made by telephone, the DSL will keep a dated and timed record of the conversation, noting what actions are to be taken and by whom. The DSL will then confirm the referral in writing to PDSCP within 24 hours by using the inter-agency referral form (available on the PDSCP website). Any pre-existing assessments such as a CAF will be attached. If no response or acknowledgment is received within one working day, the DSL will contact PDSCP again.

Where the child is not already known to social workers, a child protection file will be started in the student's name. If a file already exists, the new information will be added to the chronology. Where there is no disclosure by a child but concerns are accumulating, such as in relation to neglect or emotional abuse, the DSL will ensure that all information is brought together and that s/he makes a professional judgement about whether to refer to outside agencies; use will be made of the PDSCP threshold document available on the PDSCP website. Such an approach helps to identify the pathway required for the student; whether concerns will be managed within the School; or with the help of other agencies as part of early help which may include use of the Common Assessment Framework (CAF) and the Team around the Family (TAF) approach; or whether they require specialised support such as a social work assessment or referral to CAMHS.

The DSL will reassess the concerns following action when the situation does not improve for the child and, where appropriate, challenge inaction by external agencies.

A member of staff who reports concerns to the DSL should expect some feedback, although confidentiality might mean in some cases that this is not detailed. If the member of staff is not happy with the outcome s/he can press for reconsideration and if following this, s/he still believes the correct action has not been taken, will refer the concerns directly to social workers.

4.3 Responding to concerns reported by parents or others in the community

Occasionally parents or other people in the local community tell School staff about an incident in or accumulation of concerns they have about the family life of a child who is also a student at the School.

If the incident or concern relates to child protection, the information cannot be ignored, even if there are suspicions about the motives for making the report. Members of staff will therefore need to pass the information to the DSL in the usual way.

It is preferable if the parent / community member who witnessed or knows about the concerns or incident makes a call to Children's Social Care themselves as they will be better able to answer any

questions. They can ask for their name not to be divulged if a visit is made to the family. The DSL will advise accordingly and later confirm that this referral has been made.

If the parent / community member refuses to make the referral, the DSL will clarify that s/he has a responsibility to do so and will also need to pass on to social workers how s/he is aware of the information.

This process also applies to parents/community members who are also School staff. As professionals who work with children, they cannot be anonymous when making the referral but can ask for the situation to be managed sensitively and, if necessary, for their identity to be withheld from the family if it will cause difficulties in their private life.

4.4 Referral guidelines

The DSL will have regard for the criteria set out in KCSiE (Sep 2023) when determining whether to make a referral to the LADO or DSC (Dorset Social Care) as appropriate where a student or another person has:

- behaved in a way that caused a child to suffer or are at risk of suffering serious harm
- or
- possibly committed a criminal offence against or related to a child
- or
- behaved towards a child or children in a way that indicates he or she is unsuitable to work with children
- or
- if there are concerns about a child's welfare and there are signs that a child:
 - is experiencing or may already have experienced abuse or neglect;
 - is likely to suffer significant harm in the future

In considering a referral the DSL will differentiate between safeguarding children who have suffered or are at risk of suffering serious harm and those who are in need of additional support from one or more agencies.

A child who is considered to have suffered or is at risk of suffering serious harm will be referred to Dorset Social Care (DSC) immediately. A referral should be made within one working day of the recognition of risk.

A child who is considered to be in need of additional support from one or more agencies will be referred to one or more external agencies as required and an inter-agency assessment using local processes, which may include use of the Common Assessment Framework (CAF) and the Team around the Family (TAF), will be sought. In such situations the parents will be kept fully informed, as appropriate.

The safety of children is paramount in all decisions in relation to the welfare of children and members of staff should take all reasonable steps to offer a child immediate protection from an aggressive parent.

An allegation against a member of staff or volunteer will be discussed with the LADO whose advice will be followed. A referral to DSC or the Police of a child protection allegation or suspicion against a member of staff or volunteer at the School will not normally be made where the case is one which, upon the advice of the LADO, can be satisfactorily investigated and dealt with under the School's internal procedures. In such situations additional support from one or more external agencies will be sought and the parents will be kept fully informed, as appropriate.

A referral to DSC or Police of a child protection allegation or suspicion against a person who is from outside the School and not a member of staff or volunteer at the School will be made and the advice of DSC followed.

A complaint or suspicion of abuse involving the identification of someone who may already be engaged in illegal terrorist-related activity, will always be referred to PDSCP and, if appropriate, the Police. The relevant contact details for preventing terrorism and radicalisation referrals in Dorset are PreventReferral@dorset.pnn.police.uk.

In relation to Channel referrals, the DSL will consider seeking the consent of the child (or their parent) when determining what information can be shared. Whether or not consent is sought will be dependent on the circumstances of the case but may relate to issues such as the health of the individual, law enforcement or protection of the public.

4.5 External Agencies

Whether or not the School decides to refer a particular complaint to DSC or the Police, the parents and student will be informed in writing of their right to make their own complaint or referral and will be provided with contact names, addresses and telephone numbers, as appropriate. These are held in Appendix Two.

Where a member of staff makes a referral directly, s/he should inform the DSL as soon as possible thereafter.

Other External Agencies for reporting Prevent concerns relating to terrorism and extremism are also held in Appendix Two.

4.6 Response from Children's Services Social Care to a School referral

- **Referral**

Once a referral is received by the relevant team, a manager will decide on the next course of action within one working day. When there is concern that a child is suffering, or likely to suffer significant harm, this will be decided more quickly, and a strategy discussion held with the Police and Health professionals and other agencies as appropriate (section 47 Children Act 1989).

The DSL should be told within three working days of the outcome of the referral. If this does not happen s/he will contact the duty worker again.

- **Assessment**

All assessments should be planned and co-ordinated by qualified social worker. They should be holistic, involving other professionals, parents/carers, and the children themselves as far as practicable. Assessments should show analysis, be focused on outcomes, and usually take no longer than 45 working days from the point of referral. School staff have a responsibility to contribute fully to the assessment.

- **S47 Enquiries** (regarding significant harm)

The process of the investigation is determined by the needs of the case, but the child / young person will always be seen as part of that process and sometimes without parents' knowledge or permission. On occasions, this will mean the child/young person is jointly interviewed by the Police and social workers, sometimes at a special suite where a videorecording of the interview is made.

- **The Child Protection Conference**

If, following the S47 enquiries, the concerns are substantiated and the child is judged to be at risk of significant harm, a Child Protection Conference (CPC) will normally be convened. The CPC must be held within 15 days of the first strategy discussion and School staff will be invited to attend - normally the DSL or Headmaster. This person will produce a written report in the correct format (a pro forma is available on the PDSCP website). This will be shared with the child/young person and his/her family before the conference is held. A copy will also be sent to the person chairing the initial CPC at least 24 hours in advance.

More information is in the inter-agency safeguarding procedures 'Child Protection Conferences' on the PDSCP website:

<https://www.pdscp.co.uk/working-with-children/child-protection-conferences/>

If the DSL disagrees with the decisions made by social workers regarding the outcome of the referral, the conclusions of the assessment or any actions taken, the matter should be discussed and if necessary escalated to more senior managers (under the escalation policy available on the PDSCP website), *particularly* if the child's situation does not appear to be improving.

4.7 Responding to allegations or concerns about staff or volunteers

It is expected that all staff and Governors involved in the management of allegations of abuse made against a member of staff (including supply staff and volunteers) or former member of staff (including supply staff and volunteers) will comply at all times with DfE statutory guidance contained within KCSiE (Sep 2023) (the procedure to follow is to be found in Part four of KCSiE).

The use of rigorous recruitment and selection procedures in addition to adhering to the School's Code of Conduct will mean that there are relatively few allegations against, or concerns about, staff or volunteers. If a member of staff, or any other person, has any reason to believe that another adult (whether staff, volunteer, DSL or Deputy DSL) has acted inappropriately or abused a child or young person, they will take action by reporting to the Headmaster (not the DSL) immediately. The Headmaster will inform the Chair of Governors.

The following must be reported to the Headmaster: allegations of behaviour that a member of staff or volunteer has harmed a child, or may have harmed a child; the possibility of a criminal offence against

or related to a child; and behaviour towards a child or children in a way that indicates he or she would pose a risk of harm if they work regularly or closely with children. Even though it may seem difficult to believe that a colleague may be unsuitable to work with children, the risk is far too serious for any member of staff themselves to dismiss such a suspicion without taking action. Doing nothing is not an option; safeguarding and promoting the welfare of children is everyone's responsibility. We all have a role to play in identifying concerns, sharing information, and taking prompt action so as to act in the best interest of the child.

The person suspected of abuse must not be approached on the matter. In cases where serious harm is suspected, the Police should be informed from the outset.

This procedure relates to members of staff who are currently working in the School regardless of where the abuse is alleged to have taken place.

Should the initial allegation first be made to any other member of staff, that member of staff must either request the person raising the allegation to report it to the Headmaster or if that is not possible, to pass details of the allegation to the Headmaster immediately. If the Headmaster is absent, the allegation should be passed to the Chair of Governors.

The Chair of Governors, David Leakey, can be contacted via David Cole, Bursar, and the Clerk to the Governors. Staff should state that the contact is required as the result of an allegation against a member of staff/volunteer; no details of that allegation will be sought by the Clerk to the Governors.

If the allegation or concern is about the Headmaster, the person with concerns will contact the Chair of Governors or the LADO in the Local Authority Safeguarding and Standards Team immediately (without informing the Headmaster). All allegations about the Chair of Governors should be reported to the LADO without the Chair of Governors being informed.

The Dorset LADO can be contacted on 01305 221122.

If an allegation requires immediate attention, but is received outside normal office hours, the allegation should be referred to the Dorset MASH out of hours service (Tel: 01202 228866) or the local police and the LADO informed as soon as possible.

See also Appendix Two for all contact numbers.

Any allegation against a member of staff or volunteer will be dealt with as quickly as possible and without unnecessary delay. The School's priority will be to achieve a quick resolution of that allegation in a fair and consistent way that provides effective protection for any child involved and at the same time supports the person who is the subject of the allegation. All such allegations will be dealt with as a priority without delay.

In all cases of allegations against staff or volunteers, the Headmaster and Chair of Governors, will contact the LADO immediately and within one working day at the latest. There will be no unnecessary delay in referring an allegation.

The LADO will provide advice and preside over the investigation of any allegation or suspicion of abuse directed against anyone working in the School. The discussion with the LADO will include the nature, content, and context of the allegation. A course of action will be agreed with the LADO, including any involvement of the Police. Any communication with both the individual and the parents of the child (or children) will be agreed with the LADO.

Advice will be sought from the LADO, Police and DSC to agree the following:

- who needs to know and, importantly, exactly what information can be shared;
- how to manage speculation, leaks, and gossip;
- what, if any information can be reasonably given to the wider community to reduce speculation; and
- how to manage press interest if and when it should arise.

All discussions, including those with the LADO will be recorded in writing any communication with the individual and the parents of the child concerned will be agreed.

The School will not investigate allegations nor undertake actions within an investigation, before speaking to the LADO so as not to jeopardise statutory investigations. If a crime may have been committed, the matter will be reported to the Police and their advice followed.

The School has a duty of care towards its employees and as such, it must ensure that effective support is provided for anyone facing an allegation. Individuals will be informed of concerns or allegations as soon as possible and given an explanation of the likely course of action unless external agencies object to this. The individual concerned will be advised to contact their trade union representative, if they have one, or a colleague for support. S/he will also be given access to welfare counselling and medical advice.

If the Police decide to take the case further and the allegation is against a member of staff, it is possible that he or she might be suspended or, where the circumstances are considered to warrant it, dismissed. Suspension will not be an automatic response to an allegation.

The School aims to strike a balance between the need to protect children from abuse and the need to protect staff from false or unfounded allegations. However, the School must consider the following when assessing its actions:

- Is the student at risk?
- Are other students at risk?
- Will the presence in School of the member of staff impede an investigation?

The School will always consider alternative arrangements that would achieve the same result as suspension of the member of staff. This could include either redeployment so that the member of staff does not have direct contact with the child concerned, or by providing an assistant to be present when the individual has contact with children. Full consideration will be given to all the options, subject to

the need to ensure the safety and welfare of the student concerned and the need for a full and fair investigation. The School will give due weight to the views of the LADO.

A member of staff will only be suspended if there is no reasonable alternative. If suspension is deemed appropriate, the reasons and justification will be recorded, and the member of staff notified of those reasons in writing within one working day. Appropriate support will be provided for the suspended individual and contact details provided. Social contact with colleagues and friends should not be prevented unless there is evidence to suggest that such contact is likely to be prejudicial to the gathering and presentation of evidence.

