CHILD PROTECTION AND SAFEGUARDING

This is a core policy that forms part of the induction for all staff. It is a requirement that all members of staff and volunteers have access to this policy and sign to say they have read <u>and</u> understood its contents.

This policy will be reviewed <u>at least</u> annually and/or following any updates to national and local guidance and procedures.

CONTENTS

KEY SCHOOL CONTACTS

Named Staff	Position	Telephone	Email
Kate Simlett	Designated Safeguarding Lead (Deputy Head, Pastoral) Lead for Looked after children Lead for Prevent	01295 756244 07494 058687	ksimlett@tudorhallschool.com
Julie Lodrick	Head Deputy Designated Safeguarding Lead	01295 756200	Head@tudorhallschool.com
Kate Hart	Deputy Designated Safeguarding Lead (Assistant Head Pastoral) Appropriate Adult	01295 263434	khart@tudorhallschool.com
Gilly Cable	Deputy Designated Safeguarding Lead (Senior Housemistress)	01295 263434	GCable@tudorhallschool.com
Jennifer Scarfe	Nominated Safeguarding Governor		safeguardingGovernor@tudorhallschool.com
Alison Darling	Chair of Governors		chairofGovernors@tudorhallschool.com

OUT OF HOURS ON CALL

Monday	Kate Hart
Tuesday	Gilly Cable
Wednesday	Gilly Cable
Thursday	Gilly Cable
Friday	Kate Hart
Saturday	Kate Simlett
Sunday	Kate Simlett

KEY EXTERNAL CONTACTS

To report a new concern	MASH - Multi-Agency Safeguarding Hub	0345 050 7666	mash-childrens@oxfordshire.gov.uk
	Out of hours Emergency Duty Team (EDT)	0800 833408	
To talk about an on-going concern	The Children's Social Care Team, North Oxfordshire	01865 323039	
	Emergency Duty Team	0800 833408	
For general advice	Locality and Community Support Service (LCSS North)	0345 2412703	LCSS.North@oxfordshire.gov.uk
	LCSS Central Contact	0345 2412705	
To report concerns about child sexual exploitation	The Kingfisher Team	01865 309196	
To report concerns about a professional or person in a position of trust	Local Authority Designated Officer (LADO) Education Safeguarding Advisory Team (ESAT) Jo Lloyd Sandra Barratt Amie Pilcher Becky Langstone Sophie Kendall	01865 810603	Lado.safeguardingchildren@oxfordshire.gov.uk ESAT.safeguardingchildren@oxfordshire.gov.uk
To report a concern	Safeguarding Vulnerable people from extremism (OSCB)	0345 050 7666	Ask for Oxfordshire Multi-Agency Safeguarding Hub (MASH)
If you fear someone is vulnerable to radicalisation	Oxfordshire MASH (for a child) or the Social and Health Care Team (for an adult)	0345 050 7666	
For non-emergency situations	DfE helpline	020 7340 7264	counter.extremism@education.gov.uk
Police	Non-Emergency Line	101	
	Emergency	999	

WHAT TO DO IF YOU HAVE A WELFARE CONCERN AT TUDOR HALL

Why are you concerned?

- Something a child has said – e.g. allegation of harm
- Child's appearance – may include unexplained marks as well as dress
- Behaviour change
- Witnessed concerning behaviour

Act immediately and record your concerns. If urgent, speak to a DSL first.
Follow the school procedure

- Reassure the child
- Clarify concerns, using open questions if necessary (**TED**: **T**ell, **E**xplain, **D**escribe)
- Use child's own words, record facts not opinions.
- Sign and date your records
- Seek support for yourself if required from DSL

Inform the Designated Safeguarding Lead (Kate Simlett, Deputy Head (Pastoral))

Designated Safeguarding Lead

- Consider whether the child is at immediate risk of harm e.g. unsafe to go home
- If immediate risk of harm: refer to MASH
- Access Oxfordshire's Threshold of Needs
- Refer to other agencies as appropriate e.g.
- Internal or community services, early help open access, LADO, Police or Request for Support for integrated children's services
- If unsure then consult the LCSS North 0345 241 2703

If you are unhappy with the response

Staff:
- Follow local escalation procedures
- Follow whistleblowing procedures

Learners and Parents:
Follow school complaints procedures available from the school website and the school office

Record decision making and action taken on CPOMS

Monitor
Be clear about:
- What you are monitoring e.g. behaviour trends, appearance etc.
- How long you will monitor
- Where, how and to whom you will feedback and how you will record

Review and request further support if necessary
- At all stages, the child's circumstances will be kept under review.
- The DSL / Staff will request further support if required to ensure the child's safety is paramount.

1. CHILD FOCUSED APPROACH TO SAFEGUARDING

1.1 Introduction

1.1.1 Tudor Hall recognises our statutory responsibility to safeguard and promote the welfare of all children. Safeguarding is everybody's responsibility and all those directly connected (staff, volunteers, supply teachers, Governors, leaders, parents, families, and learners) are an important part of the wider safeguarding system for children and have an essential role to play in making this community safe and secure. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

1.1.2 All practitioners should make sure their approach is child centred and should consider, at all times, what is in the best interest of the child.

1.1.3 Tudor Hall believes that the best interests of children always come first. All children (defined as those up to the age of 18) have a right to be heard and to have their wishes and feelings taken into account, as long as these wishes do not compromise their or anyone else's safety and wellbeing. All children regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection.

1.1.4 Staff working with children at Tudor Hall will maintain an attitude of 'it could happen here' where safeguarding is concerned. All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or they may not recognize their experiences as harmful. They may feel embarrassed, humiliated or being threatened. This could be due to their vulnerability, disability and /or sexual orientation or language barrier. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is important staff determine how to best to build trusted relationships with children and young people which facilitate communication.

1.1.5 When concerned about the welfare of a child, staff will always act in the best interests of the child and if any member of our community has a safeguarding concern about any child or adult, they should act and act immediately. Our pupils' welfare is our paramount concern. The governing body will ensure that our school will safeguard and promote the welfare of pupils and work together with agencies to ensure that our school has adequate arrangements to identify, assess and support those children suffering or where significant harm is suggested ([What to do if you think a child is at risk of abuse or neglect - Oxfordshire](#)).

1.1.6 Tudor Hall recognises the importance of providing an ethos and environment within school that will help children to be safe and to feel safe. In our school children are respected and are encouraged to talk openly. We will ensure children's wishes and feelings are considered when determining what safeguarding action to take and what services to provide.

1.1.7 Our school acknowledges the need to treat everyone equally, with fairness, dignity and respect. Any discriminatory behaviours are challenged, and children are supported to understand how to treat others with respect. We also have statutory duty to report and record any of the above incidents.

1.2   Our core safeguarding principles are:

    1.2.1   **Prevention**
- Positive, supportive, safe culture, curriculum and pastoral opportunities for children, safer recruitment procedures.

    1.2.2   **Protection**
- Following the agreed procedures, ensuring all staff are trained and supported to recognise and respond appropriately and sensitively to safeguarding concerns.

    1.2.3   **Support**
- For all learners, parents and staff, and where appropriate specific interventions are required for those who may be at risk of harm.

    1.2.4   **Working with parents and other agencies**
- To ensure timely, appropriate communications and actions are undertaken when safeguarding concerns arise.

1.3   The procedures contained in this policy apply to all staff, including Governors, temporary or third-party agency staff and volunteers) and are consistent with those outlined within Keeping Children Safe in Education (KCSIE) 2024 and read in conjunction with the Oxfordshire Safeguarding Children's Board Safeguarding Policies and Procedures

1.4   **Policy Context**

    1.4.1   This policy is implemented in accordance with our compliance with the statutory guidance from the Department for Education, *'Keeping Children Safe in Education'* 2024 (KCSIE) which requires individual schools and colleges to have an effective child protection policy.

    1.4.2   This policy has been developed in accordance with the principles established by the *'Children Act'* 1989 and 2004 and related guidance. This includes but is not limited to:

- *'Keeping Children Safe in Education' (KCISE) 2024*
- *'Working Together to Safeguard Children': A guide to multi-agency working to help, protect and promote welfare of children: statutory guidance December 2023*
- *'Education Inspection Framework'* 2023, Ofsted
- *'Prevent Duty Guidance'*, revised 2021, Home Office, updated March 2024
- *'Framework for the Assessment of Children in Need and their Families'* 2001 Department of Health
- *'Oxfordshire Safeguarding Children Board Procedures Manual'*
- *'Early Years and Foundation Stage Framework'* (EYFS) 2023 Department for Education (DfE)
- Section 175 *'The Education Act'* 2002
- *'Education and Inspections Act'* 2006
- *'The Education (Independent School Standards) Regulations'* 2014
- *'The Non-Maintained Special Schools (England) Regulations'* 2015
- *'Relationships Education, Relationships and Sex Education (RSE) and Health Education'* 2021, DfE
- *'Children Act'* 1989
- *'Use of social media for online radicalisation'* July 2015 DfE and Home Office
- *'Information sharing advice for practitioners providing safeguarding services to young children, young people, parents, and carers'* July 2018 updated May 2024 DfE

- *'Domestic Abuse Act'* 2021
- *'Teaching online safety in schools'* 2023 DfE
- *'Children Missing in Education'* 2016 DfE
- *'Guidance for safer working practice for those working with children and young people in education settings'* February 2022 Safer Recruitment Consortium
- *'What to do if you are worried a child is being abused; Advice for practitioners'* 2015 HM Government
- *'When to call the police; Guidance for schools & colleges'* National Police Chiefs' Council (NPPC)
- *'Safeguarding Vulnerable Groups Act'* 2006
- *'Sharing nudes and semi-nudes; advice for education settings working with children and young people'* Updated March 2024 Department for Science, Innovation & Technology
- *'Preventing youth violence and gang involvement'* August 2013 Home Office
- *'Criminal exploitation of children and vulnerable adults; county lines'* Updated 2023, Home Office
- *'Child sexual exploitation: definition and guide for practitioners'* 2017, DfE
- *'Police and Criminal Evidence Act 1984 (PACE) Code C Code of practice for the detention, treatment and questioning of persons by police officers'* updated 2023, Home Office

1.4.3   Section 175 of the Education Act 2002 requires school governing bodies, local education authorities and further education institutions to make arrangements to safeguard and promote the welfare of all children who are pupils at a school, or who are students under 18 years of age. Such arrangements will have to have regard to any guidance issued by the Secretary of State.

1.4.4   As a result of the Covid-19 pandemic some members of our community may have been exposed to a range of adversity and trauma including bereavement, anxiety and in some cases increased welfare and safeguarding risks. We will work with local services, such as health and the local authority, to ensure necessary support is in place.

1.5   Definition of Safeguarding

1.5.1   In line with KCSIE 2024, safeguarding and promoting the welfare of children is defined for the purposes of this policy 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.
- Providing help and support to meet the needs of children as soon as problems emerge; and
- Protecting children from maltreatment, inside or outside the home, including online.

1.5.2   The school acknowledges that safeguarding includes a wide range of specific issues including (but not limited to):

- Abuse and neglect
- Bullying, including cyberbullying
- Children with family members in prison
- Children Missing Education (CME)

- Child missing from home or care
- Child Sexual Exploitation (CSE)
- Child Criminal Exploitation (CCE)
- Contextual safeguarding (risks outside the family home)
- County lines and gangs
- Domestic abuse
- Drugs and alcohol misuse
- Fabricated or induced illness
- Faith abuse
- Gender based abuse and violence against women and girls
- Hate
- Homelessness
- Human trafficking and modern slavery
- Mental health
- Nude or semi-nude image sharing, aka youth produced/involved sexual imagery or 'Sexting'
- Online safety
- Child-on-child abuse
- Preventing radicalisation and extremism
- Private fostering
- Relationship abuse
- Serious violence
- Sexual violence and sexual harassment
- So-called 'honour-based' abuse, including Female Genital Mutilation (FGM) and forced marriage
- Upskirting

1.5.3 Staff should share any concerns they have about a child with the Designated Safeguarding Lead. However, it should be remembered that sometimes children will not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful.

1.5.4 (Also see Part One and Annex B within *'Keeping Children Safe in Education'* 2024)

1.6 **Related Safeguarding Policies**

1.6.1 This policy is one of a series in the school integrated safeguarding portfolio and should be read and actioned in conjunction with the policies as listed below:

- Behaviour and Discipline Policy;
- Safe Use of Technology Policy;
- Anti-Bullying Policy;
- Data protection and Information sharing Policy;
- Relationship and Sex Education (RSE)Policy;
- Health and Safety Policy;
- Risk assessments (e.g. school trips);
- Staff Code of Conduct, including Acceptable Use Agreement (AUA);
- Recruitment Policy;
- Whistleblowing Policy; and
- Positive Mental Health and Wellbeing Policy.

1.7

1.8 **Policy Compliance, Monitoring and Review**

1.8.1   Tudor Hall will review this policy at least annually (as a minimum) and will update it as needed, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt. The policy will also be revised following any national or local updates, significant local or national safeguarding events and/or learning, and/or any changes to our own procedures.

