READING BLUE COAT

Child Protection and Safeguarding Policy

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2) Contacts

The key contacts for Reading Blue Coat School are as follows:

Safeguarding Team:

Name	Role	Other roles	Contact
Guy Williams	Designated Safeguarding Lead (DSL)	Deputy Head, Pastoral	**gjw@rbcs.org.uk** Ext. 860
Pete Thomas	Deputy Designated Safeguarding Lead (DDSL)	Headmaster	**pjt@rbcs.org.uk** Ext 809
Claire Dance	DDSL	Director of Lower School	**cd@rbcs.org.uk** Ext. 887
Scott Yates	DDSL	Director of Middle School	**sy@rbcs.org.uk** Ext. 839
Raj Ghosh	DDSL	Director of Sixth Form	**rjg@rbcs.org.uk** Ext. 882
Lisa Bennett	DDSL and Safeguarding Mentor	Teacher of Religious Studies	**ljb@rbcs.org.uk** Ext. 844

Members of the Safeguarding Team can be reached through calling the School switchboard (0118 944 1005) and asking for a connection. Phone extension numbers are given in the table above. The Safeguarding Team can also be contacted via the School Secretary (Pastoral) in the Messer Building (Maria Illingworth: **mci@rbcs.org.uk**).

Other Key Contacts:

Name	Role	Contact
Ed Trelinski	Second Master	**etr@rbcs.org.uk**
Howard Williams	Chair of Governors	**chair@rbcs.org.uk**
Clare Freeman	Safeguarding Governor	**safeguarding@rbcs.org.uk**

Contact with Governors may also be facilitated through the Headmaster's Secretary (**hm@rbcs.org.uk**).

Local Authorities and External Bodies Contacts

Key external contacts include the following:

Name	Contact
Wokingham – concerned about a child	**triage@wokingham.gov.uk** 0118 908 8002 – (out of hours: 01344 786 543)
Wokingham – LADO	**lado@wokingham.gov.uk** 0118 974 6141
Bracknell – MASH	**mash@bracknell-forest.gov.uk** 01344 352 005
Reading – Brighter Futures for Children – concerned about a child	Via online form submission, **here**. **info@brighterfuturesforchildren.org** 0118 937 3641
West Berkshire – concerned about a child	**child@westberks.gov.uk** 01635 503 090

Windsor and Maidenhead – Achieving for Children – MASH	**mash@achievingforchildren.org.uk** 01628 683 150
Slough	**sloughchildren.referrals@sloughchildrenfirst.co.uk** 01753 875 362
Buckingham	**bscp@buckinghamshire.gov.uk** 01296 383 962
Thames Valley Police	**https://www.thamesvalley.police.uk/** tel. 101
NSPCC 24-hour helpline	0808 800 5000
NSPCC Whistleblowing Advice Line	0800 028 0285
Kidscape (anti bullying helpline for parents)	0845 120 5204
Refuge Domestic Abuse National Helpline	0808 2000 247
Childline	**https://www.childline.org.uk/** tel. 0800 1111
CEOP	**https://www.ceop.police.uk/Safety-Centre/** 0870 000 3344

3) The School's Commitment

Reading Blue Coat School (RBC) is fully committed to the safety and wellbeing of children and young people. It aims to provide a warm, nurturing, and safe environment, where students feel secure and supported. All members of the School community are asked to take responsibility for protecting and safeguarding children, recognising the right of all children to grow up without fear of abuse and harm. The leadership of the School will follow its duty to protect children unflinchingly. All staff, Governors, and volunteers are asked to read and understand this policy, and to act on it whenever necessary. Through working together and taking a positive, proactive approach, the School may provide great reassurance to students and their families.

The School's commitment to protect and safeguard also reflects an outworking from the fundamental values espoused by Reading Blue Coat, namely:

- **Aspiration** – the realistic and hopeful expectation that *all* children can and should be protected from harm.
- **Courage** – the willingness to ask difficult questions and make difficult decisions where it is in the child's interests for us to do so.
- **Compassion** – the acknowledgement and support for those who suffer, particularly for those affected by abuse, poor mental health, and other risks to children.
- **Service** – the desire to put the needs of others before oneself, giving time and emotional energy unstintingly for the welfare of children.
- **Integrity** – the determination to act always in accordance with principle and make decisions in light of what is fair, honest, and true.

This policy sets out the School's commitment in practical terms, showing clearly and simply how it is implemented day-to-day.

The School's commitment is fundamentally defined by statutory guidance, *Keeping Children Safe in Education* (*'KCSIE'*), and all aspects of that guidance are in force within the School.

4) Introduction

4.1 Child Protection ('CP') refers to the protection of children from abuse or serious harm. It is linked to the broader term of 'safeguarding,' which is defined in *KCSIE* 2024 as follows:
"Safeguarding and promoting the welfare of children is defined, for the purpose of this guidance, as: providing help and support to meet the needs of children as soon as problems emerge; protecting children from maltreatment, whether that is within or outside the home, including online; 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."

4.2 Although the definition of a child is anyone under the age of 18, RBC applies the same policy and standard of care to all students (including those already aged 18). The policy applies onsite and for any other professional interaction with students, for example on an educational visit or in communicating online. The policy also applies to any RBC students who are participating in alternative provision.

4.3 The purpose of this policy is to inform staff, (including supply staff) Governors, volunteers, parents, third parties, and other responsible adults associated with the School of the responsibilities for safeguarding and how these responsibilities will be carried out.

4.4 This policy will be regularly reviewed and updated (at least annually – see 'Document History')..

4.5 This policy is published on the School's website and is also available to parents of current and prospective students from the Designated Safeguarding Lead (Guy Williams) on request. Large print or other accessible formats can also be made available.

4.6 This policy is drafted in accordance with statutory guidance as follows. This guidance is also included in the bibliography annex.

- *Keeping Children Safe in Education September 2024 (KCSIE)*
- *Working Together to Safeguard Children December 2023 (WTSC)*
- *Prevent Duty Guidance for England and Wales December 2023*
- *Education (Independent School Standards) Regulations 2014*
- *What to do if you are worried a child is being abused – advice for practitioners March 2015*
- *Children Missing Education September 2016*
- *Information Sharing Advice for Safeguarding Practitioners May 2024*
- *Relationships Education, Relationships and Sex Education and Health Education 2019*
- *The Equality Act (2010)*
- *The Human Rights Act (1998)*
- *Charity Commission guidance: Safeguarding and Protecting People for Charities and Trustees June 2022*

4.7 We follow the **procedures of the Berkshire West Safeguarding Partnership**, of which our Local Authority (Wokingham) is a member. The Wokingham SCP Procedures manual may be found **here**. Additionally, we work closely with any other safeguarding partnerships where our students are

resident, such as Oxfordshire, Windsor and Maidenhead, Bracknell Forest, *etc*. In all work with external agencies, RBC staff will ensure that all parties communicate effectively, following appropriate procedures. The contact details for Local Authorities where RBC students are most commonly resident may be found in the Contacts section, above.

4.8 Every complaint or suspicion of abuse from within or outside the School will be taken seriously and action will be taken in accordance with this policy.

5) Principles

5.1 RBC maintains strong systems for safeguarding and pastoral care. Its approach is to promote a proactive and reactive culture of vigilance and early intervention, to ensure that emerging issues are recognised and dealt with swiftly. It aims to inculcate a safe and open environment, in which students have the confidence to speak out and expect to be supported and taken seriously, should they be subject to any form of abuse. Students will be treated compassionately, so that they do not feel a sense of shame or blame in coming forwards. Staff will receive a high level of training, to help maintain this culture and ensure that they act appropriately where they have concerns. The School promotes the message: **"safeguarding is everybody's responsibility"**. To be effective, each professional and organisation should play their part within a child-centred approach. This requires understanding the needs and views of children; careful listening is at the heart of what we do.

5.2 RBC staff will operate under the assumption that abuse can and will occur among students at any school, including our own, and it should never be assumed that a lack of reporting indicates that abuse is not taking place. Abuse may occur within schools where students feel unable or unwilling to report it.

5.3 *All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the School and/or can occur between young people outside this environment. This is known as contextual safeguarding. All staff should consider, and especially those within the safeguarding team, whether students are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of forms and young people may be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, sexual abuse, and serious youth violence.*

5.4 RBC pastoral teams operate with a strong and distinctive 'community of practice' model, whereby individual students and their needs are discussed routinely in teams of professionals, to ensure fulsome information sharing, gathering of perspectives, and a healthy culture of challenge among colleagues. For example, the weekly 'Section' meetings bring together: the DSL, Director of Section, Heads of Year, Head of Learning Support, School Nurse, Chaplain, School Secretary (Pastoral).

5.5 RBC will take all reasonable steps to ensure that:

- We practise safer recruitment for all staff, Governors, volunteers, and those that may have significant and/or unsupervised contact with children. See further our *Recruitment, Selection, and Disclosure Policy*;
- Where staff from other organisations are working with our students, we have received confirmation that child protection checks and procedures apply to those members of staff and that any such checks do not raise issues of concern in relation to the suitability of those staff members;

- We follow the local procedures of the Berkshire West Safeguarding Children Partnership and contribute to inter-agency working;
- Support is given to students in need through early intervention and, where appropriate, through multi-agency working;
- We are alert to signs of abuse, both in and outside of School, and we protect each student from any form of abuse, whether from an adult or another student;
- We deal appropriately with every suspicion or complaint of abuse, and support students who have been abused in accordance with their agreed child protection plan;
- We implement procedures to promote this policy, but, so far as possible, ensure that teachers and other staff are not harmed by false allegations;
- We are alert to the needs of students with physical and mental health conditions. All staff should be aware that:
    - They are well placed to observe children day to day and identify those whose behaviour suggests that they may be experiencing or at risk of poor mental health;
    - Mental health problems may, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation;
    - Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem
    - If they have a mental health concern about a child who is also a safeguarding concern, immediate action should be taken, and they should speak to the DSL or a DDSL
- Robust health and safety procedures are implemented;
- We implement clear and supportive policies on drugs, alcohol and substance misuse;
- We assess the risk of children being radicalised and/or drawn into terrorism, based on an understanding of the potential risk in the local area;
- Children are identified, who may be vulnerable to radicalisation, and staff know what to do when they are identified;
- We take all reasonable measures to ensure that School premises are as secure as circumstances permit;
- We teach students about safeguarding issues and about how to keep themselves safe (including on-line); and
- We ensure that any deficiencies in our child protection and safeguarding procedures are remedied without delay.

5.6 *The highest standards of safeguarding are expected to be in place during term time and during the holidays; during the day and before or after school-time. The School may hire or rent out facilities to organisations, both during term time and the holidays. Where activities and courses are provided by the School (such as for holiday clubs), this policy and all other arrangements for child protection will apply. Where services or activities are supplied by another organisation, the School will seek reassurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed), regardless of whether or not the students who make use of these services or activities are on the school roll. This requirement forms part of any lease or hire agreement made with third parties and failure to comply with this will lead to the termination of the contract or agreement.*

6) Personnel, Roles and Responsibilities

6.1 All staff, volunteers and governors have a duty to protect and safeguard children. All members of the community, including students and parents, are encouraged to play their part in supporting a culture of safety and awareness. The RBC approach is to empower people with the desire, ability, and

skills to protect young people. The strongest institutions for promoting children's well-being always build from the idea of a team effort.

