

Bedales Schools’ Safeguarding & Child Protection Policy

INCLUDING EYFS

Implementation date:

Date/term of last review: November 2020

Author	Designated Safeguarding Lead, Bedales
Review body (individual or group)	3SST
Approval Body	The Governors and the Heads
ISI Regulatory Paragraph Number	7 and 8
Next Review Period	Autumn 2021

Tick relevant box(es) ✓ how this Policy should appear:

Inspector Folder		✓
Website	Upload	✓
	Signpost	
Internal only		
Parent Portal		
For Pupils/Students		

Safeguarding & Child Protection Policy

Contents

KEY SAFEGUARDING CONTACTS AT BEDALES SCHOOLS	4
KEY EXTERNAL CONTACTS	4
POLICY STATEMENT	6
VALUES AND PRINCIPLES	6
AIMS	7
SCOPE AND APPLICATION	7
REGULATORY FRAMEWORK	7
THIS POLICY HAS REGARD TO THE FOLLOWING GUIDANCE AND ADVICE:	8
SCHOOL POLICIES AND PROCEDURES	8
DEFINITIONS AND ACRONYMS	9
CONCERNS ABOUT A CHILD	10
DEFINITIONS OF SAFEGUARDING AND TYPES AND SIGNS OF ABUSE	10
PROCEDURES AND GUIDANCE FOR STAFF	10
PROCEDURE FOR DEALING WITH CONCERNS ABOUT A CHILD	10
WHAT STAFF SHOULD DO IF THEY HAVE CONCERNS ABOUT A CHILD	11
WHAT STAFF SHOULD DO IF A CHILD IS IN DANGER OR AT RISK OF HARM	11
CONTEXTUAL SAFEGUARDING	11
WHAT STAFF SHOULD DO IF A CHILD IS SEEN AS AT RISK OF RADICALISATION OR EXTREMISM	11
WHAT STAFF SHOULD DO IF THEY DISCOVER AN ACT OF FEMALE GENITAL MUTILATION ("FGM")	12
WHAT STAFF SHOULD DO IF THEY HAVE CONCERNS THAT CHILDREN ARE AT RISK FROM OR INVOLVED WITH SERIOUS VIOLENT CRIME	12
WHAT STAFF SHOULD DO IF A CHILD GOES MISSING FROM EDUCATION	12
WHAT STAFF SHOULD DO IF A CHILD NEEDS A SOCIAL WORKER (CHILDREN IN NEED AND CHILD PROTECTION PLANS)	12
WHAT STAFF SHOULD DO IF A CHILD REQUIRES MENTAL HEALTH SUPPORT	13
WHAT STAFF SHOULD DO IF THEY HAVE SAFEGUARDING CONCERNS ABOUT ANOTHER STAFF MEMBER	13
WHAT STAFF SHOULD DO IF THEY HAVE CONCERNS ABOUT SAFEGUARDING PRACTICES IN THE SCHOOL	13
LISTENING TO CHILDREN	13
MANAGING SUPPORT FOR PUPILS INTERNALLY	13
EARLY HELP	14
MAKING A REFERRAL	14
NOTIFYING PARENTS	14
NEXT STEPS	15
CONCERNS REGARDING BEDALES SCHOOLS CHILD PROTECTION POLICY OR PRACTICES	15
ALLEGATIONS AGAINST PUPILS – PEER-ON-PEER ABUSE	15
REPORTING OBLIGATIONS OF STAFF IN RELATION TO SAFEGUARDING	18
SAFEGUARDING TRAINING	19
ALL STAFF ARE ALSO REQUIRED TO:	19
NEW STAFF	19
GOVERNORS' RESPONSIBILITY	20
ARRANGEMENTS FOR DEALING WITH SAFEGUARDING CONCERNS OR ALLEGATIONS OF ABUSE ABOUT TEACHERS AND OTHER STAFF (INCLUDING THE HEAD, GOVERNORS, SUPPLY STAFF AND VOLUNTEERS)	20
ARRANGEMENTS FOR DEALING WITH SAFEGUARDING CONCERNS OR ALLEGATIONS OF ABUSE ABOUT SUPPLY TEACHERS	22

CODE OF PROFESSIONAL CONDUCT FOR STAFF	22
SAFER RECRUITMENT	22
OVERSIGHT OF SAFEGUARDING, INCLUDING ARRANGEMENTS FOR REVIEWING POLICIES AND PROCEDURES	23
THE MANAGEMENT OF SAFEGUARDING	23
THE DSL TEAM	23
TRAINING FOR THE DSL TEAM	23
THE ROLE OF GOVERNORS	24
VERSION CONTROL	24
OTHER SAFEGUARDING RESPONSIBILITIES	24
TEACHING CHILDREN HOW TO KEEP SAFE	24
ONLINE SAFETY	25
RELATIONSHIPS AND SEX EDUCATION (“RSE”)	25
LOOKED AFTER CHILDREN	25
ARRANGEMENTS FOR VISITING SPEAKERS	25
ARRANGEMENTS FOR ADDITIONAL ONLINE TUITION, APPOINTMENTS AND MEETINGS	26
ARRANGEMENTS FOR TRIPS AND WORK EXPERIENCE	26
ADULTS IN ACCOMMODATION LINKED TO BOARDING HOUSES	26
EARLY YEARS PROVISION SAFEGUARDING ARRANGEMENTS	26
DISQUALIFICATION FROM WORKING IN CHILDCARE	26
USE OF MOBILE PHONES AND CAMERAS	26
EYFS AND DUNANNIE	26
CHANGING ARRANGEMENTS	27
INTIMATE CARE	27
DSL FOR THE EYFS	27
DUTY TO NOTIFY OFSTED	27
APPENDIX	27
APPENDIX 1 INDICATORS OF ABUSE	27
TYPES OF ABUSE	27
APPENDIX 2 ACTIONS WHERE THERE ARE CONCERNS ABOUT A CHILD – GUIDANCE FOR STAFF	33
APPENDIX 3 MANAGING ALLEGATIONS AGAINST OTHER PUPILS	35
APPENDIX 4 DEALING WITH ALLEGATIONS AGAINST STAFF	38
CONCERNS REGARDING NON-RECENT CHILD PROTECTION ISSUES AT BEDALES	38
APPENDIX 5 RESPONSIBILITIES OF THE DESIGNATED SAFEGUARDING LEAD (DSL)	39
THE SAFEGUARDING COMMITTEE	39
APPENDIX 6: BRIEFING SHEET FOR TEMPORARY AND SUPPLY STAFF	40
APPENDIX 7 – INTIMATE CARE	40

Key Safeguarding Contacts at Bedales Schools

Name	Contact details
Bedales Safeguarding Team	Safeguarding@bedales.org.uk
Jen Moore Designated Safeguarding Lead Designated Teacher for Looked After Children	jmoore@bedales.org.uk 07884 665434 01730 711700
Graeme Thompson Deputy Designated Safeguarding Lead (Dunhurst)	gthompson@bedales.org.uk 07929 020961
Sharon Rose Deputy Designated Safeguarding Lead (Dunannie)	srose@bedales.org.uk
Rick Cross Deputy Designated Safeguarding Lead (Bedales)	rcross@bedales.org.uk 07867 393711
Magnus Bashaarat Head (Three Schools)	mbashaarat@bedales.org.uk ;
Colin Baty Head (Dunhurst and Dunannie)	cbaty@bedales.org.uk
Clare Bradbury Nominated Safeguarding Governor	cbradbury2017@bedales.org.uk
Matthew Rice Chair of Governors	Contact details available from the Bursar's Office.

Key External Contacts

LOCAL	
Children's Social Care, Hants Direct:	0300 555 1384 (or 08456 035620) Out of Hours contact: 0300 555 1373
Children's Reception Team	01329 225379
Hampshire LADOs Barbara Piddington, Fiona Armfield and Mark Blackwell	01962 876265
Independent Listener Joanna Farrell	joannafarrell9@gmail.com
NATIONAL	
Childline (for children and young people)	Tel: 0800 1111
Police	101 (999 if an emergency)

Disclosure and Barring Service	ADDRESS: DBS customer services PO Box 3961 Royal Wootton Bassett SN4 4HF TEL: 03000 200 190 EMAIL: customerservices@db.gov.uk
Teaching Regulation Agency	ADDRESS: Teacher Misconduct Ground Floor South Cheylesmore House 5 Quinton Road Coventry CV1 2WT TEL: 0207 593 5393 EMAIL: misconduct.teacher@education.gov.uk
NSPCC Whistleblowing Helpline	Tel: 0800 028 0285 Email: help@nspcc.org.uk
OFSTED Safeguarding Children	TEL: 0300 123 4666 (Monday to Friday from 8am to 6pm) EMAIL: Whistleblowing@ofsted.gov.uk
Independent Schools Inspectorate	TEL: 0207 6000100 EMAIL: concerns@isi.net
The Samaritans	116 123 Email: jo@samaritans.org
24 Hour Domestic Abuse Helpline	0808 2000 247
CEOP (Child Exploitation and Online Protection Command)	https://www.ceop.police.uk/safety-centre/
Forced Marriage Unit	Tel: 020 7008 0151
Prevent: for concerns about an individual potentially being radicalised	Tel: 101 quote Channel or call Anti-terrorism hotline 0800 789 321
SSAFA Forces Help – Social work service	Tel: 0800 731 4880 www.ssafa.org.uk
MALE Men's Advice Line & Enquiries	Tel: 0808 801 0327
Protecting Children & Uniting Families Across Borders (CFAB, previously International Social Services)	Tel: 020 7735 8941 www.cfab.org.uk Fax: 020 7582 0696
Foreign & Commonwealth Office	Tel: 020 7008 1500 King Charles Street London SW1A 2AH
Non-emergency contact number for FGM reporting	Tel: 101
Reporting serious wrongdoing to the Charity Commission	whistleblowing@charitycommission.gsi.gov.uk

Policy Statement

This is the Safeguarding and Child Protection Policy and Procedures for Bedales Schools (Bedales, Dunhurst and Dunannie, which includes an EYFS setting).

This policy is available on the School website and is reviewed and updated annually (as a minimum). A copy of the policy is available for inspection from the Designated Safeguarding Lead's office, and from Main Reception during the School day.

This policy can be made available in large print or other accessible format if required.

This policy and all policies referred to in it are also available to staff on the School's staff shared area and hard copies are available on request.

This policy should be read alongside the School's Covid-19 Safeguarding Addendum which sets out how this policy has been adapted to ensure appropriate regard to KCSIE during this time.

Values and Principles

At Bedales Schools we are committed to acting in the best interests of the child. We take action to enable all pupils to achieve the best outcomes. Safeguarding and promoting the welfare of children is everyone's responsibility at Bedales.

The actions that we take to prevent harm; to promote physical and mental wellbeing; to create safe environments; to educate on rights, respect and responsibilities; to respond to specific issues and vulnerabilities all form part of the safeguarding responsibilities of the school. We maintain an attitude of "it could happen here" where safeguarding is concerned.