1.8.2   All staff (including temporary staff and volunteers) will have access to this policy and Part One and/or Annex B of KCSIE 2024 as appropriate. This is readily available on the website and from HR. It is a requirement for all staff to understand and confirm they have read the policy. This must be completed at the start of the academic year or when a staff member joins the school.

1.8.3   Parents/carers can obtain a copy of the school *'Child Protection Policy'* and other related policies on request. Additionally, the policy can be viewed on the [school website](#).

1.8.4   The policy forms part of our school development plan and will be reviewed annually by the governing body who has responsibility for oversight of safeguarding and child protection systems.

1.8.5   The Designated Safeguarding Lead and Head will ensure regular reporting on safeguarding activity and systems to the governing body. The governing body will not receive details of individual learner situations or identifying features of families as part of their oversight responsibility.

2. KEY RESPONSIBILITIES

2.1   Where there is a safeguarding concern, the governing body and school leaders will ensure that the child's wishes and feelings are considered when determining what action to take and what services to provide.

2.2   **Governance and Leadership**

2.2.1   The governing body and Senior Leadership Team (SLT) have a strategic responsibility for our safeguarding arrangements and will comply with their duties under legislation.

2.2.2   The governing body will have regard to the KCSIE 2024 guidance and will ensure our policies, procedures and training is effective and complies with the law at all times.

2.2.3   The school has a nominated Governor for Safeguarding. The nominated Governor will support the DSL and have oversight in ensuring that the school has an effective policy which interlinks with other related policies, that locally agreed procedures are in place and being followed, and that the policies are reviewed at least annually and when required.

2.2.4   The governing body and SLT will ensure that the DSL is supported in the role and is provided with sufficient time to provide appropriate support to staff and children regarding any safeguarding and welfare concerns.

2.2.5   The school and governing body takes all reasonable action to limit children's exposure to the risks from the school's IT system and ensures the school has appropriate filters and monitoring systems in place and regularly review their effectiveness in line with national expectations.

2.2.6   The Head will work with the DSL to ensure that our child protection and safeguarding policies and procedures adopted by the governing body (particularly those concerning referrals of cases of suspected abuse and neglect) are understood and followed by all staff.

2.2.7   The governing body will ensure that all Governors receive appropriate safeguarding and child protection (including online) training at induction. The training will equip them with knowledge to provide strategic challenges to test and assure themselves that the safeguarding policies and procedures in place are effective and support the delivery of a robust whole school approach to safeguarding. Training will be updated regularly.

2.2.8   The governing body are aware of their obligations under the 'Human Rights Act' 1998, the 'Equality Act' 2010 (including the 'Public Sector Equality Duty'), and their local multi-agency safeguarding arrangements.

2.3   Designated Safeguarding Lead (DSL)

2.3.1   The school has appointed Kate Simlett (Deputy Head Pastoral and Head of Boarding), a member of the Senior Leadership Team, as the Designated Safeguarding Lead (DSL).

2.3.2   The DSL has overall responsibility for the day-to-day oversight of safeguarding and child protection systems (including online safety) in school. Whilst the activities of the DSL may be delegated to the deputies, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility will not be delegated.

2.3.3   The school has also appointed Deputy DSLs who will have delegated responsibilities and act in the DSL's absence.

- Julie Lodrick (Head)
- Alison Richardson (Chaplain)
- Kate Hart (Assistant Head Pastoral)

2.3.4   It is the role of the DSL to carry out their functions as identified in Annex C of KCSIE 2024 and **Appendix 5** of this policy. This includes but is not limited to:

- Acting as the central contact point for all staff to discuss any safeguarding concerns;
- Maintaining a confidential recording system for safeguarding and child protection concerns;
- Coordinating safeguarding action for individual children;
  - When supporting children with a social worker or looked after children the DSL should have the details of the child's social worker and the name of the virtual school Head in the authority that looks after the child (with the DSL liaising closely with the designated teacher)
- Liaising with other agencies and professionals in line with KCSIE 2024 and WTSC 2023;
- Ensuring that locally established procedures as put in place by the Oxfordshire Safeguarding Children Board, including referrals, are followed, as necessary;
- Representing, or ensure the school is appropriately represented at multi-agency safeguarding meetings (including child protection conferences);
- Managing and monitoring the school role in any multi-agency plan for a child;

- Ensuring that all staff and Governors are aware of the school's IT policy and understand the expectations, applicable roles and responsibilities in relation to filtering and monitoring;
- Being available during term time (during school hours) for staff in the school to discuss any safeguarding concerns;
- Ensuring there is an on call rota outside term time that is known to staff and Governors to discuss any safeguarding concerns;
- Helping promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school leadership staff;
- Promoting supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances;
- Liaising with the Designated Lead for Mental Health and Wellbeing, where safeguarding concerns are linked to mental health;
- Ensuring adequate and appropriate DSL cover arrangements in response to any closures and out of hours and/or out of term activities;
- Ensuring all staff access appropriate safeguarding training and relevant updates in line with the recommendations within KCSIE;
- Raising awareness, providing support to staff, understanding the views of children, holding and sharing information;
- Informing the Head of any significant safeguarding issues; and
- Informing the Safeguarding Governor of any issues that meet the schools safeguarding threshold.

2.3.5   The DSL will email a copy of the Child Protection Policy and Part 1 of KCSIE to all staff at the beginning of every term. Staff will be assessed on their knowledge of the documents and will be required to sign to say that they have read and understood both documents.

2.3.6   The DSL will undergo appropriate and specific training to provide her with the knowledge and skills required to carry out her role. Deputy DSLs will be trained to the same standard as the DSL. Their training will be updated formally at least every two years, but their knowledge and skills will be updated through a variety of methods at regular intervals and at least annually.

2.4   Members of Staff

2.4.1   All members of staff have a responsibility to:

- Provide a safe environment in which children can learn;
- Be aware of the indicators of abuse and neglect so that they can identify cases of children who may need help or protection;
- Know what to do if a child tells them that he or she is being abused or neglected and understand the impact abuse and neglect can have upon a child;
- Be able to identify and act upon indicators that children are, or are at risk of, developing mental health issues;
- Be prepared to identify children who may benefit from early help.
- Understand the early help process and their role in it;
- Understand the school safeguarding policies and systems;
- Undertake regular and appropriate training which is updated regularly;
- Take positive action, where it can be shown that it is proportionate, to deal with disadvantages affecting pupils with certain protected characteristics in order to meet their specific need;
- Be aware of the local process of making referrals to children's social care and statutory assessment under the *'Children Act'* 1989;
- Know how to maintain an appropriate level of confidentiality; and

- Reassure children who report concerns that they are being taken seriously and that they will be supported and kept safe.

2.5 Children and Young People

2.5.1 Children and young people (learners) have a right to:

- Feel safe, be listened to, and have their wishes and feelings taken into account;
- Confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback;
- Contribute to the development of school safeguarding policies;
- Receive help from a trusted adult; and
- Learn how to keep themselves safe, including online.

2.6 Parents and Carers

2.6.1 Parents/carers have a responsibility to:

- Understand and adhere the relevant school policies and procedures;
- Talk to their children about safeguarding issues with their children and support the school in their safeguarding approaches;
- Identify behaviours which could indicate that their child is at risk of harm including online; and
- Seek help and support from the school or other agencies.

3. CHILD PROTECTION PROCEDURES

3.1 Recognising Indicators of Abuse, Neglect and Exploitation

3.1.1 All staff are made aware of the definitions and indicators of abuse, exploitationand neglect as identified by *'Working Together to Safeguard Children'* (2023) and *'Keeping Children Safe in Education'* 2024. Abuse is a form of maltreatment of a child. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects

3.1.2 Tudor Hall recognises that when assessing whether a child may be suffering actual or potential harm there are four categories of abuse:

- Physical abuse
- Sexual abuse
- Emotional abuse
- Neglect

For further information see **Appendix 1**.

3.1.3 Tudor Hall recognises that concerns may arise in many different contexts and can vary greatly in terms of their nature and seriousness. The indicators of child abuse and neglect can vary from child to child. Children develop and mature at different rates, so what appears to be worrying behaviour for a younger child might be normal for an older child.

3.1.4 All staff should understand that children can be at risk of harm inside and outside of school, inside and outside of home and online. It is important to recognise that indicators of abuse and neglect do not automatically mean

a child is being abused however all concerns should be taken seriously and will be explored by the DSL on a case-by-case basis.

3.1.5 Tudor Hall recognises abuse, neglect, exploitation, and safeguarding issues are rarely standalone events and cannot always be covered by one definition or one label alone. In many cases, multiple issues will overlap with one another, therefore staff will always be vigilant and always raise concerns with a DSL.

3.1.6 Parental behaviours can indicate child abuse or neglect, so staff will be alert to parent-child interactions or concerning parental behaviours; this could include parents who are under the influence of drugs or alcohol or if there is a sudden change in their mental health.

3.1.7 Children may report abuse happening to themselves, their peers or their family members. All reports made by children to staff will be taken seriously and will be responded to in line with this policy.

3.1.8 Safeguarding incidents and/or behaviours can be associated with factors and risks outside the School.

3.1.9 Children can be 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, sexual abuse, serious youth violence, radicalisation and county lines.

3.1.10 Technology can be a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face and in many cases, abuse will take place concurrently via online channels and in daily life. Children can also abuse their peers and other children online, and this can take the form of abusive, harassing, and misogynistic/misandrist messages, non-consensual sharing of indecent images especially around group chats, sharing abusive images and pornography, to those who do not want to receive it.

3.1.11 By understanding the indicators of abuse and neglect, we can respond to problems as early as possible and provide the right support and services for the child and their family.

3.1.12 All members of staff are expected to be aware of and follow this approach if they are concerned about a child:
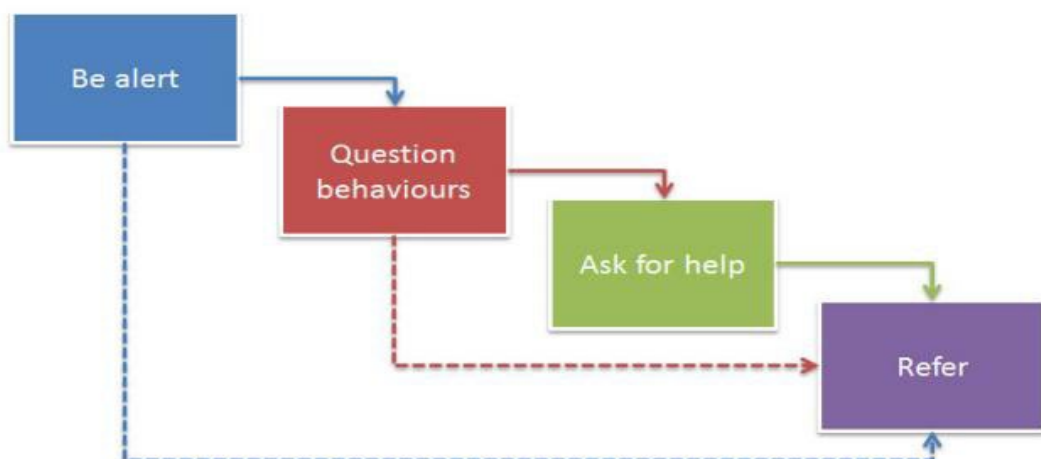
'What to do if you are worried a child is being abused' (2015)

In all cases, if staff are unsure, they will always speak to the DSL (or one of the DDSLs).

3.1.13 Tudor Hall recognises that some children have additional or complex needs and may require access to intensive or specialist services to support them.

3.1.14 If deemed necessary by the Head, or by staff authorised by the Head following a concern about a child's safety or welfare, the searching and screening of children and confiscation of any items, including electronic devices, will be managed in line with the DfE 'Searching, screening and confiscation at school' guidance.

3.2 Responding to Child Protection Concerns

3.2.1 If staff are made aware of a child protection concern, they are expected to:

- listen carefully to the concern and be non-judgmental.
- only use open questions to clarify information where necessary, e.g. who, what, where, when or Tell, Explain, Describe (TED).
- not promise confidentiality as concerns will have to be shared further, for example, with the DSL and potentially Integrated Children's Services.
- be clear about boundaries and how the report will be progressed.
- record the concern in line with school record keeping requirements.
- inform the DSL (or a Deputy), as soon as practically possible.

3.2.2 The DSL or a Deputy should always be available to discuss safeguarding concerns. If in exceptional circumstances, a DSL is not available, this should not delay appropriate action being taken. Staff should speak to a member of the Senior Leadership Team and/or take advice from Education Safeguarding Advisory Team or via consultation with the LCSS. In these circumstances, any action taken will be shared with a DSL as soon as is practically possible.

3.2.3 Where a child is suffering, or is likely to suffer from harm, or is in immediate danger, contact the MASH and/or the police. Tudor Hall recognises that in situations where there are no immediate child protection concerns for a child, it is NOT to investigate as a single agency, but to act in line with the OSCB guidance which may involve multi agency decision making.