6.2 The responsibilities of all staff (including Governors, volunteers, supply staff) are as follows:

- Contribute to a safe environment and consider the interests of students at all times;
- Listen to children and contribute to a School culture in which students can tell adults about their concerns without fear or a sense of shame;
- Yet, also be aware that children may not feel ready or know how to tell someone that they are being abused, exploited or neglected and that they may also not recognise their experiences as harmful;
- Assist children in need and to protect children from abuse, neglect, exploitation, radicalisation and extremism;
- Be proactive in maintaining professional knowledge of safeguarding issues and practices;
- Participate in any training specified by the DSL and other School management;
- Be aware of indicators of abuse, poor mental health, and other risks to students, and act on concerns about such indicators whenever they are observed;
- Maintain familiarity with and act in accordance with this policy and any other policy pertinent to the welfare of children;
- Maintain ability and willingness to enact safeguarding measures independently if needs be;
- Make and maintain adequate records of any safeguarding concerns or other significant conversations pertinent to the welfare of children;
- Report any safeguarding concerns to the DSL or DDSL in a timely manner, or to the Headmaster for allegations against staff and low-level concerns about staff;
- Annually, read and sign to accept the School's *CP and Safeguarding Policy* and *Staff Code of Conduct*, and the following external documents:
  - *KCSIE* Part One
  - *KCSIE* Annex B

6.3 The School appoints a Designated Safeguarding Lead (DSL), who is Dr Guy Williams, and, as per the requirement in *KCSIE*, this person will have sufficient time, expertise, resources, and seniority to lead in this area. This person is a member of the Senior Leadership Team and fulfils the role of 'Deputy Head Pastoral'. The DSL has lead responsibility for child protection and safeguarding (including online safety). The Headmaster and Governors will ensure that there is clear provision for this role in the job description of the DSL (see Annex: DSL Job Description). The main features of this responsibility may be summarised as follows:

- Managing referrals and processes of multi-agency working;
- Working with other adults (colleagues, parents, other professionals), to better safeguarding children;
- Maintaining and sharing information in an appropriate and secure manner;
- Raising awareness and promoting a culture of professional learning;
- Maintaining high levels of personal knowledge and training;
- Providing support and advice to staff to assist in their safeguarding work;
- Listening to students and understanding their views and needs.

The School also appoints Deputy Designated Safeguarding Leads (DDSLs), to support and deputise for the DSL as needed. The DDSLs have responsibility to deputise for any aspect of the DSL job description (as needed, though overall responsibility is never delegated) and to work as a team to contribute to a pro-active culture of safeguarding. DDSLs also have a vital role to play in the RBC approach of

maintaining a 'community of practice' around safeguarding; for example, the three Directors of Section are also DDSLs. The DDSLs are identified in the 'Contacts' section, above.

One of DDSLs also acts as the 'safeguarding mentor' and offers reflection as a 'critical friend' as to the management of CP and safeguarding cases.

The DSL will be available to deal with safeguarding concerns during school hours or, during their absence, this will be covered by one or more of the DDSLs. Outside of school hours and outside of term time, the role will be carried out by the Headmaster and/or a duty member of SLT.

6.4 The Headmaster, who is Mr Pete Thomas, will work alongside the Governing Body and SLT to ensure that RBC discharges all its duties and responsibilities, as set out in *KCSIE*, Part Two. The Headmaster has overall responsibility for ensuring that there is a the culture of safety and care in the School, and will ensure that the policies and procedures for safeguarding students are implemented effectively. Specific duties include:

- Maintaining systems for students to express their views, including safety, welfare, and safeguarding concerns;
- Ensuring that welfare risk assessments are completed, implemented, and monitored;
- Ensuring the safeguarding and child protection policy and procedures adopted by the governing body are implemented and followed by all staff;
- Ensuring sufficient time, training, funding, support and resources necessary to enable the DSL and DDSLs to carry out their roles effectively are allocated;
- Holding regular meetings with the DSL, to ensure an up-to-date understanding of welfare and safeguarding issues in the School;
- Promoting close cooperation between the Governing Body and SLT (and other staff), to ensure effective safeguarding measures are being implemented, including the chairing of Safeguarding Committee meetings;
- Ensuring that other measures are in place to support and protect the welfare of children, for example in health and safety, medical provision, educational visits;
- Maintaining an appropriate and effective Human Resources department, with the ability to implement the requirements for safer recruitment as set out in *KCSIE* Part Three;
- Managing allegations (acting as 'case manager') against members of staff (including Governors, volunteers, and supply staff), and including the management of low level concerns, as set out in this policy (sections 18, 19), liaising with the LADO as needed;
- Notifying the Disclosure and Barring Service and, where appropriate, the Teaching Regulation Agency and/or the Police of anyone who has harmed or may pose a risk to a child;

The Headmaster at RBC is also a DDSL, which helps ensure that a detailed and practical understanding of safeguarding is maintained at the highest level of leadership.

6.5 The Governing Body will have oversight of safeguarding and child protection, ensuring that the School is fully compliant with all statutory guidance, and that it publishes and implements an appropriate policy each year. It will ensure that the responsibilities set out in *KCSIE* Part Two are appropriately discharged. To this end, the Governing Body will ensure that:

- they facilitate a whole-school approach to safeguarding, ensuring child protection and safeguarding underpin all aspects of process and policy development.
- an effective, up-to-date child protection and safeguarding policy is in place that is clear and easy to understand for staff, students, parents and carers, and is made available on the School's website;

- other policies, as prescribed in Part 2 of *KCSIE*, are in place and operational;
- the obligations imposed by the *Human Rights Act* (1998) and the *Equality Act* (2010) are met;
- students are being taught about how to keep themselves safe, including online, and that provision is made to the specific needs and vulnerabilities of individual children, including those who are victims of abuse and/or have SEN/D needs;
- required pre-employment checks are being carried out in a timely way and correctly recorded in the Single Central Record;
- an appropriate member of staff from the School's leadership team is appointed to the role of DSL;
- all staff receive safeguarding induction and ongoing training in accordance with this policy;
- students are taught about safeguarding, including online safety;
- the School's safeguarding arrangements take into account the procedures and practice of the Berkshire West Safeguarding Children Partnership;
- serious incidents which fall within the threshold of serious incident reporting are reported to the Charity Commission;
- the School contributes to inter-agency working, including providing a co-ordinated offer of early help when additional needs of students are identified;
- clear systems and processes are in place for identifying and managing students with mental health problems;
- child protection files are maintained and, where appropriate, such records are transferred to a student's new school or School in accordance with statutory guidance;
- appropriate filters and monitoring systems are in place to keep children safe online and that these are reviewed regularly;
- the School reports to their local authority any student who joins or leaves the School at non-standard transition times in line with statutory and local authority guidance;
- written assurances are provided by individuals or organisations who hire School premises confirming appropriate safeguarding and child protection procedures are in place
- they convene regular Safeguarding Committee meetings, which will be chaired by the Safeguarding Governor;

6.6 The Chair of Governors will ensure the overall effectiveness of the Governing Body in providing oversight of child protection and safeguarding matters at RBC. They will also be responsible for managing any concerns raised about the Headmaster and, in the absence of the Headmaster, concerns raised about members of staff, Governors, volunteers, and supply staff.

6.7 Clare Freeman is the nominated Safeguarding Governor who takes lead responsibility for monitoring the operation of safeguarding arrangements in the School. This is done in a number of ways, these being:

- conducting discussions about safeguarding matters with the DSL at least once a term and more regularly, if needed;
- chairing the Safeguarding Committee of Governors and ensuring its effectiveness;
- liaising with the local authority and/or partner agencies where appropriate; and
- working closely with the DSL to ensure that they conduct an effective audit and produce an annual report for Governors on the School's safeguarding procedures. The Safeguarding Governor will join the DSL in verbally presenting the report to Full Governing Body and ensuring that all Governors have a clear understanding of the culture of safeguarding at RBC. The annual report will typically consider: the effectiveness and implementation of relevant policies; staff safeguarding training; the handling of safeguarding issues; referral

management; the contribution the School is making to inter-agency working; and the provision for teaching students how to keep themselves safe.

7) Training and Raising Awareness

7.1 RBC staff are trained to maintain a vigilant and caring attitude, working under the expectation that abuse could occur in any setting, may not be visible, and 'it could happen here'. There is no tolerance for any form of abuse. Quality training and regular professional updates provide the cornerstone of effective safeguarding and child protection, and RBC maintains a strong commitment to providing training of the highest level.

7.2 All staff, Governors, volunteers, and supply staff are required to undertake appropriate child protection and safeguarding training, as a precursor to beginning work and as part of a programme of regular updates. Full safeguarding training will be delivered to all staff each September, which will also contain updates to statutory guidance, policy, and practice. Training before commencing work is usually delivered in the form of an online course (EduCare or similar), although suitable alternative arrangements may be made by the DSL or Human Resources Department if needed. Training in the School's own safeguarding policy and processes is also given as part of new staff induction and further covered in the annual September training, and staff joining at other points in the year receive induction via a welcome meeting with the DSL. Responsibility for ensuring the verification and recording of training lies with the Human Resources Department.

7.3 Staff will also take part in other, related training, as required by the DSL or other members of staff. The topics will vary over time and content will be delivered through a mix of online and in-person courses and briefings.

7.4 Additional training requirements include:

- 'Targeted' training for the DSL / DDSL (including interagency working and Prevent) with refreshers every two years
- The same 'targeted' training will be provided to other key pastoral staff, who are not serving in the DDSL role. This includes: the School Secretary (Pastoral), Head of Learning Support, Director of EDI, and Heads of Year. This enables better understanding of the requirements of safeguarding across pastoral teams.

7.5 As part of and alongside training, all staff are expected to maintain familiarity with:

- Policies and systems within the School covering CP and safeguarding, student behaviour, staff conduct, whistleblowing, and e-safety safety
- The School's policy and response to children missing education
- The local early help process
- The referral process to Children's Services; statutory assessments
- What to do if a child says that they are being / have been abused, exploited or neglected
- The procedures to manage a report of child-on-child sexual harassment and sexual violence

Training for all staff, including the induction of new staff, will include the expectations, roles and responsibilities of staff in relation to filtering and monitoring of online content. (See further the School's *E-Safety, Digital Communication and Student Device Policy*).

The DSL will be available to clarify any of these matters and answer questions. The DSL and DDSLs will also maintain an enhanced level of understanding, including:

- The processes for early help and statutory intervention, including local criteria
- Local Authority child protection case conferences: how to contribute effectively
- Local contexts of safeguarding issues
- The specific needs of children, including those with SEND or young carers
- Data Protection regulations and how they relate to safeguarding matters
- The Prevent duty and risks of radicalisation

7.6 New appointees to the Governing Body receive appropriate safeguarding and child protection (including online) training at induction. This training is designed to ensure they understand their responsibilities as Governors and equip them with the knowledge to provide strategic challenge to test and assure themselves that RBC's safeguarding policies and procedures are effective and support the delivery of a robust whole college approach to safeguarding. All members of the Board of Governors receive update training at least on an annual basis.

8) Recruitment and Induction

8.1 The School will, through its recruitment procedures, ensure that all staff, volunteers, supply staff and Governors are suitable to work with children and young people. To enable this, they will be appropriately selected, screened, trained, and supervised. The School will implement safer recruitment practices, in accordance with its *Recruitment, Selection and Disclosure Policy*. Senior staff (members of SLT and Directors of Section) are trained to ensure that safer recruitment questions are asked at employment interviews. The School will adhere to all of the requirements for safer recruitment set out in *KCSIE* Part 3; this will be overseen by the Director of Human Resources.

