

# Whole School Safeguarding and Child Protection Procedures

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Governors

Headmaster, Senior Assistant Head (Whole School & DSL) and

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# This document should be read in conjunction with the 'Whole School Safeguarding and Child Protection Policy' and 'Whole School Child-on-Child Abuse Policy'

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1. Useful Definitions:	

**CAMHS** 

Child and Adolescent Mental Health Services: CAMHS promote the mental health and psychological well-being of children and young people and provide multi-disciplinary mental health services to all children and young people with mental health problems and disorders, to ensure effective assessment, treatment and support, for them and their families.

Child

A person under the age of 18 (\$105 Children Act 1989)

Child Abuse

See the current version of 'Keeping Children Safe in Education' ('KSCIE') (Updated September 2025)

Child Protection

This is part of safeguarding and promoting welfare. It is the process of protecting individual children identified as either suffering, or likely to suffer, significant harm as a result of abuse or neglect. Effective child protection is essential as part of wider work to safeguard and promote the welfare of children so that the need for action to protect children from harm is reduced.

Children 'in need'

Under section 17 of the Children Act 1989, these are children whose vulnerability is such that they are unlikely to reach or maintain a satisfactory level of health or development, or this will be significantly impaired without the provision of services, plus those who are disabled. The key factors in determining whether a child is in need are: what will happen to the child's health or development without services being provided, and the likely effect the services will have on the child's standard of health and development.

Designated Safeguarding Lead (DSL)

This is the individual identified within the School with lead responsibility for child protection and safeguarding matters.

LSCB/OSCP

Local Safeguarding Children Board (Oxfordshire Safeguarding Children Partnership): Local authorities are responsible for establishing an LSCB in their area which is responsible for co-ordinating local work to safeguarding and promote the welfare of children. This brings together relevant local agencies that have a part to play in safeguarding. LSCBs should have a clear and distinct identity within local Children's Trust governance arrangements. It is the responsibility of the Local Authority, after consultation with Board partners, to appoint a Chair of the LSCB. Membership of the LSCB is made up of senior managers from different services and agencies in local areas, including the independent and voluntary sector. Detailed guidance on LSCBs can be found in Chapter 3 of 'Working Together to Safeguard Children' (2019 updated February 2024).

NB: LSCBs have now transitioned to Local Authority Safeguarding Partner and Child Death Review Partners, which establishes collective responsibility and accountability of these arrangements across chief officers in the county council, the clinical commissioning group and the Police.

#### Child-on-Child Abuse

All staff should be aware that children can abuse other children at any age referred to as child-on-child abuse).and that it can happen both inside and c of school or college and online. It is important that all staff recognise the indi and signs of abuse and know how to identify it and respond to reports. Child-on-child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise

causing physical harm (this may include an online element which facilitates,

threatens and/or encourages physical abuse)

• sexual violence,9 such as rape, assault by penetration and sexual assault; (this

may include an online element which facilitates, threatens and/or encourages

sexual violence)

8 Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive – but children still need to know it is illegal- whilst non-consensual is illegal and abusive. UKCIS provides detailed advice about sharing of nudes and seminude images and videos.

For further information about sexual violence see Part 5 and Annex B

All child-on-child abuse is unacceptable and will be taken seriously, we have a zero-tolerance approach and recognise child-on-child abuse as abuse.

(KCSIE 2025)

Safeguarding

This is broader than child protection, and includes the process of protecting children from maltreatment, preventing the impairment of children's health (both physical and mental), or development, ensuring that children are growing up in circumstances consistent with the provision of safe and effective care, and taking action to enable all children to have the best outcomes.

Significant harm

Some children are in need because they are suffering, or likely to suffer, significant harm. The Children Act 1989 states 'where the question of whether harm suffered by a child is significant turns on the child's health and development, his health or development shall be compared with that which could reasonably be expected of a similar child.'

There are no absolute criteria, but factors will be the severity of the ill treatment, the degree and extent of physical harm, the duration and frequency of abuse, neglect and exploitation, the extent of premeditation,

and the presence or degree of threat, coercion, sadism and bizarre or

unusual elements.

Social Services The work of local authorities exercising their social services functions

with regard to children. This may also be referred to as Children's Social Care or Local Authority Children's Social Care, or Children's Services (within the local Social Services Department). The LADO will be part of

this.

Well-being For children well-being is the term used in the Children Act 2004,

relating to the five Every Child Matters outcomes, i.e. being healthy, staying safe, enjoying and achieving, making a positive contribution, and

achieving economic well-being.

#### 2. Roles and Responsibilities:

#### All Staff:

Cranford School understands that School's and their staff form part of the wider safeguarding system for children, and the School's 'Whole School Safeguarding and Child Protection Policy' and 'Whole School Safeguarding and Child Protection Procedures' and 'Whole School Child-on-child Abuse Policy'; have regard to the statutory guidance 'Working Together to Safeguarding Children' (2019 – updated February 2024).

Underpinning the School's 'Whole School Safeguarding and Child Protection Policy', 'Whole School Safeguarding and Child Protection Procedures' and 'Whole School Child-on-child Abuse Policy';

• is the understanding and acknowledgement that safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families and carers has a role to play in safeguarding children. In order to fulfil this responsibility effectively, Cranford School ensures that its approach is child-centred, and that consideration is given at all times to the best interests of the child. It is understood that in order to ensure that children and families receive the right help at the right time, everyone one who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

It is important for pupils to receive this help in order to address risks and prevent issues escalating. Research and serious case reviews have repeatedly shown the dangers of failing to take effective action. Poor practice includes failure to act on and refer the early signs of abuse, neglect and exploitation, poor record keeping, failure to listen to the views of the child, failure to re-assess concerns when situations do not improve, sharing information too slowly, and a lack of challenge to those who appear not to be taking action.

All staff receive training and regular updates to ensure that they are able to identify pupils who may benefit from early help. 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. In the first instance, staff should discuss early help requirements with the DSL. The DSL and Deputy DSLs are most likely to have the complete safeguarding picture and are the most appropriate people to advise on the response to safeguarding concerns. Staff may be required to support other agencies and professionals in early help assessments.

Any member of staff who has a concern about a child's welfare should follow the referral processes (see **Appendix I** for a flowchart setting out the process for staff to follow if they have concerns about a child). Staff may be required to support social workers and other agencies following a referral.

The school recognises the need to create the right culture so staff feel comfortable discussing safeguarding matters in and outside of work, **including online.** 

All staff are encouraged to raise concerns about poor or unsafe practice and potential failures in the School's safeguarding regime and are assured that any such concerns will be taken seriously by the Senior Leadership Team ('SLT').

Staff are made aware children are not always ready or able to talk about their experiences of abuse and/or may not always recognise that they are being abused.

When dealing with a disclosure staff should reassure victims of abuse that they are being taken seriously and will be supported. Children and young people should never be made to feel ashamed or that they are creating a problem by reporting abuse, sexual violence or sexual harassment.

The school makes it clear to all staff that being subjected to harassment, violence and or abuse, may breach children's rights, as set out in the Human Rights Act.

Staff are made aware that they:

- must not unlawfully discriminate against pupils because of their protected characteristics
- must consider how they are supporting pupils with protected characteristics
- must take positive action, where proportionate, to deal with the disadvantages these pupils face.
   For example, by making reasonable adjustments for disabled children and supporting girls if there is evidence they are being disproportionately subjected to sexual violence or harassment.
- need to be conscious that pupils with protected characteristics may be more at risk of harm and integrate this into safeguarding policies and procedures.

As part of their safeguarding and online safety training, staff need to understand their expectations, roles and responsibilities around **filtering and monitoring systems** 

All staff are aware of and share with LGBTQ+ pupils where a safe space for them to speak out or share their concerns with members of staff is.

#### The Role of the DSL and Deputy DSLs:

Governing Bodies must ensure that an appropriate senior member of staff from the School's SLT is appointed to take the role of Designated Safeguarding Lead ('DSL'). The DSL should take lead responsibility for safeguarding and child protection (including online safety). This should be explicit in the role holder's job specification. This person should have the appropriate status and authority within the School to carry out the duties of the post.

The DSL should be given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings, and/or to support other staff to do so, and to contribute to the assessment of children.

Deputy Designated Safeguarding Leads ('Deputy DSLs') should be trained to the same standard as the DSL and the role should be explicit in their job specification. Whilst the activities of the DSL can be delegated to appropriately trained deputies, for example, should the DSL be absent at any time, the ultimate lead responsibility for child protection, as set out above, remains with the DSL and this lead responsibility should not be delegated.

#### **Key Elements of the Role:**

#### Manage Referrals:

The DSL is expected to:

- Refer cases of suspected abuse to the Local Authority Designated Officer ('LADO') at the Oxfordshire Safeguarding Children Partnership ('OSCP') \*, as required;
- Support staff who make referrals to the LADO at OSCP;
- 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 has left the School due to risk/harm to a child, to the DBS, as required; and
- Refer cases where a crime may have been committed to the Police, as required.

#### Work with Others:

The DSL is expected to:

- Liaise with the Headmaster to inform him of issues, especially on-going enquiries under section 47 of the Children Act 1989, and Police investigations;
- As required, liaise with the 'case manager' (as per Part 4 of 'KCSIE', September 2025) and the LADO at OSCP, in cases which concern a staff member;
- Liaise with staff (especially pastoral support staff, school nurses, IT technicians and SENCo), 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.
- Be aware of pupils who have a social worker and liaise pro-actively with them.

\*Local Safeguarding Children Boards ('LSCBs') have now transitioned to Local Authority Safeguarding Partner and Child Death Review Partners, which establishes collective responsibility and accountability of these arrangements across chief officers in the county council, the clinical commissioning group and the Police.

Oxfordshire currently retains the name 'OSCP' which encompasses the relevant partners.

#### Filtering and Monitoring Systems:

The DSL is expected to:

- to take the lead on understanding the filtering and monitoring systems and processes in place in school
- take responsibility for understanding the filtering and monitoring systems and processes in place as part of their role
- Ensuring that all staff understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training.

#### Training:

The DSL and Deputy DSLs 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 with other DSLs, or simply taking the 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 that they can:

- Understand the assessment process for providing early help and statutory intervention, including local criteria for action, OSCP Children's Social Care referral arrangements, and the OSCP threshold document. (Full details are available in Chapter I of 'Working Together to Safeguard Children' (Updated February 2024);
- Have a working knowledge of how the OSCP 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 that each member of staff have access to, and understands the School's "Whole School Safeguarding and Child Protection Policy', "Whole School Safeguarding and Child Protection Procedures' and "Whole School Child-on-child Abuse Policy' especially new and part-time staff;
- Are alert to the specific needs of children in need, those with special educational needs and/or disabilities (SEN/D) 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. Take responsibility for the oversight of online safety at the
  School;
- recognise the additional safeguarding risks that children with SEND face, for example online, from online bullying, grooming and radicalisation, and are confident that they have the capability to support SEN/D children to stay safe;
- Recognise the different types of abuse including child-on-child abuse and sharing nudes and semi-nudes and are confident that they have the capability to support the pupils to stay safe;
- Are aware of the needs of children with a social worker and of actions that could be taken to promote these children's educational outcomes;
- Are aware of the needs of looked after or previously looked after children and of actions that could be taken to promote these children's educational outcomes;
- Obtain access to resources and attend any relevant or refresher training courses; and
- Encourage a culture of listening to pupils and taking account of their wishes and feelings, among all staff, in any measures the School may put in place to protect them.
- Ensuring that they and all staff understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training.

#### Raise Awareness:

The DSL should:

- Ensure the School's 'Whole School Safeguarding and Child Protection Policy',
   'Whole School Safeguarding and Child Protection Procedures' and 'Whole School Child-on-child Abuse Policy' are known, understood and used appropriately;
- Ensure the School's "Whole School Safeguarding and Child Protection Policy",
   "Whole School Safeguarding and Child Protection Procedures" and "Whole School Child-on-child Abuse Policy"
- are reviewed annually (as a minimum) and the implementation of the procedures are updated and reviewed regularly, and work with the Governing Body regarding this;
- Ensure the 'Whole School Safeguarding and Child Protection Policy', 'Whole
  School Safeguarding and Child Protection Procedures' and 'Whole School Childon-child Abuse Policy' documents is available publicly and parents are aware of the fact
  the referrals about suspected abuse or neglect may be made and the role of the School in
  this:
- Link with OSCP to make sure staff are aware of any training opportunities and the latest policies on local safeguarding arrangements; and
- Disseminate safeguarding and child protection updates from OSCP and others to staff via INSET training, Whole School Staff Meetings, email updates etc.

#### **Child Protection File:**

Where children leave the School, the DSL should ensure their child protection file is transferred to the new school as soon as possible, consistent with our 'Whole School Privacy Policy'. This should be transferred separately from the main pupil file, ensuring transit and confirmation of receipt is obtained. Receiving schools and colleges should ensure key staff such as Deputy DSLs and SENCos or the named person with oversight for SEN/D 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, any 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:**

During term time, the DSL (or a Deputy DSL) should always be available (during School hours) for staff in the School to discuss any safeguarding concerns. Whilst, the DSL (or a Deputy DSL) would be expected to be available in person, it is a matter for the headmaster, working with the DSL to define what 'available' means and whether in exceptional circumstances, availability via phone and/or TEAMS or other such media is acceptable.