Children have a right to feel secure and cannot learn effectively unless they do so. All children regardless of age, gender, race, ability, sexuality, religion, culture or language have a right to be protected from harm. Bedales Schools foster a culture of openness, safety, equality and protection. We make every effort to provide a safe and welcoming environment where both children and adults feel secure, able to talk and believe that they are being listened to.

All staff have a key role in prevention of harm and an equal responsibility to act on any suspicion or disclosure that may indicate a child is at risk of harm in accordance with the guidance. As such, this overarching Policy links to other policies which will provide more information.

All pupils in our schools are able to talk to any member of staff to share concerns or talk about situations which are giving them worries. The staff will listen to the pupil, take their worries seriously and share the information with the Safeguarding Lead of the relevant school. In addition, we provide pupils with information of who they can talk to outside of school both within the community and with local or national organisations who can provide support or help.

We acknowledge that working in partnership with other agencies protects children and reduces risk and so we will engage in partnership work throughout the child protection process to safeguard children.

Whilst the school will work openly with parents as far as possible, the school reserves the right to contact Children's Social Care or the police without notifying parents if this is in the child's best interests.

Safeguarding processes are intended to put in place measures that minimise harm to children. There will be situations where gaps or deficiencies in the policies and processes we have in place will be highlighted. In these situations a review will be carried out in order to identify learning and inform the Policy, practice and culture of the Schools.

Health and Safety is a specialist area of safeguarding. Eileen Voller is the lead for this at Bedales Schools.

Aims

The aims of this policy are:

1. to actively promote the welfare of children, staff and others who come into contact with the School and to protect them from harm;
2. to have clear procedures in place for dealing with and referring concerns about the welfare of any individual and/or allegations of abuse;
3. to raise staff awareness about the School's safeguarding expectations;
4. to raise awareness about how to report concerns and ensure they are appropriately investigated;
5. to ensure staff are competent to carry out their safeguarding responsibilities and feel supported in this role;
6. to demonstrate our statutory commitment to effective safeguarding practices;
7. to ensure consistent good safeguarding practice throughout the School; and
8. to create a culture of safety, equality and protection.

Scope and Application

This policy applies to the whole School.

This policy applies at all times including where pupils or staff are away from the School.

This policy applies to core School activities and to out of hours and commercial activities.

This policy is designed to address the School's charity law safeguarding duty to:

- o provide a safe and trusted environment which safeguards anyone who comes into contact with it, including beneficiaries, staff and volunteers;
- o set an organisational culture that prioritises safeguarding, so that it is safe for those affected to report incidents and concerns with the assurance they will be handled sensitively and properly;
- o have adequate safeguarding policies, procedures and measures to protect people;
- o provide clarity as to how incidents and allegations will be handled should they arise, including reporting to the relevant authorities, such as police, local authority and the Charity Commission; and
- o the specific statutory obligations on the School to safeguard and promote the welfare of children, as defined below.

Regulatory Framework

This policy has been prepared to meet the School's responsibilities under:

- Education (Independent School Standards) Regulations 2014;
- Education and Skills Act 2008;

- Children and Social Work Act 2017;
- Data Protection Act 2018 and General Data Protection Regulation (GDPR);
- Equality Act 2010; and
- Charities Act 2011.

This policy has regard to the following guidance and advice:

In order to safeguard and promote the welfare of children, Bedales Schools will act in accordance with the following legislation and guidance, and in accordance with the Hampshire Safeguarding Children Partnership (HSCP).

[Keeping children safe in education \(DfE, September 2020\) \(KCSIE\)](#);

[Working together to safeguard children \(HM Government, July 2018\) Updated 2019 \(WVT\)](#);

[Revised Prevent duty guidance for England and Wales \(HM Government, April 2019\)](#);

[The Prevent duty: Departmental advice for schools and childcare providers \(2015\)](#)

[Channel duty guidance: protecting vulnerable people from being drawn into terrorism \(HM Government, November 2020\)](#);

[The use of social media for online radicalisation \(July 2015\)](#)

[Educate Against Hate \(HM Government 2018\)](#);

[Multi-agency statutory guidance on female genital mutilation \(HM Government, July 2020\)](#);

[What to do if you're worried a child is being abused: advice for practitioners \(HM Government, March 2015\)](#);

[When to call the police \(non-statutory guidance from the National Police Chiefs' Council\)](#)

[Disqualification under the childcare act 2006 \(September 2018\)](#)

[Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers \(HM Government, July 2018\)](#);

[Sexting in schools and colleges: responding to incidents and safeguarding young people \(UK Council for Child Internet Safety \(UKCCIS\), August 2016\)](#);

[Children missing education \(DfE, September 2016\)](#);

[Child sexual exploitation: definition and a guide for practitioners, local leaders and decision makers working to protect children from child sexual exploitation \(DfE, February 2017\)](#);

[Sexual violence and sexual harassment between children in schools and colleges \(DfE, May 2018\)](#);

[Searching, screening and confiscation: advice for schools \(DfE, January 2018\)](#);

[Listening to and involving children and young people \(DfE, January 2014\)](#);

[Safeguarding children \(links to government guidance and resources\)](#)

[Strategy for dealing with safeguarding issues in charities \(Charity Commission, December 2017\)](#);

[Regulatory alert to charities - safeguarding \(Charity Commission, December 2017\)](#);

[How to report a serious incident in your charity \(Charity Commission, June 2019\)](#);

[Report serious wrongdoing at a charity as a worker or volunteer \(Charity Commission, June 2019\)](#);

[Relationships education, relationships and sex education and health education guidance \(DfE, June 2019\)](#)

School policies and procedures

The following school policies and procedures are relevant to this policy, and can be found in the Staff Shared Area:

- The staff code of professional conduct
- The Three Schools' ICT Acceptable Use policy
- The Three Schools' Whistleblowing policy

- The Three Schools' Safer Recruitment policy
- Behaviour and discipline policies for Bedales, Dunhurst and Dunannie
- Anti-bullying policies for Bedales, Dunhurst and Dunannie
- The student ICT acceptable use policies for Bedales, Dunhurst and Dunannie
- The Three Schools' Risk Assessment policy
- (Attendance and) Missing Child policies for Bedales, Dunhurst and Dunannie
- Bedales Learning Support policy
- The Three Schools' Equality and Diversity Statement and Policy
- The Three Schools' Health and Safety policy;
- The Dunannie PSHE and SMSC policy;
- The Dunhurst Sex and Relationships policy;
- The Bedales PSHE & Wellbeing and Relationships & Sex Education (RSE) Policy; and,
- The Three Schools' Medication policy and procedures
- The Three Schools Adults in Accommodation Linked to Boarding Houses policy

Definitions and acronyms

'*Safeguarding*' is defined in WT and KCSIE as protecting from maltreatment; preventing impairment of children's mental and physical health or development; ensuring that children grow up with the provision of safe and effective care; and work in a way that gives the best life chances and transition to adulthood. Our safeguarding practice applies to every child.

Child Protection is an aspect of safeguarding, but is focused on how we respond to children who have been significantly harmed or are at risk of significant harm.

The term *Staff* applies to all those working for or on behalf of the schools, full time or part time, in either a paid or voluntary capacity. This also includes Governors.

Child refers to all young people who have not yet reached their 18th birthday. On the whole, this will apply to pupils of our schools and we treat all pupils as children for the purposes of safeguarding, although we engage with adult services where appropriate. The policy will also extend to visiting children and pupils from other establishments.

Parent refers to birth parents and other adults in a parenting role for example adoptive parents, guardians, step parents and foster carers.

Abuse could mean neglect, physical, emotional or sexual abuse or any combination of these. It can take place online or in person. Parents, carers and other people can harm children either by direct acts and / or failure to provide proper care. Explanations of these are given within the procedure document.

HSCP	Hampshire Safeguarding Children Partnership
CEOP	Child Exploitation and Online Protection Command (part of the National Crime Agency)
CRT	Children's Reception Team (social services)
DBS	Disclosure and Barring Service
DfE	Department for Education
DSL	Designated Safeguarding Lead
DDSL	Deputy Designated Safeguarding Lead
EYFS	Early Years' Foundation Stage
FGM	Female Genital Mutilation
HCC	Hampshire County Council
INSET	In-service training
KCSIE	<u>Keeping Children Safe in Education (2020)</u>
(LA)DO	(Local Authority) Designated Officer
MASH	Multi agency Safeguarding Hub
TRA	Teaching Regulation Agency
WT	<u>Working Together to Safeguard Children (WT) (July 2018)</u>

Concerns about a Child

Definitions of safeguarding and types and signs of abuse

Safeguarding and promoting the welfare of children is defined as protecting children from maltreatment; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

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

- physical abuse;
- emotional abuse;
- sexual abuse; and/or
- neglect.

Staff are referred to Appendix I of this policy for further detail of the types of abuse and possible signs of abuse.

Procedures and Guidance for staff

Procedure for dealing with concerns about a child

If staff suspect or hear an allegation or complaint of abuse or neglect from a child or any third party, they must act immediately and follow the relevant procedure below. Staff should not assume that somebody else will take action and share information that might be critical in keeping children safe.

The guidance, '[Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers](#)' supports staff who have to make decisions about sharing information. Fears regarding sharing information under the Data Protection Act 2018 and the GDPR should not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children. If in doubt about what information can and should be shared, staff should speak to the Designated Safeguarding Lead ("DSL").

When listening to concerns about a child, all staff should:

- listen carefully
- avoid asking leading questions
- reassure the individual that the allegation/complaint will be taken seriously
- not guarantee absolute confidentiality (as this may ultimately not be in the best interests of the child) and explain that the information needs to be passed to the appropriate person who will ensure that the correct action is taken.

All concerns, discussions and decisions (together with reasons) made under these procedures should be recorded in writing on CPOMS. The record should include the date, time and place of the conversation and detail of what was said and done by whom and in whose presence and signed by the person making it. Where the allegation relates to harmful sexual behaviours, if possible the disclosure should be managed with two members of staff present (preferably one of them being the DSL or their deputy). If the concern

does not relate to a specific student, or if you do not know the name of the student, send your report to safeguarding@bedales.org.uk.

Where there is a safeguarding concern, the School will ensure the pupils' wishes and feelings are taken into account when determining what action to take and what services to provide. This is particularly important in the context of harmful behaviours, such as sexual harassment and sexual violence. The School manages this by sharing guidance documents in forums such as School Council, and in 1:1 discussions with pastoral staff and the safeguarding team and/or the independent listener when dealing with individual situations. The School operates its processes with the best interests of the pupil at their heart.