Accommodated staff who are being investigated following an allegation will be provided with alternative accommodation away from children. Accommodated staff who are suspended will be required to remain off-site for the duration of their suspension and will be provided with alternative accommodation away from children.

If the allegation is made against a supply agency worker, contractor or other person not directly employed by the School, the organisation or agency of employment will be informed in addition to following the procedures outlined in this policy.

The School will have regard to the guidance and restriction on the reporting or publishing of allegations made against teachers and make all reasonable effort to maintain confidentiality and guard against unwanted publicity. The School will not make any statement about an allegation without consulting Social Care and Health and the Police. This includes statements to parents. This will apply up to the point at which the alleged perpetrator is charged with an offence, or the DfE/TRA publish information about an investigation or reach a decision in a disciplinary case.

If there has been a substantiated allegation against a member of staff, the School will work with the LADO to determine whether there are any improvements to be made to the School's procedures or practice to help prevent similar events in the future.

There is a legal requirement for employers to make a referral to the DBS where they think that an individual has engaged in conduct that harmed (or is likely to harm) a child; or if a person otherwise poses a risk of harm to a child. If an allegation is substantiated and the member of staff / contractor / volunteer / student is dismissed or the School ceases to use the his/her service or the member of staff resigns or otherwise ceases to provide his/her services, the LADO should discuss with the School whether a referral should be made to the Disclosure and Barring Service (DBS) for consideration of whether inclusion on the barred lists is required.

If an allegation is substantiated and the member of staff / contractor / volunteer / student is dismissed or the School ceases to use his/her service or the member of staff resigns or otherwise ceases to provide his/her services, before a disciplinary process is completed, the Headmaster should inform the person about the employer's statutory duty to report the case to the DBS and will so inform the Authority.

If an allegation is substantiated and the member of staff/contractor/volunteer/student is dismissed or the School ceases to use the his/her service or the member of staff resigns or otherwise ceases to provide his / her services, and a judgement is made that a disciplinary process would have been

instituted if the person had remained in post, the Headmaster should similarly inform the person about the employer's statutory duty to report the case to the DBS and will so inform the Authority.

Ceasing to use a person's services includes: dismissal, non-renewal of a fixed-term contract, no longer engaging or refusing to engage a supply teacher provided by an employment agency, terminating the placement of a student teacher or other trainee, no longer using staff employed by contractors, no longer using volunteers, resignation, and voluntary withdrawal from supply teaching, contract working, a course of initial teacher training or volunteering.

If a referral is to be made it should be submitted within one month of the allegation being substantiated and as much evidence about the circumstances of the case as possible will be included in the report. If the member of staff being referred to the DBS is a teacher in England, they should also be referred to the Teaching Regulation Agency (TRA) to consider prohibiting the individual from teaching. Failure to report constitutes an offence.

Referral to the DBS cannot be prevented by a compromise agreement when referral is legally required nor can an individual's refusal to cooperate with an investigation prevent referral. The School has a responsibility to respond to requests from the DBS for information that is already held.

The School also has a duty to refer to the TRA where a teacher has been dismissed (or would have been dismissed if he or she had not resigned) and a prohibition order may be appropriate. Reasons for a prohibition order include 'unacceptable professional conduct', 'conduct that may bring the profession into disrepute' and a 'conviction, at any time, for a relevant offence'. Advice about whether an allegation against a teacher is sufficiently serious to refer to the TRA can be found in Teacher Misconduct: the prohibition of teachers (April 2018). Further guidance is published on the TRA website.

More information is available in the inter-agency procedures ('Allegations Against Staff') on the PDSCP website (<https://www.pdscp.co.uk/working-with-children/allegations-against-staff/>).

4.8 Low level concerns: Responding to allegations or concerns about staff or volunteers that do not meet the harm threshold

A culture in which all concerns about adults (**including allegations that do not meet the harms threshold** (referred to the Local Authority) are shared responsibly and with the right person, recorded and dealt with appropriately, is critical.

This will enable the School to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the school are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of Sherborne.

Concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent, or other adult within or outside of the School; or as a result of vetting checks undertaken. It is important that appropriate action to safeguard students in response to low level concerns.

What is a 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 set out at paragraph 4.4.

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

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

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

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- 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.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

It is crucial that any such concerns, including those which do not meet the harm threshold are shared responsibly and with the right person, and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools and colleges from potential false allegations or misunderstandings

Therefore, if staff have ANY safeguarding concerns (including low level concerns) or an allegation is made about another member of staff (including supply staff, volunteers, and contractors) posing a risk of harm to children, then:

- this should be referred to the Headmaster;
- where there are concerns / allegations about the Headmaster, this should be referred to the chair of governors as detailed above.

4.9 Responding to allegations or concerns about former staff or volunteers

Allegations against former members of staff or volunteers who are no longer working at the School or concerns or suspicions about applicants for positions at the School should be referred to the Headmaster. The Headmaster will inform the LADO and/or the Police.

4.10 Responding to allegations or concerns about child on child abuse

Staff at Sherborne School recognise that safeguarding issues can manifest themselves via child on child abuse meaning that children may be harmed by other students. This is likely to include (but is not limited to):

- bullying (including cyberbullying)
- gender based violence
- physical abuse

- sexual violence and sexual harassment
- sexting
- upskirting

Upskirting is a criminal offence – the offence of upskirting came into force in April 2019 and it is important for staff to look out for it as an example of child-on-child abuse. Upskirting involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm. Perpetrators could face up to two years in prison if convicted.

The nature of the allegation or concern will determine whether staff should implement the School's anti-bullying procedures or whether a referral needs to be made to social workers.

The School recognises its responsibility to minimise the risk of child on child abuse and ensures that:

- information on the School's Anti-bullying Policy is provided to parents and known to staff, as well as being available and known to the students themselves
- no 'initiation' ceremonies' intended to cause pain, anxiety or humiliation to students are allowed, with all students and staff being made aware of the fact that such ceremonies are strictly and absolutely forbidden
- assemblies, curriculum, external speakers, and training of staff to promote the anti-bullying message
- effective measures are in place to prevent bullying and to deal effectively with bullying should it arise, in order that students feel safe and do not identify bullying as a problem in the school
- pastoral care structures support staff in preventing incidents of bullying
- appropriate measures are in place to ensure that any student who is being bullied is suitably supported and that students who may bully others are given appropriate help, support, and guidance
- all incidents will be taken seriously, parents will be contacted, and appropriate action taken

Concerns must always be shared as no single professional can have a full picture of a child's needs and circumstances and what might appear to one member of staff as a one-off minor incident may very well not be. Everyone has a role to play in identifying concerns, sharing information, and taking prompt action so as to act in the best interests of the child.

Bullying is a subset of abuse that can take many forms, all of which can be seen in the bullying of students, including physical, sexual harassment and sexual violence, emotional, verbal, ostracism, homophobic

and gender-related bullying and/or cyber bullying (which includes abusive messages posted online or sent by SMS or email or via other electronic means using technology). In addition, students may be subject to initiation or hazing type violence; such practices may include:

- forced activities for new 'recruits' to 'prove' their worth to join
- forced or required consumption of alcohol, spicy foods, or other substances
- requirement to endure hardships such as staying awake, menial tasks, physical labour, running while blindfolded, etc.
- humiliation
- isolation

- beatings, paddling, or other physical acts
- requirements for new or potential members to do things established members are not required to do
- illegal activities such as requirement to steal items from local shops

Bullying will often involve more than one form. The School is determined that no type of bullying will be tolerated by staff, students, or parents at Sherborne; abuse is abuse and will not be tolerated or passed off as 'banter' or 'part of growing up'. Staff will intervene in such cases and will inform the Head of House and Director of Short Courses.

Further information is available in the School's Anti-bullying Policy and the Behaviour Management Policy. This Policy applies to bullying behaviour outside of the School of which the School becomes aware.

All incidents of bullying behaviour must be reported to the Head of House and Director of Short Courses. All reports, however minor, will be coordinated by the Director of Short Courses and investigated by the Head of House (unless the seriousness of the incident warrants an investigation by the Director of Short Courses) to ensure that a potentially serious case does not develop. Parents will be informed by the Head of House of such incidents. Records of interviews, correspondence and summaries of follow-up actions are to be kept by the relevant Head of House and / or the Director of Short Courses. All Pastoral Notes and emails must be kept for reference.

In serious cases a summary of the interviews and findings, will be forwarded to the Headmaster for consideration to determine the appropriate course of action and possible sanctioning response for the perpetrator. An appropriate record of the incident, investigation and sanction is placed in the School file of all those students involved.

Both the victims of bullying and those who have been involved in bullying behaviour themselves can expect the support of the School. The motivation behind the bullying behaviour will be considered. If this gives rise to concerns that the perpetrator of the behaviour is at risk of harm, then the School will follow the Safeguarding and Child Protection procedures.

The support for the victim of bullying behaviour will seek to help them recover from the unpleasant and upsetting effects of bullying and to begin once more to enjoy their experience of being a member of the School. This process will involve thorough discussion with the student, their parents, Head of House and Director of Short Courses. As part of this process it may be appropriate for the School Chaplain and/or the School Counsellor to become involved. Support from external services such as Social care and CAMHS will also be sought if appropriate as it might be that early help or additional support is needed.

The support for the perpetrator of the bullying behaviour will involve efforts to help them change their behaviour. Other than in the cases of those required to leave the School (including those who have been permanently excluded as a result of their bullying), this will be through discussion with the student concerned, their parents, Head of House and Director of Short Courses. As part of this process it may be appropriate for the School Counsellor to become involved. Support from external services will also be sought if appropriate as it might be that early help or additional support is needed for the perpetrator. Whilst the School recognises the need to support those who have been involved in

bullying behaviour in changing their behaviour, it also accepts that sanctions will often be necessary and appropriate as part of its response to bullying incidents.

An annual report is made to the governing body through the Governors' Pastoral Committee on the prevention of bullying and the anti-bullying strategies being followed by the School.

All School staff, parents and students should be aware that engaging in bullying behaviour or condoning or failing to challenge or report bullying could lead to the application of child protection procedures. In the case of a member of staff being complicit, or otherwise involved, in bullying behaviour, the procedure outlined in section 4.7 Responding to allegations or concerns about staff or volunteers above will be applied.

Under the Children Act 1989, a bullying incident (including cyber bullying) will be treated as a child protection concern where there is 'reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm'. The School will refer to local agencies and take advice from the PDSCP as to the appropriate action to take, including the timing of informing parents. Parents will be informed as soon as possible, unless it is not in the best interests of the child to do so. It is an expectation that in the event of disclosures about student on student abuse that all children involved, whether as perpetrator or victim, are treated as being at risk. Child protection concerns involving an allegation against a student when there is reasonable cause to suspect that a child is suffering, or likely to suffer significant harm will be referred to the LADO.

A student against whom an allegation of abuse has been made may be suspended from the School during the investigation and the School's policies on behaviour and discipline will apply.

A referral to Children's Social care will be made in all cases of domestic abuse whether physical, emotional, sexual and/or financial abuse, or coercive control.

These child protection procedures will be followed if a child or young person displays sexually harmful behaviour. This involves one or more children engaging in sexual discussions or acts that are inappropriate for their age or stage of development. It is also considered harmful if it involves coercion or threats of violence or one of the children is much older than the other.

4.11 Sexual harassment and sexual violence

Staff should not dismiss abusive behaviour as 'normal' between young people and should not develop high thresholds before taking action.

They should make it clear that sexual violence and sexual harassment is not acceptable and will never be tolerated.

It is essential that all staff understand the importance of challenging inappropriate behaviours between peers and that they are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "kids being kids" and so behaviours (potentially criminal in nature), such as grabbing bottoms, breasts or genitalia, flicking bras and lifting up skirts must be challenged. If not challenged, it can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence, or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

If staff have a concern about a student or a student makes a report to them, they should follow the safeguarding referral process as set out in section 4.10 (**Responding to allegations or concerns about child on child abuse**) of this policy.

Greater detail regarding the process of managing reports of child on child sexual violence and sexual harassment can be found in KCSiE (Sep 2023).

Details of how to proceed with an allegation of sexual harassment or sexual violence can be found in Appendix 5 of this policy.

4.12 Responding to suspicions of harm occurring outside of School

A member of staff who suspects that a student is suffering harm from outside the School should seek information from the child with tact and sympathy using 'open' and not leading questions. A sufficient record should be made of the conversation and if the member of staff continues to be concerned, he or she should follow the appropriate guidelines as set out in this policy.