8.2 Recognising that individuals who might pose a risk to children may seek access to them through voluntary roles in schools, the School will employ the same level of checks for suitability on volunteers. Where a parent or other volunteer works on behalf of the School on a one-off basis (i.e., is not vetted), he / she will only do so under the direct supervision of staff.

8.3 Members of staff will wear BLUE lanyards on site throughout the School day. The responsibility to do so will be explained to them as part of their induction. The role of different lanyards as per the status of a visitor, contractor, or members of staff is explained in the Schools' *Visitor Policy*.

8.4 On receiving an offer of employment, in addition to completing background checks, new members of staff will be required to complete safeguarding training, and to read and accept the School's *CP and Safeguarding Policy*, *Staff Code of Conduct*, and the relevant sections of *KCSIE* (as is an annual requirement for all staff, in September). They will be expected to provide a prompt return of acknowledgement, in a timescale agreed with the HR Department and / or the School Secretary (Pastoral).

8.5 On commencing employment, as part of the induction of staff, the School will provide copies (in hard or digital format) of:

- The *Child Protection and Safeguarding Policy*; this policy also includes:
    - Job description for the DSL (annex)
    - Low level concerns (section of policy – see also the *Code of Conduct*)
- Information identifying the DSL and Deputy DSLs and their role

- The *E-Safety, Digital Communications, and Student Device Policy*
- The IT *Acceptable Use Policy*
- The *Staff Code of Conduct*
    - Also containing Low Level Concerns procedures
- The *Whistleblowing Policy*
- The *Behaviour, Rewards and Sanctions Policy*
- The *Anti-Bullying Policy*
- The *Registration, Attendance, and Students Missing Education Policy*
- The relevant sections of *KCSIE* as identified in this policy: Part One, Annex B

All these documents will be available on the portal for staff to access via their login. If they experience difficulties in accessing these documents, then they should seek assistance from the School Secretary (Pastoral). All existing staff are expected to maintain an up-to-date understanding of these policies and should re-read them when needed, or whenever directed to do so by the DSL.

8.6 The DSL or appropriate DDSL will take part in new staff induction days, to explain and highlight the importance of the School's approach to CP and Safeguarding.

9) Student Education and Awareness

9.1 The School will promote among the students a culture of awareness and understanding of safeguarding issues and the School's approach. Students will be informed clearly and consistently of their ability to share and raise concerns, and how to do so. Students will be given the understanding that abuse may come from many sources, including some patterns of behaviour in their own peer group ('child-on-child abuse'); they will be given the confidence and tools to identify abusive behaviour and tell a member of staff.

9.2 The School will provide a suitable Wellbeing (PSHE) and RSE curriculum for all students, which will enable them to understand and manage risks, and to keep themselves safe. This will include (but not be limited to) such topics as:

- E-safety
- Bullying
- Mental health
- Sex and relationships, including harmful sexual behaviours
- Equity and inclusion
- Substance abuse

10) Early Help

10.1 RBC recognises the importance of early help in preventing a problem from escalating. Early help may be provided exclusively by the School in cases that do not require a referral to statutory services or in conjunction with third parties where the threshold criteria have been met. The School acknowledges that young people may face many challenges that put them in need of support and thus we ensure that staff are aware of them. These challenges include stress, peer pressure, problematic body image, anxiety, and relationship issues.

10.2 The School's community of practice model ensures that individual students are discussed on a regular basis in small teams, for example in Section meetings, which generally run through each year

group. These conversations identify emerging issues and troubling patterns, to better enable early help to be given before acute problems develop. Directors of Section are also DDSLs and are familiar with the concept or and local arrangements for early help. The DSL will also attend such meetings. Other School systems are further used to identify students who may be of concern, such as admissions processes, conversations with tutors, and Wellbeing lessons.

10.3 Students are encouraged to raise concerns as soon as they are identified, either to their tutor, Head of Year, any teacher, or directly to the Designated Safeguarding Lead, so that effective early support can be provided. They will always be taken seriously and never be made to feel that they are creating a problem for reporting concerns or abuse. Students will be told of the 'ways to share and speak out' (see further Section 16, below).

10.4 If staff believe that a student could benefit from early help, they should discuss the matter with the DSL or the student's Director of Section (DDSL), who will give consideration to local safeguarding arrangements and thresholds and decide what action should be taken.

10.5 The progress of students receiving early help will be monitored and, if the situation is not improving, a further referral to Children's Services will be considered. All decisions and actions will be logged on MyConcern.

10.6 The School recognises the additional vulnerability of children, who:

- are disabled or have special educational needs;
- do not have English as a first language;
- are in private foster care;
- are faced with challenging family circumstances
- have undergone 'aces' (adverse childhood experiences);
- are acting as a young carer;
- are showing early signs of abuse, neglect, or mental health problems;
- are misusing drugs or alcohol;
- are at risk of being radicalised or exploited;
- are frequently missing, or permanently absent from School, or not in receipt of full-time education;
- may be subject to discrimination on any grounds, for example: race, religion, ethnicity, sexual orientation, gender identity, neurodiversity; and
- have experienced temporary exclusions and are at risk of permanent exclusion

Such children may be more likely to need early help. Also, recognising abuse, exploitation or neglect may be more difficult for these children for many reasons, including:

- assumptions that indicators of possible abuse such as behaviour, mood or injury relate to a student's disability without further exploration;
- being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
- that students with special educational needs or disabilities can be disproportionately impacted by bullying without outwardly showing any signs;
- cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in the real world or online;
- normalisation of abusive behaviour at home;
- communication barriers and difficulties overcoming these barriers;
- a disabled child's understanding of abuse.

11) Local Thresholds and Levels of Need

11.1 Wokingham (as part of the Berkshire West Safeguarding Partnership) publishes threshold guidance (**here**) that may be used by staff to consider the best way to meet the needs of children. This guidance sets out how to identify levels of need and the resources and services that may therefore be required. It is to be applied individually, recognising that each child has their own context and that this may change over time.

11.2 The Wokingham descriptors for the levels of need and associated interventions are as follows:

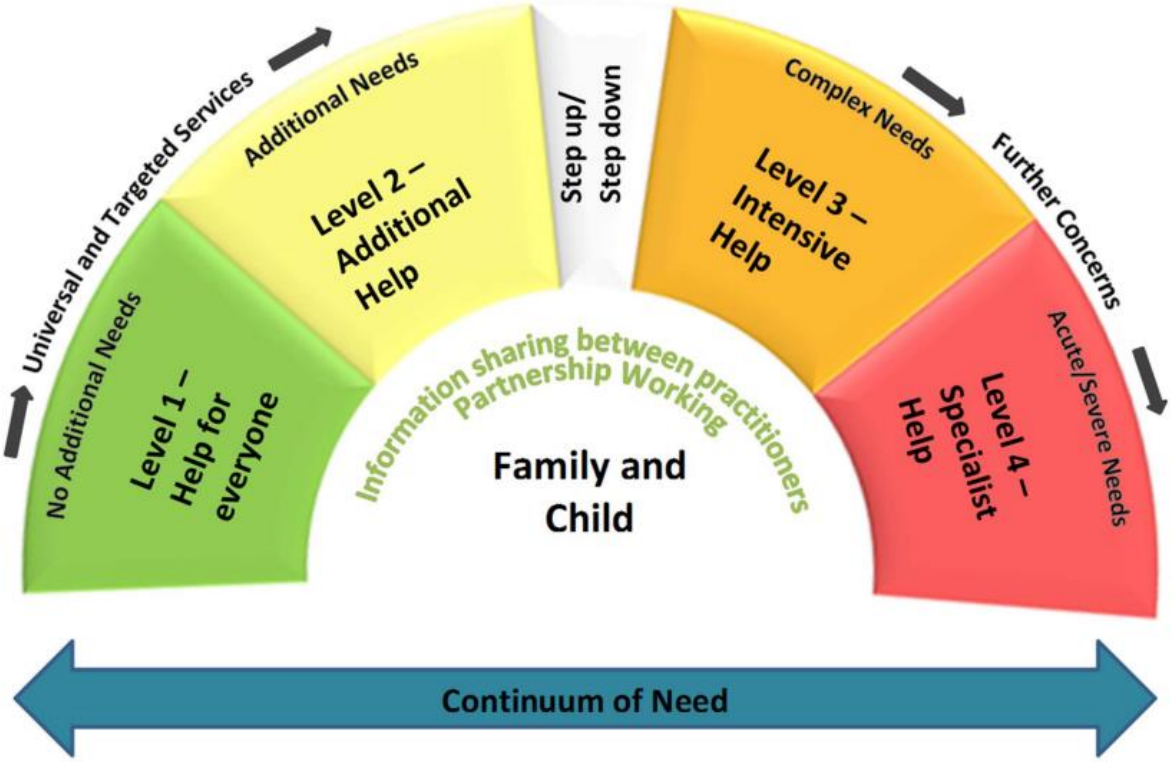
Level 1: Help for Everyone Children, young people and their families who receive universal services have no additional needs; all their health and developmental needs will be met by universal services. These are children who consistently receive child focused care-giving from their parents or carers.

Level 2: Additional Help Children with additional needs (including disabilities), who may be vulnerable and showing early signs of abuse and/or neglect; their needs are not clear, not known or not being met. These children and their families need some additional help so that their children can develop, learn and achieve their full potential. They may be living in a situation where the worries, concerns or conflicts are becoming more frequent or over an extended period. In order to resolve the issues, these children may require additional support, advice, direction and sometime planned intervention or additional resources. This may include children with disabilities accessing universal short breaks with support or targeted short breaks.

Level 3: Intensive Help Children and families who require significant or complex personalised support, often from several agencies working together, to help them to reach their potential. The child may be dealing with multiple longer-term issues such as a significant disability, anti-social or challenging behaviour, neglect or poor family relationships, long-term problems with education or health and they need support from services to ensure that the impact of these significant issues are minimised as much as possible. This is the threshold for a statutory assessment led by children's social care under section 17, Children Act 1989.

Level 4: Specialist Help Children who are living in circumstances where they are suffering or are likely to suffer significant harm, where the young person themselves may pose a risk of serious harm to others or where there are complex needs in relation to disability and may require a more specialist intervention. Children and young people will be referred to children's social care and dealt with under section 47, 20 or 31 of the Children Act 1989. This will also include children who have been remanded into custody and statutory youth offending services.

Wokingham also provides the following 'windscreen' graphic to represent the continuum.



Reading the full Wokingham thresholds document will give an understanding of the detailed considerations that go into making a threshold judgement about the circumstances of a child.

12 What to Look out for

12.1 All staff should be aware of the types and signs of abuse, neglect and exploitation so that they are able to identify students who may be in need of help or protection. They also must be mindful that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or may not recognise their experiences as harmful. To reduce barriers to a potential disclosure it is incumbent on staff to build trusted relationships with children which facilitate communication. Staff must also exercise professional curiosity and speak to the DSL if they have concerns.

12.2 Child abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can also include ill-treatment that is not physical as well as the impact of witnessing the 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. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Safeguarding risks may be affected by the area or environment a child lives in. Abuse may take place purely online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. Serious bullying is a form of abuse and therefore will be treated as a child protection concern if there is reasonable cause to suspect a child is suffering, or likely to suffer, significant harm.