What staff should do if they have concerns about a child

If staff (including governors, agency staff and volunteers) have any concerns about a child (as opposed to a child being in immediate danger), they should, where possible, speak with the School's DSL to agree a course of action, although staff can make a direct referral to children's social care. As set out above, staff should not assume that somebody else will take action and share information that might be critical in keeping children safe. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. If a child's situation does not appear to be improving, the DSL should press children's social care for reconsideration. Staff should challenge any inaction and follow this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

What staff should do if a child is in danger or at risk of harm

If staff (including governors, agency staff and volunteers) believe that a child is in immediate danger or at risk of harm, they should make an immediate referral to children's social care and/or the Police. Anyone can make a referral. Any such referral must be made immediately and in any event within 24 hours (one working day) of staff being aware of the risk. Parental consent is not needed for referrals to statutory agencies such as the police and children's social care. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. The local authority social worker should acknowledge receipt to the referrer within 24 hours and make a decision about the next steps and type of response required. Staff should challenge any inaction and follow this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

The School's Local Safeguarding Children Board is Hampshire Safeguarding Children Partnership (HSCP). A full copy of their local procedures can be found here: <https://www.hampshirescp.org.uk/procedures/>.

Contextual safeguarding

Safeguarding incidents and/or behaviours can be associated with factors outside the School and can occur between children outside School. All staff, but especially the DSL and any deputies, should consider the context within which such incidents and/or behaviours occur. The School will as part of the wider assessment of children, consider whether environmental factors are present in a child's life that are a threat to their safety and/or welfare. The School will share as much information with Children's Social Care as possible as part of the referral process to enable consideration of all the available evidence and the full context of any abuse.

What staff should do if a child is seen as at risk of radicalisation or extremism

The prevent duty requires that all staff are aware of the signs that a child may be vulnerable to radicalisation. The risks will need to be considered for political; environmental; animal rights; or faith based extremism that may lead to a child becoming radicalised. All staff have been informed of the signs that someone may be at risk at radicalisation or becoming so. Senior staff and houseparents have undertaken e-learning in order that they can identify the signs of children being radicalised.

In line with the schools' ethos, pupils are encouraged to share their views openly and freely and to treat

everyone in the community and beyond with respect, reflecting the liberal values on which the schools were founded. The Wellbeing (pastoral, social and health education) programme and Global Awareness are two opportunities for pupils to learn about and discuss issues facing the world and to take responsibility for making the world a better place.

Staff should follow the School's normal referral processes when there are concerns about children who may be at risk of being drawn into terrorism, as set out above. This may include a Prevent referral or referral to children's social care depending on the level of risk. However, if staff have concerns that there is an immediate/significant risk of a child being drawn into terrorism they must call 999. Advice and support can also be sought from children's social care.

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

What staff should do if they discover an act of Female Genital Mutilation ("FGM")

Staff must report to the Police cases where they discover that an act of FGM appears to have been carried out. Unless the member of staff has a good reason not to, they should still consider and discuss any such case with DSL and involve children's social care as appropriate. Staff are referred to Appendix I of this policy for the procedure to be followed where they suspect that a pupil may be at risk of FGM.

What staff should do if they have concerns that children are at risk from or involved with serious violent crime

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 wellbeing, signs of assault or unexplained injuries.

If staff have any concerns about a child (as opposed to a child being in immediate danger), they should, where possible, speak with the School's DSL to agree a course of action, although staff can make a direct referral to children's social care.

What staff should do if a child goes missing from education

Children who go missing from education, particularly on repeat occasions, is a potential indicator of abuse or neglect. The School's procedures for unauthorised absence and for dealing with children who go missing from education can be found in the Bedales Attendance, Student Supervision and Missing Child Policy, the Dunhurst Missing Child & School Attendance Policy and the Dunannie Missing Child Policy, which will be used when searching for, and if necessary, reporting, any pupil missing from education.

Where reasonably possible, the School will hold more than one emergency contact number for each pupil to provide the School with additional options to make contact with a responsible adult particularly when a child missing from education is also identified as a welfare and/or safeguarding concern.

The School will report to Hampshire Council a pupil who fails to attend school regularly or has been absent from school without the School's permission for a continuous period of 10 school days or more.

What staff should do if a child needs a social worker (Children in Need and Child Protection Plans)

Children may need a social worker due to safeguarding or welfare needs. 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.

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).

What staff should do if a child requires mental health support

The School has an important role to play in supporting the mental health and wellbeing of its pupils. 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.

Staff can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies. More information can be found in the DfE Mental Health and Behaviour in Schools guidance. Public Health England has produced a range of resources to support school teachers to promote positive health, wellbeing and resilience among young people.

What staff should do if they have safeguarding concerns about another staff member

If staff have safeguarding concerns about another staff member (including supply staff and volunteers), then this should be referred to the Head. Where there are concerns about the Head, this should be referred to the Chair of Governors. In the event of allegations of abuse being made against the Head, staff are referred to the procedures below regarding managing allegations of abuse against staff (including volunteers) and refer the matter directly to the LADO at Hampshire Children's Safeguarding Partnership.

What staff should do if they have concerns about safeguarding practices in the School

The School aims to ensure there is a culture of safety and raising concerns and an attitude of 'it could happen here'. Where staff have concerns about poor or unsafe practices and potential failures in the School's safeguarding systems, these should be raised in accordance with the School's whistleblowing procedures which can be found in the Three Schools' Whistleblowing Policy, available in the Shared Area. There will be no disciplinary action taken against a member of staff for making such a report provided that it is done in good faith.

If staff and volunteers feel unable to raise an issue with the School or feel that their genuine concerns are not being addressed, they may use other whistleblowing channels, such as the NSPCC whistleblowing advice line. Contact details for the NSPCC helpline can be found on the Key Contacts page at the start of this policy.

Listening to children

The School has arrangements for listening to children and providing early help. Pupils can talk to any member of staff at the school, but teachers cannot promise confidentiality when listening to a pupil. Pupils have access to tutors, houseparents, matrons or the Health Centre, with nurses and doctors, counsellors and an independent listener (in the case of boarders) for more confidential advice and support, but safeguarding or child protection concerns will be shared with the DSL, as appropriate. Details of these services are promoted around the school.

Managing support for pupils internally

The School has a framework for the identification, assessment, management and review of risk to pupil welfare so that appropriate action can be taken to reduce the risks identified.

Internal pastoral support may include meetings between the pupil and/or their family with Tutors and Houseparent; appointments with the School Counsellor or School Nurses; meetings between the pupil

and/or their family with the Deputy Head Pastoral or Designated Safeguarding Lead; liaison with other professionals to develop appropriate individual plans to support pupils in school.

Early Help

Any child may benefit from early help but all 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)
- Is a young carer
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- Is frequently missing/goes missing from care or from home
- Is misusing drugs or alcohol themselves
- 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
- Has returned home to their family from care
- Is showing early signs of abuse and/or neglect
- Is at risk of being radicalised or exploited
- Is experiencing, or is at risk of experiencing family ostracism
- Is a privately fostered child.

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 who consider that a pupil may benefit from early help should discuss this with the School's DSL. The DSL will consider the appropriate action to take in accordance with the [Hampshire and Isle of Wight Safeguarding Children's Partnership and Children's Trust referral threshold document](#). The DSL will support staff in liaising with external agencies and professionals in an inter-agency assessment, as appropriate. If early help is appropriate, the matter will be kept under review and consideration given to a referral to children's social care if the pupil's situation does not appear to be improving.

Making a Referral

Following any concerns raised by staff, the appropriate member of the DSL team will use [Hampshire Safeguarding Children Partnership and Children's Trust Thresholds Chart](#) to assess the information and consider if significant harm has happened or there is a risk that it may happen. If the evidence suggests the threshold of significant harm, or risk of significant harm has been reached or they are not clear if the threshold is met, then the DSL will contact children's social care for advice or to make a referral. If the DSL is not available or there are immediate concerns, the staff member will refer directly to children's social care.

Notifying parents

Parents and guardians play the most important role in a child's welfare. The school will seek to work with parents where possible regarding welfare concerns about a child. Where the school is not concerned that there is a risk of immediate harm and the child gives consent, we will give parents full details of any concerns as soon as possible and inform parents what the next steps will be.

We will seek parental consent before contacting external agencies, unless:

- a child makes a disclosure of physical or sexual abuse in a domestic setting;
- we believe the child may be at risk of significant harm, and that this risk may be increased by informing parents in advance
- the child does not give consent for us to notify parents

The school may also seek anonymous advice from Children's Services on any given incident. The school will then follow advice given by Children's Services in the relevant local authority, which may include sharing the concern in full. Schools are advised to have a low threshold for sharing concerns as it is best practice to seek professional advice on Safeguarding and Child Protection matters. In Hampshire the Children's Reception Team (CRT) is the 'front door' service to other agencies who work with children and families.

Next Steps

These will be either:

Inviting parents to be involved in an open conversation with their child, with the school in support, to work as a team to resolve any concerns. This may include a request for 'early help' to the local (either to the school or the home address if in the UK) early help hub team. This is not a safeguarding referral but a request made by parents, the school and, ideally, the child for support from a range of services, including social services, youth workers, GP, police etc. If an early help request is accepted by the local hub, the school would normally hear within two weeks and would be asked to attend a planning meeting. An appropriate person from the school (usually the houseparent, tutor or member of the DSL team) will attend and help formulate a plan of support which will then be discussed with the family;

or, less often:

A referral to Children's Services (of the child's home address) by the school where the school believes the child may be at risk of or suffering from emotional, physical or sexual abuse or neglect or a combination of these by another child or adult, or where it believes a child may be or is causing another child to suffer harm.

Concerns regarding Bedales Schools child protection policy or practices

Any concerns regarding the Schools' child protection policy or practices should be referred to the Headmaster, Bedales Schools, in the first instance, or the relevant Head if he is not available. If concerns remain, the School's Complaints Policy should be followed. Parents may also wish to contact the LADO to check that appropriate statutory procedures have been adhered to.

The Independent Schools' Inspectorate's Safeguarding & Prevent Officer is available as a point of contact for parents, teachers and pupils to express any concerns in relation to schools and colleges. Concerns and complaints generally include personal data, and this may include sensitive personal information, defined as 'special category data' under the General Data Protection Regulation (GDPR). Appropriate security measures are in place to ensure such information is only accessible by relevant individuals.

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally.

Contact details can be found at the start of this document.

Further details can be found in Appendix 2 of this document.

Allegations against pupils – peer-on-peer abuse

Peer-on-peer abuse is abuse by one or more pupils against another pupil. It can be standalone or as part of wider abuse. It can manifest itself in many ways and can include abuse within intimate partner relationships, bullying (including cyber bullying), physical abuse, initiation/hazing violence and rituals, upskirting, sexting, sexual assault, gender-based issues and harmful sexual behaviours including sexual violence and sexual harassment. Abusive comments and interactions should never be passed off or dismissed as "banter" or "part of growing up". Nor will harmful sexual behaviours, including sexual comments, remarks or jokes and online sexual harassment, be dismissed as the same or "just having a laugh". The School recognises that a child is likely to disclose an allegation to someone they trust: this could be any member of staff.

The School recognises that children with special educational needs and disabilities can be more prone to peer on peer group isolation than other children and will consider extra pastoral support for those children in conjunction with their tutor or houseparent.

The School recognises that children can be particularly vulnerable in residential settings and are alert to the potential for peer-on-peer abuse. Duty staff are trained in their responsibilities to prevent inappropriate behaviour that could escalate to abuse. They intervene to stop inappropriate behaviour and report any concerns about a pupil's behaviour or mood to the house staff, or to the DSL on the same day in the case of a safeguarding concern. The weekly pastoral meetings of house staff and the DSL enable a central record and monitoring of any concerns to be carried out. Parents are informed of pastoral concerns.