4.13 Early help

A member of staff who believes that a student would benefit from early help (taking action to support a child, young person, or their family as soon as a problem emerges) should speak to the Short Course Management Team including the DSL. Early help means providing support as soon as a problem emerges, at any point in a child's life, from the foundation years through to the teenage years. The School listens to the voice of the child, puts its students at the centre of its care and recognises the importance of students receiving the right help at the right time to address risks and prevent issues escalating. The Short Course Management Team will consult other Sherborne School colleagues including Housemasters, the Chaplain, Health Centre, School Counsellor, Independent Person and Pastoral Team to ensure a wide range of early help options are put in place.

Effective early help relies upon local agencies working together and hence the DSL will provide support throughout the PDSCP early help assessment process. This process involves the use of the Common Assessment Framework (CAF), the PDSCP threshold tool and the Team around the Family (TAF) approach. These early help assessments are designed to identify what help the child and family require to prevent needs escalating to a point where intervention would be needed via a statutory assessment under the Children Act 1989.

Early help will not be appropriate if a child may be suffering, or likely to suffer, significant harm, and/or may be in immediate danger and in need of immediate protection (where referrals to the police and/or children's social care should be made immediately).

All staff should, in particular, be alert to the potential need for early help for a child who:

- is disabled and has specific additional needs;
- has special educational needs;
- is a young carer;
- is showing signs of engaging in anti-social or criminal behaviour;

- Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems and domestic violence;
- has returned home to their family from care;
- is showing early signs of abuse and/or neglect.

In addition to identifying emerging problems and liaising with the DSL to share information with other professionals so to support early identification and assessment staff may be asked, in some cases, to act as the lead professional in undertaking the early help assessment. The lead professional provides support to the child and family, acts as an advocate on their behalf and coordinates the delivery of support services. The lead professional role could be undertaken by a General Practitioner (GP), family support worker, teacher, health visitor and/or special educational needs coordinator. Decisions about who should be the lead professional will be taken on a case by case basis and will be informed by the child and their family.

For an early help assessment to be effective:

- the assessment should be undertaken with the agreement of the child and their parents or carers. It should involve the child and family as well as all the professionals who are working with them;
- a teacher, GP, health visitor, early years' worker or other professional should be able to discuss concerns they may have about a child and family with a social worker in the local authority. Local authority children's social care should set out the process for how this will happen; and
- if parents and/or the child do not consent to an early help assessment, then the lead professional should make a judgement as to whether, without help, the needs of the child will escalate. If so, a referral into local authority children's social care may be necessary.

The agreement of the child and their parents or carers will be sought by the person within the School who has the closest working relationship with them; this might be the DSL, Head or Deputy Head of House, Matron, a teacher, or another member of staff. Each case will be judged individually and the decision as to the most appropriate person to undertake this will be made by the DSL in consultation. If agreement is refused by the child and/or their parents the advice of Children's Social Care will be sought by the DSL.

If early help is considered to be appropriate, the situation will be kept under constant review and a referral made to Children's Social Care if the child's situation does not appear to be improving.

If at any time it is considered that the child may be a child in need as defined in the Children Act 1989, or that the child has suffered significant harm or is likely to do so, a referral should be made immediately to Children's Social Care. This referral can be made by any professional.

Further guidance can be found in Chapter One of Working Together to Safeguard Children (July 2018).

4.14 Domestic abuse

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

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

- psychological;
- physical;
- sexual;
- financial; and
- emotional

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

Sherborne School is part of Operation Encompass. This is a police and education early intervention safeguarding partnership which supports children and young people who experience Domestic Abuse. Operation Encompass means that the police will share information about Domestic Abuse incidents with our school PRIOR to the start of the next school day when they have been called to a domestic incident.

This information will be received by a Key Adult (DSL/DDSL) who has completed an Operation Encompass Key Adult briefing. They will then assess the types of support needed for the student.

Information regarding the incident will be shared with key staff relating to that student, but only as widely as necessary, in line with other child protection information.

Operation Encompass information is stored in line with all other confidential safeguarding and child protection information and actions taken by the School must do nothing that puts the child or the non-abusing adult at risk.

The Safeguarding Governor will report on Operation Encompass in the termly report to Governors. All information is anonymised for these reports.

4.15 Students engaging in under-age sexual activity

Sexual activity where one of the partners is under the age of 16 is illegal. Whilst it is not usual for consenting partners of a similar age to be criminalised if a student reveals that they are sexually active it may be a child protection matter. The DSL involved will exercise professional judgement when deciding whether to refer to social workers, taking into account such things as the age of the students, imbalance of power, wide difference in ages or developmental stages and the possibility of peer abuse, etc.

Where a child is under the age of 13 penetrative sex is classified as rape under the Sexual Offences Act 2003 so must be reported to social workers in every case.

Sexual activity may also be considered a disciplinary matter.

4.16 Youth produced sexual imagery

School staff are advised to use the term 'youth produced sexual imagery' rather than 'sexting' to ensure clarity surrounding this issue. The [KCSiE 2023 guidance](#) and [UKCIS guidance](#) refers to YPSI as the consensual and non-consensual sharing of nude and semi-nude images and/or videos.

Professionals consider youth produced sexual imagery to be 'sending or posting sexually suggestive images, including nude or semi-nude photographs, via mobiles or over the Internet.' Young people, however, are more likely to interpret youth produced sexual imagery as 'writing and sharing explicit messages with people they know'. Similarly, many parents think of youth produced sexual imagery as flirty or sexual text messages rather than images.

This section covers the sharing of sexual imagery by young people. Creating and sharing sexual photos and videos of under-18s is illegal and therefore causes the greatest complexity for schools and other agencies when responding. It also presents a range of risks, particularly if the imagery is shared further, including embarrassment, bullying and increased vulnerability to sexual exploitation, which need careful management.

The types of incidents covered are:

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

This section does not cover the sharing of sexual imagery of people under 18 by adults as this constitutes child sexual abuse. In this instance, the School will use the reporting procedures described earlier in the Policy.

All incidents of youth produced sexual imagery must be dealt with as a safeguarding concern and [guidance](#) from the UK Council for Internet Safety will be followed. The procedure for dealing with such incidents is:

- if staff become aware of such an incident, they must report it to the DSL as soon as possible. Disclosures about such incidents can happen in a variety of ways. The young person affected may inform a member of staff, or a friend or parent may inform someone in School, or inform the Police directly
- any direct disclosure by a young person should be taken very seriously and handled sensitively. A young person who discloses they are the subject of sexual imagery is likely to be embarrassed and worried about the consequences. It is likely that disclosure in School is a last resort and they may have already tried to resolve the issue themselves
- where an electronic device is involved staff should confiscate the device and hand it to the DSL without any content first being viewed
- the DSL will hold an initial review meeting with appropriate School staff. This initial review meeting aims to establish:
 - whether there is an immediate risk to a young person or young people
 - if a referral should be made to the Police and/or Children's Social Care
 - if it is necessary to view the imagery in order to safeguard the young person – in most cases, imagery should not be viewed
 - what further information is required to decide on the best response?
 - whether the imagery has been shared widely and via what services and/or platforms. This may be unknown

- whether immediate action should be taken to delete or remove images from devices or online services
- any relevant facts about the young people involved which would influence risk assessment
- if there is a need to contact another school, college, setting or individual
- whether to contact parents of the students involved - in most cases parents should be involved
- an immediate referral to the Police and/or Children's Social Care (via the Dorset MASH team) will be made if at this initial stage;
 - the incident involves an adult
 - there is reason to believe that a young person has been coerced, blackmailed, or groomed, or if there are concerns about their capacity to consent (for example, owing to special educational needs)
 - what is known about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
 - the imagery involves sexual acts and any student in the imagery is under 13
 - we have reason to believe a young person is at immediate risk of harm owing to the sharing of the imagery, for example, the young person is presenting as suicidal or self-harming

If none of the above apply, then the School may decide to respond to the incident without involving the Police or Children's Social Care (the School can choose to escalate the incident at any time if further information / concerns come to light).

- if at the initial review stage, a decision has been made not to refer to the Police and / or Children's Social Care, the DSL should conduct a further review. This will include subsequent interviews with the young people involved (if appropriate) to establish the facts and assess the risks. The risks considered include:
 - why was the imagery shared? Was the young person coerced or put under pressure to produce the imagery?
 - who has shared the imagery? Where has the imagery been shared? Was it shared and received with the knowledge of the student in the imagery?
 - are there any adults involved in the sharing of the imagery?
 - what is the impact on the young people involved?
 - do the young people involved have additional vulnerabilities?
 - does the young person understand consent?
 - has the young person taken part in this kind of activity before?
- parents will be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm. Any decision not to inform the parents would generally be made in conjunction with other services such as Children's Social Care and/or the Police, who would take the lead in deciding when the parents should be informed.

If, at any point in the process if there is a concern a young person has been harmed or is at risk of harm, a referral will be made to Children's Social Care and/or the Police immediately.

If the DSL is aware that Children's Social Care are currently involved with a young person involved in an incident of youth produced sexual imagery, then they will contact Children's Social Care. They will

also contact Children's Social Care if they believe they may be involved or have been involved with a young person in the past.

If as a result of the investigation the DSL believes there are wider issues which meet the threshold for Children's Social Care involvement, then they will make a referral in line with the child protection procedures.

The decision to respond to the incident without involving the Police or Children's Social Care would be made in cases when the DSL is confident that they have enough information to assess the risks to students involved and the risks can be managed within the School's pastoral support and disciplinary framework and, if appropriate, their local network of support. The School can also seek the advice of the Dorset Safeguarding Standards Advisor. The decision will be made by the DSL after consultation with the Headmaster and input from other members of staff where appropriate. The decision will be recorded.

Suitable consideration will be given to deleting imagery from devices and online services to limit any further sharing of the imagery.

If a young person has shared imagery consensually, such as when in a romantic relationship, or as a 'joke', and there is no intended malice, it is usually appropriate for the School to manage the incident directly. In contrast any incidents with aggravating factors, for example, a young person sharing someone else's imagery without consent and with malicious intent, should generally be referred to police and / or Children's Social Care. Where there are doubts about whether to involve other agencies, a referral will be made.

Whilst the School recognises the need to support those who have been involved in youth produced sexual imagery behaviour in changing their behaviour, it also accepts that sanctions will often be necessary and appropriate as part of its response to such incidents. The response of the School is always guided by the principle of proportionality and the primary concern at all times is the welfare and protection of the young people involved.

Adults should not view youth produced sexual imagery unless there is good and clear reason to do so. Wherever possible responses to incidents should be based on what DSLs have been told about the content of the imagery.

The decision to view imagery should be based on the professional judgement of the DSL. Imagery should never be viewed if the act of viewing will cause significant distress or harm to the student. If a decision is made to view imagery, the DSL needs to be satisfied that viewing:

- is the only way to make a decision about whether to involve other agencies (i.e. it is not possible to establish the facts from the young people involved)
- is necessary to report the image to a website, app, or suitable reporting agency to have it taken down, or to support the young person or parent in making a report
- is unavoidable because a young person has presented an image directly to a staff member or the imagery has been found on a School device or network

If it is necessary to view the imagery, then the DSL will:

- never copy, print, or share the imagery; this is illegal
- discuss the decision with the Headmaster
- ensure viewing is undertaken by the DSL or another member of the safeguarding team with delegated authority from the Headmaster
- ensure viewing takes place with two members of staff present in the room, both of whom are ideally members of the Senior Leadership Team/Short Course Management Team with one at least being the same sex as the student involved
- ensure wherever possible ensure that viewing takes place on School premises
- record the viewing of the imagery in the School's safeguarding records including the date, who was present, why the image was viewed and any subsequent actions.

If youth produced sexual imagery has been unavoidably viewed by a member of staff either following a disclosure from a young person or as a result of a member of staff undertaking their daily role (such as IT staff monitoring School systems) the DSL will ensure that the staff member is provided with appropriate support.

Once a report is made to the Police, the report has to be recorded and the Police will conduct an investigation. This may include seizure of devices and interviews with the young people involved.

The use of Outcome 21 by the Police means that schools can be confident that the Police have discretion to respond appropriately in cases of youth produced sexual imagery and to record incidents in a way which should not have a long-term negative impact on young people. (Outcome 21 states 'further investigation, resulting from the crime report, which could provide evidence sufficient to support formal action being taken against the suspect is not in the public interest. This is a police decision.')