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

#### The Headmaster:

The Headmaster is responsible to the Governing Body for compliance with statutory requirements in relation to safeguarding. He will therefore ensure that:

- Sufficient staff are appointed to undertake the role of DSL and Deputy DSLs in relation to
  the size and composition of the School, the site and the need of the pupils. A designated
  practitioner should also be named to take responsibility for safeguarding children with the
  EYFS. The DSL is on the School's SLT and has the appropriate authority, and be given the
  time, funding, training, resources and support to provide advice and support to other staff
  on child welfare and protection matters, to take part in strategy discussions and inter-agency
  meetings (and/or support other staff to do so), and to contribute to the assessment of
  pupils. DSLs should also have regular reviews of their own practice to ensure they improve
  over time;
- The DSL is provided with job descriptions which specify that they have lead responsibility for safeguarding and child protection issues, including liaising with the OSCP, representing the School in inter-agency working and liaising with parents (broad areas of responsibility for the DSL are set out in Annex C of the current version of 'KSCIE', 2025
- The Deputy DSLs undertake the same level of safeguarding training as the DSL, so that effective cover is provided at all times. Training for all DSLs includes inter-agency working;
- Any deficiencies or weaknesses with regard to safeguarding matters in the School are brought to the attention of the Chair of Governors and are remedied without delay;
- The DSL and all Deputy DSLs have undertaken training to equip them to exercise their responsibilities effectively, including training on child protection and inter-agency working, refreshed at least every two years; they also receive informal updates;
- This training may be provided by the OSCP or an external agency acceptable to the OSCP. It is recommended that the School obtains written confirmation from the OSCP that the training is the appropriate level for a DSL (some Local Authorities refer to this as Level 3 Training);
- At Cranford School, the DSL and Deputy DSLs undertake the required training as set out in Annex C of the most current version of 'KCSIE' (September2025), which covers 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;
- All staff receive Generalist Child Protection and Safeguarding refresher training every two
  years. All staff are aware of the need to understand and respond to factors such as child
  sexual exploitation and FGM, but the focus for training and responsiveness to such issues are
  pitched at a level which is relevant and appropriate to the context of the School within the
  community;
- Online safety training is included in staff safeguarding and child protection training and monitor DfE's Generative AI in Education policy and Cyber Security Standards for Schools.
- They oversee the safe use of technology, mobile phones and cameras in the early years setting and whole school.
- Areas such as cyber-bullying and mental health issues are examined in more detail at present, as they are assessed to be of greater relevance to our pupils;
- Ensures that Office staff ask visitors for photographic identification on arrival;
- A number of staff have undertaken safer recruitment training, so that at least one member of a recruitment panel involved in all stages of the recruitment process has been trained, and to allow a margin for staff availability/turnover (we always ensure the panel member trained in safer recruitment is involved in all stages of the recruitment process, although this is not a requirement for independent schools);

- All staff and volunteers follow the 'Whole School Safeguarding and Child Protection
  Policy', 'Whole School Safeguarding and Child Protection Procedures' and
  'Whole School Child-on-child Abuse Policy 'and sign the 'Agreement to Work in
  Accordance with the School's 'Whole School Safeguarding Policy and Child
  Protection Policy' and 'Whole School Safeguarding and Child Protection
  Procedures' (see Appendix 3 of this Policy document), a signed copy of which is kept on
  the relevant staff member's file;
- All staff and volunteers (including the Headmaster himself), have undertaken up-to-date and appropriate training to equip them to carry out their responsibilities for safeguarding effectively, refreshed regularly in line with advice from OSCP, (this can be provided by the DSL, as long as their inter-agency training is up-to-date);
- All staff are given the opportunity to contribute to and shape the safeguarding arrangements and child protection at the School, through weekly Form Tutor meetings, weekly Pastoral Team meetings and weekly Heads of Year and Heads of Key Stage meetings with the Assistant Head Senior School (Pastoral)/Assistant Head Junior School (Pastoral) Feedback is given to, and examined by, the DSL;
- All staff are informed as soon as possible of any changes to the School's "Whole School Safeguarding and Child Protection Policy", "Whole School Safeguarding and Child Protection Procedures and "Whole School Child-on-child Abuse Policy";
- Safeguarding training for all staff is included as a key area in all induction procedures and is
  regularly referred to when reminding staff of key procedures at the start of each academic
  year, noting any changes to the procedures or to the relevant contact details;
- Arrangements are made (if necessary, through supply cover), to allow the DSL to attend strategy meetings, child protection conferences or to contribute to the assessment of a pupil 'in need':
- Procedures for dealing with allegations of abuse against staff/volunteers are followed up and that all staff and volunteers are aware of them;
- The required referral is made to the Disclosure and Barring Service ('DBS') and the Teaching Regulation Agency ('TRA') in cases of teachers' serious professional misconduct, where the School ceases to use the services of any person for being considered unsuitable to work with children;
- The Governing Body is kept informed of School developments and the 'Whole School Safeguarding and Child Protection Policy', Whole School Safeguarding and Child Protection Procedures' and 'Whole School Child-on-child Abuse Policy' although they have no formal role in relation to safeguarding.
- Make sure that online safety training is included in staff safeguarding and child protection training
- Oversee the safe use of technology, mobile phones and cameras in the early years setting and whole school.

#### **School Matron:**

The School Matron plays a vital part in promoting the health, welfare and development of pupils and are in an excellent position to contribute to the effective delivery of the 'Whole School Safeguarding and Child Protection Policy', 'Whole School Safeguarding and Child Protection Procedures' and 'Whole School Child-on-child Abuse Policy'.

The School Matron at Cranford School is a Deputy DSL.

The School has a Matron on-site every day of the week during term time and is guided by the Nursery and Midwifery Council's rules and codes of conduct, which allow them to provide

confidential medical advice and treatment to pupils, including on matters relating to sexual health and treatment.

The Matron is however, required to use her professional judgement in each individual case and to encourage the pupil to:

- Inform his or her parents/guardian about any treatment he/she receives or is considering;
- Carefully consider possible implications of such treatment in relation to the pupil's racial and cultural heritage and/or religious persuasion.

In addition, the School Matron must be aware of her duty to disclose information if they believe that a child may be at risk of harm, through their Deputy DSL duties. A School Matron who has any cause for concern about a pupil's safety or welfare must report this in accordance with the School's safeguarding procedures. Both pupils and staff need to be clear that the School Matron can offer confidential medical advice and treatment, including to pupils under 16 years of age, but that they must report any concerns about the welfare or safety of pupils to the DSL.

School Matron should ensure that they fully understand their obligations, and how this can override medical confidentiality, and be familiar with the provisions and guidance in relation to information sharing and consent.

Given the nature of Matron's role and the possibility of one-on-one contact regarding personal issues, records must be fully and accurately maintained and be marked 'confidential'. Accurate recording will help Matron demonstrate her decision-making process when situations on a one-to-one basis with a pupil develop over a period of time and/or information needs to be shared with others or, if a pupil moves school, be transferred to the new school's Matron or doctor.

#### **Special Educational Needs Co-ordinator (SENCo):**

Children with special educational needs and/or disabilities (SEN/D) can face additional challenges. The School recognises that assumptions can be made that indicators of possible abuse, such as behaviour, mood and injury related to the child's disability without further exploration, children with SEND/D can be disproportionately impacted by things like bullying, without outwardly showing any signs and communication barriers and difficulties in overcoming these barriers.

When the DSL is alerted to concerns about an individual pupil, she will then consult with the SENCo if the concern is about a pupil who is on the SEND Register.

However, the DSL should not delay following the child protection procedures whilst trying to gather information from the SENCo. Consultation with the SENCo would be particularly helpful in cases where the pupil has communication difficulties or behaviour problems.

#### **The Safeguarding Governor:**

The School has a Governor with particular responsibility for safeguarding, who conducts audits in School, champions child protection issues and liaises with the DSL in School.

The Safeguarding Governor also provides information and reports to the Governing Body. The members of the Board of Governors have undergone, or are in the process of undergoing Safeguarding training, to enable them to perform their duties in these areas.

Ms Christine Ellis is the Governing Body Safeguarding Lead Governor with reference to responding to safeguarding incidents and allegations against members of staff, and thus:

- Is the first point of contact in the event of a safeguarding issue and/or allegation against a member of staff being reported by the School;
- Ensures that staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children alongside the rest of the Governing Body and the Headmaster;
- Creates an environment where staff feel supported in their safeguarding role and able to raise concerns alongside the rest of the Governing Body and the Headmaster;
- Ensures that those who work directly with children have regular reviews of their own practice so that they have knowledge, skills and experience which develop and improve over time;
- Is kept informed and provides the School with advice and guidance, particularly in the event of a referral being made to children's social services;
- Plays a key part in any decision to suspend a member of staff for safeguarding reasons;
- Leads the procedures (in place of the Headmaster), in the event of an allegation being made against the Headmaster;
- Where required, assists the School in making a referral to the DBS and the TRA where the School ceases to use the service of any person for being considered unsuitable to work with children, in accordance with our legal duty;
- Where required to do so, provides information requested by the DBS and/or the TRA in respect of a member of staff or volunteer, in accordance with our legal duty;
- Reports to the Charity Commission, where required;
- Is the first point of contact for staff raising concerns under the duty to report concerns about the management of safeguarding, where it is necessary to consult outside the School;
- Ensures the checks mandated by recruitment legislation are carried out for members of the Governing Body;
- Maintains a central record of safeguarding incidents, reported to the Governing Body, reviewing these termly, and reporting annually to the Governing Body on safeguarding incidents in School;
- Reviews the School's 'Whole School Safeguarding and Child Protection Policy',
  Whole School Safeguarding and Child Protection Procedures' and 'Whole
  School Child-on-child Abuse Policy" annually, and as required by changes in legislation,
  guidance and practice and, on the advice of the OSCP, after a referral has been made so that
  any identified deficiencies or weaknesses in the procedures can be remedied without delay;
- Keeps related policies (e.g. 'Whole School Anti-Bullying Policy and Procedures',
   'Whole School Safe Recruitment Policy and Procedures' etc.) under review from a
   safeguarding perspective;
- Monitors the area of safeguarding and ensures the latest national guidance is reflected in the School's 'Whole School Safeguarding and Child Protection Policy' and 'Whole School Safeguarding and Child Protection Procedures' and practice;
- Reviews the central record of safeguarding incidents reported to the Governing Body each term:
- Recommends to the Chair of Governors amendments to the School's 'Whole School
  Safeguarding and Child Protection Policy', Whole School Safeguarding and Child
  Protection Procedures' and 'Whole School Child-on-child Abuse Policy' and
  related policies and procedures), as required by the outcome of annual internal reviews of
  policies and procedures, Safeguarding Audit processes, changes in legislation, issues raised
  and recommendations from other committees (e.g. Health and Safety Committee etc.), and
  from reviews of the central record of safeguarding incidents;

- Signs off on amendments to the 'School's 'Whole School Safeguarding and Child Protection Policy', 'Whole School Safeguarding and Child Protection Procedures' and 'Whole School Child-on-child Abuse Policy'
- Monitors and reviews compliance with the 'School's 'Whole School Safeguarding and Child Protection Policy', Whole School Safeguarding and Child Protection Procedures' and 'Whole School Child-on-child Abuse Policy" via the School Safeguarding Audit, and ensures any recommendations made are put into practice by the School;
- Reports to the Governing Body on the outcomes of internal audits;
- Arranges for the provision of any further central training or support felt to be necessary to complement School and OSCP training.

#### **The Governing Body:**

All governors and trustees receive appropriate safeguarding and child protection training at induction, and then at regular intervals. Training provides them with the knowledge to ensure their school's safeguarding policies and procedures are effective. The Governing Body has many responsibilities including the following responsibilities, which are delegated to the Safeguarding Governor:

- Ensure that mechanisms are in place to assist staff to understand and discharge their roles and responsibilities, as set out in Part I and Annex A of the current version of 'KCSIE' (September 2025);
- must make sure that the DSL has the appropriate status and authority within school to carry out the post
- To approve and annually review the 'School's 'Whole School Safeguarding and Child Protection Policy', Whole School Safeguarding and Child Protection Procedures' and 'Whole School Child-on-child Abuse Policy' and approve any substantive changes to it;
- To oversee compliance with the 'School's 'Whole School Safeguarding and Child Protection Policy', Whole School Safeguarding and Child Protection Procedures' and 'Whole School Child-on-child Abuse Policy' and other relevant audit processes, as required;
- To oversee the management of safeguarding at organisational level, delegating where appropriate to members of the SLT;
- regularly review the effectiveness of school filters and monitoring systems. They ensure that the leadership team and relevant staff are:
  - aware of and understand the systems in place
  - manage them effectively

know how to escalate concerns when identified.

- Ensure the School's 'Whole School Safeguarding and Child Protection Policy,
  Whole School Safeguarding and Child Protection Procedures' and 'Whole
  School Child-on-child Abuse Policy' includes procedures to minimise the risk of child-on-child abuse and sets out how allegations will be investigated and dealt with;
- Ensure the 'School's 'Whole School Safeguarding and Child Protection Policy',
   Whole School Safeguarding and Child Protection Procedures' and 'Whole
   School Child-on-child Abuse Policy' reflects the different forms of child-on-child abuse,
   make it clear that such abuse is never tolerated and how victims will be supported. It must
   also reflect the different gender issues that can be prevalent when dealing with child-on-child
   abuse: for example, girls being sexually touched or boys being subject to initiation-type
   violence;

- Ensure the 'School's 'Whole School Safeguarding and Child Protection Policy',
  Whole School Safeguarding and Child Protection Procedures' and 'Whole
  School Child-on-child Abuse Policy' reflect the fact that additional barriers can exist
  when recognising abuse neglect in pupils with SEND;
- Ensure that children are taught about safeguarding, including online, through teaching and learning opportunities and as part of a broad and balanced curriculum. At Cranford School, this is mainly through out PSCHEE, Computing and Relationships and Sex Education (RSE) Schemes of Learning, supported by Assemblies, Form Tutor and House time etc.;
- Ensure that safeguarding pupils is included as a standing agenda at meetings;
- Ensure that online safety is a running and inter-related theme
- Monitor' lessons learnt' from Low Level Concerns raised.
- Be aware of the potential relevance of the Human Rights Act 1998 and Equalities Act 2010
- To designate a member of the Governing Body with responsibility for safeguarding.
- Make sure that the school has appropriate filtering and monitoring systems in place and review their effectiveness
- Review the DfE's filtering and monitoring standards, and discuss with IT staff and service providers about what needs to be done to support the school to meet these standards
- Make sure the DSL takes lead responsibility for understanding the filtering and monitoring systems in place as part of their role
- Make sure that all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and in line with advice from the safeguarding partners
- Make sure staff understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training

#### Responding to Allegations:

- Clear arrangements should be in place for communication between the DSL and the Safeguarding Governor and the Chair of Governors, in the rare event of an allegation being made against the Headmaster;
- In cases of allegations against staff, members of the Governing Body need to have accurate information in line with the agreed communication plan and ahead of pupil speculation or media interest. The information given should not breach the reporting restrictions introduced by the Education Act 2011, confidentiality or include unnecessary details.

#### 3. Safeguarding Issues:

#### **The Prevent Duty:**

Please also refer to the 'Whole School Preventing Radicalisation Policy (Including EYFS)' for more details.

Cranford School School recognises its responsibility under the Prevent Duty (June 2015, DfE guidance) and sees protecting children from the risk of radicalisation as part of the School's wider safeguarding duties, similar in nature to protecting children from other forms of harm and abuse.

Radicalisation, as defined in the Revised Prevent Duty Guidance for England and Wales (2021), 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. Children are vulnerable to extremist ideology and radicalisation.

Similar to protecting our pupils from other forms of harm and abuse, protecting them from this risk is part of our complete safeguarding approach.

Extremism goes beyond terrorism and is defined in the Government's Counter Extremism Strategy as 'vocal or active opposition to our fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs'. Calls for the death of members of the armed forces are also seen as extremism.

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

Extremists often target the vulnerable, including the young, by seeking to sow the seeds of divisions between communities on the basis of race, faith and denomination; justifying discrimination towards women and girls; seeking to persuade others that minorities are inferior; or arguing against the primacy of democracy and the rule of law in our society.