12.3 There are four main types of abuse:

- Physical – causing physical injury or harm. This may involve hitting, shaking, burning, poisoning, *etc.* Injuries may be visible, although students may conceal them under clothing, makeup. Harm may also be caused by an adult inducing illness in a child.
- Emotional – attacking a child's sense of security, self-worth, and relationships. This may include ridicule, conveying a sense of worthlessness, setting unreasonable expectations, highly critical remarks, or depriving children of freedom and expression. Emotional abuse can engender a sense of fear and anxiety.
- Neglect – failing to meet basic needs. This could include depriving a child of nutrition, suitable clothing, sleep, adult supervision, emotional affirmation. Failing to provide suitable medical care may also constitute neglect.
- Sexual – forcing or enticing a child to take part in sexual activities. This could include physical sexual assault, such as penetrative acts, or less violent acts such as masturbation or touching. This may also include non-physical acts, such as asking a child to produce or view sexual images. Children may or may not be aware of or understand what is happening as a part of sexual abuse. Children may also feel that they have consented to the activity. Sexual abuse often takes place online or is preceded by online grooming. It is not exclusively perpetrated by adult males; women and young people may also perpetrate sexual abuse.

The different forms of abuse may overlap or be combined. Abusive behaviours and relationships can change over time.

Abuse may manifest itself in different ways and appear differently in different children. It is important to keep an open mind about possible causes for perceived symptoms of abuse. Abuse may impact on both physical and mental health, and it may exacerbate problems that were already present.

12.4 It is also important for staff to be aware of specific issues, which may further threaten the well-being of children. These matters are discussed, with further resources in linked documents, in Part 1 and Annex B of *KCSIE*. All RBC staff will read this information in Annex B carefully, as it provides the information required to recognise cases of such potential abuse. If RBC staff have concerns that a child is exposed to any of the matters here, they should contact the DSL immediately.

As a summary, key **specific safeguarding issues** include the following:

- Child on Child abuse (see further in Section 14); this can take many forms, including many types of abuse listed here. Acts of abuse among children may be consistent with a pattern of bullying, such as violence or intimidation, which is further covered in the School's *Anti-Bullying Policy*. Abuse may also take place as part of hazing or initiation ceremonies (e.g., into sports teams). Children are also at risk specifically of sexual abuse from their peer group.
- Sexual violence and sexual harassment; this can occur between two children of any age and sex from primary to secondary stage and into colleges. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Victims will find this stressful and distressing; it will be exacerbated if the alleged perpetrator attends the same school.
- Youth involved sexual imagery; this relates to any image of a sexual nature or a nude / semi-nude image of a child. Although it is common for young people to share images of themselves or others as part of their social lives online, there are risks associated with the nature of the content, particularly if it is of a sexual nature. It is illegal to create or share sexual images or videos of under 18s. If staff become aware of such imagery, they should notify the DSL immediately, taking care not to view or share the content. RBC staff are advised to follow the 2024 overview guidance provided by UKCIS. The Safeguarding Team will then follow the full

guidance (*Guidance: Sharing Nudes and Semi-Nudes*) in managing their response to any such incidents.

- Children missing from education (see separate School policy); this will have a negative impact on a child's development and education, and it may be a warning sign that other forms of abuse may be present. Children missing education, or prolonged absence and/or repeat absence may be an indicator for such issues as neglect, sexual abuse and exploitation, child criminal exploitation, mental health problems, substance abuse, travelling to conflict zones, female genital mutilation, or forced marriage.
- Child sexual exploitation (CSE); this occurs through an imbalance of power, where a child is exploited sexually. It may be a one-off incident or a series of incidents, which range from the opportunistic to a pattern of organised crime. In CSE young people may receive something (e.g., food, accommodation, drugs, alcohol, gifts, money or simply affection) for engaging in sexual activities. The victim may perceive it or present it as a seemingly 'consensual' relationship. The perpetrator holds power over the victim, which increases as the exploitative relationship develops. CSE involves varying degrees of coercion, including unwanted pressure to have sex, sexual bullying, cyberbullying, and grooming. However, some victims may not exhibit any external signs of this abuse.
- Child criminal exploitation (CCE) County Lines; criminals and criminal gangs seek to exploit children for various reasons, including sex, drug trafficking, or violence. This threat is geographically widespread and exploitation is a feature of county lines activity: drug networks that groom young people to carry drugs and money from urban areas to suburban and rural areas. Involvement in criminal activity may be dangerous or stressful to children, and could lead to criminal prosecution. It could manifest itself in school absence, changed behaviour, and new and unexplained possessions. Concerns should be reported to the DSL, who will consider accessing the National Referral Mechanism. Further information is found in the Children's Society report *Counting Lives* (*2019*). Staff must be aware of the issue, acknowledging that Berkshire is a regular target for county lines activities, with local news reporting recent incidents and arrests focused on Reading, Slough, and Maidenhead.
- Cybercrime; this is criminal activity committed using computers and/or the internet. It could include hacking, denial of service attacks, or making and distributing malware. Children with an interest in computers may accidentally stray into this area of crime. In cases of risk of exposure to practices of or suspected cybercrime, the DSL may refer to the 'Cyber Choices' programme, although this will not cover other, serious 'cyber enabled' offences such as fraud.
- Domestic abuse; this received statutory definition in the 2021 *Domestic Abuse Act*, and the Government's factsheet outlining that definition may be found **here**. This recognises children as victims in their own right, if they see, hear, or experience domestic abuse. Domestic abuse behaviours may take on many forms: physical, emotional, economic, coercive. Under the statutory definition, both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected". RBC staff should be aware that successive lockdowns have led to an increase in reports and referrals of domestic abuse gathered by various organisations, including the Government. The national helpline is open 24 hours a day, free of charge, on this number: 0808 2000 247. Links to resources specific to domestic abuse are contained in Annex B of *KCSIE*.
    - Operation Encompass operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when the police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead or deputy) in school before the child or children arrive at school the following day.

- So-Called Honour-Based Abuse (HBA); this encompasses crimes or incidents motivated by the desire to protect the perceived 'honour' of a family or a community. It may involve a wide network of family and community members, and multiple perpetrators. Schools may encounter children who are about to be, or already have been the victims of HBA. Specific sub-types of HBA include:
    - Female Genital Mutilation (FGM); this comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. There is a statutory duty for teachers to report to the police when they discover that FGM appears to have been carried out on a girl aged under 18. Information about the reporting duty may be found **here**.
    - Forced marriage; this is a marriage entered into without the full and free consent of both parties. It may involve violence, threats, or other forms of coercion; perpetrators may used perceived cultural traditions to coerce a victim into forced marriage. Since February 2023 it is also a crime to carry out any action with the purpose of causing a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used.
    - Breast Ironing; this is a form of physical abuse in which a young girl's breasts are damaged to flatten them or prevent their development.
- Radicalisation; children are vulnerable to extremist ideology and radicalisation. Extremism is active opposition to fundamental values (including the Fundamental British Values of democracy, the rule of law, mutual respect, and tolerance); radicalisation is the process by which one comes to support extremism and terrorism; terrorism is serious violence or criminal activity, designed to influence the Government or intimidate the public. The School follows the statutory guidance, *Prevent* (2023), which includes the Prevent duty to have "due regard for the need to prevent people from being drawn into terrorism". Concerns of this nature may lead to the DSL making a Prevent referral; this may also lead to participation in Channel – a voluntary, confidential support programme.
- Children and the court system; children may be required to give evidence in a criminal court, either for crimes against them or crimes they have witnessed. They may also be affected by child arrangements in family courts. Such circumstances may be stressful for children.
- Children with family members in prison; these children are at risk of poor outcomes including poverty, stigma, isolation, and poor mental health.
- Homelessness; this would present a significant risk to a child's welfare. 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. In such circumstances the DSL should be aware of the referral routes to the local housing authority, though this would not replace the need for a referral to children's services.
- Mental health; poor mental health is a significant challenge to a child's well-being in its own right, but may be further caused or exacerbated by other safeguarding issues, or may make a child more vulnerable to abuse. Children who have suffered from abuse or neglect are likely to suffer a decline in mental health as a result, for example in the form of anxiety or depression. It is important for all staff to be vigilant for and ready to report concerns about poor mental health, as for any other safeguarding matter. These concerns should be reported to the DSL or DDSL immediately. Further advice may be found in the Government guidance *Mental Health and Behaviour in Schools* (2018), **here**. Staff should also refer to the School's *Well-Being and Positive Mental Health Policy*.
- Child abduction; this is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. This may be committed by family members, those known to the child, or strangers. Other community safety incidents may also pose a

threat to children, such as unknown adults loitering near school and engaging children in conversation.

- Modern slavery; this encompasses human trafficking and slavery, and forced labour. It can take many forms, including sexual exploitation. Further information, including how to access the national referral mechanism, may be found **here**.
- Serious violence; involvement in serious violence would cause serious harm to a child, whether as a victim or perpetrator. It is more likely to affect male students, those who are regularly absent or excluded from school, and those who have been involved in offending. Violence can peak in the hours just before or after school.

12.5 All staff are reminded of the potential risks of inviting visiting speakers to the site or online to address students and the wider RBC community, and it is important to maintain awareness of the risks mentioned above, including the risks of extremism and radicalisation, when considering the suitability of a potential visiting speaker. Speakers who pose a risk or potential risk to students should not be invited. The details of what to consider and the process for conducting appropriate research into the suitability of visiting speakers is covered in the RBC Visitors and Vetting Visiting Speakers Policy. Staff who invite speakers to School are required to adhere to this policy.

13) Signs of Abuse

13.1 All staff need to be aware that students may be fearful, unwilling, or reticent about reporting abuse generally, and particularly about child-on-child abuse, and therefore need to be vigilant for potential indicators that abuse may be taking place and inform the DSL and/or deputies of any concerns they might have.

13.2 Signs that abuse may be taking place include the following indicators:

- the student tells and adult that they have been abused, or asks a question which implies this may be the case
- a student's injury cannot be reasonably or consistently explained, or is unusual
- a pattern of or frequent injuries are emerging
- the student displays other physical symptoms, such as fatigue, illness, or drug-related physiological changes / side effects
- the student engages in extreme or challenging behaviour, or there is a change in the student's behaviour
- the student's academic attainment or engagement in school declines
- the student asks to drop subjects with a particular teacher or activities with another adult, and is reluctant to discuss it, or avoids contact with another student in the same way
- the student appears neglected (e.g., dirty, hungry, inadequately clothed)
- the student is reluctant to return home, or has been rejected by parents or guardians
- the student's emotional development is delayed
- the student has inappropriate knowledge or language to their developmental stage/age
- the student withdraws emotionally, lacking trust
- the student shies away from being touched or flinches at sudden movements
- the student loses or gains weight
- the student participates in unusual, suspicious, or unexpected travel arrangements
- the student is secretive
- the student has new and unexplained personal possessions

Some of these indicators may occur with legitimate and reasonable explanations, so it is important not to jump to conclusions; staff should allow the safeguarding team to conduct a careful and sensitive investigation of concerns. Such lists are not exhaustive, and abuse may still be occurring without these indicators.

13.3 Staff may also access the NSPCC's guidance for different types of abuse and ways of spotting them, **here**. They may also access the Government's guidance, include signs of possible abuse and 'questioning behaviours' in *What to do if you are Worried a Child is Being Abused* (2015), **here**.

14) Child-on-Child Abuse: the School's Approach

14.1 RBC recognises the risks and harms presented by child-on-child abuse; children are capable of abusing their peers in person and online, in school and outside, and *all* staff are expected to understand the School's approach. It is important to note that a 'child' for the purposes of concerns about child-on-child abuse constitutes any student at the School (including those aged 18), to whom the School has a duty of care. Those aged over 18 may be treated in a different way by external agencies, but the School's approach will not differ. There is significant overlap between the problem of child-on-child abuse and bullying, and therefore this should be read in conjunction with the RBC *Anti-Bullying Policy*.