Deleting the Imagery

Whether the image is deleted by the school will depend on the outcome of the incident however a general guide is:

- If the incident is dealt with by the school, then the image will be deleted as much as possible. If this is the case, students will be asked to delete the images and then confirm to the DSL that they have done this.
- If the incident is passed on to the police or Dorset Safeguarding, then the imagery should not be deleted. If this is the case, then the device will be disconnected from the Internet to prevent images being deleted remotely.

Whilst young people creating and sharing sexual imagery can be very risky, it is often the result of young people's natural curiosity about sex and their exploration of relationships. Hence, teaching about safeguarding issues can prevent harm by providing young people with skills, attributes, and knowledge to help them navigate risks. Sherborne Short Courses takes opportunities to educate students about these risks through assemblies, the curriculum and House meetings.

Supporting parents (or other student representatives)

Parents will be:

- given information about the sharing of nudes and semi-nudes, what they can expect to happen next, and who will be their link person within the education setting
- given support to deal with their own feelings of upset and concern including signposting to further resources that can help them to understand the sharing of nudes and semi-nudes or support services they can contact, where appropriate
- given support on how to speak to their child about the incident
- advised on the law around the sharing of nudes and semi-nudes
- kept updated about any actions that have been taken or any support that their child is accessing, unless the child involved has specifically asked for this not to happen and is judged to be old enough to make that informed decision
- informed about sources of support for their child in case they are feeling anxious or depressed about what has happened. This could include speaking to a Childline counsellor [online](#) or on 0800 11 11, in house counselling services where available, or a GP. If they are concerned that their child is suicidal, they should contact 999
- directed to [NCA-CEOP](#) if the child or young person discloses any further details to them that may suggest they are being groomed or sexually exploited

Further information may be found in the following documents (both of which have been used in the update of this policy):

Department for Education advice document, 'Searching, screening and confiscation' (Jan 2018)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1091132/Searching_Screening_and_Confiscation_guidance_July_2022.pdf

UK Council for Internet safety, 'Sharing nudes and semi-nudes: advice for education settings working with children and young people in schools and colleges' (December 2020)

[Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK \(www.gov.uk\)](#)

Support is available from a number of agencies listed in Appendix Two.

4.17 Children absent from education

All children, regardless of their circumstances, are entitled to a full-time education which is suitable to their age, ability, aptitude, and any special educational needs they may have.

Members of staff are under a legal obligation to identify students missing from their lesson / activity unless their absence is officially recorded on iSAMS. Children who are absent from school, particularly repeatedly and/or for prolonged periods, and children missing education can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect such as sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, so-called 'honour'-based abuse or risk of forced marriage.

Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. It is therefore vital that staff follow this policy and if they have any concerns regarding the safety and welfare of a student, to inform the DSL.

If a student goes missing, then the Missing Boy Procedure must be followed. The DHP and DSL must be informed on all occasions if a student is missing to help identify vulnerable students and to help to prevent the risks of their going missing in the future. Where a student is missing from School staff should also have in mind the potential safeguarding concerns relating to travelling to conflict zones and forced marriage.

The School will notify the local authority within five days when a student's name is added to the admission register.

The School will notify the local authority when a student's name is added to or removed from the admissions register at non-standard transitions. The School will inform the local authority when a student is deleted from its register under any of the fifteen grounds set out in the Education (Student Registration) (England) Regulations 2006 as amended, as soon as the ground for deletion is met and not before the student's name is deleted from the register.

This is undertaken so that the local authority can, as part of their duty to identify children of compulsory school age who are missing education, follow up with any child who might be in danger of not receiving an education and who might be at risk of being harmed, exploited or radicalised.

The School has a legal duty to inform the local authority of any student who fails to attend School regularly or has been absent without the School's permission for a continuous period of 10 school days or more.

Further guidance can be found in the government's Missing children and adults' strategy (Dec 2011) (<https://www.gov.uk/government/publications/missing-children-and-adults-strategy>) and in Children missing education (Sep 2016) (<https://www.gov.uk/government/publications/children-missing-education>).

4.18 Child criminal exploitation (CCE): county lines

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

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

4.19 Child sexual exploitation (CSE)

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 to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and / or (b) for the financial advantage or increased status of the perpetrator or facilitator.

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

CSE is never the victim's fault, even if there is some form of exchange (sexual activity in return for something); all children and young people have a right to be safe and protected from harm.

We recognise that any child or young person may be at risk of sexual exploitation, regardless of family background or other circumstances. Boys may be less likely than females to disclose experiences of CSE and so it is important that we remain alert to CSE. We also recognise that the long-term impact of CSE can lead to significant harm to physical and mental health.

Recognition of CSE is part of staff training. Possible indicators of risk include for example, acquisition of money, clothes, mobile phones etc. without plausible explanation, isolation from peers, inappropriate sexualised behaviour, relationships with controlling older individuals or groups, and increasing secretiveness.

Due to the grooming methods used by abusers, it is common for young people not to recognise they are being abused and may feel they are 'in a relationship' and acting voluntarily. Students at this School are educated about CSE to build awareness and we promote resilience via the recognition of healthy relationships. Students discuss CSE as part of the Wellbeing Programme.

It is also recognised that children can be both experiencing CSE and perpetrating it at the same time.

Any concerns about child sexual exploitation will be discussed with the DSL who will take appropriate action including completing a PDSCP risk assessment form. We recognise that the early sharing of information is key to providing effective help and will work closely with all external agencies involved. There are more detailed local procedures and the risk assessment tool in the multi-agency safeguarding procedures on the PDSCP website (<http://www.http://pdscp.proceduresonline.com/>). The School has due regard to both the PDSCP procedures and to DfE guidance Child Sexual Exploitation: Definition and a guide for practitioners, local leaders and decision makers working to protect children from child sexual exploitation (Feb 2017).

4.20 Forms of abuse linked to culture, faith, or belief

All staff in this School will promote mutual respect and tolerance of those with different faiths and beliefs. Staff should strive to suspend professional disbelief (i.e. that it 'could not happen here') as some forms of abuse are linked to a lack of respect and tolerance. All staff should report promptly any concerns to the DSL who will seek further advice from statutory agencies, prior to contacting parents. There are more detailed local procedures in the inter-agency safeguarding procedures on the PDSCP website.

4.21 'Honour-based' abuse (HBA)

So called 'honour-based' abuse (HBA) is a crime or incident which has or may have been committed to protect or defend the honour of the family and/or community. It can exist in all communities and cultures and occurs when perpetrators perceive that a relative has shamed the family and / or community by breaking their honour code. Females are predominantly, but not exclusively, the victims and the violence is often committed with some degree of approval and/or collusion from family or community members. HBA includes female genital mutilation and forced marriage; it is abuse and should be handled and escalated as such.

4.22 Female genital mutilation (FGM)

Female genital mutilation (FGM) is illegal as it is a form of child abuse. It involves intentionally altering or injuring female genital organs for non-medical reasons. It can have serious and long-lasting implications for physical health and emotional well-being. There is a range of possible indicators, including taking the girl out of school / country for a prolonged period or talk of a 'special procedure' or celebration, which individually may not indicate risk but if two or more indicators are present this could signal a risk. Victims of FGM are likely to come from a community that is known to practice FGM, such as Somali, Kenyan, Sudanese, Sierra Leonean, Egyptian, Nigerian, Eritrean, Yemeni, Kurdish, and Indonesian communities.

If any member of staff has a concern about a girl, including those from other local schools they are teaching, the local safeguarding procedures must be activated. Evidence of FGM may come from disclosure or from visual evidence. Such visual evidence must not come from an individual examining the girl. Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) placed a statutory duty upon **teachers** along with regulated health and social care professionals. In addition to reporting any concerns to the DSL, teachers along with regulated health and social care professionals have a statutory duty to report personally to the Police if they discover that FGM has or appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions.

Further information on reporting can be found at:

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

In those cases where a teacher merely suspects that an act of FGM may have been carried out or that a girl may be at risk of FGM (as opposed to cases where the teacher discovers an act of FGM) and in cases relating to girls aged 18 or over, teachers should discuss their concerns with the DSL who will follow the School's normal safeguarding procedures and involve children's social care as appropriate.

4.23 Forced marriage

Forced marriage is also illegal and occurs where one or both people do not or, in cases of people with learning disabilities, cannot consent to the marriage and pressure or abuse is used. It is not the same as arranged marriage. Young people at risk of forced marriage might have their freedom unreasonably restricted or being 'monitored' by siblings. There might be a request for extended absence from School or might not return from a holiday abroad. We recognise that School staff can play an important role in safeguarding children from forced marriage.

4.24 Preventing radicalisation

Schools are subject to a duty under section 26 of the Counterterrorism and Security Act 2015 to have due regard to the need to prevent people from being drawn into terrorism. This duty is known as the

‘Prevent’ duty. Paragraphs 57-76 of the Revised Prevent duty guidance: for England and Wales are specifically concerned with schools. In this School we recognise that safeguarding against radicalisation and extremism is no different from safeguarding against any other vulnerability.

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. During the process of radicalisation, it is possible to intervene to prevent vulnerable people being radicalised.

Extremism is defined by HM Government as ‘Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs; and/or calls for the death of members of our armed forces, whether in this country or overseas’.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Specific background factors may contribute to a vulnerability which, when combined with other influences mean that an extremist or terrorist group may appear to provide an answer. The internet and social media in particular have become major factors in the radicalisation of young people.

Our curriculum promotes respect, tolerance, and diversity. Students are encouraged to share their views and to understand that they are entitled to have their own different beliefs which should not be used to influence others.

Appendix Five identifies the indicators that we should be aware of.

The Prevent Strategy has three main objectives;

- response to the ideological challenge of terrorism and the threat we face from those who promote it;
- prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support;
- work with sectors and institutions where there are risks of radicalisation which we need to address.

The School has statutory requirements in four key areas: risk assessment, working in partnership, staff training and ICT policies:

- the School has assessed the risk of students being drawn into terrorism. Any students who are considered at risk of radicalisation will be identified and supported
- the School works in partnership with PDSCP to ensure that our safeguarding arrangements take into account the policies and procedures at a local level
- the School recognises the importance of ‘Prevent’ awareness training to equip staff to identify children at risk of being drawn into terrorism and to challenge extremist ideas. The DSL is able to provide advice and support to staff on protecting children from the risk of radicalisation

- students are taught about how to stay safe when using the internet and are encouraged to recognise that people are not always who they say they are online. They are taught to seek adult help if they are upset or concerned about anything they read or see on the internet. The School ensures that suitable filtering is in place so that the students are safe from terrorist and extremist material when accessing the internet via the School system.

The School aims to build students' resilience to radicalisation by actively promoting fundamental British values and enabling them to challenge extremist views. The School provides safe spaces in which children and young people can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, and learn how to challenge these ideas. Sherborne Short Courses are committed to ensuring appropriate emphasis in its academic and boarding provision to promote fundamental British values as an essential aspect to counter radicalisation and enable staff and students to develop the knowledge and skills to challenge extremist arguments. The School recognises that effective engagement with parents and the family of those at risk of radicalisation is key to the identification of signs of radicalisation. The School will also assist and advise families who raise concerns and point them to the right support mechanisms.

As with managing other safeguarding risks, staff should be alerted to a student's behaviour which could indicate that they may be in need of help or protection. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately. This may include making a referral to the 'Channel' programme, which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism (although the Channel programme exists to deal with local residents rather than visitors to the UK). Outward expressions of faith, in the absence of any other indicator of vulnerability, will not be regarded as a reason to make a referral to Channel.

Dorset has a 'Channel Panel' in place, in accordance with its duties under the Counterterrorism and Security Act 2015. This is a multi-agency meeting which discusses individuals who have been referred by the Police as being vulnerable to being drawn into terrorism. Where students at School are being discussed, the DSL or Headmaster will attend the Panel meetings.

Any concerns about students becoming radicalised or being drawn into extremism should be reported to the DSL who will not speak to parents/carers or other family members at this stage but will take prompt advice from the PDSCP as to the most appropriate referral given the level of risk. This may include a referral to Children's Social Care, or Channel via Dorset Police (Safeguarding Referral Unit: DorsetReferrals@dorset.pnn.police.uk).

Although decisions to seek support for a child about whom there are concerns relating to radicalisation, would normally be taken in consultation with parents and students, parental consent is not required for a referral when there are reasonable grounds to believe that a child is at risk of significant harm.