There is no single way of identifying who is likely to be susceptible to an extremist ideology. Specific factors may contribute to vulnerability which are often combined with influences such as family, friends or online, and with specific needs for which extremism or terrorist groups appear to provide an answer. The internet and social media in particular have become a major factor in the radicalisation of young people.

As with other safeguarding risks, staff are alert to changes in children's behaviour which could indicate that they may be in need of help or protection.

Staff should use their judgement in identifying pupils who might be at risk of radicalisation and act proportionately which may include the DSL or a Deputy DSL, making a referral to the Channel programme (a multi-agency approach to supporting those at risk of radicalisation).

The DSL, who is also the School's Designated Prevent Lead person, will assess with the SLT the risk of pupils at the School being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. The DSL works with OSCP to ensure that any action needed is coordinated and timely and that effective engagement with parents is in place in order to assist them to report concerns.

All staff receive online training (OSCP-recommended Channel training) to equip them with the knowledge and understanding to support pupils at risk of radicalisation. This training is repeated on an annual basis. Staff will support pupils who may be vulnerable to influences as part of our wider safeguarding responsibilities and, where we believe a pupil is being directly influenced by extremist materials or influences, we will ensure the pupil is offered mentoring. In such circumstances, our School will seek external support from the OSCP and/or partnership structures working to prevent extremism.

We aim to provide help at the right time to address risks and prevent issues escalating, acting on and referring the early signs of abuse, neglect and radicalisation. As a result of the training given, staff understand the importance of keeping clear records, listening to the views of the child, reassessing concerns when situations do not improve, sharing information quickly and challenging inaction.

However, staff will be alert to the fact that whilst extremism and radicalisation is broadly a safeguarding issue which requires early help procedures to be investigated, there may be some instances where a child or children may be at direct and immediate risk of harm and neglect. In cases such as this, staff must alert the DSL or one of the Deputy DSLs immediately.

For example, this could be due to a pupil displaying risky behaviours in terms of the activities they are involved in or the groups they are associated with, or staff may be aware of information about a child's family that may equally place a child at risk of harm. (These examples are for illustration and are not definitive or exhaustive).

All staff working at the School (including visiting staff, volunteers, contractors etc.), are required to report instances where they believe a child may be at risk of harm or neglect to the DSL, including any harm through extremism or radicalisation. The DSL will then consider the level of risk to the pupil, with the support of the OSCP, in order to identify the most appropriate referral, which may include Channel or Children's Social Care.

Normal referral processes are also available when there are concerns about children who may be at risk of being drawn into terrorism. Any member of staff can make a referral through Channel via the OSCP.

If the child's situation does not appear to be improving, the staff member with concerns should press for re-consideration. Concerns should always lead to help for the child at some point in the process, if appropriate.

While decisions to seek support for a child in need, or about whom there are concerns relating to radicalisation, would normally be taken in consultation with parents and pupils, it is important to note that their consent is <u>not</u> required for a referral when there are <u>reasonable grounds to believe a child is at risk of serious harm.</u>

All schools and colleges are subject to a duty under section 26 of the Counter Terrorism and Security Act ('CTSA', 2015), in the exercise of their functions, to have 'due regard' (as defined in the 'Revised Prevent Duty Guidance: For England and Wales'), to the need to prevent people from being drawn into terrorism. This is known as the Prevent Duty.

The Prevent Duty should be seen as part of the School's wider safeguarding obligations. The DSL and Deputy DSLs and other senior leaders are expected to familiarise themselves with the 'Revised Prevent Duty Guidance: For England and Wales', especially paragraphs 57 – 76 which are specifically concerned with schools.

This guidance is set out in terms of four general themes: Risk Assessment, Working in Partnership, Staff Training and IT Policies. Advice for schools on the Prevent Duty has been published by the DfE and is intended to complement the Prevent Guidance and signposts to other sources of advice and support.

#### **Educate Against Hate:**

Educate Against Hate is a website launched by the Government which has been developed to support and equip school leaders, teachers and parents with information, tools and resources (including on the promotion of fundamental British values) to help recognise and address extremism and radicalisation in young people. This platform provides information on, and access to, training resources for teachers and staff and school leaders, some of which are free of charge, such as Prevent e-learning (via the Prevent Training Catalogue).

#### **Channel:**

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage for people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual may be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages. Guidance on Channel is available at Channel Guidance and a channel awareness e-learning programme is available for staff at Channel General Awareness.

The School's DSL and Deputy DSLs are aware of local procedures for making a Channel referral. As a Channel partner, the School may be asked to attend a Channel panel to discuss the individual referred in order to determine whether they are vulnerable to being drawn into terrorism and to consider the appropriate support required.

The active promotion of fundamental British values and tolerance for different religious beliefs and faiths is embedded in our Schemes of Learning in all curriculum areas (Please see 'Whole School Policy for Personal, Social, Health, Citizenship and Economic Education' ('PSHCEE'), 'Whole School and EYFS Spiritual, Moral, Social and Cultural Policy' ('SMSC'), 'Whole School Relationships and Sex Policy ('RSE'), and the Junior and Senior School (including Sixth Form) Curriculum Policies for more details, together with all other Schemes of Learning and Junior School/Department Policies).

Our School Ethos and Values further underpin our promotion of fundamental British values and encourage mutual respect, understanding of, and tolerance for different religious beliefs and cultures. Please refer to the 'Whole School Preventing Radicalisation Policy Including EYFS' and the School's 'Prevent Self-Assessment' and 'Prevent Action Plan' for more information about the School's responsibilities under the Prevent Duty.

The Home Office has developed three e-learning modules which are useful sources of information:

- Prevent awareness e-learning offers an introduction to the Prevent duty;
- Prevent referrals e-learning supports staff to make Prevent referrals that are robust, informed and with good intention;
- Channel awareness e-learning is aimed at staff who may be asked to contribute to or sit on a multi-agency Channel panel.

All staff should have an awareness of safeguarding issues, some of which are listed below. Staff should be aware that behaviours linked to the likes of drug taking, alcohol abuse, truanting and sharing nudes and semi-nudes put children in danger.

#### **Child-on-child Abuse:**

All staff should be aware that safeguarding issues can manifest themselves via child-on-child abuse. For these purposes, Child-on-child abuse is any form of physical, sexual, emotional and financial abuse, and coercive control, exercised between children, and within children's relationships (both intimate and nonintimate), friendships and wider peer associations.

All staff should be aware that children can abuse other children at any age (often referred to as child-on-child abuse) and that it can happen both inside and outside of school or college and online. It is important that all staff recognise the indicators and signs of abuse and know how to identify it and respond to reports. Child-on-child abuse is most likely to include, but may not be limited to:

I.a. I • bullying (including cyberbullying, prejudice-based and discriminatory bullying)

- 1.a.2 abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')
- 1.a.3 physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- 1.a.4 sexual violence, such as rape, assault by penetration and sexual assault
- 1.a.5 sex

It is most likely to include, but is not limited to:

- 4. causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- 5. upskirting, a criminal offence which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm;
- 6. sharing nudes and semi-nudes (also known as sexting);
- 7. initiation/hazing type violence and rituals.

All child-on-child abuse is unacceptable and will be taken seriously, we have a zero-tolerance approach and recognise <u>child-on-child</u> abuse as abuse. Passing off abusive comments and interaction as 'banter 'is equally unacceptable. Staff are aware that we also have a zero-tolerance of abusive behaviours, including negative behaviours and interactions such as misogyny, sexual, transphobia or racial abuse.

Where there is 'reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm' as a result of pupil behaviour or bullying, the School will follow the guidance for safeguarding set out in the most current version of 'KCSIE' (September 2025), including referral to the MASH (Multi-Agency Safeguarding Hub: 0845 050 7666).

All children involved in child-on-child abuse are treated as being 'at risk' in the event of a disclosure of this nature. Advice about sharing nudes and semi-nudes in schools is available: Sharing nudes and semi-nudes: advice for education settings working with children and young people (UKCIS Education Group guidance - December 2020).

All staff should be aware that safeguarding issues can manifest themselves via child-on-child abuse. Children can abuse other children.

Staff are aware that abuse is abuse and should never be tolerated or passed off as just 'banter', or 'part of growing up'. Child-on-child abuse can include different gender issues, for example, girls being sexually touched/assaulted or boys being subject to initiation/hazing-type violence. Additional information regarding child-on-child abuse is located in Annex A of the current version of 'KCSIE' (September 2025). The school also recognises that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and is simply not being reported; this is why the measures outlined in our policies are key to ensuring pupils feels safe to come forward and report abuse, but also ensures pupils can recognise abusive behaviour in their own peer groups.

Abuse (physical or emotional) by peers should be taken as seriously as abuse perpetrated by an adult: do not be dismissive or set high thresholds.

Also, it is important to bear in mind that there may be a risk to young children/young people other than those involved in 'live' cases.

In cases of bullying (especially in relation to the protected characteristics)) the School must always consider whether safeguarding processes need to be followed, due to the potential seriousness of violence concerned. Bullying on the basis of protected characteristics is taken particularly seriously.

The threshold for dealing with an issue of pupil behaviour or bullying under the School's 'Whole School Safeguarding and Child Protection Policy' and 'Whole School Safeguarding and Child Protection Procedures' and 'Whole School Child-on-child Abuse Policy'; is when there is 'reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm'.

#### Key Principles for Dealing with Child-on-child Abuse:

If a member of staff thinks for whatever reason that a child may be at risk of or experiencing abuse by another child, or that a child may be at risk of abusing or may be abusing another child/ children, they should discuss their concern with the DSL without delay (in accordance with our Safeguarding and Child Protection Policy) so that a course of action can be agreed.

Any child can be vulnerable to child-on-child abuse due to the strength of peer influence during adolescence, and staff should be alert to signs of such abuse amongst all children. Individual and situational factors can increase a child's vulnerability to abuse by other children. For example:

- child-on-child abuse may affect boys differently from girls, and that this difference may result from societal norms (particularly around power, control and the way in which femininity and masculinity are constructed) rather than biological make-up. Barriers to disclosure will also be different. In addition, we recognise that it is more likely that girls will be victims and boys perpetrators, but child-on-child abuse is unacceptable and will be taken seriously and investigated fully.
- •children with Special Educational Needs and/or Disabilities (SEND) can be more likely to be abused than other children without SEND, and additional barriers can sometimes exist when recognising abuse in children with SEND. These can include:
- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to a child's disability without further exploration,
- the potential for children with SEND to be disproportionately impacted by behaviours such as bullying and harassment, without outwardly showing any signs,
- communication barriers and difficulties, and overcoming these barriers.
- some children may be more likely to experience child-on-child abuse than others as a result of certain characteristics, particularly the protected characteristics, as outlined in the Equality Act (2010)

### <u>Detailed actions as outlined in the Whole School Child-on-child Abuse Policy are as follows:</u>

#### Responding to concerns or allegations of child-on-child abuse

It is essential that all concerns and allegations of child-on-child abuse are handled sensitively, appropriately and promptly. The way in which they are responded to can have a significant impact on our School environment. Any response should:

• include a thorough investigation of the concern(s) or allegation(s), and the wider context in which it/they may have occurred (as appropriate) – depending on the nature and seriousness of the alleged incident(s), it may be appropriate for the police and/or children's social care to carry out this investigation,

• treat all children involved as being at potential risk — while the child allegedly responsible for the abuse may pose a significant risk of harm to other children, s/he may also have considerable unmet needs and be at risk of harm themselves. We will ensure that a safeguarding response is in place for both the child who has allegedly experienced the abuse, and the child who has allegedly been responsible for it, and additional sanctioning work may be required for the latter,

#### • take into account:

- o that the abuse may indicate wider safeguarding concerns for any of the children involved, and consider and address the effect of wider sociocultural contexts such as the child's/children's peer group (both within and outside school); family; the School environment; their experience(s) of crime and victimisation in the local community; and the child/children's online presence. We will consider what changes may need to be made to these contexts to address the child/ children's needs and to mitigate risk, and
- the potential complexity of child-on-child abuse and of children's experiences, and consider the interplay between power, choice and consent. While children may appear to be making choices, if those choices are limited, they are not consenting,
- the views of the child/children affected. Unless it is considered unsafe to do so (for example, where a referral needs to be made immediately), the DSL will discuss the proposed action with the child/ children and their parents and obtain consent to any referral before it is made. The School will manage the child/children's expectations about information sharing, and keep them and their parents informed of developments, where appropriate and safe to do so. We take into account the wishes of any child who has allegedly been abused, and give the child as much control as is reasonably possible over decisions regarding how any investigation will be progressed and how they will be supported.

What should you do if you suspect either that a child may be at risk of or experiencing abuse by their peer(s), or that a child may be at risk of abusing or may be abusing their peer(s)?

If a member of staff thinks for whatever reason that a child may be at risk of or experiencing abuse by their peer(s), or that a child may be at risk of abusing or may be abusing their peer(s), they should discuss their concern with the DSL without delay (in accordance with our Safeguarding and Child Protection Policy) so that a course of action can be agreed.

Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and, if appropriate, the police) is made immediately. Anyone can make a referral. In exceptional circumstances, where referrals are not made by the DSL, the DSL should be informed as soon as possible that a referral has been made (as per the Whole School Safeguarding and Child Protection Policy procedures in section 3.5).

If a child speaks to a member of staff about child-on-child abuse that they have witnessed or are a part of, the member of staff should listen to the child and use open language that demonstrates understanding rather than judgement. For further details please see the procedures set out in (As outlined in the 'Safeguarding and Child Protection Policy').

#### How we will respond to concerns or allegations of child-on-child abuse:

The DSL will discuss the concern(s) or allegation(s) with the member of staff who has reported it/them and will, where necessary, take any immediate steps to ensure the safety of the child/all

children affected. Where any concern(s) or allegation(s) indicate(s) that indecent images of a child or children may have been shared online, the DSL should consider what urgent action can be taken in addition to the actions and referral duties set out in this policy, to seek specialist help in preventing the images spreading further and removing the images from the internet. Staff must ensure that they do not view, copy, print, share, store or save any illegal images of a child under any circumstances, even if they are attempting to provide help for the child. If a member of staff unintentionally views any images of this nature, they must inform the DSL immediately.

#### Safety plans

We will always carry out a safety plan in respect of:

- any child who is alleged to have behaved in a way that is considered to be abusive or violent,
- any child who has reportedly been abused or affected by the alleged abusive or violent behaviour by another child, or
- any child who may be at risk due to the alleged abusive or violent behaviour by another child as deemed appropriate by the DSL. Where it is alleged that a child has behaved in a way that is considered to be inappropriate or problematic (as opposed to abusive or violent), the DSL will use their professional judgment based on the particular concern(s) and/or allegation(s) raised, and the needs and circumstances of the individual child/children in question to determine whether (as explained above) it would be appropriate to contact children's social care, and to carry out a safety plan.