14.2 Child-on-child abuse may occur among children of any age, in any part of the country, in any social demographic. RBC staff will operate under the assumption that child-on-child abuse can and does occur in our School; even if there are no reports of such abuse, it should *not* be assumed that it is not happening. It may be that abuse is taking place, but children are unable, unwilling, or afraid to report it. Issues that prevent reporting may include: intimidation, social anxiety, peer pressure, lack of trust, lack of understanding. For this reason, it is crucial that staff report *all* concerns of possible child-on-child abuse to the DSL (or DDSL) immediately. It is also important for all staff to promote the understanding that students can turn to a variety of adults at RBC and there are multiple ways to share and speak out – anything that facilitates better communication makes it more likely that child-on-child abuse will be challenged effectively. When children do come forward, staff are expected to reassure them that they will be taken seriously and kept safe; students will not be made to feel that they are 'causing trouble' when reporting abuse.

14.3 All staff must recognise the importance of challenging inappropriate and abusive behaviour, and take personal responsibility for doing so. Downplaying or ignoring certain behaviours can make them worse, creating the impression among students that they are acceptable in the School. For example, suggesting that 'boys will be boys,' or that unacceptable behaviour is 'part of growing up,' or portraying harassment as a 'joke' or 'banter' could lead to a culture of such behaviours creating an unsafe environment for young people.

14.4 Child-on-child abuse is most likely to include, but may not be limited to:

- bullying (including online and prejudice-based discriminatory bullying)
- abuse within intimate relationships (sometimes known as 'teenage relationship abuse')
- physical abuse, e.g., hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence) sexual

harassment, such as sexual comments, remarks, jokes, and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- 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
- consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- upskirting, 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 (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Note: The issues and management of cases of child-on-child abuse involving sexual harassment and sexual violence are often complex and are explored more fully in Section 15 below.

14.5 RBC takes a 'zero tolerance' approach any form of child-on-child abuse. Abuse must always be challenged and never excused, minimised, or normalised, by staff or any other member of our community. Cases of suspected child-on-child abuse will always be raised with the Deputy Head Pastoral and the Second Master, in addition to the relevant Director Section. Sanctions of an appropriate level will be consistently applied, most likely with significant sanctions for established cases of child-on-child abuse (with severe cases leading to temporary or permanent exclusion). See further, the RBC *Behaviour, Rewards and Sanctions Policy*.

14.6 Knowledge and understanding of issues of child-on-child abuse will be consistently promoted by the School and staff are expected to maintain a high level of training, for example reading articles about child-on-child issues in safeguarding newsletters. Child-on-child abuse training will be refreshed regularly, in the annual (September) training and in separate updates. The DSL will produce a termly analysis of child-on-child incidents and share it with Directors of Section and/or other members of SLT, to better plan for the School's response and interventions for child-on-child concerns.

14.7 Risk of child-on-child abuse may be anticipated and minimised through the School taking a pro-active approach. Measures include (non-exhaustively): educating students through Wellbeing (PSHE) / RSE and other pastoral programming; raising awareness in the student body through assemblies, tutorials, events, student societies; sending clear signals through behaviour policy and implementation that abuse is never tolerated; ensuring appropriate supervision and management of students on site; open communication with parents about the risks and their ability to contact the School. See further, the RBC *Relationships and Sex Education Policy*; this policy and indeed the School's approach to RSE will be formed by routine (at least annual) consultation with parents and students.

14.8 Cases of suspected child-on-child abuse will be managed carefully by the DSL and /or relevant DDSL, generally in consultation with the Second Master. Staff will report any such concerns promptly to the DSL, who will review the information provided and seek any necessary clarification, and then will log the allegation securely on MyConcern.

Where the DSL considers that the behaviour meets the local authority threshold criteria (i.e., where there is reasonable cause to suspect a student is suffering or is likely to suffer significant harm), the case will be referred to the local authority using the procedures set out in this policy. The School will take advice from children's social services on when and how to inform the student about the allegations and how the investigation of allegations should be conducted. It will also take all appropriate action to ensure the safety and welfare of all students involved, including those accused of abuse. Further details on how cases of child-on-child abuse will be managed is contained in Part 5

of KCSIE (September 2024). Any advice given, whether on the telephone or in writing, will be logged on MyConcern.

Depending upon the allegation, the DSL will investigate by interviewing parties concerned and taking further notes – these will also be logged. In cases of suspected abuse and significant harm, a second member of staff will be present for interviews (e.g., Director of Section or Head of Year). All allegations will be taken seriously and reviewed in a careful, even-handed way. Resolutions will be communicated clearly, along with their rationale, to the parties affected – students in person, parents in writing.

Particular sensitivity will be exercised where both the alleged 'victim' and 'perpetrator' are students at RBC, and the DSL will assess and manage risks (logging any such risk assessments and management plans on MyConcern) of students interacting in a harmful or prejudicial way.

Throughout the investigation and in its resolution, both the 'victim' and the 'perpetrator' will be supported by the School through practical measures, which may include (non-exhaustively): changing routines and locations, for separation; briefing staff; regular meetings; counselling; liaising with Children's Services, *etc.* Even after an allegation has a formal resolution it may affect those involved for months or years to come, and therefore staff should remain vigilant to the students' welfare.

14.9 A student against whom an allegation of abuse has been made may be suspended during the subsequent investigation and the School's policies concerning behaviour and exclusions will apply.

14.10 If it proves necessary for a student to be interviewed by the police in relation to allegations of abuse, the School will ensure that, subject to the advice of children's social services and/or the police, parents are informed as soon as possible and that an appropriate adult supports the student during the interview.

15) Child-on-Child Sexual Violence and Sexual Harassment

15.1 Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Behaviour outside the normal range is called harmful sexual behaviour (HSB) because it is harmful to others or the student themselves. HSB can occur online and/or face-to-face. (For a table that presents key features of the continuum, please see Annex D.)

Central to determining whether sexual behaviour between children can be considered harmful is the age and development of those involved. For example, sexual behaviour can be considered harmful if one the children is much older, particularly if there is more than two years' difference, or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child if they have power over them, for example, if the older child is disabled or smaller in stature. For some there may be a link between viewing online pornography and subsequent HSB.

HSB can escalate over time. Early intervention when inappropriate behaviour is identified can help prevent problematic, abusive and/or violent behaviour in the future. It should be noted, though, that the majority of young people displaying HSB do not become sexual offenders as adults.

15.2 Sexual harassment refers to 'unwanted conduct of a sexual nature' and can occur online and offline and both inside and outside of school. Sexual harassment can take a wide variety of forms:

- Sexual comments, such as: telling sexual stories, making lewd comments or sexualised remarks about a person's clothes or appearance, using sexualised names, sexual jokes or taunting, etc.
- Physical behaviour, such as deliberately brushing against someone, interfering with clothing (flicking bra straps, lifting skirts, etc.), pulling down trousers, upskirting, displaying pictures, drawings or photos of a sexual nature
- Online sexual harassment, such as non-consensual sharing of images and videos (nudes and semi-nudes), sharing unwanted explicit content, sexualised online bullying, unwanted sexualised comments and messages, sexual exploitation, and coercing others into sharing images of themselves or performing acts they are not comfortable with online

15.3 Sexual violence includes acts such as sexual assault, assault by penetration, rape and causing someone to engage in sexual activity without consent (this could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party). A key feature of such acts is that the sexual activity takes place without the consent of the victim. Consent can only be given if an individual has the freedom and capacity to choose to participate in a sexual act. Consent to sexual activity may be given to one sort of sexual activity but not another and can be withdrawn at any time during sexual activity.

15.4 Sexual harassment and sexual violence can occur between students of any age and sex. However, staff should be aware that some groups are at greater risks than others. Girls, students with SEND, and LGBTQ+ students are more likely to be victims of these types of abuse. Evidence shows that boys are more likely to be perpetrators and girls to be victims. Young people who are victims of sexual harassment and sexual violence will find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment.

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

15.6 All staff will be trained to manage a report of child-on-child sexual violence and sexual harassment. It is essential that **all** victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the School should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting sexual harassment or sexual violence. Nor should a victim ever be made to feel ashamed for making a report, or their experience minimised. It is also important to emphasise that the law is in place to protect children and young people rather than criminalise them.

15.7 Section 17 of this policy provides general guidance for listening to students and record-keeping. Effective safeguarding practice in the context of claims of sexual harassment or sexual violence further requires the following:

- If possible, reports should be managed with two members of staff present, (preferably one of them being the Designated Safeguarding Lead or a Deputy).
- Where the report includes an online element, staff should know and following the **searching, screening and confiscation advice (for schools)** and **UKCIS advice on sharing nudes and semi-nudes**. **The key consideration is for staff not to view or forward illegal images of a child.** The UKCIS advice provides more details on what to do when viewing an image is unavoidable. In

some cases, it may be more appropriate to confiscate any devices to preserve any evidence and hand them to the police for inspection.

- The recognition that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory and so students may not be able to recall all details or timeline of abuse.

15.8 The School will respond appropriately to all reports and concerns about sexual harassment and/or sexual violence both online and offline, including those that have happened outside of the School. The DSL/DDSLs are likely to have a complete safeguarding picture and be the most appropriate people to inform the School's initial response. Important considerations will include:

- the wishes of the victim in terms of how they want to proceed*;
- the nature of the alleged incident(s), including whether a crime may have been committed and/or whether harmful sexual behaviour has been displayed;
- the ages and developmental stages of the children involved;
- any power imbalance between the children (e.g., whether the alleged perpetrator(s) is/are significantly older, more mature and confident);
- whether the victim has a disability or learning difficulty;
- whether the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature);
- if the sexual harassment or sexual violence took place within an intimate relationship between those involved;
- the risk of intra familial harms and the need for siblings to be supported following an incident;
- whether there are ongoing risks to the victim, other children, adult students or school or School staff;
- and other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

*Note: The victim of sexual harassment or violence may ask the School not to tell anyone, but the DSL has to balance the victim's wishes against the duty to protect the victim and other students in the School. The general rule of thumb is that if a student is either at risk of harm, or is in immediate danger or has been harmed, a referral to local authority social care should be made. Rape, assault by penetration and sexual assaults are crimes and must therefore be reported to the police.

15.9 The DSL will reach a judgement about which of the following four ways is the most appropriate for handing the case:

- Internal management: handled entirely within the School.
- Early help: where the students concerned do not require referral to statutory services but may benefit from assistance from an external agency.
- Local authority children's social care: where a child has been harmed, is at risk of harm, or is in immediate danger.
- Report to the police: in addition to the above, where the seriousness of the concern merits it.

In all but the first circumstance, how the case is managed will be determined in conjunction with the local authority safeguarding team and/or the police. The School will follow the guidance as set out in detail in *KSCIE* (2024), Part 5.

15.10 The School will do all that it reasonably can to protect the anonymity of students involved in any report of sexual harassment or sexual violence. Amongst other things, this will mean carefully

considering which staff should know about the report and any support that will be put in place for those involved.