Further information may be found in:

The prevent duty: for schools and childcare providers (June 2015)

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

Revised Prevent Duty Guidance (July 2015)

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/445977/3799_Revised_Prevent_Duty_Guidance_England_Wales_V2-Interactive.pdf

The use of social media for online radicalisation (July 2015)

<https://www.gov.uk/government/publications/the-use-of-social-media-for-online-radicalisation>

4.25 Children with special educational needs and disabilities

The School's child protection procedures will be followed if a child with special educational needs and disabilities discloses abuse or there are indicators of abuse. There are no separate procedures for such children. Research shows that children who have special educational needs and disabilities are especially vulnerable to abuse and adults who work with them need to be vigilant and take extra care when interpreting apparent signs of abuse or neglect.

Additional barriers can exist when recognising abuse and neglect in this group of children. This can include: (a) assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration; (b) children with SEN and disabilities can be disproportionately impacted by things like bullying - without outwardly showing any signs; and (c) communication barriers and difficulties in overcoming these barriers.

Staff responsible for intimate care of children will undertake their duties in a professional manner at all times in accordance with the relevant procedures.

4.26 Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers and is found at <https://helpwithchildarrangements.service.justice.gov.uk/>

4.27 Children with family members in prison

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

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

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

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

4.29 Online safety

Mobile devices and computers are important tools for communication, education, recreation, and socialising. However, the use of technology has become a significant component of many safeguarding issues including CSE, radicalisation and sexual predation. There are three broad areas of risk, (i) online content (being exposed to illegal, inappropriate or harmful material); (ii) contact (being subjected to harmful interaction with others online); and (iii) conduct (personal online behaviour that increase the likelihood of, or causes, harm).

The School recognises its responsibility to do all that it reasonably can to limit the student's exposure to the three broad areas of risk when using the School's IT system. The School has appropriate filters and monitoring systems in place that do not lead to 'overblocking'. The filters and monitoring systems used have been informed in part by the risk assessment undertaken as part of the Prevent Duty. As part of the risk assessment process the management of access to the internet whilst on School premises via 3G and 4G personal technology was considered.

The School's staff Code of Conduct and the e-safety policies for both staff and students explain the responsibilities of each group when online.

Staff receive online safety training and clear guidance to enable them to identify children who may be at risk of harm as a result of their or others' use of technology or the internet, to intervene in such cases appropriately and with sensitivity, and to escalate such cases in accordance with the School's child protection procedures.

Students receive guidance on the safe use of the web (including anti bullying and youth produced sexual imagery) through the curriculum, assemblies and in House meetings.

4.30 Safer working practice

All adults who come into contact with children at this School will behave at all times in a professional manner which secures the best outcomes for children and also prevents allegations being made.

The School's Code of Conduct separately sets out expectations of staff. All staff are expected to adhere to this Code of Conduct.

Staff at Sherborne School should ensure that their behaviour and actions do not place students or themselves at risk of harm or allegations of harm to a student. Special care should be taken to be highly professional at all times and mindful of the duty of care responsibility when dealing with students and particularly so during, for example, one-to-one tuition, music, performing arts or sports coaching, conveying a student by car and all forms of electronic communication.

We promote a culture whereby members of the School community should feel able to raise with the Headmaster, or any member of the SLT or Short Course Management Team, any concerns about staff conduct. If the reporter feels that the issue has not been addressed, they should contact the Chair of the Governors or the LADO.

4.31 Training

As part of the School's commitment to safeguarding the children in its care, all members of staff including part time staff and volunteers are supported, trained, and involved in safeguarding within the School.

The Headmaster and Designated Safeguarding Governor will receive Advanced training in safeguarding incorporating the role of the DSL every two years.

When DSLs and Deputies take up the role, they attend Advanced training provided through the PDSCP multi-agency course and includes local inter-agency working protocols, early help and intervention, participation in child protection case conferences, supporting children in need, identifying children at risk of radicalisation, record keeping and promoting a culture of listening to children. The Deputies are trained to the same standard as the Lead DSL.

Advanced training is undertaken at two-yearly intervals; the DSL and Deputies in School have all undertaken this training with the PDSCP. In addition, knowledge and skills are refreshed on a regular basis, at least annually, to allow the DSL to understand and keep up to date with any developments relevant to the role. This includes, for example, attending PDSCP training, the local DSL forum group and completing on-line training.

Child protection will be part of induction for all staff (including temporary staff) and volunteers new to the School. This training is given as soon as he or she starts at the School or earlier where possible. This induction training includes an explanation of this policy, the signs of abuse or neglect, the staff Code of Conduct, the Whistleblowing Policy, the Behaviour Management Policy, Part One of KCSiE and Annex B and details about the role of the DSL. The DSL (and / or a deputy) meets with all staff at induction and contact information (including photographs) for the DSLs is widely available throughout the School.

The induction training will be followed up by basic child protection training that equips individuals to recognise and respond appropriately to concerns about students. All staff will also have training in preventing radicalisation and extremism.

Staff who do not have designated responsibility for safeguarding and child protection, will undertake suitable refresher training at appropriate intervals. Appropriate update training in child protection procedures and safeguarding is provided at least annually and, whenever possible, is conducted by the trainer recommended by the PDSCP. Such training is designed to provide staff with the relevant skills and knowledge to safeguard children effectively. Updates will also be provided when new duties are introduced, such as the requirement to read Part One of KCSiE or the introduction of Prevent. Such training, when arranged, is a priority.

The School has put in place mechanisms to assist staff to understand and discharge their role and responsibilities as set out in KCSiE Part One in addition to ensuring that all staff read at least Part One. This includes asking line managers to identify those who may find the understanding of such

documents difficult due to such factors as eyesight, literacy or learning difficulties, providing written summary documents, and undertaking group discussions.

Attendance records are maintained for all training events; the records are held by Human Resources and/or Compliance Operations Manager and are regularly checked by the DSL to ensure that all staff remain up to date.

It is recommended by the PDSCP that all Governors attend training, briefings or other input which equips them to understand fully and comply with their legal safeguarding duties as governors, set out in KCSiE (Sep 2023). Attendance includes those who also work with children and have attended child protection training in that role.

The Headmaster, members of the SLT, all members of the Short Course Management Team and a number of Governors have completed safer recruitment training.

4.32 Record keeping

The importance of good, clear child welfare and child protection record keeping has been highlighted repeatedly in national and local Serious Case Reviews.

Record-keeping guidance in *Information sharing: advice for practitioners (Jul 2018)* highlights the fact that the Seven Golden Rules for Information Sharing are still current and that, 'GDPR and Data Protection Act 2018 do not prevent, or limit, the sharing of info for the purposes of keeping children and young people safe'.

On the 7th July 2015 the School received authority from the PDSCP to hold particular child protection records lawfully within the Data Protection Act for the foreseeable future. The School must not destroy any records for the foreseeable future which could potentially come within the scope of the Independent Inquiry into Child Sexual Abuse established by the Home Secretary.

Any member of staff who receives a disclosure of abuse (when a child talks about abuse) must make a record applying the following guidelines:

- the record should be made as soon as possible after the individual hearing the disclosure has reported it verbally to the DSL. The facts, not opinions (unless of particular relevance), should be accurately recorded in a non-judgemental way. It is important to remember that expressing an opinion as to whether the child is telling the truth is not helpful and can prejudice how a case proceeds
- the record should ideally be on the standard 'concerns' form (see Appendix Seven) but if this is not used, should include:
 - The child's name, gender, and date of birth
 - date and time of the conversation
 - what was the context and who was present during the disclosure?
 - what did the child say? (verbatim if possible)
 - what questions were asked? (verbatim if possible)
 - responses to questions (verbatim if possible)
 - any observations concerning child's demeanour and any injuries

- the name of the person to whom the disclosure was reported
- printed name and job title of the author, followed by signature and date

The record about a disclosure of abuse should be passed to the DSL. It will be retained in the student's child protection file in its original and contemporaneous form (as it could be used as evidence in court proceedings), even if later typed or if the information is incorporated into a report. Such a record is kept confidentially by the DSL in a specified locked filing cabinet.

Any member of staff who has concerns about a student (but who has not received a disclosure of abuse) should also make a record using the concern form in Appendix Seven. It is important that all concerns, discussions, and decisions made and the reasons for those decisions should be recorded in writing. If in doubt about recording requirements staff should discuss this with the DSL.

In cases of concern (as opposed to disclosure) the concern form should be passed to the DSL who will make a judgement about what action needs to be taken, in accordance with local multi-agency safeguarding procedures. The decision about any action, whether or not a referral is made to Social Care, will be recorded clearly by the DSL.

Concerns which initially seem trivial may turn out to be vital pieces of information later, so it is important to give as much detail as possible. A concern raised may not progress further than a conversation by the DSL with the parent, or, at the other end of the scale, could lead to matters being heard in a court. Such a record is kept confidentially by the DSL in a specified locked filing cabinet and reviewed regularly so that concerning patterns of behaviour can be spotted.

4.33 Monitoring of this policy

The Headmaster will monitor the operation of this policy and the effectiveness of its procedures taking into account any improvements advised by the LADO following a substantiated allegation against a member of staff or volunteer.

The Designated Safeguarding Governor responsible for overseeing the implementation of this Policy will make an annual report on safeguarding and child protection to the Board of Governors. Any deficiency that is noted in the School's safeguarding and child protection arrangements will be remedied without delay.

The Governors recognise the expertise staff build by undertaking safeguarding training and managing concerns on a daily basis. Hence, when the Governors undertake their thorough annual review of this Policy opportunity is provided for staff to contribute to and shape both the safeguarding arrangements in place and the Policy itself.

4.34 Visiting speakers

The School recognises its duty to establish clear protocols for ensuring that any visiting speakers, whether invited by staff or by the students, are suitably and appropriately supervised.

A visiting speaker will only be invited with the permission of the Headmaster or, in the Headmaster's absence, a Deputy Head or the Director of Short Courses. The member of staff who has invited the speaker will obtain such formal or informal background information about the visiting speaker as is reasonable in the circumstances to decide whether to invite and/or permit a speaker to attend the School. A central register of speakers is maintained. When assessing suitability of speakers, the School

will always have regard to the Prevent Duty Guidance and the definition of "extremism" set out in KCSiE (Sep 2023). All visiting speakers will be subject to the School's Visitor Policy and it is the responsibility of the member of staff who invited the speaker to ensure that this happens. The Visitor Policy includes signing in and out at the School, the wearing of a visitor's badge at all times and being escorted by a fully vetted member of staff between appointments.

4.35 Raising concerns about safeguarding practice in School (Whistleblowing)

In this School we promote a culture where any staff or volunteer feels able to raise with the Headmaster (or member of the School's SLT or Short Course Management Team) any concerns about safeguarding or child protection practice whether about poor or unsafe practice or about potential failures. Such concerns will always be taken seriously by the School's SLT or Short Course Management Team

All staff and volunteers are required to report to the DSL any concern or allegations about School practices which are likely to put students at risk of abuse or other serious harm. Any concern with the behaviour of colleagues or allegation made against a member of staff or volunteer or the DSL should immediately be reported to the Headmaster or, if the Headmaster is absent, the allegation should be passed directly to the Chairman of Governors. If an allegation is made against the Headmaster, the member of staff receiving the allegation must immediately inform the Chairman of the Governors.

The School has a Whistleblowing Policy in place and those who report in good faith are protected by it. Staff should refer to the School's Whistleblowing Policy for more information.

4.36 Information for parents

At this School we are committed to keeping our students safe. Our first priority is your child's welfare and we will usually discuss with you any concerns we have about your child. There might be rare occasions, however, when we have to provide information to or consult other agencies such as Children's Services Social Care before we contact you. This will include situations where we judge that to tell you first will or might put your child at risk of significant harm.

Our responsibilities are set out in this policy. It reflects statutory guidance and the multi-agency safeguarding procedures, which can be found on the PDSCP website.

4.37 Further guidance

If you have any questions about this Policy, please speak to the School's Designated Safeguarding Lead (Allister Sheffield) or the Short Course Designated Safeguarding Lead (David Shaw).

This policy can be made available in larger print or more accessible format if required.