Careful judgment and consideration are required as to whether alleged behaviour which might be judged to be inappropriate by an adult might actually be harmful to another child. Consultation is recommended with children's social care if there is any doubt about this. Where other children have been identified as witnesses to alleged abuse or violence, consideration should also be given by the DSL to whether there might be any risks to those children, and whether a safety plan would be appropriate in relation to any risks presenting to them.

#### **Disciplinary action**

Cranford School will consider whether disciplinary action may be appropriate for any child/children involved. However, if there are police proceedings underway, or there could be, we work in partnership with the police and/or children's social care. Where a matter is not of interest to the police and/ or children's social care, we consider what is the most appropriate action to take to ensure positive behaviour management. Disciplinary action, where appropriate may include:

(a) ensuring that the child/children take(s) responsibility for and realise(s) the seriousness of their

- behaviour; (b) demonstrating to the child/children and others that child-on-child abuse can never be tolerated;
- (c) ensure the safety and wellbeing of other children.

Any disciplinary action will be in line with our sanctions as outlined in the Whole School Behaviour Policy.

However, we will balance this against any police investigations, the child's/children's own potential unmet needs, and any action or intervention planned regarding safeguarding concerns. Before deciding on appropriate action, the School will always consider its duty to safeguard all children in its care from harm; the underlying reasons for a child's behaviour; any unmet needs, or harm or abuse suffered by the child; the risk that the child may pose to other children; and the severity of the childon-child abuse and the causes of it.

We recognise that disciplinary interventions alone are rarely able to solve issues of child-on-child abuse, so we will always consider the wider actions that may need to be taken, and any lessons that may need to be learnt going forwards.

#### Information sharing, data protection and record keeping

When responding to concern(s) or allegation(s) of child-on-child abuse, the School will:

- always consider carefully, in consultation with children's social care, the police and other relevant agencies (where they are involved), how to share information about the concern(s) or allegation(s) with the student(s) affected, their parents, staff, and other pupils and individuals,
- record the information that is necessary for us and other relevant agencies (where they are involved) to respond to the concern(s) or allegation(s) and safeguard everyone involved,
- keep a record of the legal purpose for sharing the information with any third party, including relevant authorities, and ensure that the third party has agreed to handle the information securely and to only use it for the agreed legal purpose, and
- be mindful of and act in accordance with its safeguarding and data protection duties, including those set out in Working Together to Safeguard Children (Updated December 2023) 74 and the HM Government advice on Information Sharing (updated in July 2018).

#### Multi-agency working

Cranford School actively engages with its Local Safeguarding Partnership in relation to child-on-child abuse, and works closely with, for example, children's social care, the police, Oxfordshire Safeguarding Childcare Partnership (OSCP), Locality and Community Support Service (LCSS) and/or other relevant agencies in accordance with the Local Safeguarding Partnership's procedures, and other schools.

• When dealing with any concerns or allegations, all staff must ensure that they do not 'view, copy, print, share, store or save any illegal images of a child under any circumstances, even if they are attempting to provide help for the child.

Cranford School would refer to The Internet Watch Foundation (IWF), who has a trained team that can evaluate and remove illegal images from the internet when the images are reported to them quickly. They will also share the image with the National Crime Agency's CEOP Command to facilitate an investigation. Any report to IWF will be made in consultation with the police. DSLs should always use their professional judgement to: (a) assess the nature and seriousness of the alleged behaviour,71 and (b) determine whether it is appropriate for the alleged behaviour to be to be dealt with internally and, if so, whether any external specialist support is required. In borderline cases the DSL may wish to consult with children's social care and/ OSCP/ LCSS and/or other relevant agencies in accordance with the Local Safeguarding Partnership's procedures] on a nonames basis (where possible) to determine the most appropriate response. Where the DSL considers or suspects that the alleged behaviour in question might be abusive or violent on a spectrum or where the needs and circumstances of the individual child/children in question might otherwise require it, the DSL should contact children's social care and/or the police immediately and, in any event, within 24 hours of the DSL becoming aware of the alleged behaviour. The DSL will discuss the concern(s) or allegation(s) with the agency and agree on a course of action, which may include:

A. Manage internally with help from external specialists where appropriate and possible. Where the alleged behaviour between peers is abusive or violent (as opposed to inappropriate or problematic –

unless as stated above), scenarios B, C or D should ordinarily apply. However, where support from local agencies is not available, the School may need to handle concerns or allegations internally. In these cases, the School will engage and seek advice from external specialists (either in the private and/or voluntary sector).

B. Undertake/contribute to an inter-agency early help assessment, with targeted early help services provided to address the assessed needs of the child/children and their family. These services may, for example, include family and parenting programmes, responses to emerging thematic concerns in extra familial contexts, a specialist harmful sexual behaviour team, CAMHS and/or youth offending services.

C. Refer the child/children to children's social care for a section 17/47 statutory assessment. Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and, if appropriate, a report to the police) is made immediately. This referral will be made to children's social care in the area where the/each child lives. Depending on the safeguarding procedures issued by the Local Safeguarding Partnership in that area, there will normally be an initial review and assessment of the referral, in accordance with that area's assessment framework. As a matter of best practice, if an incident of child-on-child abuse requires referral to and action by children's social care and a strategy meeting is convened, then the School will hold every professional involved in the case accountable for their safeguarding response, including themselves, to both the/each child who has experienced the abuse, and the/each child who was responsible for it, and the contexts to which the abuse was associated.

D. Report alleged criminal behaviour to the police. Alleged criminal behaviour will ordinarily be reported to the police. However, there are some circumstances where it may not be appropriate to report such behaviour to the police. For example, where the exchange of youth involved sexual imagery does not involve any aggravating factors [see the School's youth involved sexual imagery policy for further information]. All concerns or allegations will be assessed on a case by case basis, and in light of the wider context.

A young abuser should be the subject of a child protection conference ('CPC') if he or she is considered personally to be at risk of continuing significant harm. The School refers to the DfE guidance 'Searching, Screening and Confiscation Advice for Schools' and the UKCCIS sexting advice website when required. (Also refer to the School's 'Whole School Search and Confiscation Policy and Procedures').

#### **Child-on-child Abuse Outside the School Premises**

For the purpose of clarifying, pupil behaviour expectations apply during their journeys to and from school on Cranford School transports, and as such, so do our behaviour and sanctions policies apply in the event of behaviour falling below expectation.

When a pupil is not on school premises and are not under the lawful control or charge of a member of school staff, but an allegation is made of child-on-child abuse between Cranford School pupils, the school applies its duty of care to follow up on the allegation as per the "Whole School Safeguarding Policy" and "Whole School Child-on-child Abuse Policy". This can relate to any bullying incidents occurring anywhere off the school premises when the child/young person is in school uniform or might be reasonably be supposed to be at school or travelling to and from school, such as on school or public transport, outside the local shops, in a town or village centre; and also when cyber abuse or via social networking sites brings the issue into school, and continues to affect the victim whilst in school.

Even if the connection to school is not in line with above advice, if the misbehaviour could be criminal or poses a serious threat to a member of the public, the police will always be informed by

the school if they have not been contacted already. In addition, the school works very closely with local schools and the local police force and other law administrating bodies to help deal with local and community issues. The school will pass on intelligence gathered about local issues, and on request, will pass on details of young people in line with safeguarding rules of information sharing (KCSIE 2025) to the law enforcement agencies.

#### Sexual Violence and Sexual Harassment between Children in Schools:

A form of child-on-child abuse is the issue of sexual violence and sexual harassment between children. Sexual violence and sexual harassment can occur between children of **any** age and sex. It can also occur through a group of children sexually assaulting or harassing a single child or a group of children.

Children who are involved in such violence and harassment will obviously find the experience stressful and highly upsetting. This will, understandably and in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that **all** allegations are taken seriously and the children who are impacted are offered appropriate support.

Cranford School has a 'zero-tolerance' culture and approach to any sexual misconduct. Staff are made aware of the importance of:

- Making it clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- Not tolerating or dismissing sexual violence or sexual harassment as 'banter', 'part of growing up', 'just having a laugh', or 'boys being boys'; and
- Challenging behaviours which are inappropriate, such as grabbing bottoms, breasts, and genitalia, flicking bras, and lifting up skirts.

#### The school recognises:

- the importance of explaining to children that the law is in place to protect rather than criminalise them
- the importance of understanding intra-familial harms, and any necessary support for siblings following incidents
- the need for schools and colleges to be part of discussions with statutory safeguarding partners.

The School ensures that pupils understand a wide range of issues around developing healthy relationships through PSHCEE lessons and RSE. Home Office and Government Equalities Office guidance website, Disrespect NoBody, is a useful resource.

#### What is Sexual Violence and Sexual Harassment?

#### Sexual Violence:

It is important that staff are aware of sexual violence and the fact that children can, and sometimes do, abuse their peers in this way. When referring to sexual violence, we are referring to sexual offences under the Sexual Offences Act 2003, as described below:

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

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

**Sexual Assault:** A person (A) commits an offence of sexual assault if: He or she intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that A consents.

#### What is Consent?

A child under the age of 13 can never consent to any sexual activity. Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex, or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if he or she agrees by choice to the penetration and has the freedom and capacity to make that choice.

#### Sexual Harassment:

This is the 'unwanted conduct of a sexual nature that can occur online or offline'. When sexual harassment is referenced in this context, it is child-on-child sexual harassment. 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.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- Sexual comments such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- Sexual 'jokes' or taunting;
- Physical behaviour such as: deliberately brushing against someone, interfering with someone's clothes, (the School will consider when any of this crosses a line into sexual violence, it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature;
- Online sexual harassment. This may be standalone or part of a wider pattern of sexual
  harassment and/or sexual violence and can include: non-consensual sharing of sexual images
  and videos, sexualised online bullying, unwanted sexual comments and messages, (including
  on social media) and sexual exploitation, coercion and threats.

#### The response to a report of sexual violence or sexual harassment:

The initial response to a report from a child is important. It is essential that all pupils are reassured that they are being taken seriously and that they will be supported and kept safe. A pupil should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a pupil ever be made to feel ashamed for making a report.

Cranford School use the Sexual Behaviours Continuum Model, proposed by Simon Hackett, to demonstrate the range of sexual behaviours presented by children, which is helpful when seeking to understand a student's sexual behaviour and deciding how to respond to it. This continuum relates exclusively to sexual behaviours and is not exhaustive.

Cranford School also use The Brook Sexual Behaviours Traffic Light Tool to help distinguish between three levels of sexual behaviour – green, amber and red, and to respond according to the level of concern.

This tool uses a traffic light system to categorise the sexual behaviours of children and is designed to help professionals:

- Make decisions about safeguarding children
- Assess and respond appropriately to sexual behaviour in children
- Understand healthy sexual development and distinguish it from harmful behaviour By categorising sexual behaviours as green, amber or red, professionals across different agencies can work to the same standardised criteria when making decisions and can protect children with a unified approach.

Both the Sexual Behaviours Continuum Model and The Brook Sexual Behaviours Traffic Light Tool are available as appendices in the Whole School Child-on-child Abuse Policy.

The School will follow guidance as set out in Part 5 of the current version of 'KCSIE', (September 2025), with regard to responding to reports of sexual violence and sexual harassment, the management of the disclosure, anonymity, writing a report and the safeguarding of all pupils involved (including the issue of sharing classrooms, both in the initial and on-going stages).

In the case of an allegation regarding sexual violence or sexual harassment, the designated safeguarding lead (or deputy), should consider the following:

- parents or carers should normally be informed (unless this would put the victim at greater risk)
- the basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care, and
- rape, assault by penetration and sexual assaults are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of referring to the police remains. The police will take a welfare, rather than a criminal justice approach, in these cases. Ultimately, the designated safeguarding lead (or a deputy) will have to balance the victim's wishes against their duty to protect the victim and other children. If the designated safeguarding lead (or a deputy) decide to go ahead and make a referral to local authority children's social care and/or a report to the police against the victim's wishes, this should be handled extremely carefully, the reasons should be explained to the victim and appropriate specialist support should be offered.

Additional information on confidentiality and information sharing is available at Safeguarding Practitioners Information Sharing Advice and NSPCC: Information sharing and confidentiality for practitioners.

- All pupils involved in accusations of sexual violence and/or sexual harassment can be kept
  apart in classrooms and other shared spaces and consideration will be given about travel to
  and from the School, where applicable;
- Appropriate and proportional consequences will be applied to the alleged perpetrator;
- Decisions about responding to reports of sexual violence and/or sexual harassment are for
  the School to make on a case-by-case basis, with the DSL or one of the Deputy DSLs, taking
  a leading role and using their professional judgement, supported by other agencies, such as
  Children's Social Care and the Police as required;
- Some situations are statutorily clear, however:
  - A child under the age of 13 can never consent to any sexual activity;
  - The age of consent to any form of sexual activity is 16;
  - Sexual intercourse without consent is rape;
  - Rape, assault by penetration and sexual assault are defined in law;
  - Creating and sharing sexual, nude and semi-nude photos and videos of under-18s is illegal (often referred to as 'sexting'). This includes children making and sharing nude and semi-nude sexual images and videos of themselves.

- Where a report of rape, assault by penetration or sexual assault is made, the starting point will always be the Police;
- Reporting to the Police will generally be in parallel with referrals to Children's Social Care.
  At this stage, the School will generally inform parents or carers unless there are compelling
  reasons not to, for example, if informing a parent or carer is likely to put the child at
  additional risk;
- In circumstances where parents or carers have not been informed, it will be especially important that the School is supporting the child in any decision they make. This will be with the support of Children's Social Care;
- Where a report has been made to the Police, the School will consult with the Police and agree what information can be disclosed to staff and others, in particular the alleged perpetrator and their parents or carers. The School will also discuss the best way to protect the victim and their anonymity. All Police forces in England have specialist units that investigate child abuse;
- The names and structures of these units are matters for local forces. The DSL (or one of the Deputy DSLs) will be aware of local arrangements. Whatever the response, it will be underpinned by the principle that sexual violence and sexual harassment is never acceptable and will not be tolerated. All concerns, discussions, decisions and reasons for decisions will be recorded (handwritten or electronically). The time and location of any report of sexual violence or sexual harassment should be recorded clearly. Subsequent risk assessments will include any actions required to make the location safer.
- Supporting the alleged perpetrator will be based on effective safeguarding practice. There is clearly a difficult balancing act to consider. On the one hand to safeguard the victim and the wider pupil body, whilst on the other hand providing the alleged perpetrator with an education, safeguarding support, as appropriate, and implementing any disciplinary sanctions;
- Therefore, the School will consider the following points:
  - The age and developmental stage of the alleged perpetrator and nature of the allegations. Any child will likely experience stress as a result of being the subject of allegations and/or negative reactions by their peers to the allegations against them;
  - O The proportionality of the response. Support (and sanctions) should be considered on a case-by-case basis. An alleged perpetrator may potentially have unmet needs (in some cases these may be considerable), as well as potentially posing a risk of harm to other children. Harmful sexual behaviours in young children may be (and often are), a symptom of either their own abuse or exposure to abusive practices or materials. Advice should be taken, as appropriate, from Children's Social Care, specialist sexual violence services and the Police;
  - It is important that if the alleged perpetrator does move to another educational institution (for any reason), that the new educational establishment is made aware of any on-going support needs;
- The DSL must take responsibility to ensure this happens as well as transferring the child protection file;
- The School will record any incidents across the entire spectrum of sexual violence and sexual harassment in order to assess the scale of the problem and put plans in place to address and reduce it;
- Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example, information for schools and colleges can be found on the websites of TES, MindEd and NSPCC.