15.11 Risk and needs assessments are integral to the management of most cases of sexual harassment and all cases involving sexual violence. These assessments must be formulated on a case-by-case basis and should be conducted **immediately** once an incident comes light rather than waiting for the outcome (or even the start) of a local authority children's social care and/or police investigation. Where sexual violence is alleged to have occurred the risk and needs assessment should consider:

- The victim, especially their protection and support
- Whether there may have been other victims
- The alleged perpetrator(s)
- All other children at the School, especially any actions that are appropriate to protect them from the alleged perpetrators
- The time and location of the incident, and actions required to make the location safer

Risk assessments will be recorded in writing and kept under regular review by the DSL to ensure the risk mitigation measures that have been put in place are effective and reflect changing circumstances. It is highly likely that these risk assessments will be informed by assessments made by social workers and/or sexual violence specialists.

15.12 Where a report has been made to the police, the School will seek their advice and agree what information can be disclosed to staff and others, and in particular to the alleged perpetrators and their parents. Central to this discussion will how the victim can best be protected. Thereafter, the DSL will continue to work closely with the police (and any other agencies as required) and keep up to date with how any investigation is progressing. The fact that another body is investigating or has investigated an incident does not necessarily prevent the School from coming to its own conclusion, on the balance of probabilities, and Imposing a sanction accordingly. However, the School will consider if, by taking any action, an external investigation and/or any subsequent prosecution could be compromised. There may also be circumstances in which it would be unreasonable or irrational to reach its own view about what has occurred while an independent investigation is ongoing. The School will be guided by the police and/or local authority children's social care when making this decision.

15.13 Where allegations of sexual harassment or sexual violence are contested there can be lengthy delays before the criminal process is complete. Under such circumstances, a determination made will need to be made on a risk assessment basis as to whether it is viable for both the victim and alleged perpetrator to continue their education at the School. Consideration will be given to: stress and trauma to the victim; the potential for the suspected person to intimidate the victim or witnesses; and the need to protect the rights of the alleged perpetrator to education, privacy and family life. The decisions taken must be proportionate to the alleged offence and balance the rights of the victim and perpetrator(s) and will be guided by advice provided by children's social services and the police.

15.14 Not all cases reported to the police are progressed and those that are may result in a not guilty verdict. The fact that an allegation was withdrawn or could not be substantiated does not necessarily mean that it was unfounded. Under these circumstances, the School will discuss with the victim how the situation is to be managed and ongoing support will be provided to them and the alleged perpetrator(s).

15.15 Where a criminal investigation into sexual harassment or sexual violence leads to a conviction of caution, the School will, if it has not already done so, consider what sanctions it wishes to impose

in line with its behaviour policy. The sanction imposed will be proportionate to the offence and the circumstances in which it took place. Proven cases of rape and assault will constitute a serious breach of discipline and are highly likely to result in the permanent exclusion of the perpetrator(s). Where an offence justifies a lesser sanction, consideration will also be given to how best to keep the victim and perpetrator(s) a reasonable distance apart on School premises (including during before and after school-based activities) and on transport to and from school. Any arrangements will take account of the wishes of the victim and will be discussed with their parents or carers and those of the perpetrator(s). Support arrangements will be put in place for both the victim and the perpetrator(s).

15.16 Sexual assault can result in a range of health needs, including physical, mental, and sexual health problems and unwanted pregnancy. Where students have a health need arising from sexual assault or abuse, the School will assist them in gaining access to suitable specialist support services.

15.17 If a report of sexual violence or sexual harassment is determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider if disciplinary action should be taken against the student who made the allegation and/or whether a referral to local authority children's social care is appropriate.

16) Safeguarding against Online Risks

16.1 Young people often spend much of their lives online, on various platforms and devices, and RBC staff should be aware of the opportunities and risks this presents. Many safeguarding issues relate to interactions or relationships formed or continued online. Therefore, this policy should also be read in conjunction with the *E-Safety, Digital Communication and Student Device Policy*. Staff are expected to maintain a strong level of understanding of online risks and will refresh e-safety training on a regular basis.

16.2 The School will provide resources and education, to help all members of the community understand and manage online risks. For example, the School has also bought into the 'Safer Schools' app via our insurers (Zurich), which is available to staff, students, and parents as a constantly updated resource. E-safety will also feature in a consistent and age-appropriate way through the School's Wellbeing (PSHE) curriculum.

16.3 There are many ways in which online activity feeds into safeguarding issues, with concerns being classified into the '4 Cs':

1. **Content**: Being exposed to illegal, inappropriate or harmful online content such as spam, pornography, fake news, substance abuse, violence, misogyny, anti-Semitism, racism, radicalisation and extremism, and lifestyle sites that promote anorexia, self-harm or suicide.
2. **Contact**: Being subjected to harmful online interaction with other users. Examples include: peer-to-peer pressure, exposure to viruses and malware, anonymous online chat sites, cyber-bullying commercial advertising, personal data or identity theft, cyber-stalking, and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
3. **Conduct**: Personal online behaviour that increases the likelihood of being harmed oneself or causing harm to others. Examples include: threats to health and wellbeing, such as gaming or social network addiction; online disclosure of personal information and ignorance of privacy settings; online bullying; making, sending and receiving explicit images (eg consensual and non-consensual sharing of nudes and semi-nudes and/or pornography,

sharing other explicit images); and illegal conduct, including hacking, plagiarism, and copyright infringement of digital media, such as music and film.

4. **Commerce**: Risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your students or staff are at risk, please report it to the Anti-Phishing Working Group (https://apwg.org/).

Staff are expected to be aware of such risks, speaking honestly and openly with students about online risks, not creating false or hysterical warnings, but giving sound advice based on evidence.

16.4 The School has a range of filtering systems in place to keep students safe when accessing the internet via its network, and usage is also monitored. The School recognises, however, that students may attempt to use their 3G/4G/5G connection and bypass its filters, even when they are not permitted to use phones. This means that some students could, whilst at School, potentially use these devices to bully, control or sexually harass, share indecent images, and view and share pornography and other harmful content. The School employs a range of strategies to promote an understanding of online risks and to discourage misuse:

- exploring e-safety in detail via the curriculum and pastoral events;
- ensuring systems are in place to facilitate early disclosure of potentially harmful online incidents;
- providing information to parents about how the School uses filters and monitors online use and, more generally, to promote understanding of the varied and evolving nature of online risks; and
- informing students (and their parents) of the online activity that will be expected of them as members of the School: the websites they will be expected to access (eg the VLE); and how and with whom they will interact online (eg email or Teams meetings with their DoS).
- deterrence through the use of robust sanctions against those found to have abused others online.

16.5 RBC staff are also required to have regard for appropriate use and conduct of technology for messaging and communicating with students and their families online. For example, video conferencing may be used for Parents' Evenings or for absent students to access live-streamed lessons. Careful management of communication will protect both the student and the staff member from potential abuse or misunderstanding. The School follows DfE advice on remote learning. General principles for staff include using online communications for clear and educational purposes, ensuring the appropriateness of context and content of what is shared online, firm, and competent management of the platform (e.g., Teams), and discussing intended uses with the DSL. If it is possible to interact with a student in person, in School, then this should always be the favoured means of communication. The School will also communicate to parents the platforms for intended use (e.g., Microsoft Teams), the reasons for them, and the parameters of their safe and appropriate use.

17) Listening to Students and Reporting Concerns

17.1 RBC takes a child-centred approach to CP and safeguarding, and places great emphasis on the voice of the child. Staff are expected to embody the School's values, to be compassionate and empathetic towards students, to enable them to speak up and be listened to. Staff are also expected to understand that it is easier for students to speak up if there are many opportunities to talk and

share concerns. This will contribute to an open culture, with effective sharing of information and clear pathways to early help. The School will promote to students the idea that there are 'ways to share and speak out' through assemblies, notices, and posters. The means for speaking to staff and sharing concerns include:

- Talking to any teacher
- Talking to Tutors
- Talking to Heads of Year
- Talking to Directors of Section (who are also DDSL)
- Talking to the Deputy Head Pastoral (the DSL) or other members of SLT
- Talking to the Chaplain
- Talking to the Nurses
- Talking to the Head of Learning Support and other Learning Support teachers
- Talking to the Director of Equality, Diversity, and Inclusion (EDI)
- Seeing a School Counsellor
- Email: **worried@rbcs.org.uk** (students may use an anonymous account if they wish)
- Leaving a written note in the worries box, by Reception

17.2 The School recognises that LGBT students may find it particularly difficult to find adults they can share their concerns with. The Director of EDI acts as a 'trusted adult' to such students and will promote their availability to support as needed. Some staff may also choose to wear a rainbow badge, to indicate their willingness to support LGBT students in a compassionate and non-judgemental way.

17.3 If a student tells a member of staff that they have suffered from abuse or neglect, or have been affected by witnessing or learning of it happening to somebody, they should:

- Stop any distractions or other activities, and listen in a focused way
- Assure the student that they can speak and will be helped
- Listen with care and an open mind, giving the child time and not filling silences
- Not bombard the child with questions and use them carefully
- Consider using open questions (e.g., what else?) or closed but purely factual questions (e.g., what date/time was that?)
- Not ask leading questions (e.g., "did she hit you?"), as these may compromise any further investigations
- Not attempt to investigate the matter, as it must instead be referred on
- Not offer confidentiality and clarify that abuse must always be reported
- Reassure the child, once they have finished speaking, that they have done the right thing in coming forward
- Produce a simple, accurate written record of the conversation as soon as possible:
    - Use the child's own words and base it on what they said
    - Keep to the facts; try to include everything, check for gaps, errors
    - Enlist the help of the child (where appropriate) to ensure the accuracy of the summary / record
    - Do not offer personal opinions, explanations or interpretations of the reported abuse
    - Provide the date and time on your record
    - Log the record on MyConcern (see instruction in Annex G) or, as a back-up: submit a handwritten report to the DSL, email a copy of the report to the DSL (marked as urgent in the email properties)
    - If a handwritten report is made, it must be signed legibly by the member of staff reporting (i.e., not initials); it will be scanned by the DSL and entered on MyConcern.

- Reports on MyConcern will be automatically notified to the DSL. However, if a concern is time-critical, staff should give urgent notification by:
  - Seeing the DSL in person, in their office (Deputy Head Pastoral)
  - Visiting the School Secretary (Pastoral) (in Messer Building), who can make urgent contact with the DSL or an appropriate DDSL
  - Out-of-hours emergencies can be notified to: **emergency@rbcs.org.uk**

Any supplementary information or evidence a staff member may have (e.g., images, messages) should also be passed on promptly, along with the concern report. Staff should not retain their own copies of these items.

If the child is in a vulnerable state or at risk at the time of making a report of abuse, staff should always ensure their immediate safety and well-being, asking colleagues for assistance where necessary. There are respite spaces available within the School and a pastoral triage rota, which is managed by School Secretary (Pastoral).

At this point, there would be no further action to take, unless requested by the DSL.

NB – if the reported suspected abuse involves a member of staff at RBC, it is important to listen to the child in exactly the same way as outlined above. However, the record of such a concern should *not* be logged on MyConcern but should be emailed immediately to the Headmaster (**hm@rbcs.org.uk**) and marked as urgent.

NB – if a report of abuse includes child-involved sexual imagery, nudes, semi-nudes, it is important that the member of staff does not view the image(s), nor ask the child to delete, share, or forward copies of the image. The UKCIS guidance on nudes and semi-nudes can be found **here**.

17.4 It is important that all staff (including volunteers, supply staff, Governors) recognise common indicators and types of abuse (as per Section 12, above), and accept their responsibilities to communicate concerns. There may be uncertain, borderline, or ambiguous cases, where it is not immediately clear to the member of staff whether a matter is a safeguarding concern – in such cases, the approach at RBC is: *if in doubt, pass it on*. It is far better to discuss a concern or report with the DSL, rather than thinking about whether to report it. Any such conversations should occur as soon as possible.