Appendix One - Responding to concerns summary

SAFEGUARDING

Please remember the following if a student should approach you with a problem:

- **Stop and Listen**
(if it is not convenient to do so immediately, let the student know when they can talk to you)
- **Do not agree to talk in confidence**
(agree only to speak in private, because we have a duty to pass on information)
- **Take seriously what the student tells you**
(do not hint that you do not believe what they are telling you, or that you are dismissing what they say)
- **Avoid asking leading questions**
(ask questions for clarification only. If questions are necessary, they should be open and not 'lead' the child in any way. Remember TED: Tell me.... Explain.... Describe...)
- **Write down what is said**
(please do this as soon as possible after the conversation and not in front of the student)
- **Report the conversation to somebody who can help**
(take the notes, or report the conversation to one of the people listed below)
- **Avoid suggesting ways of dealing with the problem**
(listen and offer to find out a possible way forward from somebody who can help)
- **Do not keep to yourself information that might prove critical**
(in certain cases, the law requires that information be passed to the Designated Safeguarding Leads or Headmaster)
- **If you overhear conversations that concern you, pass on the information**
(all sorts of information can be overheard, some of it might have serious consequences, and we need to know as much information as possible).

Please always remember ...
Don't think - 'What if I am wrong?'
Think - 'What if I am right?'

When in doubt, seek help or reassurance from one of the School's DSLs:

			
Allister Sheffield (Sherborne School Lead DSL) allister.sheffield@sherborne.org 01935 810421	David Shaw (Short Courses Lead DSL) david.shaw@sherborne.org 01935 810474	Simon Larkin (Deputy DSL) simon.larkin@sherborne.org 01935 811785	Sam Belgeonne (Deputy DSL) sam.belgeonne@sherborne.org 01935 810449



SHERBORNE

SAFEGUARDING

All of us who have contact with children and young people at work have a duty of care to safeguard and promote their welfare.

Safeguarding also keeps us as individuals safe by helping us to make safe and sound decisions about how to conduct our relationships with those for whom we have that duty of care.

The same principles that are there to protect young people also protect us from malicious and unfounded accusations.

- We are all **role models** for the students and as such we need to adopt high standards of personal conduct in order to maintain the confidence and respect of our peers, students and their parents.
- We should ensure that **our dress and appearance** in School promotes a positive and professional image, is appropriate to our role and status, and is in line with published guidance.
- **Personal contact** details, such as a private email address or private mobile telephone number, should not be given to students.
- **Internet or web-based communication channels** should not be used to send personal messages to current Shirburnians, and we must be very wary of doing so to those who have recently left the School. Any of us who do use social networking sites should ensure that our privacy settings are set at the maximum level possible.
- We should avoid any activity that records **students' images** unless it is with a clear purpose. Consideration must be given to what will happen to the images at the end of the activity. We should use School-owned devices to take photographs or video footage.
- All students have a right to **personal privacy**. Always knock before entering a study, announce your presence before going into any area where students might be changing, allow students to make private phone calls and obviously we should not read any personal correspondence.
- When working in **one-to-one situations** with students we are potentially more vulnerable to allegations. It therefore makes sense to plan and conduct such meetings to ensure that the security of both the student and yourself is maintained. It is recommended that such meetings should take place where there is visual access and/or an open door.

Thank you for all that you do to help safeguard the welfare of the students in the School. If you have any concerns, please contact your line manager or one of the School's DSLs.

Appendix Two - Contact details

1) Dorset Social Care

To make new referrals to Social Care regarding individual children

PDSCP Multi Agency Safeguarding Hub	01305 221196
MASH Team	

2) To contact children's allocated social workers:

• West Area (Bridport & Dorchester)	01305 221450
• East Area (Ferndown & Christchurch)	01202 474106
• Central Area (Purbeck)	01929 553456
• North Dorset	01258 472652
• South Area (Weymouth & Portland)	01305 760139

3) Out of Hours Service

01202 228866

4) Dorset Safeguarding and Standards Team

The team comprises Children's Services managers and advisors including:

The Education Safeguarding Standards Advisor who offers advice and support to Headteachers and Designated Safeguarding Leads in relation to safeguarding and child protection issues

Dorset Safeguarding Standards Advisor	01305 221122
---------------------------------------	--------------

The Designated Officer (also known as the LADO) to whom allegations against adults who work with children in education establishments must be reported

Dorset LADO	01305 221122 lado@dorsetcouncil.gov.uk
-------------	--

Children's Services Prevent Lead	01305 221122
----------------------------------	--------------

5) Dorset Virtual School for children who are in care / Looked After

01305 228309

6) Sexual images

ChildLine (for children)	0800 1111
--------------------------	-----------

<http://www.childline.org.uk/Talk/Chat/Pages/OnlineChat.aspx>

NCA-CEOP (for parents/carers concerned that their child is being contacted by adults as a result of having sharing sexual imagery)	www.ceop.police.uk/safety-centre
--	--

NSPCC Helpline	0808 800 5000 help@nspcc.org.uk
----------------	---

NSPCC Online Safety Helpline	0808 800 5002
------------------------------	---------------

7) Prevent referrals

Preventing terrorism and radicalisation referrals in Dorset

preventreferrals@dorset.pnn.police.uk

DfE dedicated telephone helpline for non-emergency advice for staff and Governors regarding extremism and the prevention of radicalisation

020 7340 7264

counter-extremism@education.gsi.gov.uk

8) Other external agencies

Sherborne Police Station
NSPCC
NSPCC Whistleblowers Advice Line

01305 222222 or 101

0808 800 5000

0800 028 0285

help@nspcc.org.uk

9) Dorset Governor Services (for governor safeguarding training)

01305 224382

10) Other External Agencies for reporting Prevent concerns relating to terrorism and extremism are as follows:

Anti-Terrorist hotline

0800 789 321

Crime stoppers

0800 555 111

Local Police

101

<https://www.gov.uk/report-suspicious-activity-to-mi5>

<https://www.gov.uk/report-terrorism> (for reporting online material)

11) Local Housing Authority

<https://www.dorsetforyou.gov.uk/housing/housing.aspx>

12) Independent Person (for Sherborne School Staff)

Jen Kershaw

01935 814525

Appendix Three - Possible Indicators of Abuse

The following information is not designed to turn School staff into experts, but it will help everyone to be more alert to the signs of possible abuse. The examples below are not meant to form an exhaustive list; DSLs and other staff will find it helpful to refer to Government advice 'What to do if you are worried about a child being abused' (2015) and the inter-agency safeguarding procedures on the PDSCP website for more detailed information.

i) Physical Abuse

Most children will collect cuts and bruises in their daily lives. These are likely to be in places where there are bony parts of the body, like elbows, knees and shins. Some children, however, will have bruising which is less likely to have been caused accidentally. An important indicator of physical abuse is where bruises or injuries such as burns are unexplained, or the explanation does not fit the injury or there are differing explanations. A delay in seeking medical treatment for a child when it is obviously necessary is also a cause for concern. Bruising may be more or less noticeable on children with different skin tones or from different ethnic groups and specialist advice may need to be taken.

Patterns of bruising that are suggestive of physical child abuse can include:

- bruising in children who are not independently mobile
- bruises that are seen away from bony prominences
- bruises to the face, back, stomach, arms, buttocks, ears and hands
- multiple bruises in clusters
- multiple bruises of uniform shape
- bruises that carry the imprint of an implement used, hand marks, fingertips or a belt buckle

Although bruising is the commonest injury in physical abuse, fatal non-accidental head injury and non-accidental fractures can occur without bruising. Any child who has unexplained signs of pain or illness must be seen promptly by a doctor.

Other physical signs of abuse can include:

- cigarette burns, especially burns found on palms, soles of feet, abdomen, buttocks
- immersion burns producing 'stocking' or 'glove' marks on hand and feet
- rope burns
- burns in the shape of common household utensils or appliances
- infected burns indicating delay in treatment
- adult bite marks
- broken bones
- scalds

Changes in behaviour which can also indicate physical abuse:

- fear of parents being approached for an explanation
- aggressive behaviour or severe temper outbursts
- flinching when approached or touched
- withdrawal from physical contact
- bald patches
- self-destructive tendencies

- reluctance to get changed, for example wearing long sleeves in hot weather
- refusal to discuss injuries
- admission of punishment which appears excessive
- missing School
- running away from home

ii) **Emotional Abuse**

Emotional abuse can be difficult to measure, and often children who appear otherwise well cared for may be emotionally abused by being taunted, put down or belittled. They may receive little or no love, affection or attention from their parents or carers. *Children who live in households where there is domestic violence often suffer emotional abuse.* Emotional abuse can also take the form of children not being allowed to mix/play with other children.

The physical signs of emotional abuse can include:

- a failure to thrive or grow, particularly if the child puts on weight in other circumstances, e.g. in hospital or away from parents' care
- sudden speech disorders
- developmental delay, either in terms of physical or emotional progress.

Changes in behaviour which can also indicate emotional abuse include:

- neurotic behaviour, e.g. sulking, hair twisting, rocking
- being unable to play
- fear of making mistakes
- self-harm
- fear of parents being approached
- fear of new situations
- inappropriate emotional responses to painful situations
- extremes of passivity or aggression
- cruel behaviour, seeming to derive pleasure from hurting others or animals
- drugs/solvent abuse
- chronic running away
- compulsive stealing
- scavenging for food or clothes

iii) **Sexual Abuse**

Adults who use children to meet their own sexual needs abuse both girls and boys of all ages, including infants and toddlers. Children can also be sexually abused by other children (i.e. those under 18).

Usually, in cases of sexual abuse it is the child's behaviour which may cause concern, although physical signs can also be present. In all cases, children who talk about sexual abuse do so because they want it to stop. It is important, therefore, that they are listened to, taken seriously and appropriate action taken promptly.

The physical signs of sexual abuse can include:

- pain or itching in the genital/anal areas
- bruising or bleeding near genital/anal areas or in the throat

- sexually transmitted diseases
- vaginal discharge or infection
- stomach pains
- discomfort when walking or sitting down
- pregnancy

Changes in behaviour which can also indicate sexual abuse can include:

- sudden or unexplained changes in behaviour, e.g. becoming aggressive or withdrawn
- fear of being left with a specific person or group of people
- be fearful of undressing for gym
- having nightmares
- missing School
- running away from home
- sexual knowledge which is beyond their age or developmental level
- being inappropriately seductive
- sexual drawings or language
- bedwetting
- eating problems such as overeating or anorexia
- self-harm or mutilation, sometimes leading to suicide attempts
- saying they have secrets they cannot tell anyone about
- alcohol / substance / drug use
- depression
- suddenly having unexplained sources of money
- not being allowed to have friends (particularly in adolescence)
- acting in a sexually explicit way towards adults or other children
- have chronic ailments such as stomach pains and headaches
- mixing with older people
- sexually abuse a child, sibling, or friend

Please also be mindful of the possibility of CSE if you have concerns about sexual abuse.

iv) **Neglect**

Neglect can be a difficult form of abuse to recognise yet have some of the most lasting and damaging effects on children and young people.

The physical signs of neglect can include:

- constant hunger, sometimes stealing food from other children
- being constantly dirty or smelly
- loss of weight, or being constantly underweight
- inappropriate dress for the conditions
- untreated injury or illness

Changes in behaviour which can also indicate neglect can include:

- complaining of being tired all the time
- not requesting medical assistance and/or failing to attend appointments
- having few friends

- mentioning being left alone or unsupervised
- assuming adult responsibilities for siblings

It is important that we recognise that providing compensatory care might address the immediate and presenting issue but could cover up or inhibit the recognition of neglect in all aspects of a child's life. Compensatory care is defined as 'providing a child or young person, on a regular basis, help or assistance with basic needs with the aim of redressing deficits in parental care'. This might involve, for example, providing each day a substitute set of clothing because those from home are dirty, or showering a child whose personal hygiene or presentation is such that it is affecting his/her interaction with peers. It does not include isolated or irregular support such as giving lunch money or washing a child who has had an 'accident'. If any adult in School finds s/he is regularly attending to one or more aspects of a child's basic needs, then this will prompt a discussion with the DSL.

The general rule is: the younger the child, the higher the risk in terms of their immediate health. However, serious neglect of older children and adolescents is often overlooked, on the assumption that they have the ability to care for themselves and have made a 'choice' to neglect themselves. Lack of engagement with services should be seen as a potential indicator of neglect.

All staff should be mindful of the above and discuss any concerns with the DSL who will take the appropriate action in accordance with the inter-agency neglect guidance on the PDSCP website.