The School takes the following steps to minimise the risk of peer-on-peer abuse

- Providing a developmentally appropriate Wellbeing (PSHE) syllabus which develops pupils understanding of acceptable behaviour and keeping themselves safe
- Having systems in place for any pupil to raise concerns with any member of staff, knowing that they will be listened to, believed and valued
- Delivering targeted work on assertiveness and keeping safe to those pupils identified as being at risk
- Developing robust risk assessments & providing targeted work for pupils identified as being a potential risk to other pupils.

Where an issue of pupil behaviour or bullying gives 'reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm', staff should follow the procedures below rather than the School's Anti-Bullying and Behaviour policies.

A pupil against whom an allegation of abuse has been made may be suspended from the School during the investigation. The School will take advice from the police, if appropriate, and relevant Local Authorities (or Hampshire Children's Services) on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the alleged victim and perpetrator. If it is necessary for a pupil to be interviewed by the Police in relation to allegations of abuse, the School will ensure that, subject to the advice of the relevant Local Authorities (or Hampshire Children's Services), parents are informed as soon as possible and that the pupils involved are supported during the interview by an appropriate adult and until the investigation is completed. Confidentiality will be an important consideration for the School and advice will be sought as necessary from the relevant Local Authorities (or Hampshire Children's Services) and/ or the Police as appropriate.

Police may be informed of any harmful sexual behaviours which are potentially criminal in nature, such as grabbing bottoms, breasts and genitalia. Rape, assault by penetration and sexual assaults will be passed to the police. If the DSL decides to make a referral to children's social care and/or a report to the police against a victim's wishes, the reasons should be explained to the pupil and appropriate specialist support offered. The School will follow Hampshire Constabulary's guidance when managing instances of sexting/YPSI in school, seeking advice from 101 if deemed appropriate. Separate disciplinary processes may also be followed. Specific guidance on managing instances of harmful sexual behaviour can be found in a separate Three Schools document entitled 'Peer-on-peer sexual behaviour: guidance, risk-assessment and procedures'.

The definition of sexting varies widely, therefore 'Youth Produced Sexual Imagery' (YPSI) is felt to be a clearer term to refer to the sharing of naked or 'nude' pictures or video through mobile phones and the internet. It also includes underwear shots and sexual poses. This guidance refers specifically to images that have been taken by children under the age of 18, and shared with other children under the age of 18.

Sharing videos, 'selfies' and pictures is part of everyday life for young people, but the taking and sharing of YPSI is risky and potentially damaging on a number of levels for young people. It also constitutes a criminal offence (Protection of Children Act 1978, as amended by the Sexual Offences Act 2003). While sharing YPSI is not an uncommon occurrence, NSPCC research has shown that most young people aren't sharing sexual imagery of themselves.

Bedales Schools' initial aim is to educate young people on the dangers of this practice through Wellbeing sessions, in assemblies and in other contexts.

Any member of staff who becomes aware of an indecent image should take the following steps:

- Confiscate any device where an image is present, ensuring it is switched to 'flight mode', or turned off;
- Do NOT view the image or take steps to share it electronically;
- Report the matter to the DSL immediately;

The DSL will meet with those concerned to assess the risk factors, which include the children's ages and circumstances, following Hampshire Constabulary's risk assessment advice flowchart. A decision will be made about how to proceed, which may include contacting police, social services and other agencies for further advice or to make a referral; and the process will be discussed with parents (unless it is deemed unsafe to do so). Ongoing support will be offered to the young people involved.

In the event of disclosures about pupil-on-pupil abuse, all children involved (both victim and perpetrator) will be treated as being at risk, and safeguarding procedures in accordance with this policy will be followed. Victims will be supported by houseparents, the Health Centre and school counsellors as appropriate, and support from external agencies will be sought if deemed appropriate.

When there has been a report of sexual violence, the DSL will make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider:

- the victim;
- the alleged perpetrator; and
- the other children (and, if appropriate, staff) at the School.

Risk assessments will be recorded and kept under review. In relation to a report of sexual violence or sexual harassment, the DSL will reassure any victim that they are being taken seriously and that they will be supported and kept safe. The victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment; nor would a victim ever be made to feel ashamed for making a report. The DSL will consider the risks posed to pupils and put adequate measures in place to protect them and keep them safe. This may include consideration of the proximity of the victim and alleged perpetrator and considerations regarding shared classes, sharing School premises and School transport.

Further details can be found in Appendix 3 of this document.

Staff responsibility statement

When concerned about the welfare of a pupil, staff members should always act in the best interests of the pupil.

All staff have a key role to play in identifying concerns early and in providing help for children. To achieve this they will:

- report any concerns they may have about the safety and/or wellbeing of pupils on the same working day;
- report any concerns they may have about the safety and/or wellbeing of other persons associated with the School;
- report any safeguarding concerns about staff or anyone else associated with the School;
- Record their concerns if they are worried that a child is being abused and report these to the DSL as soon as practical that day.

- If the disclosure is an allegation against a member of staff they will follow the allegations procedures (Appendix 4).
- follow up on any such reports to ensure that appropriate action is or has been taken.
- Never rely on someone-else to pass on a safeguarding concern;
- Establish and maintain an environment where children feel secure, are encouraged to talk and are listened to;
- Ensure children know that any adult in the school can be approached if they are worried about any problems;
- Plan opportunities within the curriculum for children to develop the skills they need to assess and manage risk appropriately and keep themselves safe;
- Attend training in order to be aware of and alert to the signs of abuse.
- Maintain an attitude of “it could happen here” with regards to safeguarding.
- Be alert to signs of children at risk of radicalisation and other forms of risk associated with extremism.
- Follow the procedures set out by the HSCP and take account of guidance issued by the DfE.
- Support pupils in line with their child protection plan.
- Treat information with confidentiality but never promising to “keep a secret”.
- Notify DSL of any child on a child protection plan who has unexplained absence.
- In the context of early help, staff will notify the DSL of any concerns about their child(ren), and provide them with, or signpost them to, opportunities to change the situation.
- Liaise with other agencies that support pupils and provide early help.
- Ensure they know who the Designated Safeguarding Lead (DSL) and deputy DSLs are and know how to contact them.

If staff are unsure about the appropriate process to use, they should not hesitate to speak to the DSL, senior leadership team or directly to children's social care or police in their absence for guidance.

In order to help keep children safe and avoid putting themselves at risk of accusations of inappropriate behaviour, staff members must:

- adhere to the Code of Professional Conduct for Staff
- contribute to inter-agency working in line with guidance (WT2018)
- provide a co-ordinated offer of early help when additional needs of children are identified
- work with Children's Social Care, support their assessment and planning processes including the school's attendance at conference and core group meetings
- carry out tasks delegated by the governing body such as training of staff; safer recruitment; maintaining a Single Central Register

Reporting obligations of staff in relation to safeguarding

A concern about a child is not defined and should be interpreted broadly. It may relate to a recognition that a child would benefit from extra support, to an emerging problem or to a potentially unmet need or may reflect a concern that a child may be deemed to be "in need" or at "immediate risk of harm" as defined by the Children Act 1989. 9.3 If the concern involves an allegation against staff, this must be reported in accordance with the procedures set out in Appendix 3.

If staff have any concern about a pupil's welfare, they should report their concerns to the DSL (or the DDSL at Dunhurst or Dunannie, or in the DSL's absence) immediately. The contact details of the DSL and DDSL are set out in the contacts list at the front of this policy. See Appendix 2 for guidance about what to do when receiving a disclosure and recording a concern.

A member of the DSL team will always be available in term time to discuss safeguarding concerns; the DSL may be contacted on her mobile phone in relation to any safeguarding concerns out of school hours.

If in exceptional circumstances the DSL and DDSL are unavailable, staff must not delay taking action. Staff should speak to their line manager or a member of the senior leadership team and / or advice should be taken from children's social care. Their contact details are set out at the front of this policy.

Safeguarding Training

All staff in our school are expected to be aware of the signs and symptoms of abuse and must be able to respond appropriately. They must also recognise when a child may be in need of 'early help' or at immediate risk of harm and be familiar with specific safeguarding issues. The training is updated regularly to accommodate changes to local authority and national practices. The DSL and deputies provide current staff with refresher training to enable them to both fulfil their role and also to understand the Safeguarding and Child Protection Policy, the Code of Professional Conduct for Staff, and part one of Keeping Children Safe in Education September 2020 and Annex A, Pupil Behaviour Policy and Missing Child Policy (relevant to the school(s) worked in). Training includes an introduction to the DSL and Deputy team.

Any update in national or local guidance is shared with all staff in briefings and bulletins. There is also an intranet page with key advice to enable the quick referral of child protection or cause for concerns for staff.

All staff are also required to:

- Read and understand Part One and Annex A of *KCSIE* and confirm that they have done so. Each time Part one of *KCSIE* is updated by the Department for Education, staff will be updated on the changes via email. The School will ensure staff understanding by asking colleagues to complete a short quiz.
- Receive regular (at least annual) training in safeguarding and child protection, in line with advice from HSCP, as well as online training provided by Flick Learning. Training will include online safety and harmful sexual behaviours (including peer on peer sexual violence and harassment). Staff training also includes Prevent awareness training, which equips staff to raise concerns appropriately by ensuring all staff have the knowledge and confidence to identify children at risk of being drawn into terrorism; are able to challenge extremist ideas; and know how to refer children and young people for further help.
- Undertake regular informal updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. The School provides these through safeguarding bulletins which are emailed to all colleagues and displayed in staff workrooms.

New staff

As part of their on-boarding, all new staff, workers and volunteers receive a Policy Pack that includes electronic copies of:

- the safeguarding and child protection policy,
- Part one & Annex A of *KCSIE*
- the Staff Code of Professional Conduct

Their safeguarding induction training covers:

- key information from the Safeguarding and Child Protection policy;
- the role and identity of the DSL and DDSLs;
- details of how to access electronic copies of the behaviour policy;
- reference to the Three Schools' whistleblowing procedure and;
- the ICT acceptable use of technologies policy, staff/pupil relationships and communications including the use of social media;
- the safeguarding response to children who go missing from education;

- School leaders and staff who work directly with children will also be required to read *Part five of KCSIE*
- Details of where to find these documents in full (all available on the intranet and the Three Schools area on the Staff T: Drive)

Governors' responsibility

The Board of Governors has overall responsibility for all matters which are the subject of this policy and has specific responsibilities as described in Part 2 of KCSIE.

The Board of Governors has nominated one of its senior board level members, Clare Bradbury, to take leadership responsibility for the school's safeguarding arrangements. Contact details are set out in the contacts list at the start of this policy.