18) Referrals to External Agencies

18.1 When a student is not considered at risk of harm, but still has an unmet need that could mean they are in a Child in Need, a referral should be made as soon as possible by the DSL to Children's Social Care in the local authority in which the student lives. Parental consent for referrals of this type is not required in these circumstances. However, it is best practice for such concerns to be discussed first with parents and any subsequent referral to be made transparently with their knowledge. Where a child and family would benefit from coordinated support from one or more agency (for example: education, health, housing, police) there should an inter-agency early-help assessment and procedures will be put in place by children's services to arrange this. The School will coordinate with the local agencies involved.

18.2 Where there are concerns that a child is experiencing or at risk of significant harm, the DSL (or DDSL) will make a referral to Children's Services immediately. Parental consent is not required for this type of referral.

18.3 When receiving reported concerns about the welfare of a child, the DSL and / or DDSLs will consider carefully all the relevant information to decide an appropriate course of action. Specifically, a referral to Children's Services would be made considering the following factors:

- The best interests of the child
- The child's wishes and feelings*
- The nature and seriousness of the concern
- Local thresholds, or advice from a 'no-names' conversation with professionals

* As per Section 15, above, the caveat here is the general rule that risk of immediate harm or danger to the child or others should lead to a referral to children's services, even if it is against the wishes of a child.

If the decision is made not to refer a matter, the situation will still be kept under review and a referral might be made later, particularly if circumstances do not improve or deteriorate. Decisions and their rationales will be logged on MyConcern.

18.4 In making a referral, the DSL will telephone the relevant Children's Services in the Local Authority where the student is resident, to talk through the specifics of the concern. If required, a completed referral form will also be submitted via email. Confirmation of a decision or action should be received from the Local Authority within one working day; if this does not come through then the DSL will follow up by telephone. If a referral is made by a DDSL or other member of staff, they should inform the DSL as soon as possible. The DSL will also continue to follow-up on open cases, sharing information, or alerting Children's Services if the situation seems unchanged or worse. Any emails or referral forms pertinent to a referral to Children's Services will be logged on MyConcern.

18.5 Whenever possible, it is best practice to make referrals with the knowledge and consent of a student's parents; however, there may be exceptional circumstances in which this is not possible (see further Section 19, below).

18.6 Referrals may also be made by the DSL to fulfil the Prevent duty, for concerns about radicalisation. Such referrals will follow the same principles to the ones above; the DSL will carefully consider the full range of information about the child and the circumstances of the concern, with cases kept under constant review.

18.7 In cases where it is unclear whether a referral would be appropriate or not, the DSL may make a 'no names' call to Children's Services, to discuss the issues in a general way and seek further advice.

18.8 Where a concern about a child involves potential criminal activity, the police may also be notified, by the DSL or DDSL, either over the phone or via an online reporting tool. This may go alongside a referral to Children's Services, or it may be appropriate to seek advice from Children's Services as to whether to call the police. Further guidance may also be found in the NSPCC document, *When to Call the Police*, **here**.

18.9 Anyone can make a referral, although if a referral is made by someone other than the DSL, the DSL should be notified as soon as possible.

19) Communication, Information Sharing and Record Keeping

19.1 Safeguarding matters are by their nature sensitive and often complex. There are important demands on the one hand for confidentiality, data security, and privacy (to protect the child) and on the other hand for raising awareness and sharing information (to enable parties to support children effectively). The DSL will follow the law, advice from external agencies, and will form careful judgements as to the way safeguarding information is managed and shared.

19.2 The School will cooperate with external agencies and share information appropriately, to ensure the best possible support for children. Requests for information will be dealt with promptly and accurately, and this will be logged on MyConcern. Similarly, the cooperation with external agencies requires that the DSL / DDSL is proactive in seeking relevant information held by, for example, Children's Services or the Police. The most important consideration for sharing information will be the child's best interests and safety. Personal data and information should never be shared indiscriminately, either internally or externally.

19.3 The following principles will be applied in decision-making about information sharing:

- Honesty about what is shared, why, how, and when
- Sharing information with consent whenever possible, but when necessary, without
- Security of the means of communication and storage by the recipient
- Utilisation of expert advice where necessary
- Recording of decisions: to share information, or not, and why
- Necessary, proportionate, relevant, accurate, timely, secure

Internal advice should be sought from the School's Data Controller, who is the Bursar. More detailed guidance may also be found in the Government advice *Information Sharing, 2024*.

19.4 Where possible, it is important to keep parents informed of child protection and safeguarding concerns regarding their children, as parents will play a key role in helping to protect their children and promote their welfare. Cooperation and openness are always best working practices. The School's safeguarding policy and practice is transparent and published online, and parents are welcome to discuss any aspect of this policy with the DSL.

Where a referral is made concerning a child, parents should be informed as soon as possible. However, parents will *not* be informed where there are strong reasons not to do so, for example if they are alleged perpetrators of or accessories to abuse, or if there is specific advice from external agencies. There may be a short delay in informing parents if it is important to access further advice first. Similarly, as a case progresses, further information will be shared with the parents (or not) according to the principles above.

19.5 Staff have a legitimate interest in understanding the needs of the children they look after, for example giving them emotional support or avoiding triggers in lessons. However, these interests are balanced by fundamental considerations of privacy, data security, and the child's wishes. The extent to which RBC staff beyond the Safeguarding Team are informed of safeguarding concerns will be judged on a case-by-case basis by the DSL or DDSL. Wider dissemination of information will only be made where it is necessary, beneficial to the child, and can be managed carefully.

19.6 Sensitive safeguarding information will be stored on the system MyConcern, and sensitive documents received in hardcopy will be scanned and entered there, and / or attached to the student's paper file. MyConcern will be managed by the School Secretary (Pastoral) and the Safeguarding Team. This will be used for logging actions, discussions, decisions (with their reasoning), and communication by RBC staff, as well as official documentation (such as referral forms). Information stored on

MyConcern is not accessible to the wider staff body. Less sensitive information about lower-level or general pastoral concerns will be stored on the School's MIS.

20) Allegations Against Staff and Responsible Adults

20.1 All staff (including supply staff, volunteers, Governors) are advised to be circumspect and to avoid putting themselves in a situation which poses a risk to a child or risks giving rise to an allegation of abuse. Guidance is given to staff as to how to manage these risks in the RBC *Staff Code of Conduct*. Staff are asked to take particular care when they are alone with students or communicating with them individually, online, by ensuring transparency and appropriateness of any such contact and communication. Where staff are unsure about best working practices, they should seek advice from the DSL.

20.2 The School will follow-up on all allegations swiftly, fairly, and in accordance with the law and Government guidance. 'Allegations' should be understood as actions or behaviour which correspond to one or more of the four criteria: (1) committing a criminal offence, (2) causing harm to a child, (3) putting a child at risk of harm, or (4) behaving in such a way as to call into question their suitability to work with children (this may include incidents outside of School and incidents which do not specifically involve children). Incidents of this nature are dealt with in this section of policy; concerns that do not meet the harms threshold (low-level concerns) are dealt with in the following section (21). For any level of concern, the School will follow the guidance given in Part Four of *KCSIE*.

20.3 Allegations against members of staff (including the DSL, as well as volunteers, supply staff, contractors,) should be made as soon as possible, direct to the Headmaster (without informing the member of staff). The Headmaster manages allegations against staff but, in the Headmaster's absence, the Chair of Governors should be contacted. If an allegation is made against the Headmaster, the Chair of Governors should be contacted direct (without informing the Headmaster). If the Chair of Governors is unavailable, then the Safeguarding Governor should be contacted. Contact information can be found 'Contacts', above. The Headmaster's Secretary can also assist in making contact. The Headmaster or other person responsible (e.g., Chair of Governors) will be referred to in these circumstances as the 'case manager'.

20.4 Allegations against Governors should be made to the Chair of Governors or, in their absence, to the Safeguarding Governor.

20.5 Where there is or is perceived to be a conflict of interest in reporting concerns to the Headmaster or to the Chair of Governors, concerns may be raised direct to the Wokingham LADO (see Contacts, above).

20.6 Where there is on-going or urgent risk of harm to a child, the responsibilities for child protection outlined above will be followed; the case manager will ensure that any referrals to Children's Services or the Police are carried out by the DSL.

20.7 The case manager will immediately make initial and basic enquiries to establish facts, as far as this is possible without compromising any further investigation. Allegations will then be referred to the LADO and (for potentially criminal matters) the Police. This referral should take place as soon as possible (within one working day of the reported concerns). The staff member who is the subject of the allegation will not be informed until / unless the LADO advises. When referring concerns to the LADO, the case manager will participate in discussions as to the nature and management of the case.

Discussions should be recorded in writing, leading to an agreed course of action, including any communications to the member of staff concerned and / or the parents of any children affected.

20.8 Suspension will not be an automatic response to an allegation and will only be considered in a case where there is cause to suspect that one or more students at the School are at risk of significant harm, or where the allegation is so serious that it might be grounds for dismissal. The School will consider whether the result that would be achieved by suspension could be obtained by alternative arrangements, such as redeployment. A member of staff will only be suspended if there is no reasonable alternative. The School will balance the need to ensure the safety and welfare of the student with the need for a full and fair investigation. The LADO will be consulted as to the appropriate action to take.

If suspension is deemed appropriate, the reasons and justification will be recorded by the School and the individual notified of the reasons for the suspension. The School will ensure that the suspended person is given the contact details for the representative who has been appointed to keep him or her informed about the progress of the case.

If it is decided that the person who has been suspended should return to work, the School will consider how to facilitate this: for example, whether a phased return would be appropriate. The School may provide a mentor and will also consider how to manage contact with the student who made the allegation.

20.9 In terms of support, the School has a duty of care towards its employees and will ensure that effective support is provided for anyone facing such an allegation. A representative will be appointed to keep them informed of the progress of the case. The School will also provide access to counselling or medical advice, where appropriate, for example through the Employee Assistance Programme. The School will not prevent social contact with work colleagues and friends, when staff are suspended, unless there is reason to believe this may be prejudicial to the gathering and presentation of evidence.

Support will also be offered to the student(s) affected and their parents. The School will consult with the children's social services, or the police as appropriate, as to how this can be done in the most suitable and effective way.

20.10 The LADO or other external agency may advise that further investigation is required by the School, which should then be undertaken by the case manager or a senior member of staff (such as the Second Master or DSL). If the case manager judges that more resource or expertise is required, they should ask the LADO for advice about further support (e.g., an investigator from the Local Authority). Where there is a Police investigation, the nature of any internal investigations will be developed and agreed in consultation with external agencies, and the reasons for any decisions will be recorded.

20.11 Where there is an allegation against an adult not directly employed by the School (e.g., agency staff or contractors) the same approach should still be taken and the School will always notify and work with the individual's employer (if applicable) to ensure an appropriate response. The Headmaster will undertake the management of such cases. Under no circumstances will the School cease to use agency and other staff due to allegations, without following the processes set out here or without the explicit advice of the LADO. Similarly, any allegations against adults using the School premises for the purpose of running activities for children would be investigated according to the same principles and advice taken from the LADO.

20.12 The School will not cease investigations when the subject of an allegation leaves the School (e.g., retirement), until there is a conclusion agreed with the LADO and any other agencies involved.