#### **Upskirting:**

This typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress or alarm. Under changes to the Voyeurism (Offences) Act 2019, this is now a criminal offence. Any one of any gender can be a victim.

#### **Gender Questioning Children:**

In line with the 2025 KCSIE guidance and associated non-statutory advice, our school recognises that some children may experience gender questioning or gender-related distress. We are committed to providing a safe, respectful, and inclusive environment for all pupils. Any requests related to social transition will be considered carefully, with safeguarding as the primary concern, and in consultation with parents unless doing so would pose a significant risk of harm. Decisions will be made in accordance with legal duties, including those under the Equality Act 2010, and will reflect the child's best interests.

#### **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. There are two age appropriate guides to support children: 5 - 11 year olds and 12 - 17 year olds. These guides explain each step of the process and the support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is also explained.

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.

#### **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.

#### **Child Sexual Exploitation (CSE):**

As per the updated 'Working Together to Safeguard Children' (Updated December 2023), child sexual exploitation 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. Like all forms of child sex abuse, child sexual exploitation:

- Can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex;
- Can still be abuse even if the sexual activity appears consensual;
- Can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity;
- o Can take place in person or via technology, or a combination of both;
- Can involve force and/or enticement-based methods of compliance and may, or not, be accompanied by violence;
- May occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created or posted on social media);
- Can be perpetrated by individuals or groups, males or females, and children or adults.
   The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse;
- Is typified by some form of power imbalance in favour of those perpetrating the abuse.
   Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status and access to economic and other resources.

Child sexual exploitation involves exploitative situations, contexts and relationships where young people receive something (for example, food, accommodation, drugs, alcohol, gifts, money or in some cases, simply affection), as a result of engaging in sexual activities.

## Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them.

Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationships develops.

Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying (including cyber-bullying) and grooming. However, it is important to recognise that some young people who are being sexually exploited do not exhibit any external signs of abuse. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point. Some of the following signs may be indicators of sexual exploitation:

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

As the new definition reminds us, Child Sexual Exploitation can include non-contact activities, and the internet can facilitate these potential offences. Children do not need to be using social media to fall into problems, popular online games like MineCraft also have a risk of grooming.

#### **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.

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

Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes.

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

Key to identifying potential involvement in county lines is missing episodes, when the victim may have been trafficked for the purpose of transporting drugs. In cases like this, a referral to the National Referral Mechanism 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;
- O Can affect any vulnerable adult over the age of 18 years;
- Can still be exploitation even if the activity appears consensual;
- As well as being physical can be facilitated and/or take place online;
- Can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- o Can be perpetrated by individuals or groups, males or females and young people or adults;
- 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.

Information about Child Criminal Exploitation can be found in KCSIE (2025) page 15 and Annex B page 149.

#### **Serious Violence:**

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

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

#### Female Genital Mutilation ('FGM'):

Female genital mutilation (sometimes referred to as female circumcision) refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. It comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs.

This practice is illegal in the UK, as is taking a British national or permanent resident abroad for FGM or helping someone to do so. It has been estimated that over 20,000 girls under the age of 15 are at risk of FGM in the UK each year, and that 66,000 women in the UK are living with the consequences of FGM. FGM is a form of child abuse with long-lasting, harmful consequences.

Most of the women and girls from those communities practicing FGM in the UK live in the major cities, including London, Manchester, Sheffield, Liverpool, Birmingham and Cardiff. Girls may be taken to their countries of origin so that FGM can be carried out during the summer holidays, allowing them time to 'heal' before they return to schools back in the UK. There are also worries that some girls may have FGM performed in the UK.

Schools have a legal duty to safeguard children at risk and FGM is a child protection issue. Any indicators that FGM is a risk, is imminent, or has already taken place will be dealt with under the procedures in this Policy document.

Under Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015), there is a mandatory statutory duty upon teachers\* along with regulated health and social care professionals in England and Wales, to report to the Police where they discover (either through disclosure by the victim or physical evidence) that an act of FGM appears to have been carried out on a girl who is under 16.

Teachers\* must personally report cases where they discover that an act of FGM appears to have been carried out to the Police.

\*under Section 5B (11) (a) of the Female Genital Mutilation Act 2003, 'teacher' means, in relation to England, a person under section 141A (1) of the Education Act 2002 ('persons employed or engaged to carry out teaching work in schools or other institutions in England').

Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence and they **not** examine pupils, but the same definition of what is meant by 'to discover that an act of FGM appears to have been carried out' is used for all professionals for whom this mandatory reporting duty applies. Information on when and how to make a report can be found at Mandatory Reporting of Female Genital Mutilation Procedural Information.

Unless they've been specifically told not to disclose, staff should still consider and discuss such a case with the Designated Safeguarding Lead and involve Children's Social Care, as appropriate, but they must still report the case personally to the Police. This duty does not apply in relation to at risk or suspected cases (i.e. where a teacher does not actually discover that an act of FGM appears

to have been carried out, either through disclosure by the victim or physical evidence), or in cases where the woman is 18 years or over. In these instances, teachers should follow local safeguarding procedures. Please see the FGM Fact Sheet which is a useful summary of the mandatory reporting duty.

Dealing with concerns regarding the potential for FGM to take place remains, as before, under the School's safeguarding procedures. In support of this provision, the School aims to raise awareness of FGM among staff and ensure that sources of information and advice are available to all, including pupils. Examples of this include the signposts for accessing additional help, e.g. the NSPCC's helpline, ChildLine services and appropriate black and ethnic minority women's groups.

If there is a disclosure of abuse of this kind, or staff are concerned for any other reason, they are advised:

- To report the case personally to the Police. It is not sufficient to report it just to the DSL;
- To alert the DSL to their concerns. This member of staff will then relay concerns to Children's Social Care. If a pupil has disclosed that she is at risk in this way, the case will be referred to social care even if it is against the pupil's wishes;
- Not to reveal to anyone other than the Police and the DSL that their enquiries might be related to FGM, as this could increase risk to the pupil;
- Not to engage initially with the pupil's parents or family, or others within the community.

Further information and support materials are available at NHS Choices: <a href="http://www.nhs/Conditions/female-genital-mutilation/Pages/Introduction.aspx">http://www.nhs/Conditions/female-genital-mutilation/Pages/Introduction.aspx</a> and the Foundation for Women's Health Research and Development (FORWARD) at <a href="http://www.forwarduk.org.uk/">http://www.forwarduk.org.uk/</a>

#### Female Genital Mutilation reporting procedures

Where there is a disclosure of FGM it is important that staff know what their statutory response should be. Keeping Children Safe in Education (2024), paragraph 42 says 'whilst **all** staff should speak to the designated safeguarding lead (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific **legal duty on teachers**. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police'.

What is often less well-know is what a teacher should do next to make a report.

Below is a very short summary and must be read in conjunction with the mandatory reporting guidance. (See http://safeguarding.link/fgmreporting)

The mandatory reporting procedures say:

'It is recommended that you make a report orally by calling 101, the single non-emergency number.' Where there is a risk to life or likelihood of serious immediate harm, professionals should report the case immediately to police, including dialling 999 if appropriate'.

In most cases 'reports under the duty should be made as soon as possible after a case is discovered, and best practice is for reports to be made by the close of the next working day'.

The procedures also set out what information is needed, in order to make a report.

See here: <a href="https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information/mandatory-reporting-of-female-genital-mutilation-procedural-information-accessible-version#reporting">https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information-accessible-version#reporting</a>

#### So-Called 'Honour-Based' Abuse (HBA) and Forced Marriage:

Closely linked to FGM is so-called 'honour-based abuse' ('HBA'), formerly known as so-called 'Honour-Based Violence' ('HBV'), encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including FGM, forced marriage and practices such as breast ironing.

Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding which form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such.

If in any doubt, staff should speak to the DSL. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of, or having already suffered HBA.

If staff have a concern regarding a child that might be at risk of HBA, they should speak to the DSL or one of the Deputy DSLs, who will activate local safeguarding procedures, using existing national protocol for multi-agency liaison with Police and Children's Social Care. Where FGM has taken place, since 31 October 2015, there has been a mandatory reporting duty placed on teachers (see section above on FGM for more details).

Forcing a person into marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or other forms of coercion are used to cause a person to enter into marriage. Threats can be physical, emotional or psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning difficulties, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools can play an important role in safeguarding children from forced marriage.

Since February 2023, it's been a crime to carry out any conduct whose purpose is to cause a child to marry before their 18th birthday, even if violence, threats or another form of coercion are not used. This applies to non-binding, unofficial 'marriages' as well as legal marriages (See KCSIE 2025 pages 161 and 162)

Guidance on the warning signs that forced marriage may be about to take place, or has already taken place, can be found on pages 13 - 14 of the multi-agency guidelines, 'Handling Cases of Forced Marriage', pages 32 - 36 focus on the role of schools. Staff can contact the Forced Marriage Unit if they need advice or information. Contact: <a href="mailto:fmu@fco.gov.uk">fmu@fco.gov.uk</a> or call 020 7008 0151.

#### **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
- o Financial
- o Emotional

Exposure to domestic abuse and/or violence can have serious, long-lasting emotional and psychological impact on children.

In some case, 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 occur within their personal relationships, as well as in the context of their home life.

#### **Operation Encompass:**

The School is a member of Operation Encompass, a scheme which operates in the majority of Police forces across England.

It helps police and schools work together to provide emotional and practical help to children. The system ensures that when Police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the Police will inform the key adult (the DSL) before the child or children arrive at the School the following day. This ensures that the School has up to date relevant information about the child's circumstances and can enable support to be given to the child according to their needs.

#### **National Domestic Abuse Helpline:**

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

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

NSPCC-UK domestic-abuse-signs-symptoms-effect

Refuge: What is domestic violence/effects of domestic violence on children

Domestic Abuse: Various Information/Guidance (Home Office)

Safelives: Young People and Domestic Abuse

#### **Homelessness:**

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL (and Deputy DSLs) should be aware of contact details and referral routes into the Local Housing Authority, so they can raise and 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, this does not, and should not, replace a referral to Children's Social Care, particularly where a child has been harmed or is at risk of harm.

The Homelessness Reduction Act 2017 now places a 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. Homeless Reduction Act Factsheets summarise the new duties. These new duties shift the focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis. Also see 'Homelessness: How Local Authorities Should Exercise their Functions' (HCLG).

In most cases, School 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 that in some cases, 16 and 17 year olds could be living independently, from their parents or guardians, for

example, through their exclusion from the family home, and will therefore require a different level of intervention and support.

Children's Services will be the lead agency for these young people, and the DSL (or a Deputy DSL) should ensure appropriate referrals are made based on the child's circumstances. The DfE and the Ministry of Housing, Communities and Local Government have published joint statutory guidance on the provision for 16 and 17 year olds who may be homeless and/or require accommodation.

#### **Mental Health:**

All staff should be aware that both mental and physical health are relevant to safeguarding. Safeguarding involves preventing impairment of children's mental and physical health or development

All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem.

Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

All staff should be aware that attendance can be impacted by Mental Health.

Where children have suffered abuse, neglect and exploitation, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following School's 'Whole School Safeguarding and Child Protection Policy' and 'Whole School Safeguarding and Child Protection Procedures' and staff must speak to the DSL or a Deputy DSL.

The DfE has published advice and guidance on 'Preventing and Tackling Bullying' and 'Mental Health and Behaviour in Schools'. In addition, Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among young people, including its guidance: 'Promoting Children and Young People's Emotional Health and Wellbeing'. Its resources include social media, forming positive relationships, smoking and alcohol. See Rise Above for links to all materials and lesson plans.

#### **Online Safety:**

Please also refer to the School's 'IT Code of Conduct for Pupils' 'Whole School Internet Safety Policy' and 'Policy on Pupils' use of IT, Smartphones and other Digital Devices' for more information.

The use of technology has become a significant component of many safeguarding issues. Technology often provides the platform that facilitates harm particularly in cases of CSE, radicalisation and sexual predation etc.

The School's processes and policies relating to online safety have regard to the DfE guidance document: 'Teaching Online Safety in School' (Updated January 2023) and 'Education for a Connected Framework' (UKCIS, 2018).

The School ensures an effective approach to online safety which empowers the School to protect and educate the Whole School Community in their use of technology and establishes mechanisms to

identify, intervene in and escalate any incident where appropriate. The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:

- o Content: being exposed to illegal, inappropriate or harmful materials;
- o Contact: being subjected to harmful online interaction with other users; and
- Conduct: personal online behaviour that increases the likelihood of, or causes, harm.
   Including 'misinformation', 'disinformation', and 'conspiracy theories'

The School does as much as it reasonably can to limit pupils' exposure to the above risks from the School's IT network. Whilst considering our responsibility to safeguard and promote the welfare of pupils and provide them with a safe environment in which to learn, the School also considers the age of our pupils and how they access the IT network. The School also refers to the DfE's Generative AI in Education policy and Cyber Security Standards for Schools.

Effective filters are in place and the School follows the guidance from the UK Safer Internet Centre, some of which are listed below:

- UK Safer Internet Centre: 'Appropriate Filtering and Monitoring';
- National Education Network (for guidance on e-security);
- o Buying for Schools: Specific advice on procurement from the 'School's Buying Strategy'.

As schools increasingly work online, it is essential that children are safeguarded from potentially harmful and inappropriate online material.

As such, the School ensures that appropriate filters and appropriate monitoring systems are in place. Additional information to support the School and members of staff in keeping their children safe online (including when they are online at home) is provided in Annex B in the latest version of 'KCSIE' (September 2025) and DfE information 'safeguarding-in-schools-colleges-and-other-providers and safeguarding-and-remote-education'.