ARRANGEMENTS FOR DEALING WITH SAFEGUARDING CONCERNS OR ALLEGATIONS OF ABUSE ABOUT TEACHERS AND OTHER STAFF (INCLUDING THE HEAD, GOVERNORS, SUPPLY STAFF AND VOLUNTEERS)

The School's procedures for managing allegations against staff (including supply staff and volunteers) who are currently working in the School follows DfE statutory guidance and Hampshire Safeguarding Children's Partnership arrangements and applies when staff (including volunteers) have (or are alleged to have):

- Behaved in a way that has harmed a pupil, or may have harmed a pupil
- Possibly committed a criminal offence against or related to a pupil
- Behaved towards a pupil in a way that indicated that they may pose a risk of harm if they were to work regularly or closely with children or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Allegations against a teacher who is no longer teaching should be referred to the Police. Historical (non-recent) allegations of abuse should be referred to the Police and also the LADO.

If an allegation is made against anyone working with children in the School, the School should not undertake their own investigation of allegations without prior consultation with the Local Authority 'designated officer' or, in the most serious cases, the Police, so as not to jeopardise statutory investigations. In borderline cases, the School may discuss informally with the 'designated officer' on a no-names basis.

Concerns including allegations about a staff member should be investigated as a priority to avoid any delay.

1. Concerns including allegations which appear to meet the above reporting criteria are to be reported straight away to the 'case manager' who is the Head of the relevant school (see Key Contacts page at the start of this document). Where the Head is absent or is the subject of the allegation or concern, reports should be made to the Chair of Governors. Where the Head is the subject of the allegation or concern, the Head must not be informed of the allegation prior to contact with the the Chair of Governors and LADO. However, staff may consider discussing any concerns with the DSL and make any referral via them.
2. The case manager should immediately discuss the allegation with the LADO and consider the nature, content and context of the allegation and agree a course of action including any involvement of the Police. (Where the case manager deems there to be an immediate risk to children or there is evidence of a possible criminal offence, the case manager may involve the Police immediately.) All discussions should be recorded in writing, and any communication with both the individual and the parents of the child(ren) agreed. The LADO should be informed within one working day of all allegations that come to the School's attention and appear to meet the criteria or that are made directly to the Police and/or children's social care.

3. The case manager will ensure that the individual who is the subject of the allegation is informed as soon as possible and given an explanation of the likely course or action, unless there is an objection by children's social care or the Police. The case manager will appoint a named representative to keep the individual informed of the progress of the case and will consider what other support is appropriate for the individual.
4. The case manager should give careful consideration as to whether the circumstances of the case warrant suspension or whether alternative arrangements should be put in place until the allegation is resolved. The case manager will give due weight to the views of the designated officer, *WT* and *KCSIE* when making a decision about suspension. Where the individual is suspended, the case manager will ensure they know who their point of contact is in the School and shall provide them with their contact details.⁷¹
5. Where a member of boarding staff is suspended pending an investigation, the case manager will consider whether arrangements for alternative accommodation away from children should be made.
6. The case manager will ensure that parents are informed as soon as possible and kept informed about progress of the case, subject to any advice from children's social care or the Police.
7. The case manager will discuss with the LADO whether a referral to the Disclosure and Barring Service or Teaching Regulation Agency should be made where an allegation is substantiated and the person is dismissed or the School ceases to use their services, or the person resigns or otherwise ceases to provide their services. The School has a legal obligation to report promptly to the Disclosure and Barring Service any person (whether employed, contracted, a volunteer or a student) who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. Further, or in the alternative, if an investigation leads to the dismissal or resignation prior to dismissal of a member of teaching staff specifically, the School must consider making a referral to the Teaching Regulation Agency and a prohibition order may be appropriate (because that teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence).
8. On conclusion of the case, the case manager should review the circumstances of the case with the designated officer to determine whether there are any improvements to be made to the School's safeguarding procedures or practices to help prevent similar events in the future.

The School will make every reasonable effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered.

Allegations found to be malicious will be removed from the individual's personnel records. In all other circumstances a written record will be made of the decision and retained on the individual's personnel file in accordance with *KCSIE* and a copy will only be provided to the individual concerned. Schools have an obligation to preserve records which contain information about allegations of sexual abuse for the duration of the inquiry in accordance with the guidelines of the Independent Inquiry into Child Sexual Abuse ("IICSA"). All other records should be retained until the accused has reached pension age, or for a period of 10 years from the date of the allegation, whichever is longer.

Allegations proven to be false, unsubstantiated, unfounded or malicious will not be included in employer references. If an allegation is shown to be deliberately invented or malicious, the Head will consider whether any disciplinary action is appropriate against a pupil who made it; or whether the Police should be asked to

consider if action might be appropriate against the person responsible even if they are not a pupil.

In all cases where there are concerns or allegations of abuse, the School will make a serious incident report to the Charity Commission whenever the Commission's guidelines deem it appropriate to do so.

ARRANGEMENTS FOR DEALING WITH SAFEGUARDING CONCERNS OR ALLEGATIONS OF ABUSE ABOUT SUPPLY TEACHERS

The School's procedures for managing allegations against staff above also apply to staff not directly employed by the School, for example, supply teachers provided by an employment agency or business ('the agency'). The School will usually take the lead but agencies should be fully involved and co-operate in any enquiries from the LADO, police and/or children's social services.

In no circumstances will the School decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. The School will discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation.

The School will advise supply teachers being investigated to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting which is often arranged by the LADO should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the School during the investigation.

When using an agency, the School should inform the agency of its process for managing allegations. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

CODE OF PROFESSIONAL CONDUCT FOR STAFF

The Schools' code of professional conduct for staff can be found in the Staff Shared Area. The aim of the code of conduct is to provide clear guidance about behaviour and actions so as to not place pupils or staff at risk of harm or of allegation of harm to a pupil.

SAFER RECRUITMENT

The school operates recruitment under a separate Safer Recruitment Policy.

The School is committed to safer recruitment processes. Members of the teaching and non-teaching staff at the School including part-time staff, temporary and supply staff, and visiting staff, such as musicians and sports coaches are subject to the necessary statutory child protection checks before starting work, for example, right to work checks, additional overseas checks (if necessary), verifying identity, taking up references, checking work history and confirming medical fitness for the role. For most appointments, an enhanced DBS check with 'barred list' information will be appropriate. A DBS certificate will be obtained from the candidate before or as soon as practicable after appointment. Alternatively, if the applicant has subscribed to it and gives permission, the School may undertake an online update check through the DBS Update Service.

Full details of the School's safer recruitment procedures for checking the suitability of staff, Governors and volunteers to work with children and young people is set out in the Three Schools' Safer Recruitment Policy, which can be found in the Shared Area.

The School's protocols for ensuring that any visiting speakers, whether invited by staff or pupils themselves, are suitable and appropriately supervised is set out in the Three Schools' Visitor Policy and the Visiting Speaker Code of Conduct. Both of these documents can be found in the Shared Area.

OVERSIGHT OF SAFEGUARDING, INCLUDING ARRANGEMENTS FOR REVIEWING POLICIES AND PROCEDURES

The Management of Safeguarding

The Designated Safeguarding Lead's responsibility is to maintain an overview of safeguarding within the School, to open channels of communication with local statutory agencies, support staff in carrying out their safeguarding duties and to monitor the effectiveness of the School's policies and procedures in practice. The DSL works with the governors to review and update the School's safeguarding policy. Where a pupil leaves the School, including for in-year transfers, the DSL will also ensure their safeguarding and child protection file is transferred to the new school (separately from the main pupil file) as soon as possible. The DSL will ensure secure transit and obtain confirmation of receipt.

The DSL Team

The DSL for Bedales Schools is Jen Moore. The DSL has status equivalent to the Senior Management Team on all safeguarding matters, with the authority to take lead responsibility for all aspects of safeguarding and child protection (including online safety) throughout the school. Rick Cross is the Deputy DSL at Bedales and the person to whom reports should be made in the absence of the DSL.

Graeme Thompson is the Deputy DSL based at Dunhurst. Sharon Rose is the Deputy DSL at Dunannie, with responsibility for EYFS.

The DSL team's contact details can be found on the Key Contacts page at the start of this policy.

Training for the DSL team

The DSL and deputies receive updated child protection training at least annually to provide them with the knowledge and skills required to carry out the role, allowing for specialist areas such as EYFS. This includes local inter-agency working protocols, 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, training in HSCP's approach to Prevent duties and harmful sexual behaviours. Further details of the required training content for the DSL are set out in Annex B of *KCSIE*.

The DSL regularly reviews the School's and their own practices and concerns about welfare and safeguarding matters. This includes the personal and professional duty of all staff to report welfare and safeguarding concerns to the DSL, or in the absence of action, directly to local children's services.

During term time, the DSL and/ or DDSLs will always be available for staff in the School to discuss any safeguarding concerns. For out of term activities, staff should contact Hampshire Children's Services.

The DSL or Deputy DSL should liaise with the three safeguarding partners and work with other agencies in line with *Working Together to Safeguard Children*. "NSPCC - When to call the police" can assist the DSL or Deputy DSL understand when they should consider calling the police and what to expect when they do.

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

The DSL has the time, funding, resources and support to enable her to provide training, 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. The full responsibilities of the DSL are set out in Appendix 5.

The role of Governors

Whilst the Governors are ultimately responsible for ensuring staff are competent, supported and regularly reviewed in relation to safeguarding, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility should not be delegated.

Clare Bradbury is the board-level member designated to take a lead in relation to responsibility for the safeguarding arrangements in the School. She is a member of the governing body and her contact details can be found at the start of this document.

The School considers its obligation to review safeguarding practices a matter of its everyday concerns. A review of the School's child protection policies takes place at least annually, including an update and review of the effectiveness of procedures and their implementation. Termly updates are provided at board meetings, and an annual report is presented to the board in the Summer Term. The School draws on the expertise of staff, including the DSL(s), in shaping the School's safeguarding arrangements and policies.

Version control

To ensure the efficient discharge of its responsibilities under this policy, the Board of Governors has allocated the following tasks:

Task:	Allocated to:	When/frequency of review
Keeping the policy up to date and compliant with the law and best practice	Jen Moore, DSL	As required, and at least annually
Monitoring the implementation of the policy, relevant risk assessments and any action taken in response and evaluating effectiveness	Jen Moore, DSL	As required, and at least termly
Maintaining up to date records of all information created in relation to the policy and its implementation as required by the GDPR	Jen Moore, DSL	As required, and at least termly
Seeking input from interested groups to consider improvements to the School's processes under the policy	The Safeguarding Committee	As required, and at least annually
Formal annual review of the School's safeguarding policies and procedures and their implementation.	The Board of Governors	At least annually

OTHER SAFEGUARDING RESPONSIBILITIES

Teaching children how to keep safe

The governing body ensures that all pupils are taught about safeguarding, including online, through the curriculum and Wellbeing lessons, to help children to adjust their behaviours, both inside and outside of school, in order to reduce risks and build resilience, including to radicalisation. This includes teaching pupils about the safe use of electronic equipment and the internet and the risks posed by adults or young people, who use the internet and social media to bully, groom, abuse or radicalise other people, especially children, young people and vulnerable adults.