Appendix Four - Record Keeping: Best Practice

1. Introduction

- 1.1 The importance of good, clear child welfare and child protection record keeping has been highlighted repeatedly in national and local Serious Case Reviews.
- 1.2 It is the Designated Safeguarding Lead (DSL)'s responsibility to ensure that child protection files, access, storage and transfer meet the required professional standards as detailed in this document.
- 1.3 The common law of confidentiality, Data Protection and Human Rights principles must be adhered to when obtaining, processing or sharing personal or sensitive information or records. Record-keeping guidance in *Information sharing: advice for practitioners (Jul 2018)* highlights the fact that the Seven Golden Rules for Information Sharing are still current and that, 'GDPR and Data Protection Act 2018 do not prevent, or limit, the sharing of info for the purposes of keeping children and young people safe'. Any electronic record keeping system should comply with the general standards set out below.
- 1.4 On the 7th July 2015 the School received authority from the PDSCP to hold particular child protection records lawfully within the Data Protection Act for the foreseeable future. The School must not destroy any records for the foreseeable future which could potentially come within the scope of the Independent Inquiry into Child Sexual Abuse established by the Home Secretary.

2. Record to be made by an adult receiving a disclosure of abuse (when a child talks about abuse)

- 2.1 This record should be made as soon as possible **after** the individual hearing the disclosure has reported it verbally to the DSL. The facts, not opinions (unless of particular relevance), should be accurately recorded in a non-judgemental way. It is important to remember that expressing an opinion as to whether the child is telling the truth is not helpful and can prejudice how a case proceeds.
- 2.2 The record should ideally be on a standard 'concerns' form but if this is not used, should include:
 - The child's name, gender and date of birth
 - Date and time of the conversation
 - What was the context and who was present during the disclosure?
 - What did the child say? – verbatim if possible
 - What questions were asked? – verbatim
 - Responses to questions –verbatim
 - Any observations concerning child's demeanour and any injuries
 - The name of the person to whom the disclosure was reported
 - Printed name and job title of the author, followed by signature and date

- 2.3 The record about a disclosure of abuse should be passed to the DSL and retained in the student's child protection file in its original and contemporaneous form (as it could be used as evidence in court proceedings), even if later typed or if the information is incorporated into a report.
- 2.4 Schools should never ask students, regardless of their involvement in a child protection matter (i.e. the subject of an allegation, a witness or the alleged 'perpetrator'), to write out their 'statements' of what has happened. In some cases, this could have the unintended consequence of jeopardising a child protection investigation. This applies regardless of whether the incident(s) took place within or outside School.

3. Records kept by the DSL

- 3.1 As stated at 2.2 above it is useful and recommended practice for School staff to have one standard pro forma for recording all 'welfare' and child protection concerns.
- 3.2 The concern form should be passed to the DSL who will make a judgement about what action needs to be taken, in accordance with local inter-agency safeguarding procedures, using the Threshold Tool, if necessary. The decision about any action, whether or not a referral is made to Social Care, will be recorded clearly by the DSL.
- 3.3 Concerns which initially seem trivial may turn out to be vital pieces of information later, so it is important to give as much detail as possible. A concern raised may not progress further than a conversation by the DSL with the parent, or, at the other end of the scale, could lead to matters being heard in a court.
- 3.4 All 'lower level' concerns about a child's welfare, which will generally have been discussed with parents/carers, are kept in the child's main file. Alternatively, some schools have adopted their own systems of collating such welfare concerns, but whichever system is in place, these records should not be labelled 'child protection'.
- 3.5 It is never good practice to keep student welfare records in a diary or day-book system. Often it is only when a number of seemingly minor issues relating to an individual student over a period of time are seen as a whole that a pattern can be identified indicating a child protection concern.

4. Starting a School child protection file

- 4.1 A School child protection file does not necessarily mean that the student is or has been the subject of a child protection conference or plan. 'Child protection file' denotes a high level of School concern which has warranted the involvement of, and in most cases assessment by, childcare social workers.
- 4.2 It is the responsibility of the DSL to start a School child protection file when a social worker is or was involved, e.g.:
- A formal referral is made by the School to Children's Social Care on an inter-agency referral form

- Social Care inform the School they have commenced an assessment in relation to a student resulting from information from another source
- A child protection file is forwarded to the School by a previous School or pre-School attended by the student
- A child who is in care/looked after transfers into the School
- A student is privately fostered

- 4.3 It is not good practice to make 'family files'; each child should have his/her own record which includes information specific to him/her and which will be sent to the next school at the time of transfer. The names of siblings and/or other children who live in the household who also attend the School should be clearly noted on individual files.
- 4.4 If two (or more) students at the School are referred to Social Care for the same concern (for example, an allegation of sexually harmful behaviour), then child protection files will be started on both / all students.
- 4.5 'Document wallet' - type files are not ideal as the papers therein can easily fall out or get 'out of order'.
- 4.6 School child protection files are never 'closed' or de-categorised. Once a school has started a child protection file, it is always a school child protection file and the chronology is maintained so that any future concerns can be considered in the context of past events.
- 4.7 Note - If there is an allocated social worker because a child is disabled or a young carer and there are no child protection concerns then a child protection file should not be started.

5. Adopted children

- 5.1 When a student is admitted to a school in Reception class and parents provide the information that s/he was adopted prior to commencing education, this should be recorded with their permission on the main school file in order that appropriate support can be provided in future if necessary. In these situations, it is not necessary to start a child protection file **unless** the criteria described above (at 4.2a and 4.2b) also apply.
- 5.2 Some older adopted children will have school child protection files because they were initially in care/looked after and were subsequently adopted. During the period when the child is 'placed for adoption' (prior to an adoption order being made) any file that contains information that identifies both the birth family and the adoptive family must be classed as highly sensitive and this information should only be shared on a strictly 'need to know' basis.
- 5.3 Once the adoption order has been made the DSL in the School that holds the child protection file must overhaul the file. The principle is that there must be nothing that identifies the child's birth name or the birth family. In sifting the file, it is acceptable to destroy documents that will continue to be held by other agencies: for example, child protection conference minutes and LAC review minutes which will be in Social Care records.

- 5.4 A chronology should be prepared that gives an overview of the information previously held in the file but **without giving the child's birth name or any details which would identify the birth family.**
- 5.5 The overhauled file should only contain the new chronology and any information that has originated from within School (for example concern forms). This file should now be in the child's new name, contain no information which identifies the birth name or birth family, will be held in the School as long as the child remains or sent onto a new school as described (at 9) below.
- 5.6 Please note that once a child is adopted, all school records, not just cp files, must be amended so that there is nothing which gives the birth name or identifies the birth family.

6. The format of child protection files

- 6.1 It is helpful if individual files have a front sheet with key information about the student and contact details of parents / carers, social worker, and any other relevant professionals.
- 6.2 If the child is Looked-After the front sheet should include important information about legal status, parental responsibility, arrangements for contact with birth parents and extended family, levels of authority delegated to carers and the name of the virtual school head in the authority that looks after the child.
- 6.3 If a student is or was subject of a child protection plan or in care / looked after, this should be highlighted in some way to make it immediately obvious to anyone accessing the record.
- 6.4 It is a multi-agency standard that children's child protection files must have at the front an up to date chronology of *significant* incidents or events *and* subsequent actions/outcomes. Maintaining the chronology is an important part of the DSL role; it aids the DSL, Deputy and others to see the central issues 'at a glance' and helps to identify patterns of events and behaviours.
- 6.5 It should make sense as a 'stand-alone' document: anyone else reading the chronology should be able to follow easily what the concerns are/have been, whether the concerns have escalated and why plus the actions taken by the School to support and protect the child. This will be particularly useful for DSLs in receiving schools when students transfer, for professionals involved in collating information for Serious Case Reviews and for parents/students/ex-students if they view the record.
- 6.6 Once a chronology is started it should be updated as appropriate even if Social Care later cease involvement (see 4.6 above).
- 6.6.1 The file should be well organised and include, as appropriate, School 'concern forms', copies of correspondence, School reports to and minutes of child protection conferences, documents relating to children in care / 'looked after' etc. The DSL will decide which relevant information which pre-dates the starting of the child protection file, such as CAF or other pastoral care documentation, will also be included.

7. Storage

- 7.1 All records relating to child protection concerns are sensitive and confidential so will be kept in a secure (i.e. locked at all times) filing cabinet, separate from other School files, and accessible through the DSL, the Deputy(s) and other senior staff in larger schools.
- 7.2 The student's general School file should be marked in some way (e.g. a yellow star) to indicate that a child protection file exists. All staff that may need to consult a child's School file should be made aware of what the symbol means and to speak to the DSL if necessary if they see this symbol and have concerns. For example, a member of the office staff who is looking in the main file for a parent's contact details because of unexplained absence might decide to report this to the DSL if they see the indicator, in case the absence is significant.

8. Sharing of and access to child protection records

- 8.1 It is highly unlikely that all members of staff need to know the details of a child's situation, or that there should be widespread access to the records. Access to, and sharing of, information should be on a need-to-know basis, decided case by case. The DSL is the best person to decide this. Consideration must also be given to *what* needs to be shared. Generally speaking, the closer the day-to-day contact with the child, the more likely the need to have some information.
- 8.2 The child who is the subject of a child protection record has the right to access the file, *unless* to do so would affect his/her health or well-being or that of another person or would be likely to prejudice a criminal investigation or a Section 47 assessment (which relates to significant harm) under the Children Act 1989.
- 8.3 Parents (i.e. those with parental responsibility in law) are entitled to see their child's child protection file, with the same exemptions as apply to the child's right to access the record. Note that an older student may be entitled to refuse access to the record by his/her parents. As a guide, this applies to students who are 12 years of age or above if they are of normal development or maturity.
- 8.4 References by name to children other than the student who is the subject of the file should be removed when disclosing records, unless consent is obtained from the individual/s concerned (or their parents/carers on their behalf). Care must be taken to ensure all identifying information is removed from the copy of the record to be shared.
- 8.5 Always seek advice from your legal advisor or Dorset Data Protection Officer (01305 838125) if there are any concerns or doubt about a child or parents reading records. However, it is generally good practice to share all information held unless there is a valid reason to withhold it, e.g. to do so would place the child or any other person at risk of harm. Any requests to see the child's record should be made in writing to give time for confidential information, such as any details of other students, to be removed.

- 8.6 In respect of requests from students or parents for information which wholly or partly consists of an educational record, access should be granted within 15 school days. This might be relevant to 'welfare' concerns in a main School file, for example. Viewing-only access to these records is free but it is reasonable to charge for copies on a sliding scale from £1 - £50 (maximum) depending on the number of pages.
- 8.7 However, should the request only seek access to a child protection file (which is not classed as an educational record), access should be granted within 40 calendar days. A discretionary maximum fee of £10 can be charged for viewing access to or a copy of a child protection record.
- 8.8 If the record to be disclosed contains information about an adult professional, that information can be disclosed if it relates to the performance by that person of their job or other official duties e.g. a reference to a teacher in their teaching role or a school nurse in their nursing role. However, if the reference refers to that individual's private life, it should be removed (unless this relates to a child protection matter which is relevant to the record to be disclosed).
- 8.9 Child protection information should not normally be shared with professionals other than those from Social Care, the Police, Health or the Local Authority. OfSTED and other school inspectors can view individual child protection files. Information should not be released to parents' solicitors on request; advice should be sought from the School's legal advisor in such cases.
- 8.10 Governors, including the Nominated Governor, should not access the records.
- 8.11 Further advice about disclosure of information held in child protection records can be sought from the DCC Data Protection Officer (01305 838125).

9. Transfer of child protection records

- 9.1 When a student transfers to another school (including to a Learning Centre because of permanent exclusion) the DSL should inform the receiving school as soon as possible in person or by telephone that child protection records exist. The original records must be passed on either by hand or sent by recorded delivery, separate from the child's main school file. Care must be taken to ensure confidentiality is maintained and the transfer process is as safe as possible.
- 9.2 If the records are to be posted, they should be copied, and these copies retained until there has been confirmation in writing that the originals have arrived at the new school. They can then be shredded.
- 9.3 Whether child protection files are passed on by hand or posted, there should be written evidence of the transfer (such as a form or slip of paper signed and dated by a member of staff at the receiving school.) This receipt should be retained by the originating school for 6 years (in line with guidance from the Records Management Society).
- 9.4 If the student is removed from the roll to be home educated, the School should pass the child protection file to the LA EHE Administrator and a receipt obtained as described above.

- 9.5 If a student with a child protection record leaves the School without a forwarding address and no contact is received from a new school the DSL should follow the School's Child Missing Education (CME) procedures. If there is reason to suspect the student is suffering harm, then the DSL will refer to Social Care in the usual way.
- 9.6 If a child arrives in the School in an unplanned way and / or there are concerns about them from the outset, it is worth contacting the previous school for a discussion with the DSL. There might be a CP file which has not been passed on.
- 9.7 School 'welfare' or pastoral records (i.e. where concerns or issues have been raised but there has been no referral to or involvement by a social worker) should also be passed onto the next school for their information and can be included in the main School file, for example. In respect of data protection, parents/carers should be made aware (either individually or through newsletters, for example) that information is transferred in this way to enable the next school to properly support their child. Most parents will understand the reasons for this but if for whatever reason a parent disagrees with you passing on non-child protection documents, you should not do so.