3.2.4 The DSL may seek advice or guidance from the LCSS North before deciding next steps. In the event of a request for support being necessary, parents/carers will be informed and consent to this will be sought by the DSL in line with the guidance provided by the LCSS. Parents/carers will be informed of this, unless there is a valid reason not to do so, for example, if to do so would put a child at risk of harm or would undermine a criminal investigation.

3.2.5 All staff are aware of the process for making requests for support referrals for statutory assessments under the Children Act 1989, along with the role they might be expected to play in such assessments.

3.2.6 Any child may benefit from early help. Early help is support for children of all ages that improves as a family's resilience and outcomes or reduces the chance of the problem getting worse.

3.2.7 All staff should be alert to the potential need for early help for a child who: disabled or has certain health conditions; special additional needs; mental

health needs; is a young carer; showing signs of anti-social behaviour or criminal behaviour; frequently going missing/goes missing from education, home or care; has experienced multiple suspensions, is at risk of being permanently excluded from school and in Alternative Provision or a Pupil Referral Unit; at risk of modern slavery, trafficking, sexual and/or criminal exploitation; at risk of being radicalised or exploited; has a parent or carer in custody or affected by parental offending; family circumstance presenting challenges for the child; misusing alcohol or other drugs; risk of so-called 'honour' based abuse such as FGM or is privately fostered child. Where is it is identified that a child may benefit from Early Help support (as provided by OSCB), the DSL (or Deputy) will generally lead, as appropriate, and make a request for support via the Strength and Needs Form.

3.2.8   The DSL will keep all early help cases under constant review and consideration will be given to escalating concerns to the LCSS North to seek adviceif the situation does not appear to be improving or is getting worse.

3.2.9   If, after a request for support or any other planned external intervention, a child's situation does not appear to be improving or there is a concern regarding decisions made, the DSL will consider the OSCB escalation procedures to ensure their concerns have been addressed and, most importantly, that the child's situation improves. DSLs may request support from other agencies involved in safeguarding children, including Early Help and preventative services.

3.2.10 Tudor Hall is an [Operation Encompass School](). This means we work in partnership with Thames Valley Police to provide support to children experiencing domestic abuse.

3.3   Recording Concerns

3.3.1   All safeguarding concerns, discussions and decisions, and reasons for those decisions, will be recorded either in writing or on the school safeguarding incident system CPOMS and passed without delay to the DSL. Teaching, boarding, administration, and medical staff are able to access CPOMS and receive regular training in using the system. All other staff, including, volunteers and contractors who do not have a school email address are told (during training or via a briefing sheet) how they can log any concerns they may have and are provided with the contact details, mobile phone numbers and email addresses of the DSL, DDSL's as named in this policy. If a member of staff has a concern about a child or if a child tells them they are being abused, exploited or neglected, the staff member must respond appropriately by listening and offering reassurance.

3.3.2   Records of welfare concerns are kept electronically on CPOMS. Records must be signed and dated by the author (or equivalent on electronic based records).

3.3.3   Records will be completed as soon as possible after the incident/event, using the child's words and will be signed and dated by the member of staff. Child protection records will record facts and not personal opinions. A body map will be completed if injuries have been observed. Actions and decisions made (outcomes) will be recorded in a timely manner and in the best interest of the child, taking into consideration the child's voice.

3.3.4   If there is an immediate safeguarding concern the member of staff will consult with the DSL before completing any records, as reporting urgent concerns takes priority.

3.3.5 If members of staff are in any doubt about recording requirements, they will discuss their concerns with the DSL.

3.3.6 The DSL will consider if there is a requirement for immediate medical intervention. However urgent medical attention should not be delayed if the DSL is not immediately available.

3.3.7 Child protection records will include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved and details regarding any action taken, decisions reached and the outcome.

3.3.8 Child protection records will be kept confidential and stored securely. Child protection records will be kept for individual children and will be maintained separately from all other records relating to the child in the school. Child protection records are kept in accordance with Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR), which places duties on organisations and individuals to process personal information fairly and lawfully and to keep the information theu hold safe and secure. See ICO guidance 'For Organisations' which includes information about your obligations and how to comply, including protecting personal information and providing access to official information. All records are retained centrally and securely by the DSL.

3.3.9 All child protection records will be transferred in accordance with data protection legislation to the child's subsequent school, under confidential and separate cover. Child Protection files will be transferred securely to the new DSL, separately to the child's main file, and a confirmation of receipt will be obtained. Where pupils leave the school (including in year transfer), the DSL should ensure their child protection file is transferred to the new school as soon as possible, and within 5 days for an in-year transfer, or within the first 5 days of the start of a new term.

3.3.10 In addition to the child protection file, the DSL will also consider if it would be appropriate to share any information with the DSL at the new school or college in advance of a pupil leaving, for example, information that would allow the new school or college to continue to provide support.

3.3.11 Where the school receives child protection files, the DSL will ensure key staff such as the special educational needs co-ordinators (SENCO), will be made aware of relevant information as required.

3.4 The Role of an Appropriate Adult (AA) in Safeguarding

3.4.1 The Police and Criminal Evidence (PACE) act advises that 'The role of the appropriate adult is to safeguard the rights, entitlements, and welfare of juveniles and vulnerable persons'. The AA is expected to observe that the police are acting properly and fairly in relation to a vulnerable detained persons rights and entitlements, as well as helping the detained person understand their rights. The Assistant Head (Pastoral), as a DDSL, has been named as the designated Appropriate Adult.

3.5 Multi-Agency Working

3.5.1 Tudor Hall recognises and is committed to its responsibility to work within the OSCB multi-agency safeguarding arrangements. The governing body, Senior Leadership Team and DSL will work to establish strong and co-operative local relationships withn other agencies, including agencies providing early help services to children, the police and Children's Social Care.

3.5.2   Tudor Hall recognises the importance of multi-agency working and is committed to working alongside partner agencies to provide a coordinated response to promote children's welfare and protect them from harm. This includes contributing to OSCB processes as required, such as, participation in relevant safeguarding multi-agency plans and meetings, including Child Protection Conferences, Child Safeguarding Practice Reviews (CSPR's) Core Groups, Strategy Meetings, Child in Need meetings or other early help multi-agency meetings. The school will ensure that they have clear process for gathering the evidence required for reviews and audits. They will embed recommendations into practice and complete required actions within the agreed timescales.

3.6   **Confidentiality and Information Sharing**

3.6.1   Tudor Hall recognises its duty and powers to hold, use and share relevant information with appropriate agencies in matters relating to child protection at the earliest opportunity as per statutory guidance outlined within KCSIE 2024.

3.6.2   Tudor Hall has an appropriately trained Data Protection Officer (DPO), as required by the *'General Data Protection Regulations'* (GDPR), to ensure that the school is compliant with all matters relating to confidentiality and information sharing requirements.

3.6.3   The *'Data Protection Act'* 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children (KCSIE 2022). DfE *'Information sharing advice for safeguarding practitioners'* (2018) provides further detail. The school's privacy notice is readily available on the school website.

3.6.4   The Head and DSL will disclose relevant safeguarding information about a pupil with staff on a 'need to know' basis.

3.6.5   All members of staff must be aware that whilst they have a duty to keep information confidential, in line with our confidentiality policy, they also have a professional responsibility to be proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of children; this may include sharing information with the DSL and with other agencies as appropriate. All staff are aware they cannot promise confidentiality in situations which might compromise a child's safety or wellbeing.

3.6.6   All staff members who come into contact with children will be given appropriate training to understand the purpose of information sharing to safeguard and promote children's welfare.

3.7   **Complaints**

3.7.1   All members of the school community should feel able to raise or report any concerns about children's safety or potential failures in the school's safeguarding regime. The school has a complaints procedure available to parents, pupils and members of staff and visitors who wish to report concerns or complaints. This is available to view on the website.

3.7.2   Whilst we encourage members of our community to report concerns and complaints directly to us, we recognise this may not always be possible. Children, young people, and adults who have experienced abuse at school

can contact the NSPCC 'Report Abuse in Education' helpline on 0800 136 663 or via email: help@nspcc.org.uk

3.7.3   Staff can also access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding child protection failures internally by calling 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or emailing help@nspcc.org.uk.

3.7.4   The Senior Leadership Team at Tudor Hall will take all concerns reported to the school seriously and all complaints will be considered and responded to in line with the relevant and appropriate process.

3.7.5   Anything that constitutes an allegation against a member of staff or volunteer will be dealt with in line with section 8 of this policy.

4.   SPECIFIC SAFEGUARDING ISSUES

Tudor Hall is aware of a range of specific safeguarding issues and situations that can put children at greater risk of harm. In addition to Part One, DSLs, school leaders and staff who work directly with children will read Annex B of KCSIE 2024 which contains important additional information about specific forms of abuse and safeguarding issues.

Where staff are unsure how to respond to specific safeguarding issues, they should follow the processes as identified in Part Three of this policy and speak with the DSL or a Deputy.

4.1   Addressing Child-on-Child Abuse

4.1.1   All members of staff at Tudor Hall recognise that children can abuse their peers, and that it can happen inside and outside of school as well as online.

4.1.2   Tudor Hall recognises that child-on-child abuse can take many forms, including but not limited to:

- bullying, including cyberbullying, prejudice-based and discriminatory bullying;
- abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse');
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence (rape, assault by penetration and sexual assault – this may include an online element which facilitates, threatens and/or encourages sexual violence) and sexual harassment (sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse);
- consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery);
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- upskirting (which is a criminal offence), which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- initiation/hazing type violence and rituals.

4.1.3   Tudor Hall believes that abuse is abuse and it will never be tolerated or dismissed as 'banter', 'just having a laugh', 'part of growing up' 'girls being girls' or 'boys being boys' as this can lead to a culture of unacceptable

behaviours and an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

4.1.4 Tudor Hall recognises that even if there are no reported cases of child-on-child abuse, such abuse might still be taking place and that it may be the case that it is not being reported.

4.1.5 All staff have a role to play in challenging inappropriate behaviours between peers. Staff recognise that some child-on-child abuse issues may be affected by gender, age, ability and culture of those involved, i.e. for gender-based abuse, girls are more likely to be victims and boys more likely to be perpetrators.

4.1.6 Concerns about pupil's behaviour, including child-on-child abuse taking place offsite will be responded to as part of a partnership approach with pupils and parents/carers. Offsite behaviour concerns will be recorded and responded to in line with existing appropriate policies, for example anti-bullying, acceptable use, behaviour and child protection policies.

4.1.7 To minimise the risk of child-on-child abuse, Tudor Hall will:

- Ensure that a robust anti-bullying policy is in place and remains under constant review;
- Provide an age/ability appropriate PSHEE and RSE curriculum;
- Provide a range of reporting mechanisms and access to dedicated and experienced pastoral staff;
- Acknowledge and reward acts of kindness in the school community; and
- Have clear procedures in place for addressing and minimising the risk of child-on-child abuse, including harmful sexual behaviours, sexual violence and sexual harassment (which could take place on or off-line)
- Acknowledge the importance of 'contextual safeguarding', which considers wider environmental factors in a pupil's life that may be a threat to their safety and/or welfare.

4.1.8 Tudor Hall wants children to feel able to confidently report abuse and know their concerns will be treated seriously. All allegations of child-on-child abuse will be reported to the DSL and will be recorded, investigated, and dealt with in line with associated school policies, including child protection, anti-bullying and behaviour. Pupils who experience abuse will be offered appropriate support, regardless of where the abuse takes place.

4.1.9 Alleged victims, perpetrators and any other pupil affected by child-on-child abuse will be supported by the pastoral and Senior Leadership Teams.

4.2 Child on Child Sexual Violence or Harassment

4.2.1 When responding to concerns relating to child-on-child sexual violence or harassment, Tudor Hall will follow the guidance outlined in Part Five of KCSIE 2024.

4.2.2 Tudor Hall recognises sexual violence and/or harassment can occur between two children of any age and sex. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children and can occur online and face to face (both physically and verbally). Sexual violence and sexual harassment are never acceptable and can happen both inside and outside of school.

4.2.3 Tudor Hall considers sexual harassment in broad terms. Any suspected sexual harassment will be challenged so that inappropriate behaviours are not normalised and we do not create an environment that may lead to sexual violence.

4.2.4 All victims of sexual violence or harassment will be reassured that they are being taken seriously and that they will be supported and kept safe. A victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment or be made to feel ashamed for making a report.

4.2.5 When there has been a report of sexual violence or harassment, the DSL will make an immediate risk and needs assessment which will be considered on a case-by-case basis. This explores how best to support and protect the victim and the alleged perpetrator (and any other children involved/impacted).

4.2.6 The risk and needs assessment will be recorded and kept under review and will consider the victim (especially their protection and support), the alleged perpetrator, all other children and staff; including any actions that are required to protect them.

4.2.7 Reports will initially be managed internally by the school and where necessary will be referred to Integrated Children's Services and/or the Police.