Online safety

Internet safety (including when children are online at home) is an integral part of the School's Wellbeing curriculum. Our ICT Acceptable Use Policies for pupils and those working at the school set out its expectations of behaviour in relation to use of the internet and ICT and the way in which the school seeks to protect pupils from the negative aspects of ICT and build resilience amongst pupils so that they can protect themselves and others.

The IT department monitors the internet use of all those using the school network. Any concerns around the use of ICT by staff or pupils are reported to the DSL. Concerns about pupils are reported by house staff to parents so that they can work in partnership with the pupil(s). Police are involved as appropriate. The School has appropriate filters and monitoring systems in place to safeguard children from potentially harmful and inappropriate material online. The School's Smoothwall firewall filters access to inappropriate material, including that relating to terrorism and other illegal activities such as pornography and violence. Such systems aim to reduce the risk of children being exposed to illegal, inappropriate and harmful materials online; reduce the risk of children being subjected to harmful online interaction with others; and help manage online behaviour that can increase a child's likelihood of, or causes, harm. Further detail of the School's approach to online safety can be found the ICT acceptable use policies for students and staff.

Relationships and Sex Education ("RSE")

Relationships Education OR RSE is compulsory from September 2020 and is taught as part of the Wellbeing curriculum. The School will have regard to the DfE's statutory guidance *Relationships Education, Relationships and Sex Education (RSE) and Health Education* when making arrangements for and teaching RSE.

Looked after children

The governing body ensures that staff have the skills, knowledge and understanding necessary to keep safe any children on roll who are looked after by a local authority.

Jen Moore is the designated member of staff who has responsibility for their welfare and progress. The School ensures that the designated member of staff receives appropriate training in order to carry out their role.

Arrangements for visiting speakers

The School has clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable. These can be found in the Visiting Speakers' Code of Conduct and the Visitor Policy. The School's responsibility to pupils is to ensure that they can critically assess the information they receive as to its value to themselves, and that the information is aligned to the ethos and values of the School and British values. The School will take measures to risk assess Visiting Speakers prior to their arrival at school. This will take into account any vetting requirements considered appropriate in the circumstances, and may include a DBS check if relevant. Before their visit, speakers are asked to read and understand the Visiting Speakers' Code of Conduct.

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

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

Arrangements for additional online tuition, appointments and meetings

The school cannot guarantee the safety of some online platforms used by external practitioners. Additionally, we cannot carry out recruitment checks on people who are not employees, and we cannot supervise sessions that are conducted in this way. Parents must ensure they are satisfied that their children are adequately safeguarded during online tuition, appointments and meetings. Parents can request access to Zoom and Skype for the purposes of such sessions using the 'Additional use of school facilities for private online tutoring and counselling' form on the Parent Portal.

Arrangements for trips and work experience

When the school organises trips that entail students staying in other schools or host families, it establishes that appropriate safeguards are in place and notifies parents of the arrangements; details are set out in the school's Educational Visits Policy.

Adults in Accommodation Linked to Boarding Houses

The School outlines its expectations of the conduct and behaviour of all adults living in accommodation linked to boarding houses in the Three Schools Adults Staying in Accommodation Linked to Boarding Houses Policy, which is updated annually and shared with all relevant households.

EARLY YEARS PROVISION SAFEGUARDING ARRANGEMENTS

Disqualification from working in childcare

Where staff work in, or are involved in the management of, the School's early years or provision of care of pupils under the age of eight, the School will take steps to check whether those staff are disqualified under the Childcare Act 2006. These checks will be undertaken pre-appointment, and from time to time during employment. This forms part of the School's safer recruitment practices, further details of which can be found in the School's Safer Recruitment Policy.

The School records all checks of staff employed to work in or manage relevant childcare on the Single Central Register. This includes the date disqualification checks were completed.

Where a member of staff is found to be disqualified or if there is doubt over that issue then, pending resolution, the School will remove them from the work from which they are or may be disqualified. Suspension or dismissal will not be an automatic response; the School will consider if there is scope in principle to redeploy them with other age groups or in other work from which they are not disqualified, subject to assessing the risks and taking advice from the designated officer when appropriate.

Use of mobile phones and cameras

The School's policy on the use of mobile phones and cameras in the setting can be found in the Three Schools ICT Acceptable Use Policy and the Three Schools' Taking, Using and Storing Images of Children Policy. Staff who act in breach of this may be subject to disciplinary action.

EYFS and Dunannie

- In Dunannie all staff mobile phones must be stored in a cupboard during teaching time. Staff only access their phones when children are not present.
- Phones may be taken on outings and visits for emergency contact but not for photographic use.
- Each class has its own camera that can be used by staff and children. Photos can only be downloaded onto the school system.

- Parental use of mobile phones, cameras and other technology must only be for personal use and must not be uploaded onto any social media.

Changing arrangements

At Dunannie children dress/ undress for P.E and after school activities in their classrooms or other areas such as the library. It is possible that parents and school visitors may be in school at these times and see children changing.

The children are well supervised at all times and care is taken to keep them from view as much as is reasonably possible without inhibiting the children in any way.

Intimate Care

The school's approach to intimate care for the EYFS is outlined in Appendix 7.

DSL for the EYFS

The practitioner designated to take lead responsibility for safeguarding children in the early years settings is Sharon Rose.

Duty to notify Ofsted

The School will inform Ofsted of any significant event which is likely to affect the suitability of any person who is in regular contact with children on the premises where childcare is provided.¹⁵⁴ For example, where the School is satisfied that a person working in a relevant setting falls within one of the disqualification criteria. Any significant event must be notified to Ofsted as soon as reasonably practicable, but at the latest within 14 days of the date the School became aware (or ought reasonably to have become aware) of it.

The School will notify Ofsted within 14 days of any allegations of serious harm or abuse by any person living, working or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere).]

APPENDIX

Appendix I Indicators of abuse

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

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

Types of abuse

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

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

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males; women can also commit acts of sexual abuse, as can other children. Sexual abuse also includes sexual violence and sexual harassment which can occur between two children of any sex. They can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence are sexual offences under the Sexual Offences Act 2003, such as rape, sexual assault and assault by penetration. Sexual harassment is 'unwanted conduct of a sexual nature' that can occur online and offline. Sexual harassment is likely to violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Sexual harassment can include sexual comments, 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 and displaying pictures, photos or drawings of a sexual nature; and online sexual harassment, which might include non-consensual sharing of sexual images and videos and sharing sexual images and videos (both often referred to as sexting); inappropriate sexual comments on social media; exploitation; coercion and threats. Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

Upskirting: is a criminal offence and typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission and/or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Anyone of any gender can be a victim.

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

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

Specific safeguarding issues: behaviours linked to drug taking, alcohol abuse, truanting and sexting put children in danger. Safeguarding issues can also manifest themselves via peer-on-peer abuse, such as abuse within intimate partner relationships, bullying (including cyberbullying), gender-based violence/sexual assaults, sexting and upskirting. Safeguarding issues can also be linked to, for example, children missing education; child sexual exploitation; domestic violence; fabricated or induced illness; faith abuse (including ostracism of families); female genital mutilation; forced marriage; gangs and youth violence; gender-based violence / violence against women and girls; hate; mental health; preventing radicalisation; relationship abuse; sexting; and trafficking.

Child sexual exploitation (CSE): CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. CSE 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. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media).

The above CCE indicators can also be indicators of CSE, as can:

- children who have older boyfriends or girlfriends, and
- children who suffer from sexually transmitted infections or become pregnant.

The DfE has published guidance on this entitled [Child sexual exploitation: definition and guide for practitioners](#).

Child criminal exploitation (CCE): CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines, see below), forced to shoplift or pickpocket, or to threaten other young people.

Some of the following can be indicators of CCE:

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

County lines: County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas within the UK,

using dedicated mobile phone lines or other form of “deal line”.

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move and store drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, 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.

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

Further information on the signs of a child’s involvement in county lines is available in guidance published by the Home Office.

Mental health: all staff should 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.

Where children have suffered abuse and neglect, or 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 this policy and speaking to the DSL or a deputy.

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 and senior 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.¹⁷⁴

So called ‘honour based’ abuse: encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing.

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 what form of safeguarding action to take.

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can also be found on pages 38-41 of the [Multi-agency statutory guidance on FGM](#). To give an example of indications that a girl has already been subjected to FGM:

- A pupil may have difficulty walking, sitting or standing and may even look uncomfortable.
- A pupil may have frequent urinary, menstrual or stomach problems or spend longer than normal in the bathroom due to difficulties urinating.

- There may be prolonged or repeated absences from School and/or noticeable behaviour changes (e.g. withdrawal or depression) on the pupil's return.
- A pupil is reluctant to undergo medical examination.

Forced marriage: Forcing a person into a 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 any other form of coercion is used to cause a person to enter into a marriage.¹⁸¹ Threats can be physical or emotional and 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 disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage. There are a range of potential indicators that a child may be at risk of forced marriage, details of which can be found on pages 13-14 of the [Multi-agency guidelines: Handling cases of forced marriage](#). School staff can also contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fm@fco.gov.uk.

Radicalisation: Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. It can also call for the death of members of the armed forces, whether in this country or overseas. 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.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home). As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately, which may include making a Prevent referral. Staff should contact the DSL or the Deputy DSL, who should be aware of the local procedures in place, before making a Prevent referral.

Special educational needs and/or disabilities: Pupils with SEND may not outwardly shown signs of abuse and/or may have difficulties in communication about abuse or neglect.

These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- the potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.

Staff will support such pupils in expressing any concerns they may have and will be particularly vigilant to any signs or indicators of abuse, discussing this with the DSL as appropriate.

Lesbian, gay, bi, trans or queer ("LGBTQ"): Children who are LGBTQ can be targeted by their peers. In some cases, a pupil who is perceived by their peers to be LGBTQ (whether they are or not) can be just as vulnerable as children who identify as LGBTQ.

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

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have serious, long lasting emotional and psychological impact on children. The School is mindful that children can

often blame themselves for the abuse or may have had to leave the family home as a result of the abuse. Domestic Abuse may lead to other safeguarding concerns, and is therefore managed under this policy.

Homelessness: Being homeless, or at risk of homelessness presents a real risk to a child's welfare. The School should be aware of potential indicators of homelessness including: household debt, rent arrears, domestic abuse and anti-social behaviour, as well as a family being asked to leave a property. If staff are made aware, or suspect that a pupil may be at risk of homelessness they should talk to the DSL in the first instance. Whilst referrals to the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not and should not replace a referral to Children's Services where a child has been harmed or is at risk of harm, in accordance with this policy.

Children who go missing from school: A child going missing from School is a potential indicator of abuse or neglect. Staff must follow the School's procedures for dealing with children who go missing, particularly on repeat occasions. The School's procedures for unauthorised absence and for dealing with children who go missing from education can be found in the Bedales Attendance, Student Supervision and Missing Child Policy, the Dunhurst Missing Child & School Attendance Policy and the Dunannie Missing Child Policy, which will be used when searching for, and if necessary, reporting, any pupil missing from education.