10. 'Dual registered' students

- 10.1 Where a student is on roll at the School and starts to attend a Learning Centre (LC), the chronology and other relevant information in the child protection file should be copied and passed to the DSL at the LC at the earliest opportunity. Because of the nature of such 'bespoke' arrangements for individual students, the two DSLs should agree on which one of them will keep the chronology updated and how best to communicate to each other significant events and issues in relation to that student.

11. Retention of records

- 11.1 The School should retain the record for as long as the student remains in School and then transferred as described above.
- 11.2 Guidance from the Records Management Society is that when a student with a child protection record reaches statutory school leaving age (or where the student completed 6th form studies), the last school attended should keep the child protection file until the student's 25th birthday. It should then be shredded (and a record kept of this having been done, date, and why).
- 11.3 The Independent Inquiry into Child Sexual Abuse has instructed relevant organisations, including schools and colleges, that they should NOT destroy, for the foreseeable future, any of their records that could potentially come into the scope of the inquiry (i.e. any records relating to sexual abuse).

12. Electronic child protection records

- 12.1 Electronic records must be password protected with access strictly controlled in the same way as paper records.
- 12.2 They should be in the same format as paper records (i.e. with well-maintained chronologies etc.) so that they are up to date if/when printed, if necessary.
- 12.3 Electronic files must not be transferred electronically to other schools unless there is a secure system in place (such as cjsm, GCSX or IronPort) but should be printed in their entirety, linked with paper documentation such as conference minutes and transferred as described in section 9 above. When the receipt has been returned to confirm that the file has been received at the new school, the computer record should be deleted.

13. Sharing information with Further Education (FE) Colleges

- 13.1 A protocol is in place with DSLs at FE colleges: at the start of each academic year they will send to secondary school DSLs a list of newly enrolled students who have previously attended the School, requesting any relevant information. Secondary school DSLs will use their professional judgement but should always disclose if a young person is in care/looked after, is or has been subject of a child protection plan or is assessed as posing a risk to themselves or other students.
- 13.2 Note this applies only to Dorset schools and FE Colleges with whom the protocol has been agreed.

Appendix Five - Sexual Violence and Sexual Harassment

Definitions

Sexual Violence

Sexual violence are sexual offences under the Sexual Offences Act 2003.

They are:

- Rape
Intentional penetration of the vagina, mouth, or anus by a penis without consent (and the perpetrator does not believe they have consent).
- Assault by Penetration
Intentional penetration of the vagina or anus by a part of the body or something else for sexual purposes without consent (and the perpetrator does not believe they have consent).
- Sexual Assault
Intentional touching of a sexual nature where the victim does not consent, and the perpetrator does not believe they have consent.
Consent is about having the freedom and capacity to choose. Consent may be given for some sexual acts but not others. Consent can be withdrawn at any time.

Sexual Harassment

Sexual harassment is unwanted conduct of a sexual nature. It can occur online and offline. Sexual harassment is likely to violate a child's dignity and/or make them feel intimidated, degraded, or humiliated and/or create a hostile, offensive or sexualised environment.

Sexual harassment can include:

- sexual comments
- sexual 'jokes' or taunting including sexual banter
- physical behaviour such as deliberately brushing against someone, interfering with someone's clothes, or displaying images of a sexual nature.
- on-line sexual harassment
- 'Upskirting' (taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm).

Response to an allegation of Sexual Harassment or Sexual Violence

Responding to the report

It is important to note that children may not find it easy to tell staff about their abuse verbally. Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report, or a member of school staff may overhear a conversation that suggests a child has been harmed, or a child's own behaviour might indicate that something is wrong.

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. Abuse that occurs online or outside of the school or college should not be downplayed and should be treated equally seriously. 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 or their experience minimised.

As with all safeguarding concerns, it is important that in such instances staff take appropriate action in accordance with their child protection policy. They should not assume that someone else is responding to any incident or concern. If in any doubt, they should speak to the designated safeguarding lead (or a deputy). In such cases, the basic safeguarding principles remain the same, but it is important for the school or college to understand why the victim has chosen not to make a report themselves. This discussion should be handled sensitively and with the support of children's social care if required.

There may be reports where the alleged sexual violence or sexual harassment involves students or students from the same school or college but is alleged to have taken place away from the school or college premises, or online. There may also be reports where the children concerned attend two or more different schools or colleges. The safeguarding principles, and the School's duty to safeguard and promote the welfare of their students and students, remain the same. In such circumstances, appropriate information sharing and effective multi-agency working will be especially important.

As per Part one of Keeping children safe in education, if staff have any concerns about a child's welfare, they should act on them immediately rather than wait to be told.

The following safeguarding practice will be followed:

- if possible, managing reports with two members of staff present, (preferably one of them being the designated safeguarding lead or a deputy). However, this might not always be possible;
- where the report includes an online element, being aware of searching screening and confiscation advice (for schools) and the key consideration is for staff not to view or forward illegal images of a child. In some cases, it may be more appropriate to confiscate any devices to preserve any evidence and hand them to the police for inspection;
- not promising confidentiality at this initial stage as it is very likely a concern will have to be shared further (for example, with the designated safeguarding lead or children's social care) to discuss next steps. Staff should only share the report with those people who are necessary in order to progress it. It is important that the victim understands what the next steps will be and who the report will be passed to;
- recognising that a child is likely to disclose information to someone they trust: this could be anyone on the school or college staff. It is important that the person to whom the child discloses recognises that the child has placed them in a position of trust. They should be supportive and respectful of the child;
- recognising that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory and so children may not be able to recall all details or timeline of abuse;
- keeping in mind that certain children may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity and/or sexual orientation;

- listening carefully to the child, reflecting back, using the child's language, being non-judgmental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions – where, when, what, etc. It is important to note that whilst leading questions should generally be avoided, staff can ask children if they have been harmed and ask what the nature of that harm was;
- considering the best way to make a record of the report. Best practice is to wait until the end of the report and immediately write up a thorough summary. This allows the staff member to devote their full attention to the child and to listen to what they are saying. It may be appropriate to make notes, especially if a second member of staff is present. However, if making notes, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking. Either way, it is essential a written record is made;
- only recording the facts as the child presents them. The notes should not reflect the personal opinion of the note taker. Schools and colleges should be aware that notes of such reports could become part of a statutory assessment by children's social care and/or part of a criminal investigation; and
- following the safeguarding referral process as described in the school safeguarding policy which involves informing the designated safeguarding lead (or deputy), as soon as practically possible, if the designated safeguarding lead (or deputy) is not involved in the initial report.

The victim and alleged perpetrator will require on-going support. Substantial details of this can be found in Part 5 of 'Keeping Children Safe in Education (Sept 2022)'. It is recommended that the victim is offered a designated trusted adult to talk to about their needs. This may be a tutor, Housemaster or the DSL but it may also be another adult within the school and should be the choice of the student's.

The victim will not be isolated although there may be times when they will feel unable to attend lessons or other activities. This will be supported by the school and will be because the victim wants to, not because it makes it easier for the school to deal with the situation.

Support of the perpetrator will also be considered. Any child will likely experience stress as a result of being the subject of allegations and may have unmet needs as well as posing a risk to other children. Advice will be taken as appropriate from children's social care, specialist sexual violence services and the police where relevant.

Further guidance may be found in ['Sexual Violence and Sexual Harassment Between Children in Schools and Colleges' \(September 2021\)](#).

Appendix Six - Prevent within schools

Indicators of vulnerability or involvement in extremism

There is no such thing as a 'typical extremist' and those involved in extremism come from a range of backgrounds and experiences. A list of indicators is given below to assist professionals to understand and identify factors that could suggest a child, young person or their family may be vulnerable or involved with extremism.

The list of indicators is not exhaustive and all or none may be present in individual cases of concern. Nor does it mean that vulnerable people/ young people experiencing these factors are automatically at risk of exploitation for the purposes of extremism. The accepted view is that a complex relationship between the various aspects of an individual's identity determines their vulnerability to extremism. Over-simplified assessments based upon demographics and poverty indicators have consistently demonstrated to increase victimisation, fail to identify vulnerabilities and, in some cases, increase the ability of extremists to exploit, operate and recruit.

1. Vulnerability

- Identity Crisis - Distance from cultural/ religious heritage and uncomfortable with their place in the society around them
- Personal Crisis – Family tensions; sense of isolation; adolescence; low self-esteem; disassociating from existing friendship group and becoming involved with a new and different group of friends; searching for answers to questions about identity, faith and belonging
- Personal Circumstances – Migration; local community tensions; events affecting country or region of origin; alienation from UK values; having a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy
- Unmet Aspirations – Perceptions of injustice; feeling of failure; rejection of civic life
- Criminality – Experiences of imprisonment; poor resettlement/ reintegration, previous involvement with criminal groups

2. Access to extremism / extremist influences

- Is there reason to believe that the child/young person associates with those known to be involved in extremism - either because they associate directly with known individuals or because they frequent key locations where these individuals are known to operate? (e.g. the child/young person is the partner, spouse, friend, or family member of someone believed to be linked with extremist activity)
- Does the child/young person frequent, or is there evidence to suggest that they are accessing the internet for the purpose of extremist activity? (e.g. Use of closed network groups, access to or distribution of extremist material, contact associates covertly via Skype / email etc.)
- Is there reason to believe that the child/young person has been or is likely to be involved with extremist / military training camps / locations?
- Is the child/young person known to have possessed or is actively seeking to possess and/ or distribute extremist literature / other media material likely to incite racial / religious hatred or acts of violence?

- Does the child / young person sympathise with, or support illegal / illicit groups e.g. propaganda distribution, fundraising and attendance at meetings?
- Does the child / young person support groups with links to extremist activity but not illegal / illicit e.g. propaganda distribution, fundraising and attendance at meetings?

3. Experiences, Behaviours, and Influences

- Has the child / young person encountered peer, social, family or faith group rejection?
- Is there evidence of extremist ideological, political, or religious influence on the child / young person from within or outside UK?
- Have international events in areas of conflict and civil unrest had a personal impact on the child/ young person resulting in a noticeable change in behaviour? It is important to recognise that many people may be emotionally affected by the plight of what is happening in areas of conflict (i.e. images of children dying) it is important to differentiate them from those that sympathise with or support extremist activity
- Has there been a significant shift in the child / young person's behaviour or outward appearance that suggests a new social / political or religious influence?
- Has the child/ young person come into conflict with family over religious beliefs / lifestyle / dress choices?
- Does the child / young person vocally support terrorist attacks, either verbally or in their written work?
- Has the child / young person witnessed or been the perpetrator/ victim of racial or religious hate crime or sectarianism?

4. Travel

- Is there a pattern of regular or extended travel within the UK, with other evidence to suggest this is for purposes of extremist training or activity?
- Has the child / young person travelled for extended periods of time to international locations known to be associated with extremism?
- Has the child / young person employed any methods to disguise their true identity? Has the child / young person used documents or cover to support this?

5. Social Factors

- Does the child / young person have experience of poverty, disadvantage, discrimination, or social exclusion?
- Does the child / young person experience a lack of meaningful employment appropriate to their skills?
- Does the child / young person display a lack of affinity or understanding for others, or social isolation from peer groups?
- Does the child / young person demonstrate identity conflict and confusion normally associated with youth development?
- Does the child / young person have any learning difficulties / mental health support needs?
- Does the child / young person demonstrate a simplistic or flawed understanding of religion or politics?

- Does the child / young person have a history of crime, including episodes in prison?
- Is the child /young person a foreign national, refugee or awaiting a decision on their immigration / national status?
- Does the child / young person have insecure, conflicted, or absent family relationships?
- Has the child / young person experienced any trauma in their lives, particularly any trauma associated with war or sectarian conflict?
- Is there evidence that a significant adult or other in the child /young person's life has extremist view or sympathies?

6. More critical risk factors could include

- Being in contact with extremist recruiters
- Articulating support for extremist causes or leaders
- Accessing extremist websites, especially those with a social networking element
- Possessing extremist literature
- Using extremist narratives and a global ideology to explain personal disadvantage
- Justifying the use of violence to solve societal issues
- Joining extremist organisations
- Significant changes to appearance and/or behaviour

If you have any concerns discuss them with your DSL and local Prevent Officer