4.2.8 The decision making and required action taken will vary on a case by case basis but will be informed by the wishes of the victim, the nature of the alleged incident (including whether a crime may have been alleged, the incident is a one-off or a sustained pattern of abuse, if there are any ongoing risks to the victim, other children, adult students or school staff, and, any other related issues or wider context.

4.2.9 If at any stage the DSL is unsure how to proceed, advice will be sought from the LCSS or MASH. Advice about tackling and reporting sexual harassment in schools and colleges is available in the DfE guidance KCSIE 2024.

4.3 **Nude and/or Semi-Nude Image Sharing by Children**

4.3.1 The term 'sharing nudes and semi-nudes' is used to mean the sending or posting of nude or semi-nude images, videos or live streams of/by young people under the age of 18. Creating and sharing nudes and semi-nudes of under-18s (including those created and shared with consent) is illegal which makes responding to incidents complex.

4.3.2 The 'UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people' guidance outlines how schools and colleges should respond to all incidents of consensual and non-consensual image sharing.

4.3.3 Tudor Hall recognises that consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as youth produced/involved sexual imagery or 'sexting') can be a safeguarding issue; all concerns will be reported to and dealt with by the DSL (or Deputy).

4.3.4 When made aware of concerns involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos by children, staff are advised to:

- Report any concerns to the DSL immediately.
- Never view, copy, print, share, store or save the imagery, or ask a child to share or download it – this may be illegal. If staff have already viewed the imagery by accident, this will be immediately reported to the DSL.
- Not delete the imagery or ask the child to delete it.
- Not say or do anything to blame or shame any children involved.
- Explain to the child(ren) involved that they will report the issue to the DSL and reassure them that they will receive appropriate support and help.
- Not ask the child or children involved in the incident to disclose information regarding the imagery and not share information about the incident with other members of staff, the child(ren) involved or their, or other, parents and/or carers. This is the responsibility of the DSL.

4.3.5 The DSLs will respond to concerns as set out in the non-statutory UKCIS guidance: Sharing nudes and semi-nudes: advice for education settings working with children and young people' and the local OSCB guidance. When made aware of a concern involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos:

- the DSL will hold an initial review meeting to explore the context and ensure appropriate and proportionate safeguarding action is taken in the best interests of any child involved. This may mean speaking with relevant staff and the children involved, as appropriate.
- parents and carers will be informed at an early stage and be involved in the process to best support children, unless there is good reason to believe that involving them would put a child at risk of harm.
- all decisions and action taken will be recorded in line with our child protection procedures.
- A referral will be made to Childrens Services the police immediately if:
  - the incident involves an adult (over 18)
  - there are concerns about their capacity to consent, for example, age of the child or they have special educational needs
  - the image/videos involve sexual acts and a child under the age of 13,
  - the image/videos depict sexual acts which are unusual for the child's developmental stage or are violent
  - a child is at immediate risk of harm owing to the sharing of nudes and semi-nudes
- The DSL may choose to involve other agencies at any time if further information/concerns are disclosed at a later date.
- If the DSL is unsure how to proceed, advice will be sought from the Education Safeguarding Advisory Team.

4.4 Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

4.4.1 Tudor Hall recognises that CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity. It may involve anexchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. While there is still no legal definition of CCE, it is increasingly being recognised as a major factor behind crime in communities, while also simultaneously victimising vulnerable young people and leaving them at risk of harm.

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4.4.2   A child who is affected by gang activity or serious youth violence may have suffered, or may be likely to suffer, significant harm through physical, sexual and emotional abuse or neglect. Children can be vulnerable to recruitment into gangs and involvement in gang violence. This vulnerability may be exacerbated by risk factors in an individual's background, including violence in the family, involvement of siblings in gangs, poor educational attainment, or poverty or mental health problems.

4.4.3   Criminal exploitation of children is a typical feature of County Lines criminal activity. County Lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line". This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell 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 (mainstream and special), further and higher educational institutions, pupil referral units, children's homes and care homes. Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. Key identifying features of involvement in county lines are:

- going missing and are subsequently found in areas away from their home;
- having been the victim or perpetrator of serious violence (e.g. knife crime);
- being involved in receiving requests for drugs via a phone line, moving drugs,
- handing over and collecting money for drugs;
- being exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection;
- being found in accommodation that they have no connection with, often called a 'trap house' or 'cuckooing' or hotel room where there is drug activity;
- owing a 'debt bond' to their exploiters;
- having their bank accounts used to facilitate drug dealing.

4.4.4   When children are missing, when the victim may have been trafficked for transporting drugs, a referral to the National Referral Mechanism should be considered with Social Care and Police colleagues.

4.4.5   If staff are concerned that a child may be at risk of CSE or CCE, immediate action should be taken by speaking to the DSL or a Deputy DSL.

4.5   Serious Violence

4.5.1   All staff are made aware of the indicators which may signal children are at risk from or are involved with serious violent crime. These may include unexplained gifts or new possessions, 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.

4.5.2   Any concerns regarding serious violence will be reported and responded to in line with other child protection concerns.

4.5.3 The initial response to child victims is important and staff will take any allegations seriously and work in ways that support children and keep them safe.

4.6 So-called honour-based abuse

4.6.1 So-called 'honour'-based abuse (HBA) encompasses incidents or 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.

4.6.2 All forms of HBA are abuse (regardless of the motivation) and concerns should be responded to in line with section 3 of this policy. Staff will report any concerns about HBA to the DSL (or a Deputy DSL).

4.6.3 Whilst all staff will speak to the DSL (or Deputy DSL) about any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers.

4.6.4 If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police.

4.7 Preventing radicalisation

4.7.1 Tudor Hall is aware of our duty under section 26 of the *'Counter-Terrorism and Security Act'* 2015 (the CTSA 2015), to have *'due regard to the need to prevent people from being drawn into terrorism',* also known as the Prevent duty and the specific obligations placed upon us as an education provider regarding risk assessments, working in partnership, staff training, and IT policies.

4.7.2 Tudor Hall recognises that children are vulnerable to extremist ideology and radicalisation and staff will be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. During the process of radicalisation, it is possible to intervene to prevent susceptible people being radicalised.

4.7.3 Extremism is defined as 'vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs'. We also include in our definition of extremism calls for the death of members of our armed forces.

4.7.4 Radicalisation is the process of a person legitimisingsupport for, or use of, terrorist violence.

4.7.5 Terrorism is an action that endangers or causes serious violence to a person/people; causes serious violence to a person/people; causes serious damage to property; or seriously interferes with an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause. Although there is no single way of identifying whether a child is likely to be susceptable to radicalisation into terrorism, there are factors that may indicate concern.

4.7.6 Some children are at risk of being radicalised, adopting beliefs and engaging in activities which are harmful, criminal or dangerous. This can happen both online and offline. The school is clear that exploitation of vulnerable children and radicalisation should be viewed as a safeguarding concern and follows the Department for Education guidance for schools

and childcare providers on preventing children and young people from being drawn into terrorism. The school seeks to protect children and young people against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to Far Right / Neo Nazi / White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.

4.7.7 Although not a cause for concern on their own, possible indicators when taken into consideration alongside other factors or context may be a sign of being radicalised.

4.7.8 All schools are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015, in the exercise of their functions, to have 'due regard to the need to prevent people from becoming terrorist or supporting terrorism'. This duty is known as the Prevent duty. DSLs/DDSLs and senior leaders should familiarise themselves with the revised prevent duty guidance. The guidance is set out in three general themes: leadership and partnership, capabilities and reducing permissive environments.

4.7.9 Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be susceptible to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages and an individual will be required to provide their consent before any support delivered through the programme is provided. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. Consent is obtained and support arranged and provided to those individuals.

4.7.10 Staff will report any concerns to the DSL (or a Deputy), who is aware of the local procedures to follow.

4.7.11 Refer to **Appendix 4** for the Prevent Protocol which includes a risk assessment, working in partnership, training, IT policies, visiting speaker information and what to do if you have a concern.

4.8 **Cybercrime**

4.8.1 Tudor Hall recognises that children with particular skill and interest in computing and technology may inadvertently or deliberately stray into 'cyber-enabled' (crimes that can happen offline but are enabled at scale and at speed online) or 'cyber dependent' (crimes that can be committed only by using a computer/internet enabled device) cybercrime.

4.8.2 If staff are concerned that a child may be at risk of becoming involved in cyber-dependent cybercrime, the DSL will be informed, and consideration will be given to accessing local support and/or referring into the Cyber Choices programme, which aims to intervene when young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

4.8.3 Where there are concerns about 'cyber-enabled' crime such as fraud, purchasing of illegal drugs online, child sexual abuse and exploitation, or other areas of concern such as online bullying or general online safety, they will be responded to in line with this and other appropriate policies.

4.9 Domestic Abuse

4.9.1 Domestic abuse is actual or threatened physical, emotional, psychological or sexual abuse. It involves the use of power and coercive control by one person over another. It occurs regardless of race, ethnicity, gender, class, sexuality, age, religion, mental or physical ability. Domestic abuse can also involve other types of abuse.

4.10 Child Abduction and Community Safety incidents

4.10.1 Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers. Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

4.10.2 As children get older, and are granted more independence, it is important they are given practical advice on how to keep themselves safe. Further information is available at: action against abduction and clever never goes!, and teachers should ensure this is referred to as necessary.

4.11 Children and the Court System

4.11.1 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. The guides explain each step of the process, 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 (which may be useful for parents, guardians and carers). Staff should make themselves aware of this guidance.

4.12 Children with family members in prison

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

4.13 Modern slavery and the National Referral Mechanism (NRM)

4.13.1 This section is included here because it has significant areas of overlap with CSE, CCE and County Lines.

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

4.13.3 A child who is affected by gang activity, criminal exploitation or serious youth violence can be at risk of significant harm through physical, sexual and emotional abuse. Girls may be particularly at risk of sexual exploitation.

4.13.4 Any concerns that a child is being or is at risk of being criminally exploited will be passed without delay to the DSL. The school is aware there is a clear link between regular non-attendance at school and exploitation. Staff will consider a child to be at potential risk in the case of regular non-attendance at school and make reasonable enquiries with the child and parents to assess this risk.

4.14 Homelessness

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

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

4.15 Female Genital Mutilation (FGM)

4.15.1 Female Genital Mutilation (FGM) is illegal in England and Wales under the FGM Act (2003). It is a form of child abuse and violence against women. Whilst all staff should speak to the DSL (or a Deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers which requires them to report to the police 'known' cases of FGM in under 18s, identified in the course of their professional work.

4.15.2 If staff have a concern they should activate safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. Mandatory reporting commenced in October 2015. These procedures remain when dealing with concerns regarding the potential for FGM to take place. Where a teacher discovers that an act of FGM appears to have been carried out on a girl who is aged under 18, there will be a statutory duty upon that individual to report it to the police. Unless the teacher has good reason not to, they should still consider and discuss any such case with the school's DSL and involve the Integrated Front Door as appropriate.

4.15.3 School staff are trained to be aware of risk indicators of FGM. Concerns about FGM outside of the mandatory reporting duty should be reported using the school's child protection procedures. Staff should be particularly alert to suspicions or concerns expressed by female pupils about going on a long holiday during the summer holiday.

4.15.4 There should also be consideration of potential risk to other girls in the family.

4.15.5 Where there is a risk to life or likelihood of serious immediate harm the teacher should report the case immediately to the police, including dialling 999 if appropriate. There are no circumstances in which a teacher or other member of staff should examine a girl.

4.16 Forced Marriage

4.16.1 A forced marriage is a marriage in which one or both people do not (or in cases of people with learning disabilities cannot) consent to the marriage but are coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse.

4.16.2 Forced marriage is recognised in the UK as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights. Since June 2014 forcing someone to marry has become a criminal offence in England and Wales under the Anti-Social Behaviour, Crime and Policing Act 2014. Since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with existing forced marriage laws, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

4.16.3 A forced marriage is not the same as an arranged marriage which is common in many cultures. The families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the prospective spouses. Staff should report any concerns to the DSL (or a Deputy DSL).

4.17 Upskirting

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

4.18 Consent
4.18.1 Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

5. SUPPORTING CHILDREN POTENTIALLY AT GREATER RISK OF HARM

5.1 Whilst all children should be protected, some groups of children are potentially at greater risk of harm.

5.2 Safeguarding Children with Special Educational Needs or Disabilities (SEND)

5.2.1 Tudor Hall acknowledges that children with special educational needs or disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges and barriers for recognising abuse and neglect both online and offline.

5.2.2 Tudor Hall recognises that children with SEND may face additional communication barriers and experience difficulties in managing or reporting abuse or challenges. Children with SEND will be appropriately supported to communicate and ensure that their voice is heard and acted upon.

5.2.3 All members of staff will be encouraged to appropriately explore possible indicators of abuse such as behaviour, mood changes or injuries and not to assume that they are related to the child's disability. Staff will be mindful that children with SEND or certain medical conditions may be disproportionally impacted by behaviours such as bullying, without outwardly showing any signs.