Online safety training is conducted for pupil, staff and parents and the DSL and Deputy DSLs receive integrated, aligned and considered training as part of their overarching safeguarding responsibilities. The following websites provide support and information for staff (hyperlinks to websites):

- www.thinkuknow.co.uk;
- o 'Teaching Online Safety in School' (June 2019);
- o 'Education for a Connected World Framework' (UKCIS, 2018);
- o www.disrespectnobody.co.uk
- www.saferinternet.org.uk
- o www.internetmatters.org
- o <u>www.internetmatters.org</u>
- o www.childnet.com/cyberbullying-guidance;
- o <u>www.pshe-association.org.uk</u>
- o <a href="http://educateagainsthate.com/">http://educateagainsthate.com/</a>
- $\verb| o www.gov.uk/governmentpublications/the-use-of-social-media-for-online-radicalisation| \\$
- o www.gov.uk/UKCCIS-external-visitors-and-online-safety.
- Undressed (lgfl.net)
- The KCSIE 2025 guidance signposts the Department for Education's new filtering and monitoring standards (DfE, 2023b), which support schools to have effective systems in place. Schools and colleges should consider meeting the DfE's Cyber security standards for schools and colleges (DfE, 2023c).

#### **Children Who Are Missing / Absent From Education:**

Please also refer to the School's 'Whole School Attendance Policy and Procedures' and 'Whole School Admissions Policy and Procedures' for more information.

A child absent from an education setting is a potential indicator of abuse, neglect and exploitation. The school recognises that being absent, as well as missing, from education can be warning sign of a range of safeguarding concerns, including sexual abuse, sexual exploitation or child criminal exploitation Staff should treat prolonged or repeated absences or particular patterns of absence, with no satisfactory explanation, as a potential safeguarding issue and take action accordingly. The risks associated with children being absent from education are given more prominence in the current version of 'KCSIE' (September 2025).

The School has procedures in place to identify and respond to children who are absent, particularly on repeat occasions. Staff, in particular Form Tutors/Heads of Key Stage/Heads of Year, are made aware of the following:

- Being absent, particularly repeatedly, can act as a vital warning sign of a range of safeguarding risks, including abuse, neglect and exploitation, which may include sexual abuse or exploitation, child criminal exploitation, mental health problems, substance abuse and other issues. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to prevent the risks of them going missing in the future;
- Where reasonably possible, the School will ensure that more than one emergency contact number is held on the database for each pupil. Although this exceeds the legal minimum, the School recognises the benefit of having additional options available to make contact with a responsible adult when a child missing education is also identified as a welfare and/or safeguarding concern;
- Staff are made aware of the School's 'Whole School Attendance Policy and Procedures'.

The Government's 'Missing Children and Adults Strategy' and the DfE's 'Children Missing Education' guidance provides useful information together with Annex A of the current version of KCSIE. Also refer to the DfE statutory guidance: 'Child Missing from Home or Care'.

New regulations are now in place with regards to admissions and attendance which are detailed in the School's 'Whole School Attendance Policy and Procedures' and 'Whole School Admissions Policy and Procedures'. A 'Return to School' interview will always be conducted with a pupil who has been absent for any length of time, upon their return. This will be organised by the Head of Key Stage or Head of Year. The school will give special consideration to pupils who are missing or absent from education for prolonged periods and/or repeat occasions.

#### **Contextual Safeguarding:**

Safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside school or college. All staff, but especially the DSL at the School (and Deputy DSLs) consider the context within which such incidents and/or behaviours occur. All staff and governors have training on Contextual Safeguarding.

This is known as 'contextual safeguarding', which simply means that assessments of young children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. Children's Social Care assessments should consider such factors, so it is important that schools and colleges provide as much information as possible as part of the referral process. This will allow any assessment to consider the available evidence and full context of any

abuse. Additional information regarding contextual safeguarding is available at: <u>Contextual Safeguarding.</u>

#### **Children Potentially at Greater Risk of Harm:**

Children may need a social worker due to safeguarding or welfare needs. They may be a 'child in need' or have a Child Protection Plan. Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health. Local authorities should share the fact a child has a social worker, and the DSL should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes.

This should be considered as a matter of routine. There are clear powers to share this information under existing duties on both local authorities and schools and colleges to safeguard and promote the welfare of children.

Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

Findings from the Children in Need review, 'Improving the Educational Outcomes of Children in Need of Help and Protection' contains further information; the conclusion of the review, 'Help, Protection, Education' sets out the action the Government is taking to support this.

#### **Looked After Children:**

The School understands that a previously looked after child potentially remains vulnerable and all staff will be trained to ensure they have the skills, knowledge and understanding to keep previously looked after children safe, should a child from such a background be admitted to the School. The importance of working together with other agencies and prompt action when dealing with concerns to safeguard these children is recognised.

Please also refer to the School's 'Whole School Policy for Looked After Children' for more details. Local Authorities are the corporate parent to care leavers and are under a duty to help further the education and career aspirations and ambitions of care leavers in their area, including through participation in further education. The Designated Safeguarding Lead will have details of the Local Authority Personal Advisor who has been appointed to guide and support the care leaver and will liaise with them as necessary regarding any issues of concern.

#### **Private Fostering**

This occurs when a child under the age of 16 (under 18, if disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home.

A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer. Such arrangements may come to the attention of School staff through the normal course of their interaction and promotion of learning activities with pupils. Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence. Children in private foster care are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country.

Where a member of staff or a volunteer identifies that a private fostering arrangement is planned, or is in place, this should be raised with the DSL or one of the Deputy DSLs. The School will then

notify the Local Authority to check that the arrangement is suitable. On admission to the school, we will take steps to verify the relationship of the adults to the child who is being registered.

#### **Children Staying with Host Families:**

In the case of foreign exchanges, where arrangements are made for pupils to have learning experiences for short periods of time in other countries and may be provided with care and accommodation by a host family to whom they are not related, the responsible adult providing the care will be engaging in regulated activity for the period of the stay. In such a case, the School has arranged this accommodation and is therefore the regulated activity provider.

Where the child's parent(s) or a pupil themselves arranges their own 'homestay', this would be considered a private arrangement and therefore the School would not be the regulated activity provider. The School will therefore obtain an enhanced DBS (Disclosure and Barring Service) certificate with barred list information on any host families who are welcoming foreign exchange pupils into their homes as organised by the School.

The full Disclosure and Barring Service ('DBS') check and barred list check will allow the School to establish whether any adults in the home (including anyone aged 16 or over in the household) are barred from engaging in regulated activity relating to children, but will also allow the School to consider whether any criminal record information shown on the certificate would indicate the adult was an unsuitable host for the child. DBS enhanced certificates with barred list information for volunteers' roles can be obtained free of charge.

As it is often not possible for schools to obtain criminality information from the Disclosure and Barring Service ('DBS') about adults who provide such homestay accommodation abroad, the School will always liaise with partner schools overseas to establish a shared understanding of the arrangements in place to ensure that they are sufficient to effectively safeguard every child who will take part in the exchange. This applies to pupils from Cranford School School staying with families outside the UK.

The School may also contact the relevant foreign embassy or High Commission of the country in question to discuss what checks may be possible in respect of those providing such accommodation outside the UK. Please also refer to the School's 'Whole School Outings and Trips Procedures' for more information.

#### **Adults who Supervise Pupils on Work Experience:**

When organising work experience placements for our pupils, the School will ensure that the placement provider has policies and procedures in place to protect children from harm. Barred list checks by the DBS might be required on some people who supervise a child under the age of 16 on a work experience placement. The School will refer to the Gov.UK 'Guidance on Work Experience' for advice when organising work experience placements.

Consideration will be given to the specific circumstances of the work experience and in particular to the nature of the supervision and the frequency of the activity being supervised, to determine what, if any, checks are necessary. These considerations would include whether the person providing the teaching/training/instructions/supervision to the child on work experience will be unsupervised themselves; and providing the teaching/training/instruction frequently (more than three days in a 30-day period, or overnight).

If the person working with the child is unsupervised and the same person is in frequent contact with the child, the work is likely to be regulated activity. If so, the School will ask the employer providing

the work experience to ensure that the person providing the instruction or training is not a barred person.

The School is not able to request an enhanced DBS check with barred list information for staff supervising children aged 16 to 17 on work experience. If the activity undertaken by the child on work experience takes place in a 'specified place', such as a school or college, and gives the opportunity for contact with children, this may itself be considered to be regulated activity.

In these cases, and where the child is 16 years of age or over, the work experience provider should consider whether an enhanced DBS check should be requested for the child/young person in question. DBS checks cannot be requested for children or young people under the age of 16.

#### Allegations against staff and low level concerns

Where a safeguarding-related allegation or cause for concern is made against any member of staff or volunteer (including the Designated Safeguarding Lead), the matter should be reported immediately to the Head (unless the allegation relates to the Headmaster). The Headmaster should **not speak** to the member of staff who is the subject of the allegation at this point. In the absence of the Headmaster the allegation should be reported to the Chair of Governors or Safeguarding Governor.

-Where a safeguarding-related allegation or cause for concern is made against the Headmaster, the person receiving the allegation should immediately inform the Safeguarding Governor, Ms Christine Ellis, and the Chair of Governors, Mr Stuart Wallis. The Headmaster should NOT be informed.

The guidance in KCSIE (Part Four) should be followed where it is alleged that anyone working in the school, including supply teachers and volunteers has:

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

#### **Low Level Concerns:**

Any concerns about the conduct of other adults in the school should be taken to the headteacher and concerns about the headteacher should go to the Chair of Governors. Further information can be found in our 'Whole School Low Level Concerns Policy'.

Concerns may come from various sources, for example, a suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken. The headteacher will decide whether the concern is an allegation or low-level concern. It is important to recognise that the term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold for referral to the Local Authority Designated Officer (LADO).

Understanding low level concern allegations:

It is an allegation if the person\* has:

· behaved in a way that has harmed a child, or may have harmed a child and/or; · possibly committed a criminal offence against or related to a child and/or;

· behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children;

and/or · behaved or may have behaved in a way that indicates they may not be suitable to work with children (also includes behaviour outside the school).

(\*Person could be anyone working in the school or a college that provides education for children under 18 years of age, including supply teachers, volunteers and contractors.)

Allegations should be reported to the LADO 'without delay'. Before contacting the LADO, the school should conduct basic enquiries in line with local procedures to establish the facts to help them determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation. The LADO's role is not to investigate the allegation, but to ensure that an appropriate investigation is carried out, whether that is by the police, children's social care, the school or college, or a combination of these

Low-level Concerns may be graded Low-level if the concern does not meet the criteria for an allegation; and the person\* has acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work. Example behaviours include, but are not limited to: being over friendly with children; having favourites; taking photographs of children on their mobile phone; engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or, using inappropriate sexualised, intimidating or offensive language.

If the concern has been raised via a third party, the headteacher should collect as much evidence as possible by speaking: · directly to the person who raised the concern, unless it has been raised anonymously; · to the individual involved and any witnesses. Reports about supply staff and contractors should be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

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

Low-level concerns will be recorded in writing, including: ·name\* of individual sharing their concerns ·details of the concern · context in which the concern arose · action taken (\* if the individual wishes to remain anonymous then that should be respected as far as reasonably possible) Records must be kept confidential, held securely and comply with the Data Protection Act 2018. This information will be kept at least until the individual leaves our employment. Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. If a concerning pattern of behaviour is identified and now meets the criteria for an allegation, then the matter should be referred to the LADO.

#### Organisations or Individuals using school premises:

Where there are concerns/ allegations relating to incidents occurring when an individual or organisation uses a school's premises the school will follow our school safeguarding policies and procedures, including informing the Local Authority Designated Officer (LADO). Further details can be found in Annex F of the Keeping children safe in education 2024 (DfE, 2023a)

#### **Whistleblowing:**

Where there are concerns about the way that safeguarding is carried out in the school, staff should refer to the Whistle-blowing Policy. In the first instance, staff should bring whistleblowing concerns to

one of the deputy heads who will share the concern with Headmaster. If the concern is related to the actions or inaction of the DSL, this should be reported to the Headmaster. If the concern relates to the Headmaster, refer to the Chair of Governors, Stuart Wallis (<a href="mailto:swallis@cranfordhouse.net">swallis@cranfordhouse.net</a>). See 9.4 in the Whole School Safeguarding and Child protection Policy for further information on how to report concerns if you believe these reporting routes are not working. Staff may also refer to children's social care directly.

Staff may also use the NSPCC whistleblowing helpline; 0808 800 5000.

#### Safeguarding Issues: Links to Government Guidance:

Staff can access Government guidance via GOV.UK and other Government websites. These should also be viewed in conjunction with Annex A of the latest version of 'KCSIE' (September 20245and the relevant related Policy documents listed at the beginning of this Policy document. A number of sources are listed below with hyperlinks included:

#### Abuse:

- What to do if you're worried a child is being abused DfE advice
- Domestic abuse: Various Information/Guidance Home Office (HO)
- Faith based abuse: National Action Plan DfE advice
- Relationship abuse: disrespect nobody Home Office website
- Additional information can be found at GOV.UK.

#### **Bullying:**

- Preventing and Tackling Bullying DfE advice
- > Cyber bullying: advice for headteachers and school staff DfE advice

#### Children missing from education, home or care:

- Children missing education DfE statutory guidance
- > Child missing from home or care DfE statutory guidance
- > Children and adults missing strategy Home Office strategy

#### Children with family members in prison:

National Information Centre on Children of Offenders - Barnardo's in partnership with HM Prison and Probation Service (NICCO)

#### Child Exploitation:

Trafficking: safeguarding children - DfE and Home Office guidance

#### Drugs:

- > Drugs: advice for schools DfE and ACPO advice
- Drug strategy 2017 Home Office strategy
- Information and advice on drugs Talk to Frank website

➤ ADEPIS platform sharing information and resources for schools: covering drug (& alcohol) prevention - Website by Mentor UK

#### 'Honour Based Abuse' (so called) (including FGM):

- Female genital mutilation: multi agency statutory guidance DfE, DH, and HO statutory guidance
- ➤ Honour Based Abuse Refuge

#### Health and Well-being:

- Fabricated or induced illness: safeguarding children DfE, Department of Health, Home Office
- Rise Above: Free PSHE resources on health, wellbeing and resilience Public Health England
- Medical-conditions: supporting pupils at school DfE statutory guidance
- Mental health and behaviour DfE advice

#### Homelessness:

Homelessness: How local authorities should exercise their functions - Ministry of Housing, Communities & Local Government guidance

#### Online:

(see also Annex B of 'KCSIE' (September 2025):

- Sexting: responding to incidents and safeguarding children UK Council for Internet Safety
- ➤ The guidance signposts the Department for Education's new filtering and monitoring standards (DfE, 2023b), which support schools to have effective systems in place. Schools and colleges should consider meeting the DfE's Cyber security standards for schools and colleges (DfE, 2023c).