The School shall inform the local authority of any pupil who is going to be added to or deleted from the School's admission register at non-standard transition points in accordance with the requirements of the Education (Pupil Registration) (England) Regulations 2006 (as amended). This will assist the local authority to:

- a) fulfil its duty to identify children of compulsory school age who are missing from education; and
- b) follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect or radicalisation.

Where reasonably possible, the School will hold more than one emergency contact number for each pupil to provide the School with additional options to make contact with a responsible adult particularly when a child missing from education is also identified as a welfare and/or safeguarding concern. School attendance registers are carefully monitored by houseparents to identify any trends, and concerns are raised with the Deputy Head, Pastoral and the Designated Safeguarding Lead. The School will inform the local authority (and the local authority where the child is normally resident) of any pupil who fails to attend school regularly, or has been absent without the School's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the School and the local authority.

Action should be taken in accordance with this policy if any absence of a pupil from the School gives rise to a concern about their welfare.

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 available on the gov.uk website.

The guides explain each step of the process and support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is 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. The School may refer some parents and carers to this service where appropriate.

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

Appendix 2 Actions where there are concerns about a child – guidance for staff

A member of staff who is approached by a child should listen positively and try to reassure them. They cannot promise complete confidentiality and should explain that they may need to pass information to other professionals to help keep the child or other children safe. The degree of confidentiality should always be governed by the need to protect the child.

Additional consideration needs to be given to children with communication difficulties and for those whose preferred language is not English. It is important to communicate with them in a way that is appropriate to their age, understanding and preference.

All staff should know who the DSL team are and who to approach if the relevant member of the team is unavailable. Ultimately, all staff have the right to make a referral to the police or social care directly and should do this if, for whatever reason, there are difficulties following the agreed protocol, e.g. they are the only adult on the school premises at the time and have concerns about sending a child home.

Guiding principles, the seven R's

Receive

- Listen to what is being said, without displaying shock or disbelief
- Accept what is said and take it seriously
- Make a note of what has been said as soon as practicable

Reassure

- Reassure the pupil, but only so far as is honest and reliable
- Don't make promises you may not be able to keep e.g. 'I'll stay with you' or 'everything will be alright now' or 'I'll keep this confidential'
- Do reassure e.g. you could say: 'I believe you', 'I am glad you came to me', 'I am sorry this has happened', 'We are going to do something together to get help'

Respond

- Respond to the pupil only as far as is necessary for you to establish whether or not you need to refer this matter, but do not interrogate for full details
- Do not ask 'leading' questions i.e. 'did he touch your private parts?' or 'did she hurt you?' Such questions may invalidate your evidence (and the child's) in any later prosecution in court
- Do not criticise the alleged perpetrator; the pupil may care about him/her, and reconciliation may be possible
- Do not ask the pupil to repeat it all for another member of staff. Explain what you have to do next and whom you have to talk to. Reassure the pupil that it will be a senior member of staff

Report

- Share concerns with the designated safeguarding lead as soon as possible
- If you are not able to contact your designated safeguarding lead, and the child is at risk of immediate harm, contact the children's services department directly
- If you are dissatisfied with the level of response you receive following your concerns, you should press for re-consideration

Record

- If possible make some very brief notes at the time, and write them up as soon as possible
- Keep your original notes on file
- Record the date, time, place, persons present and noticeable nonverbal behaviour, and the words used by the child. If the child uses sexual 'pet' words, record the actual words used, rather than translating them into 'proper' words
- Complete a body map to indicate the position of any noticeable bruising
- Record facts and observable things, rather than your 'interpretations' or 'assumptions'

Remember

- Support the child: listen, reassure, and be available
- Complete confidentiality is essential. Share your knowledge only with appropriate professional colleagues
- Try to get some support for yourself if you need it

Review (led by DSL/DDSL)

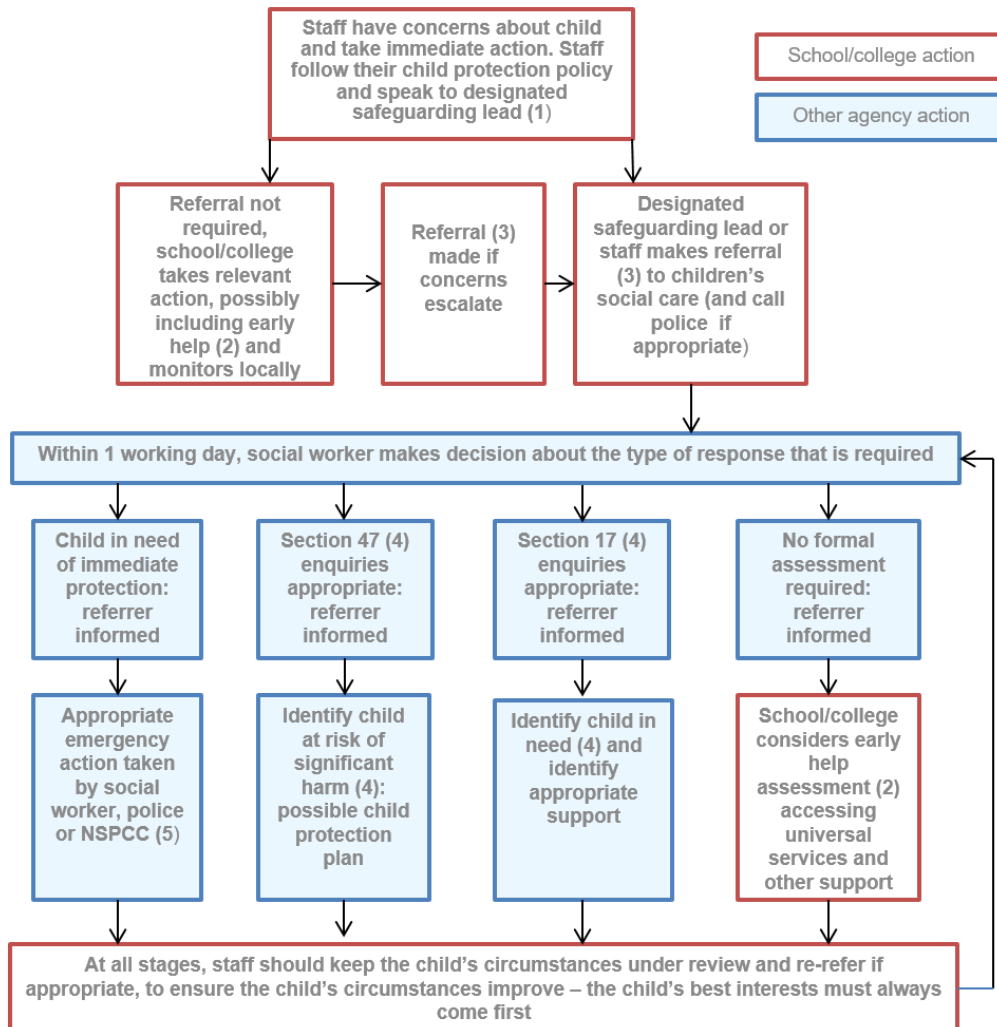
- Has the action taken provided good outcomes for the child?
- Did the procedure work?
- Were any deficiencies or weaknesses identified in the procedure? Have these been remedied?
- Is further training required?

What happens next?

Staff should provide details of any safeguarding concerns relating to specific students using CPOMS immediately, or before leaving work that day if it is not urgent. Colleagues can inform the safeguarding team of general concerns using the email address safeguarding@bedales.org.uk.

State the concern (eg physical, sexual, emotional abuse or harm, neglect or other concern). Describe the concern/incident as factually as possible. If you received information from another person, including a child, use their words as much as possible. Include who was involved, where it happened, exactly what happened etc. Remember to describe clearly any behavioural or physical signs you have observed.

Actions where there are concerns about a child



(1) In cases which also involve an allegation of abuse against a staff member, see Part Four of this guidance.

(2) 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 local authority's referral process. 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. This can include section 17 assessments of children in need and section 47 assessments of children at risk of significant harm. Full details are in Chapter One of [Working together to safeguard children](#).

(5) This could include applying for an Emergency Protection Order (EPO).

Appendix 3 Managing allegations against other pupils

At Bedales Schools we believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm by adults in the school and other pupils.

We recognise that some pupils will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the school's behaviour policy.

This policy follows the DfE guidance KCSIE (2020) which says that 'governing bodies should ensure that there are procedures in place to handle allegations against other children'. The guidance also states the

importance of minimising the risks of peer-on- peer abuse.

Peer-on-peer abuse may include:

- bullying (including cyberbullying);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence and sexual harassment;
- upskirting;
- sexting (also known as youth produced sexual imagery); and
- initiation/hazing type violence and rituals.

In most instances, the conduct of pupils towards each other will be covered by the school's behaviour policy. Some allegations may be of such a serious nature that they may raise safeguarding concerns. These allegations are most likely to include possible or actual physical abuse, emotional abuse, sexual abuse and sexual exploitation. It is also likely that incidents dealt with under this policy will involve older pupils and their behaviour towards younger pupils or those who are vulnerable.

A safeguarding concern may be raised if the allegation:-

- Is made against an older pupil and refers to their behaviour towards a younger pupil or a more vulnerable pupil
- Is of a serious nature, possibly including a criminal offence
- Raises risk factors for other pupils in the school
- Indicates that other pupils may have been affected by this pupil
- Indicates that young people outside the school may be affected by this pupil

At the senior school, older boarding students are trained and supervised in their role as 'dorm mentors' and there are clear expectations of the role. In addition, students aged 18 or over do not share dorms with students aged under 16.

The safeguarding implications of sexual activity between young people

The intervention of child protection agencies in situations involving sexual activity between children can require difficult professional judgments. Some situations are statutorily clear – for example, a child under the age of 13 cannot consent to sexual activity (the age of consent is 16); sexual intercourse without consent is rape (as defined in law); creating or sharing sexual images or videos of under 18s is illegal, including children making or sharing these themselves. Upskirting is a criminal offence and must be reported to the police.

But it will not necessarily be appropriate to initiate safeguarding procedures where sexual activity involving children and young people below the age of legal consent (16 years) comes to notice.

Decisions about whether or not to refer a matter to children's services will be made on a case by case basis, and always following an assessment of the extent to which a child is suffering, or is likely to suffer, significant harm. As part of decision-making, the following key specific considerations will be included:

- The age, maturity and understanding of the children;
- Any disability or special needs of the children;
- Their social and family circumstance;
- Any evidence in the behaviour or presentation of the children that might suggest they have been harmed;
- Any evidence of pressure to engage in sexual activity;
- Any indication of sexual exploitation;

- There are also contextual factors. Gender, sexuality, race and levels of sexual knowledge can all be used to exert power. A sexual predator may sometimes be a woman or girl and the victim a boy

Staff will refer to the Three Schools Peer-on-peer sexual behaviour: guidance, risk-assessment and procedures document in the first instance, which makes use of the Brook Traffic Light tool and the Hackett Continuum of sexual behaviours.