5.2.4 Members of staff are encouraged to be aware that children with SEND can be disproportionally impacted by safeguarding concerns, such as exploitation, peer group isolation or bullying including prejudice-based bullying.

5.2.5 To address these additional challenges, our school will always consider implementing extra pastoral support and attention for children with SEND. The DSL will work closely with the SENCO to plan support as required.

5.3 Children Requiring Mental Health Support

5.3.1 All staff will be made 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.

5.3.2 Staff are aware that children's experiences, for example where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, can impact on their mental health, behaviour and education.

5.3.3 Staff 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.

5.3.4 If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by speaking to the DSL or a Deputy.

5.3.5 The school has 2 counsellors based at the school. Pupils can self-refer and staff can also refer pupils to see the counsellors.

5.3.6 The school has a Designated Lead for Mental Health and Wellbeing to promote wellbeing and mental health in school who works closely with the Deputy Head (Pastoral) and Health Centre team. Further guidance can be found at 'Mental Health and Wellbeing Resources for Teachers and Teaching Staff'

5.3.7 The school has a separate '*Positive Mental Health and Wellbeing*' policy for pupils.

5.4 Children Who Are Absent from Education

5.4.1 Children missing from education for prolonged, unexplained periods and/or persistent/repeat absences, can act as a vital warning sign to a range of safeguarding issues including neglect, sexual abuse, and child sexual and child criminal exploitation – particularly county lines. School staff should follow the school's procedures for dealing with children who are persistently absent and children missing education to identify such abuse as early as possible and, in the case of absent pupils, this helps prevent the risk of them becoming a child absent from education in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care and have a social worker (such as a child who is a child in need, who has a child protection plan or is a child we care for), where being absent from education may increase known safeguarding risks within the family or community.

5.4.2 The school will put in place appropriate safeguarding policies, procedures and responses for pupils who are identified as absent or missing from education, particularly on repeat occasions.

5.4.3 Where Tudor Hall has concerns that a child is missing from education, we will respond in line with our statutory duties and local policies. Local support is available via the Oxfordshire School Inclusion Team (OXSIT).

5.5 Alternative Provision

5.5.1 Where a school places a pupil with an alternative provision provider, it continues to be responsible for the safeguarding of that pupil and should be satisfied that the placement meets the pupil's needs.

5.6 Elective Home Education

5.6.1 Where a parent/carer expresses their intention to remove a child from school with a view to educating at home, we will respond in line with the national Elective Home Education guidance and Learning at Home: Oxfordshire and will work together with parents/carers and other key professionals and organisations to ensure decisions are made in the best interest of the child. Tudor Hall would refer any safeguarding concerns to the Local Authority/Children Missing from Education officer. This is particularly important where a child has special educational needs or a disability, and/or has a social worker, and/or is otherwise vulnerable.

5.6.2 Many home educated children have a positive learning experience. However, elective home education can mean that some children are not in receipt of suitable education and are less visible to the services that are there to keep them safe and supported in with their needs.

5.7 Children who need a Social Worker

5.7.1 The DSL will hold details of social workers working with children in the school so that decisions can be made in the best interests of the child's safety, welfare, and educational outcomes.

5.7.2 Where children have a social worker, this will inform school decisions about their safety and promoting their welfare, for example, responding to unauthorised absence and provision of pastoral and/or academic support.

5.8 **Looked after children, previously looked after children and care leavers**

5.8.1 Tudor Hall recognises the common reason for children becoming looked after is as a result of abuse and/or neglect and a previously looked after child also potentially remains vulnerable.

5.8.2 The school has appointed a 'designated teacher' (Kate Simlett, Deputy Head Pastoral) who works with local authorities to promote the educational achievement of registered pupils who are looked after or who have been previously looked after.

5.8.3 The designated teacher will work with the DSL to ensure appropriate staff have the information they need in relation to a child's looked after legal status, contact arrangements with birth parents or those with parental responsibility, care arrangements and the levels of authority delegated to the carer by the authority looking after them. They will ensure that appropriate staff have access to the information they need in relation to a child's looked after legal status.

5.8.4 Where a child is looked after, the DSL will hold details of the social worker and the name of the virtual school Head in the authority that looks after the child.

5.8.5 Where the school believe a child is being cared for as part of a private fostering arrangement (occurs when a child under 16 or 18 if the child is disabled is cared for and lives with an adult who is not a relative for 28 days or more) there is a duty to recognise these arrangements and inform the Local Authority.

5.8.6 Where a child is leaving care, the DSL will hold details of the local authority Personal Advisor appointed to guide and support them and will liaise with them as necessary regarding any issues of concern.

6. ONLINE SAFETY

6.1 It is essential that children are safeguarded from potentially harmful and inappropriate material or behaviours online. Tudor Hall will adopt a whole school approach to online safety which will empower, protect, and educate our learners and staff in their use of technology, and establish mechanisms to identify, intervene in, and escalate any concerns where appropriate.

6.1.1 Tudor Hall will ensure online safety is reflected as required in all relevant policies. Online safety is considered as a running and interrelated theme when devising and implementing our policies and procedures and when planning our curriculum, staff training, the role and responsibilities of the DSL and parental engagement.

6.1.2 Tudor Hall identifies that the breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

- Content: being exposed to illegal, inappropriate or harmful content. For example, pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
- Contact: being subjected to harmful online interaction with other users. For example, peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- Conduct: personal online behaviour that increases the likelihood of, or causes, harm. For example, making, sending and receiving explicit

images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying.

- Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams.

6.1.3   Tudor Hall recognises that technology, and the risks and harms related to it, evolve and change rapidly. The school will carry out an annual review of our approaches to online safety, supported by an annual risk assessment which considers and reflects the risks our pupil's face.

6.1.4   The Head will be informed of online safety concerns by the DSL, as appropriate. The named Governor for safeguarding will report on online safety practice and incidents, including outcomes, on a regular basis to the wider governing body.

6.2   **Policies and Procedures**

6.2.1   The DSL has overall responsibility for online safety within the school but will liaise with other members of staff, for example IT technicians, curriculum leads etc. as necessary.

6.2.2   The DSL will respond to online safety concerns reported in line with our child protection and other associated policies, including our anti-bullying, online safety and behaviour policies.

- Internal sanctions and/or support will be implemented as appropriate.
- Where necessary, concerns will be escalated and reported to relevant partner agencies in line with local policies and procedures.

6.2.3   Tudor Hall uses a wide range of technology. This includes computers, laptops, tablets and other digital devices, the internet, our learning platform, intranet and email systems.

6.2.4   All School owned devices and those using the school's network and systems will be used in accordance with our acceptable use agreement and with appropriate safety and security measures in place.

6.2.5   Tudor Hall recognises the specific risks that can be posed by mobile and smart technology including mobile/smart phones, cameras and wearable technology. In accordance with KCSIE 2024, Tudor Hall has appropriate mobile and smart technology and image use policies in place which also reflects the fact that many children have unlimited and unrestricted access to the internet via mobile phone networks (3G, 4G and 5G), which are shared and understood by all members of the community. These policies can be found on the website.

6.3   **Appropriate Filtering and Monitoring**

6.3.1   Tudor Hall will do all we reasonably can to limit children's exposure to online risks through school provided IT systems and will ensure that appropriate filtering and monitoring systems Smoothwall (internet) and SENSO (Teams chat) are in place on school devices and the school's network.

6.3.2   Tudor Hall will ensure that it meets its duty by ensuring the standards for filtering and monitoring set out by the DfE are met through:

- Identifying and assigning roles and responsibilities to manage filtering and monitoring systems;

- Reviewing filtering and monitoring provision at least annually;
- Blocking harmful and inappropriate content without unreasonably impacting teaching and learning; and
- Having effective monitoring strategies in place that meet the school's safeguarding needs.

6.3.3   The governing body will review the standards and discuss what more needs to be done to support the school in meeting these standards. The governing body will consider the number of and age range of the children in the school, those who are potentially at greater risk of harm and how often they access the IT system.

6.3.4   If pupils or staff discover unsuitable sites or material, they are required to **report the concern immediately to their teacher or the Network Manager and, report the URL of the site to the DSL.**

- All users will be informed that use of our systems can be monitored, and that monitoring will be in line with data protection, human rights, and privacy legislation.
- Filtering breaches or concerns identified through our monitoring approaches will be recorded and reported to the DSL who will respond as appropriate.
- Any access to material believed to be illegal will be reported immediately to the appropriate agencies, such as the Internet Watch Foundation and the police.
- When implementing appropriate filtering and monitoring, Tudor Hall will ensure that 'over blocking' does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding.

6.3.5   Tudor Hall acknowledges that whilst filtering and monitoring is an important part of school online safety responsibilities, it is only one part of our approach to online safety.

- Pupils will use appropriate search tools, apps and online resources as identified following an informed risk assessment.
- Pupils' internet use will be supervised by staff according to their age and ability.
- Pupils will be directed to use age-appropriate online resources and tools by staff.

6.4   Information Security and Access Management

6.4.1   Tudor Hall is responsible for ensuring an appropriate level of security protection procedures are in place, to safeguard our systems as well as staff and learners.

6.4.2   Tudor Hall will review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies and meet the cyber security standards for schools.

6.4.3   Information that is held by the school will be done so with regard to the Storage and Retention policy.

6.4.4   Safeguarding procedures for remote learning will be followed when planning remote education strategies and teaching remotely. The school maintains the capability to provide remote education when it is not possible for some or all of our pupils to attend in person.

6.5 **Staff Training**

6.5.1 Tudor Hall will ensure that all staff and the governing body receive online safety training as part of induction. Ongoing online safety training and updates for all staff and the governing body will be integrated, aligned and considered as part of our overarching safeguarding approach.

6.6 **Educating Learners**

6.6.1 Tudor Hall will ensure a comprehensive whole school curriculum response is in place to enable all learners to learn about and manage online risks effectively as part of providing a broad and balanced curriculum.

6.7 **Working with Parents/Carers**

6.7.1 Tudor Hall will build a partnership approach to online safety and will support parents/carers to become aware and alert of the potential online benefits and risks for children.

7. STAFF ENGAGEMENT AND EXPECTATIONS

7.1 **Awareness, Induction and Training**

7.1.1 All members of staff including Governors, have been provided with a copy of Part One or Annex B of 'Keeping Children Safe in Education' 2024 which covers safeguarding information for staff.

- School leaders, including the DSL will read the latest version of KCSIE in its entirety.
- School leaders and all members of staff who work directly with children will read Annex B.
- After having had the opportunity to seek clarification or enhance understanding, all members of staff will be asked to sign to confirm that they have read and understood the national guidance shared with them. This is monitored **by the DSL.**

7.1.2 The DSL undergoes training to provide them with the knowledge and skills required to carry out their role. The DSL and members of the Safeguarding team undertake their refresher training at least every 2 years to fulfil their role.

7.1.3 The DSL will ensure that all new staff and volunteers (including agency and third-party staff) receive safeguarding and child protection training (including online safety, filtering and monitoring), including information to ensure they are aware of the school's internal safeguarding processes, as part of their induction.

7.1.4 All staff members (including agency and third-party staff) will receive appropriate child protection training (including online safety) to ensure they are aware of a range of safeguarding issues; this training will be updated at least annually.

7.1.5 Safeguarding training for staff, including online safety training, will be integrated, aligned and considered as part of the whole school safeguarding approach and wider staff training and curriculum planning.

7.1.6 In addition to specific child protection training, all staff will receive regular safeguarding and child protection updates such as online safety (via email,

bulletins or staff meetings), at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

7.1.7   Staff will be encouraged to contribute to and shape the school's safeguarding arrangements and child protection policies.

7.1.8   The DSL and Head will provide a termly report to the governing body detailing safeguarding training undertaken by all staff and will maintain an up-to-date register of who has been trained.

7.1.9   Although the school has a nominated safeguarding lead for the governing body, all members of the governing body will access appropriate safeguarding training which covers their specific strategic responsibilities on a regular basis.

7.1.10   The school will maintain accurate and up to date records of staff induction and training.

7.2   **Safer Working Practice**

7.2.1   All members of staff are required to work within our clear guidelines on safer working practice as outlined in the school's *'Code of Conduct.'*

7.2.2   The DSL will ensure that all staff and volunteers (including agency and third-party staff) have read the child protection policy and are aware of the school's expectations regarding safe and professional practice via the *'Staff Code of Conduct and Acceptable Use Agreement'* (AUA).

7.2.3   Staff will be made aware of the school's behaviour management and physical intervention policies. Staff will manage behaviour effectively to ensure a good and safe educational environment and will have a clear understanding of the needs of all children. Physical interventions and/or use of reasonable force will be in line with our agreed policy and procedures and national guidance.

7.2.4   All staff will be made aware of the professional risks associated with the use of social media and electronic communication (such as email, mobile phones, texting, social networking). Staff will adhere to relevant school policies including *'Staff Code of Conduct and Acceptable Use Policies.'*

7.3   **Supervision and Support**

7.3.1   The induction process will include familiarisation with child protection responsibilities and procedures to be followed if members of staff have any concerns about a child's safety or welfare.