#### **Private Fostering:**

Private fostering: local authorities - DfE statutory guidance

#### Radicalisation:

- Prevent duty guidance Home Office guidance
- Prevent duty: additional advice for schools and childcare providers DfE advice
- Educate Against Hate website DfE and Home Office advice

#### Upskirting:

Upskirting know your rights – UK Government

#### Violence:

- Gangs and youth violence: for schools and colleges Home Office advice
- Ending violence against women and girls 2016-2020 strategy Home Office strategy
- Violence against women and girls: national statement of expectations for victims -Home Office guidance
- Serious violence strategy Home Office Strategy

Please note that further useful websites and publications are listed under the relevant sections in this document (and the 'Whole School Safeguarding Including Child Protection Policy') and hyperlinks have been added for ease of access.

### 5. Early Help:

All staff, including temporary, supply, volunteers and outside providers of clubs and activities are trained on the early help process to assist them in understanding their roles and responsibilities in this area. Any child may benefit from early help, but staff should be particularly alert to the potential need for early help for a child who:

- Is disabled and has specific additional needs;
- Has special educational needs (whether or not they have a statutory education, health and care plan (EHIC plan);
- Is a young carer;
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
- Is frequently missing/goes missing from care or home;
- Is misusing drugs or alcohol;
- Is at risk of modern slavery, trafficking or exploitation;
- Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
- Is showing early signs of abuse and/or neglect;
- Is at risk of being radicalised or exploited;
- Is a privately fostered child and/or
- Has returned home to their family from care.

This includes the importance of identifying emerging problems, liaising with the DSL, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking an early help assessment.

# 6. Staff Training:

All staff who work at the School (including supply and temporary staff, volunteers and outside providers of clubs and activities, referred to as 'Staff' throughout this document) receive training in safeguarding children as part of their induction. Please refer to the School's 'Induction Policy for New Staff and Procedures for NQTs' for more information.

This training includes information about the School's 'Whole School Safeguarding and Child Protection Policy' and 'Whole School Safeguarding and Child Protection Procedures', the identity of the Designated Safeguarding Lead and Deputy Designated Safeguarding Leads and staff

are given a hard copy of Part I and Annex A of the latest version of 'Keeping Children Safe in Education' ('KCSIE', September 2025). Staff will also receive an explanation as to the systems in place at the School to support the safeguarding of pupils, including the logging of concerns on CPOMS.

During induction\*, all staff, including temporary, supply staff, outside providers of clubs and activities and volunteers, are additionally provided with induction training on, and hard copies of, the following Policy documents:

- 1 'Staff Code of Conduct' (which includes details about the acceptable use of technologies and social media and about appropriate contact and behaviour with pupils);
- 2 'Whole School Behaviour Policy and Procedures Including Rewards and Sanctions';
- 3 'Whistleblowing Policy and Procedures for Staff';
- 4 'Whole School Attendance Policy and Procedures' (which covers the School's procedures for Children Missing Education);
- 5 'Whole School Preventing Radicalisation Policy (Including EYFS)' (and awareness training on the Prevent Duty).

All staff, including temporary staff and volunteers are made aware of the systems within the School which support safeguarding and these are explained to them as part of Staff Induction. This includes training on, and hard copies given of, the following:

- I 'School's 'Whole School Safeguarding and Child Protection Policy' and 'Whole School Safeguarding and Child Protection Procedures' and 'Whole School Child-on-child Abuse Policy';
- 2 'Whole School Behaviour Policy and Procedures Including Rewards and Sanctions';
- 3 'Staff Code of Conduct';
- 4 'Whole School Attendance Policy and Procedures' (including details of the safeguarding response to children who go missing from education);
- 5 Information about the role of the Designated Safeguarding Lead ('DSL') (including the identity of the DSL and Deputy Designated Safeguarding Leads, (Deputy DSLs);
- 6 'Whistleblowing Policy and Procedures for Staff';
- 7 'Whole School Preventing Radicalisation Policy (Including EYFS)';
- **8** Part I and Annex A of the current version of 'Keeping Children Safe in Education' ('KCSIE', September 2025).

\*Where Covid-19 restrictions are in place, they will be provided with hard copies of the 'Whole School Safeguarding and Child Protection Policy' and KCSIE Part I and Appendix A as a minimum and signposted to the location of the remaining policies in the Cranford School Policies area on the Whole School Staff section of Microsoft Teams. They will also receive full explanations about how to raise concerns about these and other relevant issues and personnel procedures (e.g. disciplinary, capability and whistle blowing, reporting cases of sexual harassment and sexual violence, preventing radicalisation etc.) The identity and contact information of the Designated Safeguarding Lead and Deputy Designated Safeguarding Leads will be provided.

All staff, including supply staff, temporary staff, outside providers of clubs and activities and volunteers and the Headmaster (who is also one of the Deputy Designated Safeguarding Leads) are trained in child protection regularly, in line with advice from the Oxfordshire Safeguarding Children Partnership, Local Authority Safeguarding Partner and Child Death Review Partner ('OSCP').

All staff and governors have training including (i) Contextual Safeguarding, (ii) the identification and classification of specific behaviours, including digital behaviours, (iii) the importance of taking

seriously all forms of child-on-child abuse (no matter how 'low level' they may appear) and ensuring that no form of child-on-child abuse is ever dismissed as horseplay or teasing, and (iv) social media and online safety, including how to encourage children to use social media in a positive, responsible and safe way, and how to enable them to identify and manage abusive behaviour online.

Training includes Prevent and online safety training and all staff receive informal updates regularly. All staff receive training on the school filtering and monitoring systems and this training ensures that staff understand their expectations, roles and responsibilities around filtering and monitoring.

The Designated Safeguarding Leads (including the Deputies) receive updated child protection training at least every two years.

All staff (including supply, temporary staff, outside providers of clubs and activities and volunteers) receive annual safeguarding training updates to provide them with the required knowledge and skills to effectively safeguarding pupils. In addition to this, all staff receive a hard copy of Part I and Annex A of the current version of 'KCSIE' (September 2025), at any time there are changes to this guidance.

All staff are trained at induction and through subsequent refresher training sessions in how to report cases of sexual violence and sexual harassment and any other safeguarding issue they may encounter.

The Headmaster will ensure that training is scheduled during INSET or Whole School Staff Meetings to explain any changes or updates as they occur to 'KCSIE', many of which will impact our School's 'Whole School Safeguarding and Child Protection Policy' and 'Whole School Safeguarding and Child Protection Procedures'. Details will be outlined so that all staff understand how they must discharge their roles and responsibilities in this area. Knowledge is regularly tested, with Safeguarding quizzes to be completed by all staff and the use of scenarios for individual School Departments to discuss and feedback how they would deal with safeguarding situations to check understanding and awareness.

The School's Safeguarding and Prevent Governor completes a Safeguarding Audit at the School annually, with the Oxfordshire Safeguarding Children Partnership ('OSCP') conducting a 'Safeguarding Health Check' biennially. Any deficiencies in policy or procedures and gaps in staff knowledge are reported back and immediate attention is given to rectifying them.

Deputy DSLs at the School are trained to the same level as the DSL to ensure that sufficient cover is maintained at all times. Such training covers inter-agency working and follows the guidance laid out in Annex B of the latest version of 'KCSIE' (September 2025).

# 7. Sharing Information:

As part of meeting a child's needs, it is important for staff to recognise the importance of information sharing between professionals and local agencies. Further details on information sharing can be found in Chapter I of 'Working Together to Safeguard Children' (Updated December 2023) and at 'Information Sharing: Advice for Practitioners providing Safeguarding Services to Children, Young People, Parents and Carers'.

In every case, the member of staff or volunteer should consider whether the pupil is able to provide consent for the information to be shared, and, if so, seek to obtain that consent in accordance with the guidance from the DSL, relating to information sharing and consent.

If the pupil does **not consent**, the member of staff should explain that they need to share the information with the DSL and reassure the pupil that the information **will only be disclosed to other people who need to know**. Whilst the General Data Protection Regulations ('GDPR', 2018) places duties on the School to process personal information fairly and lawfully, it is not a barrier to sharing information where the failure to do so would result in a child being placed at risk of harm.

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. The School recognises that, whilst inter-agency working and information sharing are vital in identifying and tackling all forms of abuse, it is clear that they are especially important to identify and prevent child sexual exploitation.

Staff should ensure that they are confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information which is sensitive and personal, and should be treated as 'special category personal data'.

The School understands that 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data. This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner, but it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.

Further details on information sharing can be found:

- In Chapter one of 'Working Together to Safeguard Children' (Updated December 2023), which includes a myth-busting guide to information sharing;
- At 'Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers'. The seven golden rules for sharing information will be especially useful;
- At The Information Commissioner's Office (ICO), which includes ICO GDPR FAQs and guidance from the department;
- <u>In Data protection: Toolkit for Schools</u> Guidance to support schools with data protection activity, including compliance with the GDPR.

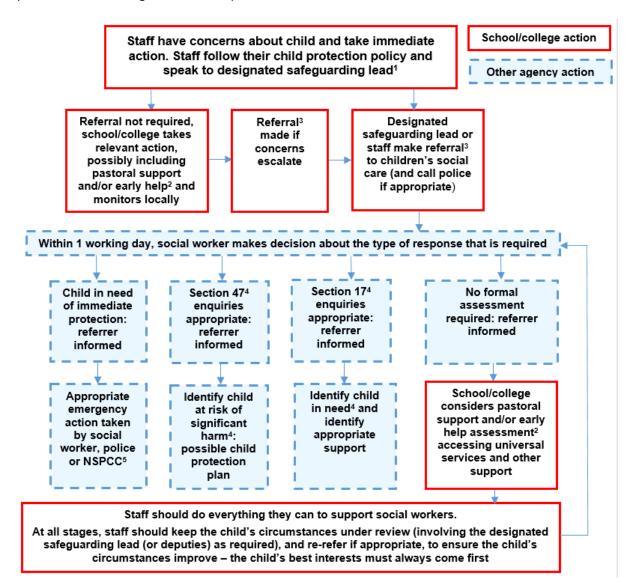
#### **Seven Golden Rules of Information Sharing:**

- I. Remember, the General Data Protection Regulations ('GDPR', 2018) are not barriers to sharing information, but provides a framework to ensure that personal information about living people is shared appropriately.
- 2. Be open and honest with the person (and their family, where appropriate), from the outset, about why, what how and with whom information will be shared and seek their agreement, unless it is unsafe or inappropriate to do so.
- 3. Seek advice if you are in any doubt, without disclosing the identity of the person, where possible, as they may be occasions where it is appropriate to share confidential, sensitive information without the knowledge of the child/family. In such cases, it is recommended that advice is sought from the DSL and/or OSCP.
- 4. Share with consent where appropriate and, where possible, respect the wishes of those who do not consent to share confidential information. You may still share information without consent, if, in your judgement, that lack of consent can be overridden in the public interest. You will need to base your judgement on the facts of the case. It is recommended that advice is sought from the DSL and/or OSCP.
- 5. Consider safety and well-being: base your information sharing decisions on considerations of the safety and well-being of the person and others who may be affected by their actions.

- 6. Necessary, proportionate, relevant, accurate, timely and secure: ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those people who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely.
- 7. Keep a record of your decision and the reasons for it, whether the decision is to share the information or not. If you decided to share, then record what you have shared, with whom and for what purpose. This record should include the date, time, name of the person making the decision and details of any relevant advice from the LADO at OSCP or any other agencies. The note should distinguish between fact and opinion, where possible.

## Appendix 1: Actions where there are Concerns about a Child

(From 'KCSIE', September 2025)



- <sup>1</sup> In cases which also involve a concern or an allegation of abuse against a staff member, see Part Four of KCSIE (September 2025)
- <sup>2</sup> Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of Working Together to Safeguard Children provides detailed guidance on the early help process.
- 3 Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of Working Together to Safeguard Children.
- 4 Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of Working Together to Safeguard Children.
  5 This could include applying for an Emergency Protection Order (EPO).

# Appendix 2: Sources of Support for Staff and Volunteers:

Staff or volunteers may feel adversely affected by incidents of abuse they have been exposed to personally or professionally. The HR Department will be able to offer advice and help.

The following organisations may also be helpful sources.

#### **Counselling Services:**

Organisation	Contact Details
Your local GP may be able to arrange free counselling through your local surgery	
DAS Confidential Counselling Service (through Marsh School Insurance) 24 hr Counselling Helpline Service (for staff and members of their immediate family, providing they live with you and are over the age of 18)	Tel No: 0117 9330687 Policy No: 202604
Lists of professionally qualified counsellors and therapists in your area can be obtained from MIND or the British Association for Counselling and Psychotherapy (BACP)	www.mind.org.uk http://www.bacp.co.uk
Local Citizens Advice Bureau	Tel No: 03444
Family Lives (Formerly Parentline Plus)	www.familylives.org.uk 0808 800 222
The Samaritans	http://samaritans.org/ 01865 722122 (Oxford)

The NSPCC Child Protection Helpline:
24 hr free service that will give advice
and information

0808 800 5000 help@nspcc.org.uk

# Appendix 3: Agreement to Work in Accordance with the School's Whole School Safeguarding and Child Protection Policy' and 'Whole School Safeguarding and Child Protection Procedures'

Cranford School School is committed to supporting all staff and volunteers to carry out their roles and responsibilities effectively and to ensure that the highest standards of professional conduct are maintained at all times. We rely on you to help us safeguard and promote the welfare of the pupils in our care. No member of staff or volunteer is allowed to develop an intimate or sexual relationship with a pupil under 18 years. This is regarded as an 'Abuse of Trust' and is a criminal offence. An intimate or sexual relationship with a pupil of any age is regarded as gross misconduct under the School's Disciplinary Procedure.

**All** staff (including visiting teachers and sport coaches) and volunteers should help the school by reporting concerns they have about misconduct, inappropriate behaviour or abuse by any staff member or volunteer. Concerns must be reported in good faith and must not be malicious.

If you have any queries about your role in relation to safeguarding or if you have any ideas that could help to keep pupils safe/ promote their welfare, talk to your Line Manager or the DSL.

**Agreement:** I understand and have received a copy of:

- 1. 'School's 'Whole School Safeguarding and Child Protection Policy' and 'Whole School Safeguarding and Child Protection Procedures' (including training on logging a concern on CPOMS) and 'Whole School Child-on-child Abuse Policy';
- 2. Part I and Annex A of 'Keeping Children Safe in Education' (2024)
- 3. Staff Code of Conduct (including the Acceptable Use of IT), the Behaviour Policy ('Whole School Behaviour Policy and Procedures Including Rewards and Sanctions'), 'Whole School Attendance Policy and Procedures' and 'Whistleblowing Policy and Procedures for Staff).
- 4. The 'Whole School Preventing Radicalisation Policy (including EYFS)'.