Examples of safeguarding issues against a pupil could include:

Physical Abuse

- Violence, particularly pre-planned
- Forcing others to use drugs or alcohol

Emotional Abuse

- Blackmail or extortion
- Threats and intimidation

Sexual Abuse

- Indecent exposure, indecent touching or serious sexual assaults
- Forcing others to watch pornography or take part in sexting

Sexual Exploitation

- Encouraging other children to engage in inappropriate sexual behaviour (for example - having an older boyfriend/girlfriend, associating with unknown adults or other sexually exploited children, staying out overnight)
- Photographing or videoing other children performing indecent acts

Procedure:-

When an allegation is made by a pupil against another pupil, members of staff should consider whether the complaint raises a safeguarding concern. If one child is more than one year older than another or there is or may be a safeguarding concern the designated safeguarding lead (DSL) should be informed.

A factual record should be made of the allegation and any related communications and meetings, but no attempt at this stage should be made to investigate the circumstances

The DSL should contact the children's reception team (CRT) to discuss the case

The DSL will follow through the outcomes of the discussion and make a referral where appropriate. A referral will be immediate, or the police will be contacted, if a child is felt to be in immediate danger or is at risk of harm.

If the allegation indicates that a potential criminal offence has taken place, CRT will refer the case to the multi-agency agency safeguarding hub where the police will become involved

Parents, of both the pupil being complained about and the alleged victim, should be informed and kept updated on the progress of the referral

The DSL will make sure a record of the concern, the discussion and any outcome is stored in all relevant pupils' files

It may be appropriate to exclude the pupil being complained about for a period of time according to the school's behaviour policy and procedures

Where neither social services nor the police accept the complaint, a thorough school investigation should take place into the matter using the school's usual disciplinary procedures

In situations where the school considers a safeguarding risk is present, a risk assessment should be prepared along with a preventative, supervision plan. Such a plan may include changes to sleeping

arrangements, contact with certain individuals being prevented or supervised, counselling arrangements and improvements for children to be listened to.

The plan should be monitored and a date set for a follow-up evaluation with everyone concerned

Appendix 4 Dealing with allegations against staff

HM Government statutory guidance Working Together to Safeguard Children (2018) Chapter 2, Organisational Responsibilities, explains how to manage allegations against people who work with children. This covers paid and unpaid employees, contractors, volunteers and those in positions of leadership and management. This will include any person who manages access to an establishment where children are present.

It is important to know what is meant by the term 'allegation'.

An allegation is where someone who works or volunteers with children under 18 years of age has: -

- behaved in a way that has harmed a child, or may have harmed a child or
- committed a criminal offence against or related to a child or
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children (These behaviours can refer to things that happen both inside and outside of the workplace).
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Following an allegation, a LADO referral must always be made within one working day. This still needs to happen even if there is evidence that the incident did not occur. Allegations about past events must be referred in the same way as things that have happened in the present day.

Where an issue does not meet the definition of an allegation a LADO referral is not needed. However, it will still need to be taken seriously and addressed as a complaint or a practice concern.

For example, where a parent comments that their child is always being treated unfairly by a member of staff or volunteer but there is no direct allegation of harm or of a criminal offence being committed against the child, they may be reminded of their right to make a complaint. The complaints procedure may be a useful way of dealing with this. Likewise if a member of staff or volunteer is reported by colleagues to be breaching policy in their day to day work, but again, there is no direct allegation or harm or of a criminal offence being committed against a child, this would still need to be addressed as a practice concern so that it does not keep happening.

The school's safeguarding allegations procedure states what a concern, complaint and an allegation is. The Head of School is responsible for dealing with allegations or suspicions of abuse about someone who works with children. This person should be trained in managing allegations and should know who to contact if any concerns are raised.

Staff and volunteers receive training and cards that indicate who the responsible person is and how to contact them.

Concerns regarding non-recent child protection issues at Bedales

Allegations of non-recent abuse and allegations against former members of staff or children should be referred to the police immediately.

If a member of staff is notified of an allegation of non-recent abuse, they are required to notify the police immediately.

Appendix 5 Responsibilities of the Designated Safeguarding Lead (DSL)

(please read in conjunction with DSL role description in KCSIE (2020) and the school's safeguarding training plan)

As well as adhering to the responsibilities of all staff listed above, the DSL's role includes:

- Being the person most likely to have the full safeguarding picture and, therefore, the most appropriate person to advise on the response to safeguarding concerns
- Take lead responsibility for safeguarding and child protection, including online safety
- Assist the Governing Body in fulfilling their responsibilities under section 175 or 157 of the Education Act 2002
- Attend initial training for the role and refresh this at least every year. By attending the initial refresher training and then demonstrating evidence of continuing professional development thereafter
- Ensure every member of staff knows who the DSL is, is aware of the DSL role and has their contact details
- Ensure all staff and volunteers understand their responsibilities in being alert to the signs of abuse and responsibility for referring any concerns to the DSL
- Ensure that whole school training occurs annually so that staff and volunteers can fulfil their responsibilities
- Ensure any members of staff joining the school outside of this training schedule receive induction post appointment
- Keep written records of child protection concerns securely and separately from the main pupil file and use these records to assess the likelihood of risk
- Ensure that copies of safeguarding records are transferred securely and with confirmation of receipt (separate from pupil files) when a child transfers school
- Ensure that where a pupil transfers school and is on a child protection plan or is a child looked after, the information is passed to the new school immediately and securely, with confirmation of receipt, and that the child's social worker is informed. The DSL should consider sharing information in advance of transferring the child protection file if that may be in the child's interests, including with the SENCO.
- Link with the HSCP to make sure staff are aware of training opportunities and the latest local policies on safeguarding
- Contact the LADO on any matter that the DSL considers cannot be dealt with properly internally
- Develop, implement and review procedures in our school that enable the identification and reporting of all cases, or suspected cases, of abuse

The Safeguarding Committee

The Safeguarding Committee meets twice a year. Its purpose is to ensure that those in key positions of responsibility prioritise safeguarding by:

- reviewing and updating practices and policies
- run through scenarios and test cases
- planning for improvements
- sharing national changes that impact on safeguarding
- being well-informed and have a good understanding of safeguarding and therefore able to ensure those they line manage are too
- being directly accountable to Governors for their practices in relation to safeguarding

Its members are: Bursar (data protection), DDSLs (Bedales, Dunhurst, Dunannie), Head of Boarding, Head of IT – (IT practices such as AUP, filtering, monitoring), Health Centre nurse (information-sharing, referrals and use of health centre by outside practitioners), H+S (particularly in boarding houses and site security), HR (recruitment), DSL (chair), Safeguarding lead governor; Head of Wellbeing .

Appendix 6: Briefing sheet for temporary and supply staff

For supply staff and those on short contracts in Bedales Schools

While working at Bedales Schools, you have a duty of care towards the pupils here. This means that at all times you should act in a way that is consistent with their safety and welfare.

In addition, if at any time you have a concern about a child or young person, particularly if you think they may be at risk of abuse or neglect, it is your responsibility to share that concern with the school designated safeguarding lead (DSL) or Deputy DSLs (contact details are on page 67).

This is not an exhaustive list but you may have become concerned as a result of:

- observing a physical injury, which you think may have been non-accidental
- observing something in the appearance of a child or young person which suggests they are not being sufficiently well cared for
- observing behavior that leads you to be concerned about a child or young person
- a child or young person telling you that they have been subjected to some form of abuse

In any of the circumstances listed here, you must write down what you saw or heard, date and sign your account, and give it to the DSL. This may be the beginning of a legal process – it is important to understand that legal action against a perpetrator can be seriously damaged by any suggestion that the child has been led in any way.

If a child talks to you about abuse, you should follow these guidelines:

- Rather than directly questioning the child, just listen and be supportive
- Never stop a child who is freely recalling significant events, but don't push the child to tell you more than they wish
- Make it clear that you may need to pass on information to staff in other agencies who may be able to help – do not promise confidentiality. You are obliged to share any information relating to abuse or neglect
- Write an account of the conversation immediately, as close to verbatim as possible. Put the date and timings on it, and mention anyone else who was present. Then sign it, and give your record to the designated person/child protection officer, who should contact children's social care if appropriate

The school has a policy on safeguarding children and young people which you can find, together with the local procedures to be followed by all staff, on our website.

Remember, if you have a concern, discuss it with the DSL.

Appendix 7 – intimate care

Guidelines for good practice adapted from the Chailey Heritage centre

1. Treat every child with dignity and respect and ensure privacy appropriate to the child's age and the situation.

2. Where possible, the member of staff carrying out intimate care should be someone chosen by the child or young person. For older children it is preferable if the member of staff is the same gender as the young person. However, this is not always possible in practice.
3. Using a single named member of staff for intimate care or operating on a pre-arranged rota system can minimise risks of abuse.
4. Involve the child as far as possible in his or her own intimate care. Try to avoid doing things for a child that s/he can do alone, and if a child is able to help ensure that s/he is given the chance to do so. Support children in doing all that they can themselves. If a child is fully dependent on you, talk with her or him about what you are doing and give choices where possible.
5. Be responsive to a child's reactions. It is appropriate to "check" your practice by asking the child - particularly a child you have not previously cared for - "Is it OK to do it this way?"; "Can you wash there?"; "How does mummy do that?". If a child expresses dislike of a certain person carrying out her or his intimate care, try and find out why. Conversely, if a child has a "grudge" against you or dislikes you for some reason, ensure your line manager is aware of this.
6. Make sure practice in intimate care is as consistent as possible. Line managers have a responsibility for ensuring their staff have a consistent approach. This does not mean that everyone has to do things in an identical fashion, but it is important that approaches to intimate care are not markedly different between individuals.
7. Never do something unless you know how to do it. If you are not sure how to do something, ask. If you need to be shown more than once, ask again.
8. Concerns about a colleague's intimate care practice must be addressed promptly, either with the line manager or the DSL team, as appropriate.
9. Share concerns about your own practices immediately if:
 - you are concerned that during the intimate care of a child:
 - You accidentally hurt the child;
 - The child seems sore or unusually tender in the genital area;
 - The child appears to be sexually aroused by your actions;
 - The child misunderstands or misinterprets something;
 - The child has a very emotional reaction without apparent cause (sudden crying or shouting).
10. Encourage the child to have a positive image of her or his own body.

Intimate care is to some extent individually defined, and varies according to personal experience, cultural expectations and gender.

We recognise that children who experience intimate care may be more vulnerable to abuse:-

- Children with additional needs are sometimes taught to do as they are told to a greater degree than other children. This can continue into later years. Children who are dependent or over-protected may have fewer opportunities to take decisions for themselves and may have limited choices. The child may come to believe they are passive and powerless
- Increased numbers of adult carers may increase the vulnerability of the child, either by increasing the possibility of a carer harming them, or by adding to their sense of lack of attachment to a trusted adult
- Physical dependency in basic core needs, for example toileting, bathing, dressing, may increase the accessibility and opportunity for some carers to exploit being alone with and justify touching the child inappropriately
- Repeated "invasion" of body space for physical or medical care may result in the child feeling ownership of their bodies has been taken from them