7.3.2   The school will provide appropriate supervision and support for all members of staff to ensure that:

- All staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children.
- All staff are supported by the DSL in their safeguarding role.
- All members of staff have regular reviews of their own practice to ensure they improve over time.

7.3.3   Any member of staff affected by issues arising from concerns for children's welfare or safety can seek support from the DSL.

7.3.4   The DSL will also put staff in touch with outside agencies for professional support if they so wish. Staff can also approach organisations such as their Union, the Education Support Partnership or other similar entities directly.

8.   SAFER RECRUITMENT AND ALLEGATIONS

8.1   **Safer Recruitment and Safeguarding Checks**

8.1.1   Tudor Hall is committed to ensuring the development of a safe culture and that all steps are taken to recruit staff and volunteers who are safe to work with our learners and staff.

8.1.2   Tudor Hall will follow relevant guidance in KCSIE 2024 (Part Three, 'Safer Recruitment') and from The Disclosure and Barring Service (DBS). Checks will be done to ensure that any person taking up a management position is not subject to a section 128 direction made by the Secretary of State. Online searches will be carried out on any shortlisted candidates to help identify any issues that are publicly available online. Shortlisted candidates will be informed before online checks are carried out as part of due diligence checks and evidence of these checks will be retained.

8.1.3   The governing body and SLT are responsible for ensuring that the school follows safer recruitment processes as outlined within guidance.

8.1.4   The governing body will ensure that at least one person on any interview pannel has completed safer recruitment training. This is monitored and reviewed to ensure compliance by the governing body and the school's leadership team.

8.1.5   The school maintains an accurate Single Central Record (SCR) in line with statutory guidance.

8.1.6   Tudor Hall is committed to supporting the statutory guidance from the Department for Education on the application of the 'Childcare (Disqualification) Regulations' 2018 and related obligations under the 'Childcare Act' 2006 in schools.

8.1.7   We advise all staff to disclose any reason that may affect their suitability to work with children including convictions, cautions, court orders, cautions, reprimands, and warnings.

8.1.8   Where the school places a learner with an alternative provision provider, the school will continue to be responsible for the safeguarding of that child.

8.1.9   The school will undertake appropriate checks to ensure the provider meets the needs of the pupil, including written confirmation that appropriate safeguarding checks have been carried out on individuals working at the establishment.

8.1.10   The school will ensure that contractors and providers are aware of the safeguarding policy and procedures and that this will be referred to and followed if an allegation is made regarding a member of their agency. The school will require employees and volunteers provided by these organisations use the school's procedures to report concerns.

8.1.11   The school will seek assurance that employees and volunteers provided by these organisations and working with our pupils have been subjected to appropriate levels of safeguarding checks in line with KCSIE 2024. If

insurance is not obtained, permission to work with our pupils or use our school premises may be refused.

8.1.12 Where the school organises work experience placements, we will follow the advice and guidance as identified in Part Three of KCSIE 2024.

8.1.13 Where the school organises homestays as part of exchange visits, we will follow the advice and guidance as identified in Part Three and Annex E of KCSIE 2024.

8.2 **Allegations/concerns raised in relation to teachers, including supply teachers, other staff, volunteers and contractors**

8.2.1 The school will respond to allegations in line with Part Four of KCSIE 2024.

8.2.2 Any concerns or allegations about staff, including those which do not meet the allegation/harm threshold (8.3), will be recorded and dealt with appropriately in line with national and local guidance. Ensuring concerns are dealt with effectively will protect those working in or on behalf of the school from potential false allegations or misunderstandings.

8.2.3 If the Head is unsure whether a concern meets the harm thresholds, advice will be sought via the Local Authority Designated Officer (LADO) Enquiry Line and/or the Education Safeguarding Advisory Team.

8.3 **Concerns that meet the 'harm threshold'**

8.3.1 Tudor Hall recognises that it is possible for any member of staff, including volunteers, Governors, contractors, agency and third-party staff (including supply teachers), and visitors to behave in a way that indicates a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in a school or college. This includes when someone has:

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

8.3.2 Allegations against staff which meet this threshold will be referred immediately to the Head who will contact the LADO to agree further action to be taken in respect of the child and staff member. In the event of allegations of abuse being made against the Head, staff are advised that allegations should be reported to the Chair of Governors who will contact the LADO.

8.3.3 Where there is a conflict of interest in reporting the matter to the Head, it must go straight to the LADO. Staff are to refer to the Whistleblowing policy.

8.3.4 If allegations of professional misconduct are founded, the LADO may recommend a referral to the TRA.

8.4 **Concerns that do not meet the 'harm threshold' – Low-level concerns**

8.4.1 Tudor Hall may also need to act in response to 'low-level' concerns about staff. These would typically be behaviours which are inconsistent with our staff *'Code of Conduct'*, including inappropriate conduct outside of work and concerns that do not meet the allegations threshold. That said, these low-level concerns may form part of a wider pattern and need to be recorded and reported to the Head. She will keep a record of low-level concerns, which will include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns will be noted; if the individual wishes to remain anonymous then that will be respected as far as reasonably possible.

8.4.2 Where low-level concerns are reported to the school, the Head will share or liaise with the LADO enquiries officer via the LADO Enquiry Line.

8.4.3 Low-level concerns will be recorded in writing and reviewed so potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern is identified, the school will implement appropriate action, for example consulting with the LADO enquiry line and following our disciplinary procedures.

8.4.4 Additional information regarding low-level concerns is contained with our staff *'Code of Conduct'* – this includes what a low-level concern is and the importance of sharing them.

8.4.5 Below offers clarity on the structure we use to report allegations and concerns, demonstrating where low level concerns 'sit'.

a) Concerns around teaching standards and the academic performance of colleagues should be raised in the first instance through the Head of Department, Deputy Head Academic.

b) Allegations against staff are defined in KCSiE 2024 and should be reported to the Head (or the Chair of Governors in the case of allegations against the Head) in line with the Safeguarding Policy. These include allegations that someone who works with children has:

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

c) Low-level concerns are any concerns, no matter how small, that may not meet the above harm thresholds but cause a sense of unease or a 'nagging doubt' that an adult may have acted in a way that is inconsistent with the Staff Code of Conduct. Where staff have such concerns, they do not need to determine how serious the concern is, but should immediately refer these concerns to the Head (or the Chair of Governors if concerning the Head). If the Head is absent, low-level concerns should be shared with the DSL, who will pass them on immediately on the Head's return.

8.5 **Safe Culture**

8.5.1   As part of our approach to safeguarding, the school continuously strives to maintain and embed a culture of openness, trust and transparency in which our values and expected behaviour as set out in our staff *'Code of Conduct'* are constantly lived, monitored and reinforced by all staff (including supply teachers, volunteers and contractors) and where all concerns are dealt with promptly and appropriately.

8.5.2   All staff and volunteers should feel able to raise any concerns about poor or unsafe practice and potential failures in the school safeguarding regime. The SLT at Tudor Hall will take all concerns or allegations received seriously.

8.6   **Whistleblowing in a safeguarding context**

8.6.1   While the school has a separate whistleblowing policy, this is a summary that outlines the process when there is a concern that safeguarding issues have not been reported or followed correctly.

8.6.2   Whistleblowing is a term that is used when staff want to report a concern within their organisation that involves a person senior to them which may prevent them from following normal reporting systems. It is a disciplinary offence not to report concerns about the conduct of a colleague that could place a child at risk.

8.6.3   The Head is responsible for all staff. If you are concerned that any member of staff within the school is not following safeguarding processes or behaving in a way that is placing children at risk, you should, in the first place, make the Head aware.

8.6.4   If your concern is about the Head, you should raise this with the Chair of Governors.

8.6.5   Staff can access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email help@nspcc.org.uk.

8.6.6   Tudor Hall has a legal duty to refer to the Disclosure and Barring Service (DBS) anyone 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. The DBS will consider whether to bar the person.

8.6.7   If these circumstances arise in relation to a member of staff at the school, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO.

9.   OPPORTUNITIES TO TEACH SAFEGUARDING

9.1   Tudor Hall will ensure that children are taught about safeguarding, including online safety, as part of a broad and balanced curriculum. This will include covering relevant issues through Relationships and Sex Education (secondary schools) with the PSHEE curriculum and within the IMPACT programme which is delivered in tutor time.

9.2   We recognise that the school plays an essential role in helping children to understand and identify the parameters of what is appropriate child and adult behaviour, what is 'safe', to recognise when they and others close to them are not safe, and how to seek advice and support when they are concerned. The curriculum provides opportunities

for increasing self-awareness, self-esteem, social and emotional understanding, assertiveness and decision making so that learners have a range of age-appropriate contacts and strategies to ensure their own protection and that of others.

9.3 Tudor Hall recognises that a one size fits all approach may not be appropriate for all children, and a more personalised or contextualised approach for more vulnerable children, victims of abuse and some SEND children might be needed.

9.4 The school systems support children to talk to a range of staff. Children will be listened to and heard, and their concerns will be taken seriously and acted upon as appropriate.

10. PHYSICAL SAFETY

10.1 **Use of 'reasonable force'**

10.1.1 There may be circumstances when it is appropriate for staff to use reasonable force in order to safeguard children from harm. Further information regarding our approach and expectations can be found in our *'Use of Reasonable Force'* policy.

10.2 **The Use of Premises by Other Organisations**

10.2.1 Where services or activities are provided separately by another body using the school facilities/premises, the DSL and Head on behalf of the governing body will seek written assurance that the organisation concerned has appropriate policies and procedures in place regarding safeguarding children and child protection, and that relevant safeguarding checks have been made in respect of staff and volunteers. If this assurance is not achieved, an application to use premises will be refused.

10.2.2 Safeguarding requirements will be included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises. Failure to comply with this will lead to termination of the agreement.

10.3 **Site Security**

10.3.1 All members of staff have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may come to light.

10.3.2 Appropriate checks will be undertaken in respect of visitors and volunteers coming into school as outlined within national guidance. Visitors will be expected to sign in and out via the reception visitors' log and to display a visitor's badge whilst on site.

10.3.3 Any individual who is not known or identifiable on site should be challenged for clarification and reassurance.

10.3.4 The school will not accept the behaviour of any individual (parent or other) that threatens school security or leads others (child or adult) to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse access for that individual to the school site.

10.4 **Boarding and International Students**

10.4.1 Tudor Hall complies with the National Minimum Standards for boarding schools and is appropriately inspected by ISI, the Independent Schools Inspectorate.

10.4.2 Providing boarders with a 'voice' is a priority. Pupils are encouraged to speak up about anything that is of concern to them. They are made aware of the channels of communication open to them at the beginning of the academic year. An Independent Person is available to any girl who may need an impartial listening ear.

10.4.3 All new staff are vetted using DBS checks and once appointed undergo an induction process. Boarding staff receive induction training, both before taking up their role and ongoing, and this includes specific advice relating to safeguarding issues in a boarding community.

10.4.4 If a member of the boarding staff is suspended pending investigation of a child protection matter, arrangements for alternative accommodation away from children will be made.

10.4.5 Whilst not a statutory requirement, boarding schools are encouraged to report significant safeguarding incidents, as well as risks to a pupil's safety at home to the   Boarding Schools' Association (Claire Dan, Head of Safeguarding).

10.4.6 Help and advice when dealing with issues relating to international students will be sought from International Social Services, as required. Additional support is given to international boarders and their families with regards to cultural differences and settling into life in the UK.

10.5   Screening, searching and confiscation

10.5.1 In certain situations, confiscation of property is a suitable sanction. The confiscation must be proportionate to be lawful; it must be necessary in a democratic society and have a legitimate aim. All searches conducted will be logged in the Safeguarding file. Refer to the Behaviour and Discipline Policy for further information.

10.6   Quality Assurance

10.6.1 Tudor Hall will ensure that systems are in place to monitor the implementation of and compliance with this policy and accompanying procedures.

10.6.2 The school's SLT and the governing body will ensure that action is taken to remedy any deficiencies and weaknesses identified in child protection arrangements without delay.

11. POLICY REVIEW

11.1.1 This policy and the procedures will be reviewed every academic year, and more frequently if new guidance or legislation is introduced. All other linked policies will be reviewed in line with the policy review cycle.

11.1.2 The DSL will ensure that all staff, including volunteers and sessional workers, are made aware of any amendments to policies and procedures.

11.1.3 Additional updates to this policy and appendices will take place as needed.

Written by Deputy Head (Pastoral): September 2023
Date agreed and ratified by Governing Body: September 2023
Updated by Deputy Head (Pastoral): September 2024
Updated by Deputy Head (Pastoral): January 2025

CATEGORIES OF ABUSE

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

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. They may be abused by an adult or adults or another child or children. It should be noted that abuse can be carried out both on and offline and be perpetrated by men, women, and children.

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.