The School Designated Safeguarding Lead is Mrs Kath Heard (Senior Assistant Head). She can be contacted on tel. no: 01491 651218 ext. 224 or kheard@cranfordschool.co.uk

The Deputy Designated Safeguarding Leads are:

- Dr James Raymond (Headmaster): ext. 203: <u>jraymond@cranfordschool.co.uk</u>
- Mrs Christine Shephard (Matron): ext. 209: <a href="mailto:cshephard@cranfordschool.co.uk">cshephard@cranfordschool.co.uk</a>
- Mrs Clare Viggers (Head of Senior School Pastoral): <a href="mailto:cviggers@cranfordschool.co.uk">cviggers@cranfordschool.co.uk</a>
- Miss Rachel Hudson ((Deputy Head Juniors): Ext 258 <u>rhudson@cranfordschool.co.uk</u>
- The Designated Lead for EYFS and Nursery is Mrs Kay Raymond (EYFS Teacher Reception): ext. 261: <a href="mailto:kraymond@cranfordschool.co.uk">kraymond@cranfordschool.co.uk</a>
- Mrs Anne Mir (Director of Studies): Amir@cranfordschool.co.uk
- Dr Katy Hill (Head of Year 12 and 13): khill@cranfordschool.co.uk

• Mrs Annabel Clarance (Deputy Head Academic): <a href="mailto:aclarance@cranfordschool.co.uk">aclarance@cranfordschool.co.uk</a>

The Governor with responsibility for Safeguarding and Prevent: Ms Christine Ellis cellis@cranfordschool.co.uk

I agree to work in accordance with Cranford School's 'Whole School Safeguarding and Child Protection Policy' and 'Whole School Safeguarding and Child Protection Procedures' and any future changes to these:

Signed	Print Name	Role
	CRANFOI	

# Appendix 4: Self-Disclosure Form for Regulated Activity

#### Part I

Name of Candidate/Person:	
Previous name(s) - Please include	
date(s) each name was used	
(MM/YYYY)	
Address with Postcode:	
Telephone/Mobile No:	
Date of Birth	
Gender:	

#### Part 2

As the role you are in or have applied for involves regulated activity, you will be required to provide a valid DBS certificate, which will provide details of criminal convictions. This may include a barred list check, depending on the nature of the role.

All information you provide will be treated as confidential and managed in accordance with relevant data protection legislation and guidance. You have a legal right to access information held about you.

Have you ever been known to any Children's Services department or Police as bring a risk or potential risk to children?	Yes	No
If yes, please provide further information:		

Have you been the subject of any investigation by organisation or body due to concerns about your towards children?	•	No
If yes, please provide further information:		
Have your own children been taken into care? Have ever been the subject of disciplinary procedures of asked to leave employment or voluntary activity disappropriate behaviour towards children?	r been	No
If yes, please provide further information:		
Do you have any convictions, cautions, reprimands warnings that are not "protected" as defined by the Rehabilitation of Offenders Act 1974 (Exceptions) 1975 (Amendment) 2013?	e	No
If yes, please provide further information:  Confirmation of declaration (tick box below)		
I agree that the information provided here recruitment purposes and I understand that disciplinary action may be taken if informati come to the organisation's attention.	an offer of employment	may be withdrawn, or
In accordance with the organisation's proce criminal record certificate and consent to t provided on the disclosure with the agencie	he organisation clarifying a es providing it.	any information
I agree to inform the organisation within 24 agency or organisation in relation to concer young people.	rns about my behaviour to	owards children or
I understand that the information contained information supplied by third parties may be or organisations in circumstances where the	e supplied by the organisa	tion to other persons
I understand my responsibility to safeguard chil Headmaster immediately of anything that may affensure that I notify my Cranford School School orders, reprimands or warnings I may receive.	ect my suitability to wor	k with children. I will
Signature of Candidate		
Print Name:		

Date:		
For Headmaster:		
I have reviewed the above and confirm that no further action is to be taken.		
OR		
I have reviewed the above and the fo	allowing action has been taken:	

# Appendix 5: Reporting a Concern using 'CPOMS'

I. Log into CPOMS, either by clicking the tab on the Cranford School staff home screen: or logging on at https://login.cpoms.net

- 2. To report a concern, click 'Report a Concern'.
- 3. The reporting screen will open:

The full user briefing can be found after logging on to your CPOMS account by clicking on the 'Help' tab at the top of the screen and then selecting 'Trusted User Briefing'.

# Appendix 6: Guidelines for Sport

#### These guidelines apply to all staff including Outside Providers of Clubs

Please also refer to the School's 'Showering and Changing Room Policy'.

The School believes that sport should be carried out in a safe, positive and encouraging atmosphere of healthy competition, which assists in the promotion of pupils' welfare. Pupils should be encouraged to enjoy sport, in an environment which encourages all to develop a healthy lifestyle, self-confidence, enjoyment and fun, as well as providing opportunities for skill development, sporting excellence and achievement.

We know that safeguarding concerns can occur in different situations, including the sporting arena. To help promote clear expectations about the behaviour of coaches in the School, Cranford School School staff adhere to guidance on best practice from leading organisations, such as the Coaches Charter set out below:

#### The Coaches Charter:

I. Coaches must respect the rights, dignity and worth of every person and treat everyone equally within the context of their sport;

- 2. Coaches must place the well-being and safety of the performer above the development of performance. They should follow all guidelines laid down by their sport's Governing Body and hold appropriate insurance cover;
- 3. Coaches must develop an appropriate working relationship with performers, especially children, based on mutual trust and respect. Coaches must not exert undue influence to obtain personal benefit, or reward;
- 4. Coaches must encourage and guide performers to accept responsibility for their own behaviour;
- 5. Coaches should hold up-to-date nationally recognised Governing Body coaching qualifications;
- 6. Coaches must ensure that the activities they direct or advocate are appropriate for the age, maturity, experience and ability of the individual;
- 7. Coaches should, at the outset, clarify with performers, and where appropriate their parents, exactly what is expected of them and what performers are entitled to expect from their coach;
- 8. Coaches should co-operate fully with other specialists (e.g. other coaches, officials, sports scientists, doctors, physiotherapists), in the best interest of the performer;
- 9. Coaches should always promote the positive aspects of their sport (e.g. fair play), and never condone rule violations or the use of prohibited substances;
- 10. Coaches must consistently display high standards of behaviour and appearance.

This charter is reproduced courtesy of Sports Coach UK. For more information on guides for sports coaches, visit <a href="https://www.sportscoachuk.org/">https://www.sportscoachuk.org/</a>

The Director of Sport will ensure that staff, outside coaches or volunteers do not:

- Introduce training regimes which by their nature and intensity of training, exceeds the capacity of a pupil's immature and growing body;
- Encourage the use of drugs to improve the young person's performance;
- Engage in constant criticism, bullying or unrealistic pressure to perform to consistently high expectations.

The Director of Sport will ensure that staff, outside coaches or volunteers:

- Always liaise with parents/guardians before recommending specific diets and that parents should be encouraged to seek further medical advice before starting a specific diet designed to build stamina, strength or sporting performance;
- Consider how they congratulate young performers, i.e. in accordance with guidelines on acceptable and unacceptable physical contact.

#### Additional Guidelines on Safe Physical Contact in Sport:

The Director of Sport will develop an awareness of the views and position of sporting Governing Bodies with regards to safe physical contact for any sport undertaken in the School. Not all sporting Governing Bodies have developed protocol for safe physical contact but many sporting organisations are in the process of doing so. Further information is available at http://www.thecpsu.org.uk

Developing awareness and knowledge base is essential and will help avoid situations of coaches claiming that physical contact is necessary when, in fact, it may not be necessary at all. In general, the following points should be borne in mind:

- Physical contact should only take place to help with complex skills or movements or to avoid injury;
- Over-handling must be avoided;
- Any physical contact must not be invasive of sensitive parts of the body;
- The pupil should always be easily observed by others;
- Parents should not be discouraged from watching by (prior arrangement with the School and coach), performances or coaching sessions.

#### **Protocol in Changing Rooms and Showers:**

- Swimming in public leisure facilities should take place in sessions which are specifically for the use of schools, to reduce public access to pupils;
- Pupils should only use single sex changing rooms and showers from Year 3 upwards;
- Only female staff and volunteers should supervise girls (from Year 3 upwards) in showers and changing areas and male staff for boys from Year 3 upwards;
- Staff should not shower at the same time as pupils;
- In the event of a pupil misbehaving in the showers, staff should take a minimal intervention approach in terms of what they say and any action they take to effectively resolve the situation. Staff can then follow up any further intervention when the pupil is fully dressed;
- Team tactics should be discussed outside of the changing areas. If this is not possible, a suitable time should be agreed in advance when the member of staff can enter the changing rooms, e.g. 10 minutes before play, and all pupils need to be changed into their sports kit before staff can enter. In the event that a member of staff must enter a changing room, they should alert pupils first by announcing it in advance, this is more appropriate for pupils in the Senior School and/or for male staff entering a female changing room and vice versa.

#### Photography:

Please refer to the School's Policies and Guidelines. Outside Providers of clubs are reminded NOT to take photographs of pupils as there are strict guidelines regarding parental permission and storage/use of images.

#### Videoing as a Coaching Aid:

The use of video equipment can be a valuable aid to coaching, however there are strict protocols governing this, particularly with regard to parental permission.

The Director of Sport will ensure that:

- Outside providers of clubs are informed that they are NOT permitted to video any pupils taking part in their clubs;
- Pupils and their parents are aware of the purpose of filming as a coaching aid by PE staff;
- During filming, either another member of staff/volunteer or the child's parent is present;
- Video material is securely stored to avoid inappropriate access or use.

# Appendix 7: Guidelines for the Arts (Including all Arts, Media, Music, Dance and Drama

#### These guidelines apply to all staff including Outside Providers of Clubs.

The School is committed to promoting the Arts and a broad spectrum of arts activities through provision of a rich and diverse curriculum and a positive ethos of collaborative work with professional artists and arts groups. We believe that education should provide opportunities for pupils to express their own ideas, values and feelings. The Arts can provide a very potent channel for this expression and a means of giving it unique form and meaning.

In order to promote good safeguarding practice in the Arts and protocol adhered to by major organisations, all schools should ensure that:

- A member of staff is present during activities with visiting artists and groups in School;
- Adults involved in performing arts events have separate dressing rooms/changing/toilet facilities;
- Individual tuition should only take place in rooms with glass windows where teacher and pupil are visible (notices covering vision panels should be removed during individual lessons);
- Quality of individual lessons should be monitored on both a planned and ad hoc basis.

#### **Visiting Peripatetic Staff:**

We ensure that visiting arts teachers (drama, dance, music or other arts media) have undergone the relevant safeguarding checks, have attended School Safeguarding Training and are familiar and agree to adhere to the School's 'Whole School Safeguarding and Child Protection Policy' and 'Whole School Safeguarding and Child Protection Procedures' together with the following additional guidance:

#### **Safe Physical Contact in Arts Education:**

Physical contact may be necessary in some arts activities, for example, certain dance positions or movements. When teaching singing or a musical instrument, it may be necessary to touch a pupil, for example, to adjust posture, correct hand position, breathing or embouchure. Touch is only appropriate when it is absolutely necessary to assist the pupil to achieve an activity, position or dance movement.

Physical contact with pupils should take place only when it is absolutely necessary in relation to the particular arts activity and is in keeping with the School's '**Staff Code of Conduct'**. Please remember:

- Do not touch a pupil around the chest, waist, diaphragm or ribs to teach breathing;
- Consider explaining the correction of movement or the point you are trying to explain in another way, e.g. by you or another pupil demonstrating and then copying.

#### **Visiting Artists and Arts Groups:**

Visiting artists and art groups are provided with a copy of the School's 'Whole School Safeguarding and Child Protection Policy' and 'Whole School Safeguarding and Child Protection Procedures' and requested to adhere to accepted practice based on the following guidelines regarding behaviour between artists and arts groups and pupils. An example is as follows:

'We are committed to promoting the arts and a broad spectrum of arts activities in our School through provision of a rich and diverse curriculum and a positive ethos of collaborative work with

professional artists and arts groups. We are grateful for your services and unique contribution in helping us to achieve this aim in our Arts Department programme.

In order to promote good safeguarding practice in the Arts, in accordance with protocol adhere to by major arts organisations, we request that you observe the following guidelines:

- Treat pupils with dignity and respect;
- Address pupils by their first name;
- Provide constructive feedback rather than negative criticism;
- Seek to promote equality with regards racial, cultural and religious backgrounds;
- Avoid handling a pupil below the shoulder, unless absolutely necessary, consider you or another adult or pupil demonstrating instead;
- Avoid playing tickle games or horseplay, or encouraging pupils to sit on your lap;
- Do not encourage or engage in inappropriate humour, chat or gestures (e.g. sexual innuendo or swearing);
- Do not give pupils your personal details;
- Do not offer care journeys to pupils.

Please report any concerns about a pupil's welfare or behaviour to your accompanying member of staff or the Headmaster.'

# Appendix 8: Contractors' Agreement Form

#### **Health and Safety Site Rules:**

- The School has a full 'Whole School Health and Safety Policy', which is in operation throughout the premises, and all people on the premises are required to comply with it;
- Contractors of the School's premises are required to conduct their activities in line with the Health and Safety at Work Act 1974, and all subsequent legislation relevant to their activities;

In addition to this, contractors are required to comply with any other legislation applying to the work that they are to perform and carry out the work in line with the accompanying guidelines. Contractors are required to follow and abide by 'Contractor Rules (Work in and around Occupied Buildings' and the Site Rules. Signing below confirms that you are agreeing to do so.

- 3 Generally, contractors are required to take all reasonable steps to prevent danger or ill health to anyone on the premises, arising from actions by the contractor's employees or subcontractors appointed by the contractor;
- 4 All contractors are required to have relevant employer's liability insurance in place and any other insurances necessary to protect the School when work is carried out on School premises.

#### **Safeguarding and Child Protection:**

Cranford School School takes its safeguarding responsibilities very seriously and is committed to promoting the welfare of children. This means, amongst other things, providing a safe and secure environment for children and preventing unsuitable people having the opportunity for contact with children. In order to help us achieve the above aim, the Headmaster requests that you agree to comply with the following requirements at all times:

- 1. To sign in and out of a site office and the main School Office;
- 2. To wear an identity, red 'Visitor' lanyard and ensure that you are accompanied at all times by a member of Cranford School (Maintenance Staff);
- 3. To abide by the site's entry and exit procedures;
- 4. To contact the Maintenance Manager if access is required to part of the site where children may be present;
- 5. To act professionally and appropriately.

Cranford School has a Designated Safeguarding Lead (DSL) who takes responsibility for child protection matters. If you witness anything which gives you cause for concern, you must contact the Headmaster without delay so that concern can be reported to the DSL.

I confirm that the work undertaken will comply with the School's 'Whole School Contractors' Policy', 'Whole School CDM Policy' and the Site Rules, together with the above conditions:

oignea	
Name	
On behalf of (company)	Date