Signs that MAY INDICATE Sexual Abuse:

- Sudden changes in behaviour and performance
- Displays of affection which are sexual and age inappropriate
- Self-harm, self-mutilation or attempts at suicide
- Alluding to secrets which they cannot reveal
- Tendency to cling or need constant reassurance
- Regression to younger behaviour for example thumb sucking, playing with discarded toys, acting like a baby
- Distrust of familiar adults e.g. anxiety of being left with relatives, a childminder or lodger
- Unexplained gifts or money
- Depression and withdrawal
- Fear of undressing for PE
- Sexually transmitted disease
- Fire setting

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

Signs that MAY INDICATE physical abuse:

- Bruises and abrasions around the face
- Damage or injury around the mouth
- Bi-lateral injuries such as two bruised eyes
- Bruising to soft area of the face such as the cheeks
- Fingertip bruising to the front or back of torso
- Bite marks
- Burns or scalds (unusual patterns and spread of injuries)
- Deep contact burns such as cigarette burns
- Injuries suggesting beatings (strap marks, welts)
- Covering arms and legs even when hot
- Aggressive behaviour or severe temper outbursts.

- Injuries need to be accounted for. Inadequate, inconsistent, or excessively plausible explanations or a delay in seeking treatment should signal concern.

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.

Signs that MAY INDICATE emotional abuse:

- Over reaction to mistakes
- Lack of self-confidence/esteem
- Sudden speech disorders
- Self-harming
- Eating Disorders
- Extremes of passivity and/or aggression
- Compulsive stealing
- Drug, alcohol, solvent abuse
- Fear of parents being contacted
- Unwillingness or inability to play
- Excessive need for approval, attention, and affection

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.

Signs that MAY INDICATE neglect:

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Inadequate clothing
- Frequent lateness or non-attendance
- Untreated medical problems
- Poor relationship with peers
- Compulsive stealing and scavenging
- Rocking, hair twisting and thumb sucking
- Running away
- Loss of weight or being constantly underweight
- Low self esteem

All staff should have awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and/or alcohol misuse, unexplained and/or persistent absences from education, serious violence, radicalisation and consensual and non-consensual sharing of nude and semi-nude images or videos can be signs that children are at risk.

SOURCES

Relevant local links with additional links to be found in KCSIE 2024 Annex B and D.

NSPCC 'Report Abuse in Education' Helpline
- 0800 136 663 or help@nspcc.org.uk

National Organisations
- NSPCC
- Barnardo's: www.barnardos.org.uk
- Action for Children: www.actionforchildren.org.uk
- Children's Society: www.childrenssociety.org.uk

Support for Staff
- Education Support: www.educationsupportpartnership.org.uk
- UK Safer Internet Centre: https://saferinternet.org.uk/guide-and-resource/teachers-and-school-staff

Support for Learners
- ChildLine: www.childline.org.uk
- Papyrus: www.papyrus-uk.org
- The Mix: www.themix.org.uk
- Shout: www.giveusashout.org
- Fearless: www.fearless.org
- Victim Support: www.victimsupport.org.uk

Support for Adults
- Family Lives: www.familylives.org.uk
- Crime Stoppers: https://crimestoppers-uk.org/
- Victim Support: www.victimsupport.org.uk
- The Samaritans: www.samaritans.org
- NAPAC (National Association for People Abused in Childhood): www.napac.org.uk
- We Stand (formerly MOSAC): https://westand.org.uk/
- Action Fraud: https://www.actionfraud.police.uk/
- Shout: www.giveusashout.org
- Advice now: www.advicenow.org.uk

Support for Learning Disabilities
- Respond: www.respond.org.uk
- Mencap: www.mencap.org.uk
- Council for Disabled Children: https://councilfordisabledchildren.org.uk

Contextual Safeguarding Network
- https://contextualsafeguarding.org.uk/

Substance Misuse
- Aquarius https://aquarius.org.uk/
- Talk to Frank

Domestic Abuse
- Domestic abuse services: https://a2dominion.co.uk/about-us/Domestic-abuse-support-services
- Refuge: www.refuge.org.uk
- Women's Aid: www.womensaid.org.uk
- Men's Advice Line: https://mensadviceline.org.uk/
- National Domestic Abuse Helpline: www.nationaldahelpline.org.uk
- Respect Phoneline: https://respectphoneline.org.uk

Criminal and Sexual Exploitation
- National Crime Agency: www.nationalcrimeagency.gov.uk/who-we-are
- It's not okay: www.itsnotokay.co.uk
- NWG Network: www.nwgnetwork.org

Honour Based Abuse
- Forced Marriage Unit
- FGM Factsheet
- Mandatory reporting of female genital mutilation: procedural information

Child-on-child abuse, including bullying, sexual violence and harassment
- Rape Crisis: https://rapecrisis.org.uk
- Brook: www.brook.org.uk
- Disrespect Nobody: www.disrespectnobody.co.uk
- Upskirting – know your rights: www.gov.uk/government/news/upskirting-know-your-rights
- Lucy Faithfull Foundation: www.lucyfaithfull.org.uk
- Stop it Now! www.stopitnow.org.uk
- Parents Protect: www.parentsprotect.co.uk
- Anti-Bullying Alliance: www.anti-bullyingalliance.org.uk
- Diana Award: www.antibullyingpro.com/
- Kidscape: www.kidscape.org.uk

Online Safety
- CEOP: www.ceop.police.uk
- Internet Watch Foundation (IWF): www.iwf.org.uk
- Think U Know: www.thinkuknow.co.uk
- Childnet: www.childnet.com
- UK Safer Internet Centre: www.saferinternet.org.uk
- Report Harmful Content: https://reportharmfulcontent.com
- Marie Collins Foundation: www.mariecollinsfoundation.org.uk
- Internet Matters: www.internetmatters.org
- NSPCC: www.nspcc.org.uk/onlinesafety
- Get Safe Online: www.getsafeonline.org
- Parents Protect: www.parentsprotect.co.uk
- Cyber Choices
- National Cyber Security Centre (NCSC): www.ncsc.gov.uk

Mental Health
- Mind: www.mind.org.uk
- Moodspark: https://moodspark.org.uk
- Young Minds: www.youngminds.org.uk
- Anna Freud: www.annafreud.org/schools-and-colleges/

Radicalisation and hate
- Educate against Hate: www.educateagainsthate.com
- Counter Terrorism Internet Referral Unit: www.gov.uk/report-terrorism
- True Vision: www.report-it.org.uk

CONTINUUM MODEL TO DEMONSTRATE A RANGE OF SEXUAL BEHAVIOURS

Hackett (2010) has proposed a continuum model to demonstrate the range of sexual behaviours presented by children and young people, from those that are normal, to those that are highly deviant:

Normal	Inappropriate	Problematic	Abusive	Violent
• Developmentally expected	• Single instances of inappropriate sexual behaviour	• Problematic and concerning behaviours	• Victimising intent or outcome	• Physically violent sexual abuse
• Socially acceptable	• Socially acceptable behaviour within peer group	• Developmentally unusual and socially unexpected	• Includes misuse of power	• Highly intrusive
• Consensual, mutual, reciprocal	• Context for behaviour may be inappropriate	• No overt elements of victimisation	• Coercion and force to ensure victim compliance	• Instrumental violence which is physiologically and/ or sexually arousing to the perpetrator
• Shared decision making	• Generally consensual and reciprocal	• Consent issues may be unclear	• Intrusive	• Sadism
		• May lack reciprocity or equal power	• Informed consent lacking, or not able to be freely given by victim	
		• May include levels of compulsivity	• May include elements of expressive violence	

Hackett et al 2013 study of children and young people with harmful sexual behaviour suggests that two thirds had experienced some kind of abuse or trauma.

KCSIE (2024) Part 5

PREVENT PROTOCOL

The *'Counter-Terrorism and Security Act'* 2015 requires schools to have due regard for the need to prevent people from being drawn into terrorism. This is called the Prevent duty. Protecting children from the risk of radicalisation is part of the school's wider safeguarding duty and is similar to protecting children from other forms of harm (sexual abuse, neglect etc.) whether these come from within their amily or are the product of outside influences.

This protocol forms part of a group of Safeguarding Policies and should be read in conjunction with:

- Anti-Bullying Policy
- Safe Use of Technology
- Use of Reasonable Force
- Visiting Speaker Protocol
- The Prevent Strategy statement
- *'Prevent Duty Guidance'*, revised 2021, Home Office, updated March 2024

In order for schools to fulfil the Prevent duty, it is essential that staff are able to identify children who may be vulnerable to radicalisation and know what to do when they are identified. Protecting children from the risk of radicalisation is seen as part of schools' wider safeguarding duties.

It is important to emphasise that the Prevent duty is not intended to stop pupils debating controversial issues. The school provides a safe space in which pupils and staff can understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments.

Risk Assessment

The general risks affecting children and young people may vary from area to area, and according to their age. The school has identified risks within a given local context and it is important that these risks are understood so that the school can respond in an appropriate and proportionate way. It is important to understand the increased risk of online radicalisation, as terrorist organisations such as ISIL seek to radicalise young people through the use of social media and the internet. The local authority and local police provide contextual information to help schools understand the risks in their areas. A Prevent Risk Assessment for schools is completed and updated each year which is kept with the school's risk assessments. The details of risk are shared with staff during safeguarding training.

Working in partnership

The Prevent duty builds on existing local partnership arrangements. Local Safeguarding Children Boards (LSCBs) are responsible for co-ordinating what is done by local agencies for the purposes of safeguarding and promoting the welfare of children in their local area. The school's Safeguarding arrangements take into account the policies and procedures of the OSCB and the OSCB's published threshold guidance indicating when a child or young person might be referred for support.

It is important to work with parents, guardians, and carers in assisting and advising them when they raise concerns and being able to refer them to the right support.

Training

All staff participate in Prevent awareness training to equip them to identify children at risk of being drawn into terrorism and to challenge extremist ideas. Building pupils' resilience to radicalisation by providing a safe environment for debating controversial issues and helping them to understand how they can influence and participate in decision-making through our PSHEE curriculum, our IMPACT programme and presentations. We teach our pupils how to be safe and to recognise the possible dangers they may face. Teachers make sure this is done in a sensitive and age-appropriate way. The D S L undertakes Prevent awareness training and is able to provide advice and support to other members of staff on protecting children from the risk of radicalisation.

IT Policies

The school ensures suitable filtering is in place (Smoothwall and Senso) to protect pupils from terrorist and extremist material when accessing the internet via the school's wifi and embedding internet safety in the PSHEE curriculum and our IMPACT programme.

Visiting Speakers

The school has a Visiting Speaker protocol which sets out clear guidelines for ensuring that any visiting speakers whether invited by staff or pupils, are suitable and appropriately supervised.

What to do if you have a concern?

If a member of staff in school has a concern about a particular pupil, they should follow the school's normal safeguarding procedures and discuss with the DSL, who acts as the Prevent lead.

DESIGNATED SAFEGUARDING LEAD - JOB DESCRIPTION

The Designated Safeguarding Lead (DSL) has **lead responsibility** for safeguarding and child protection (including online safety). The DSL will provide advice and support to other staff on child welfare and child protection matters, take part in strategy discussions and inter-agency meetings, and/or support other staff to do so, and contribute to the assessment of children.

Key Interfaces: External Agencies, whole staff, pupils and parents, guardians and carers

Staff Reports: Deputy Designated Safeguarding Leads

The role includes, but is not limited to, the following specific areas of responsibility:

Availability

During term time the DSL (or a Deputy) will always be available for staff in the school to discuss any safeguarding concerns. The DSL (or a Deputy) will be, where possible, available in person. However, if they are not available in person, they can be contacted via telephone, the concern reported on CPOMS or a member of SLT alerted.

Managing referrals

The DSL is responsible for:
- Referring cases of suspected abuse and neglect to the local authority children's social care as required and supporting staff who make referrals to local authority children's social care;
- Referring cases to the channel programme where there is a radicalisation concern as required and supporting staff who make referrals to the channel programme;
- Referring cases where a person is dismissed or left due to risk/harm to a child to the disclosure and barring service as required; and
- Referring cases where a crime may have been committed to the Police as required.

Working with others

- The DSL is responsible for acting as a source of support, advice and expertise for all staff;
- Acting as a point of contact with the safeguarding partners;
- Liaising with the headmistress to inform her of issues, especially ongoing enquiries under section 47 of the *'Children Act'* 1989 and police investigations;
- As required, liaising with the 'case manager' and the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member;
- Liaising with staff (especially teachers, pastoral support staff including House staff, school nurses, IT and the Learning Support Department and the Designated Lead for Mental Health and Wellbeing on matters of safety, mental health, safeguarding and welfare (including online and digital safety) and, when deciding whether to make a referral, liaising with relevant agencies so children's needs are considered holistically; and
- Promoting supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances;
- Working with the Headmistress and Deputy Head, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these might be having on children's attendance, engagement and achievement at school;
  - o Ensuring that relevant staff know who in the school's cohort of children have or have had a social worker, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort; and,
  - o Supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still lasting impact on children's educational outcomes.

Information sharing and managing the child protection file

The DSL is responsible for:
- Ensuring that child protection files are kept up to date and that information is kept confidential and stored securely;
- Ensuring records include:
  o A clear and comprehensive summary of the concern;
  o Details of how the concern was followed up and resolved;
  o A note of any action taken, decisions reached and the outcome;
- Ensuring the file (physical or online) is accessed only by those who need to see it and, where the file or content within it is shared, this happens in line with information sharing advice as set out in part one and part two of KCSIE (2024);
- Ensuring that when pupils leave the school their child protection file is:
  o Transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of the new term;
  o Transferred separately from the main pupil file, ensuring secure transit, and obtaining a confirmation of receipt.
- Considering whether it is appropriate to share information with the new school in advance of a child leaving, which may allow the new school to continue support and have support in place for when the child arrives.

Raising Awareness

The DSL is responsible for:
- Ensuring each member of staff has access to, and understands, the school's child protection policy and procedures, especially new and part-time staff;
- Ensuring the school's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, including regular reports to the education & welfare committee regarding this;
- Ensuring the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this; and
- Linking with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements;
- Helping promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children who have or have had a social worker, are experiencing, with teaching staff and Senior Leadership Team (SLT).

Training, knowledge and skills

The DSL (and DDSLs) will undergo training, updated every two years, to provide them with the knowledge and skills required to carry out the role.

The DSL must keep up to date with all changes in legislation and government guidance to ensure she:
- Understands the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements;
- Has a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- Understands the importance of the role the dsl has in providing information and support to children social care in order to safeguard and promote the welfare of children;
- Understands the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes;
- Is alert to the specific needs of children in need, those with special educational needs and disabilities (send), those with relevant health conditions and young carers;
- Understands relevant data protection legislation and regulations, especially the *'Data Protection Act'* 2018 and the general data protection regulations;
- Understands the importance of information sharing within the school and with the safeguarding partners, other agencies, organisations and practitioners;

- Understands and supports the school with regards to the requirements of the prevent duty and is able to provide advice and support to staff on protecting children from the risk of radicalisation;
- Understands the unique risks associated with online safety and is confident in the relevant knowledge and up to date capability required to keep children safe whilst they are online at school;
- Recognises the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and has the capability to support send children to stay safe online;
- Obtains access to resources and attends any relevant or refresher training courses; and
- Encourages a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school may put in place to protect them;
- In addition to formal training set out above, refreshes knowledge and skills at regular intervals as required, for example via e-bulletins, meeting other designated safeguarding leads, or taking time to read and digest safeguarding developments, to understand and keep up with any developments relevant to the role;
- The DSL will also have regard for the requirements of the inspection framework as set out by ISI to ensure that safeguarding procedures meet the standards required.

Online safety

The DSL is responsible for:
- Acting as the main point of contact on all online safety issues;
- Ensuring relevant policies are in place to mitigate or handle online safety concerns;
- Recording online safety incidents and actions taken;
- Ensuring the school community understands what safe and appropriate online behaviour is and that there will be sanctions for misusing the internet;
- Liaising with SLT and technical staff to ensure appropriate filtering and monitoring systems are in place on school devices, understanding the processes in place and regularly reviewing the effectiveness of these processes;
- Liaising with the data protection officer to ensure online safety policies align with current legislation;
- Implementing online safety training for all teaching staff and those who have pastoral responsibilities;
- Actively encouraging positive online behaviour;
- Ensuring online safety education is embedded throughout the curriculum and empowering children to keep themselves and others safe online;
- Promoting online safety to parents and carers by giving access to the national online safety platform where courses, webinars and information is provided, and arranging external speakers on online safety;
- Refreshing training at regular intervals, at least annually, and keeping up to date with current research, legislation and trends.

Providing support to staff

The DSL is responsible for:
- Supporting and advising staff to help them feel confident on welfare, safeguarding and child protection matters;
- Ensuring that staff are supported during the referrals processes; and
- Supporting staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

Understanding the views of children

The DSL is responsible for:
- Encouraging a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school may put in place to protect them; and
- Understanding the difficulties that children may have in approaching staff about their circumstances and considering how to build trusted relationships which facilitate

communication.

Holding and sharing information

The DSL is responsible for:
- Understanding the critical importance of information sharing, both within the school and with other schools and colleges on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners;
- Understanding relevant data protection legislation and regulations, especially the *'Data Protection Act'* 2018 and the UK general data protection regulation (UK GDPR); and
- Keeping detailed, accurate, secure written records of concerns and referrals and understanding the purpose of this record-keeping.

LOW LEVEL CONCERNS

1. INTRODUCTION

1.1 Tudor Hall and Carrdus School operate a safeguarding culture and ethos in which the values and expected behaviours of staff are set out in the Staff *'Code of Conduct'*. These should be demonstrated, monitored, and reinforced by all staff.

1.2 The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the allegation threshold or is otherwise not considered serious enough to consider a referral to the LADO.

1.3 We do all we can to ensure that all adults living and working at Tudor Hall and Carrdus School are confident and clear about expected behaviours of themselves and their colleagues, the delineation of professional boundaries and reporting lines.

1.4 We promote a culture of trust, awareness and positive values in which staff can recognise concerning or inappropriate behaviour, either in themselves or in other adults.

1.5 We empower staff to share their concerns, whether about their own or a colleague's behaviour, with the Head, and help staff to interpret the sharing of a concern as a neutral act.

1.6 We address unprofessional behaviour swiftly and help staff to correct such behaviour at an early stage.

2. DEFINITION OF A LOW-LEVEL CONCERN

2.1 A low-level concern is any concern, no matter how small, and even if no more than a 'nagging doubt' which can include:

    2.1.1 an adult may have acted in a manner inconsistent with either the School's *'Code of Conduct'* or the *'Safeguarding Policy'*, or

    2.1.2 even if not linked to a particular act or omission, a sense of unease as to the adult's behaviour, particularly towards or around children.

3. SPECTRUM OF BEHAVIOUR

Appropriate Conduct Behaviour which is entirely consistent with the organisation's Code of Conduct, and the law.
Low-Level Concern Any concern, no matter how small, even if no more than a 'nagging doubt', that an adult may have acted in a manner which: • is not consistent with an organisation's Code of Conduct, and/or • relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children.
Allegation Behaviour which indicates that an adult who works with children has: • behaved in a way that has harmed a child, or may have harmed a child; • possibly committed a criminal offence against or related to a child; • behaved towards a child or children in a way that indicates they may pose a risk of harm to children

4.   REPORTING LOW-LEVEL CONCERNS

4.1   It is important that staff feel comfortable and are clear about, the concept of low-level concerns and that they do not need to be able to determine in each case whether their concern is a low-level concern or if in fact, it is serious enough to consider a referral to the LADO or meets the threshold of an allegation.

4.2   Reporting of a low-level concern is a neutral act and the Head (or in the case of a concern regarding the Head, the Chair of Governors) will determine how best to deal with the matter.

4.3   Where a staff member has a low-level concern about a member of staff, it should be reported to the Head who will determine the next course of action.

4.4   Where the low-level concern raised is about the Head, it should be reported to the Chair of Governors.

4.5   Members of staff can self-refer if they find themselves in a situation which could be misinterpreted or might appear compromising to others or if they have behaved in a manner, on reflection, they consider falls below the standard set out in the Code of Conduct.

5.   RESPONSE TO THE LOW-LEVEL CONCERN

5.1   On receipt of a report of a low-level concern, the Head will speak with the member of staff who has raised the concern, review the nature of the concern, and give consideration as to whether any concerns have been raised about the individual in the past.

5.2   Where the concern is regarded as a Safeguarding issue, the School's *'Safeguarding Policy'* and procedures come into action.

5.3   If the concern is established as low-level, it will be responded to in a sensitive and proportionate way – on the one hand maintaining confidence that such concerns when raised will be handled promptly and effectively whilst, on the other hand, protecting staff from any potential false allegations or misunderstanding.

5.4   The Head will decide who would be the most appropriate person in the school to deal with the matter. This would normally be the line manager of the individual about whom the concerns have been raised.

5.5   Most low-level concerns, by their very nature, are likely to be minor. Some will not give rise to any on-going concern and accordingly will not require any further action. Others will be most appropriately dealt with by means of management guidance and/or training.

5.6   In many cases, a low-level concern will simply require a values-based conversation with the individual about whom the concern has been raised to help maintain a positive professional relationship with the member of staff concerned.

5.7   Any such conversation should be recorded and should include being clear with the individual why their behaviour is inappropriate, what change is required in their behaviour, enquiring what, if any, support they might need in order to achieve and maintain that and being clear about the consequences if they fail to reach the required standard or repeat the inappropriate behaviour. On some occasions, ongoing and transparent monitoring of the individual's behaviour may be appropriate. An action plan or risk assessment which is agreed with the individual and regularly reviewed with them may also be appropriate.

5.8   The Head may determine that some low-level concerns are matters of misconduct or poor performance, in which case, the relevant disciplinary grievance or whistleblowing

procedures will be followed. If there is any doubt, the Head will seek advice, including from the LADO, where appropriate.

6. THE ROLE OF STAFF

6.1 Staff are encouraged to report any concerns they have within 48 hours of them first becoming a concern.

6.2 If the staff member who raises the concern does not wish to be named, then the school will respect that person's wishes as far as possible. However, there may be circumstances where the staff member will need to be named (for example, where it is necessary in order to carry out a fair disciplinary investigation) and for this reason, anonymity will never be promised to members of staff who report low-level concerns. Where possible, staff are encouraged to consent to be named as this will help to create a culture of openness and transparency.

6.3 Staff are given the option of either discussing their low-level concern verbally or providing a written summary of it on the *'Low-Level Concerns Reporting Form'* (see **Appendix 1**). Where the low-level concern is provided verbally, the Head will make a record of the conversation on a *'Low-Level Concerns Reporting Form'*, either contemporaneously or immediately following the discussion.

6.4 Unless exceptional circumstances apply (for example, providing a copy would create a real risk of harm to any adult or child), the member of staff about whom the concern has been raised should be asked if they would like to see a copy of the record made on conclusion of the case.

7. RECORD KEEPING

7.1 All records of low-level concerns will be retained in a central low-level concerns file which will remain confidential and kept securely in the Head's office with access limited to the Head, Designated Safeguarding Lead (DSL), and Safeguarding Governor.

7.2 Although the record of the low-level concern should be placed in a central file, some concerns may also involve issues of misconduct or poor performance, or they may trigger a procedure such as a grievance or whistleblowing. Where these issues would ordinarily require a record to be made and retained on the staff member's personnel file, this should be done in the normal way, in addition to the low-level concerns record.

7.3 When a low-level concern is re-classified as a safeguarding concern/allegation, all records of low-level concerns relating to that individual are kept in the central low-level concerns file at both Carrdus and Tudor and can only be accessed by the Head. The record of concern is required to be a clear and comprehensive summary of all allegations (except those which are found to have been malicious), details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached, to be kept as a record within the low level concerns file and securely kept in a lockable cabinet. A copy will be provided to the person concerned.

7.4 Low-level concerns should not be referred to in references unless they relate to issues which would ordinarily be included in a reference such as, for example, misconduct or consistent poor performance. It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) will not be referred to in a reference.

7.5 The DSL and the Head will review the low-level concerns file periodically to ensure that concerns are being dealt with appropriately and that any patterns of concerning behaviour are identified. A record of these reviews should be made.

8.   THE ROLE OF THE GOVERNORS

8.1 The DSL should regularly inform the Governing Body about the implementation of the low-level concerns policy and any evidence as to its effectiveness annually in the DSL's Safeguarding Report.

8.2 The Governing Body will also review an anonymised sample of low-level concerns at regular intervals in order to ensure that these concerns have been responded to appropriately.

9.   LOW LEVEL CONCERN THRESHOLD

9.1 If a staff member has more than 3 low level concerns logged against their name, they will be asked to attend a meeting with the Head to discuss the nature of the concerns, whether support needs to be put in place or the concerns need to escalated to.

Written by Head: April 2022
Approved by Education & Welfare Committee: May 2022
Reviewed by DSL: September 2024

REPORTING LOW LEVEL CONCERNS FORM

Please use this form to share any concern, no matter how small, and even if no more than a 'nagging doubt' that an adult may have acted in a manner which:

- Is not consistent with Tudor Hall's Code of Conduct, and/or
- Relates to their conduct outside of work, even if not linked to a particular act or omission, has caused a sense of unease about the adult's suitability to work with children.

You should provide a concise record, including brief context in which the low-level concern arose, and details which are chronological, and as precise and accurate as possible, of any such concern and relevant incident(s) (and please use a separate sheet if necessary).

The record should be signed, timed and dated.

Details of Concern	
Name of staff member:	**Department and Role:**
Signed:	**Time and Date:**

Received by:	**At (time):**	**On (date):**
Action taken (specify):		

Signed:	**Time and Date:**