20.13 The outcomes of investigations will be understood in terms of the definitions given by *KCSIE*, as follows:

- Substantiated: there is sufficient evidence to prove the allegation
- Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive or cause harm to the person subject of the allegation
- False: there is sufficient evidence to disprove the allegation
- Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence, or
- Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made.

20.14 Substantiated allegations: If an allegation is substantiated and the member of staff, contractor or volunteer is dismissed because they are unsuitable to work with children a report to the Disclosure and Barring Service will be made promptly, and in any event within one month of the person leaving the School.

Settlement agreements, including a form of words for a reference, will not be used in cases where a member of staff, volunteer or contractor resigns or ceases to provide his or her service, where there are allegations that indicate the person is a risk or poses a risk of harm to children. Resignation or ceasing to provide services will not prevent a referral being made to the Disclosure and Barring Service where appropriate.

If a teacher has been dismissed, or would have been dismissed had they not resigned, in cases involving unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction for a relevant offence, the School will give separate consideration to whether a referral should be made to the Teaching Regulation Agency. The School will follow the advice set out in the TRA documents: **Teacher misconduct: information for teachers** and **Teacher misconduct: the prohibition of teachers** (as updated from time to time) to decide whether a referral should be made.

At the conclusion of a case in which an allegation is substantiated, the LADO will review the circumstances of the case with the case manager to determine whether any improvements could be made to the School's procedures to prevent the occurrence of similar events in the future. Consideration will also be given to how the investigation process was managed, including, where appropriate, the use of suspension of the accused. The case manager will produce a written report that will be presented to the governors without delay.

20.15 Reading Blue Coat School is a registered charity and, as such, will report to the Charity Commission any serious incidents involving students in the School, such as: incidents where students have been abused or harmed by adults connected with the School; failure to follow policy which puts students at significant risk of harm. The Bursar will liaise with the Governing Body to ensure that any such report is made promptly, as required. The report will provide details of the circumstances of the incident, actions taken by the School and details of lessons to be learnt from the subsequent review. The Governors will also ensure that an action plan is put in place to ensure any deficiencies or weaknesses in the School's safeguarding arrangements are remedied without delay.

20.16 Record keeping and references: details of allegations that are found to be malicious or false will be removed from personnel records unless the individual gives their written consent for the

retention of the information. For all other allegations, a comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any actions taken, decisions made, and the outcome (*substantiated, unfounded or unsubstantiated*) will be kept on the employee's file. A copy of this summary will be provided to the individual concerned, where agreed by local authority children's care or the police, and a declaration on whether the information will be referred to in any future reference. Such records will be retained at least until the employee reaches the normal pension age (or for a period of ten years from the date of the allegation, if this is longer).

When providing employer references, the Headmaster will not refer to any allegation or history of allegations where the allegation(s) have been proven to be false, unfounded, unsubstantiated, false or malicious. Factual information (not opinions) will be included in references, where an allegation has been substantiated.

20.17 Learning lessons: throughout the investigation process into a safeguarding allegation about a member of staff and at the conclusion of a case, irrespective of whether the allegation is substantiated, the School will review the circumstance of the case to see if there are any improvements that can be made in its practice or policy which may prevent similar cases in the future. Such reviews will be conducted by the case manager in consultation with the LADO and will also consider how future investigations of a similar nature could be carried out more effectively, including any issues arising from any decision to suspend a member of staff, the duration of the suspension and whether or not the suspension was justified. The case manager will submit a report the Governing Body summarising the outcome of the review.

20.18 It is also important that all staff are mindful of their wider duties and rights in terms of whistleblowing at RBC (see the RBC Whistleblowing Policy). All staff are required to report to follow this policy and report:

- *poor or unsafe safeguarding practices at the School;*
- *potential failures by the School or its staff to properly safeguard the welfare of students; or*
- *other wrongdoing in the workplace that does not involve the safeguarding and welfare of students.*

If the member of staff feels unable to raise their concerns with their manager, SLT, or the Headmaster, or if they believe any concern has not been dealt with, they should contact the Chair of Governors. The NSPCC whistleblowing advice line is available for staff who do not feel able to raise safeguarding concerns internally (see section 2 for contact details). Any member of staff can whistleblow without fear of detriment (retribution or disciplinary action), provided the report was made in good faith. However, malicious allegations may be considered as a disciplinary offence.

21) Low-Level Concerns about Staff and Responsible Adults

21.1 As part of a whole School approach to safeguarding, RBC seeks to promote a culture in which all concerns about all adults working in or on behalf of the School are dealt with promptly and appropriately. The purpose of the School's low-level concerns policy is to create and embed a culture of openness, trust and transparency in which our values and expectations of staff behaviour as set out in the Code of Conduct are constantly lived, monitored and reinforced by all staff. It also aims to promote early intervention for concerning behaviour, to minimise risk of abuse or harm, and to help staff stay within professional boundaries. An effective low level concerns policy may help prevent more serious concerns arising in the future.

21.2 A 'low-level' concern is any concern – no matter how small, and even if no more than causing a sense of unease or a nagging doubt – that an adult has acted in a way that:

- Is inconsistent with the School's Code of Conduct, including inappropriate conduct outside of work; and
- Does not meet the allegation threshold (see Section 20, above) or is otherwise not serious enough to consider a referral to the LADO. If the School is any doubt as to whether the information shared about a member of staff meets the harms threshold, advice from the LADO will be sought.

NB: The term 'low-level' does not mean that the concern is insignificant; it simply means the behaviour does not meet the allegation threshold as defined in *KCSIE*.

21.3 Inappropriate behaviour can exist on a wide spectrum, from that which is inadvertent or thoughtless through to that which is ultimately intended to enable abuse. Examples of such behaviour could include but are not limited to: being overly friendly with students; showing favouritism; taking photographs of students contrary to policy; engaging with students in a secluded areas; or humiliating students.

21.4 Low level concerns may arise in several ways and from a number of sources: for example, suspicion; complaint; or disclosure made by a student, parent or another adult within or outside the organisation; or as a result of vetting checks undertaken.

21.5 Staff are required to report any concerns about any adult (including a person employed by a supply agency or a contractor) to the Headmaster. In the case of supply staff and contractors, their employers will also be notified so any patterns of inappropriate behaviour can be identified. Where the concern relates to the Headmaster, it should be reported to the Chair of Governors. Such reports should be made without undue delay. Staff do not need to be able to determine whether their concern is a low-level concern or whether it meets the threshold of an allegation. This determination will be made by the Headmaster or Chair of Governors when the matter has been investigated.

All concerns should be reported, preferably, in writing to the Headmaster, including the date and times of events, and the date and times of the writing of the report. Those communicating concerns may choose to be treated anonymously, as far as it is possible to do so. Preferably, this written report should be made via email, with the term 'low-level concern' or 'LLC' in the email subject, along with the date of the report. The same approach should be taken for any report to the Chair of Governors.

It is best practice to submit a pro-forma low-level concerns form, which is included as an annex to this policy and in the *Staff Code of Conduct*, as this removes potential ambiguity in reporting. However, where a concern is raised without a pro-forma, this will be completed by, or with this assistance of, the Headmaster or DSL.

However, where written communication could be a barrier to a report being made, an individual can arrange to speak with the Headmaster in person, to give a verbal report of their concerns. Appointments should be made with the Headmaster's Secretary.

21.6 A member of staff may find themselves in a situation which could be misinterpreted or might appear compromising to others. Equally, a member of staff, for whatever reason, may have behaved in a manner which, on reflection, falls short of the standard set out in the *Staff Code of Conduct*. Under such circumstances, the member of staff should make a self-referral to the Headmaster as soon as possible. Doing so demonstrates transparency, facilitates effective management of the issue, and can reduce the risks of misunderstandings and false allegations.

21.7 Whenever a low-level concern is logged, the history of any other concerns specific to that individual will be considered consistently by the Headmaster, to ensure that behaviour is understood in context and that patterns may be identified.

The Headmaster (or deputising, if necessary: the Second Master or DSL) will respond to reported concerns by speaking directly to the individual and any witnesses. Although investigation may be delegated, decisions will always be made by the Headmaster. Other information and evidence (e.g., from IT accounts) may also need to be gathered, which will be managed by the Headmaster (or the Second Master, or DSL), and this will be managed as discretely as possible and stored securely with the rest of the low-level concerns file by the Headmaster's Secretary (see further below).

All information will be considered carefully to arrive at a fair and proportionate judgement. Any decisions will be offered with a clear, written rationale. This rationale will also be recorded securely, along with all other items in the low-level concerns file, and will be shared with the subject of the concern.

21.8 All low-level concerns, including those determined to be unfounded, will be recorded in writing by the Headmaster. The record will include details of the concern, the context in which the concern arose, any actions taken, and decisions reached (along with the rationale for them), and the eventual outcome. The log of low-level concerns and related documents to each case will be filed securely by the Headmaster's Secretary. The name of the individual sharing their concerns will be noted. If the individual wishes to remain anonymous, then this will be respected as far as is reasonably possible. Records of low-level concerns are confidential and securely stored in accordance with the Data Protection Act 2018 and the UK General Data Protection regulation until the individual ceases to be employed by the School. The further aim of this data storage is for the Headmaster to have the most complete possible picture of the culture surrounding low-level concerns and to plan for any action which may need to be taken. Commentary and reflections on low-level concerns will be stored securely, along with all other low-level concern documentation. Files will be accessible only to the Headmaster, Second Master, and DSL. Information about cases may be shared with other members of the SLT, as per the Headmaster's judgment as to the best way to manage a situation.

21.9 Low-level concerns which relate exclusively to safeguarding (and not to misconduct or poor performance) will not be referred to in employment references provided by the School. However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it will be referred to.

21.10 Records of low-level concerns will be reviewed at least termly by the Headmaster and the DSL, to ensure that all such concerns are being dealt with promptly and appropriately, and that any potential patterns of concerning, problematic or inappropriate behaviour are identified. This will lead to the production of a written commentary, to ensure that the process of reflection and learning can be reviewed over time. Where a pattern of behaviour is identified consideration will be given to whether disciplinary procedures should be invoked, the matter should be escalated to the LADO and, more broadly, whether existing policies need to be revised and/or additional training is required to address wider cultural issues and minimise the risk of recurrence in the future. The status and management of low-level concerns will also be routinely reported to the Governors' Safeguarding Committee.

21.11 Identifying concerning patterns: reviews of records may reveal concerning, inappropriate, or problematic behaviour. Where such a pattern is identified, the School will take a course of action either in the form of disciplinary procedures or, where a pattern rises up to the level of meeting the harm threshold, making a referral to the LADO. Consideration will also be given to whether there are

wider cultural issues within the School that enabled the behaviour to occur and where appropriate policies could be revised, or extra training delivered to minimise the risk of it happening again. Such considerations will be discussed in the regular review meetings.

21.12 It is recognised that being the subject of a low-level concern may be a worrying or stressful experience for a member of staff. While acknowledging this difficulty, it should be reaffirmed that the primary intent of this policy is to perpetuate a safe and positive culture within the School, which protects both staff and students. As such, staff should feel reassured that the policy protects them and further aims to make it easier for them to comply with professional norms and the *Code of Conduct*. No assumptions will be made, and it is the explicit desire of the School Governors and SLT to promote a culture of openness and honesty, rather than one of suspicion or accusation.

To provide further reassurance, it should be emphasised that:

- Staff are welcome to discuss the content of this policy with the DSL
- It is appropriate to ask for clarification of 'grey areas' from the DSL
- Dealing with emerging inappropriate conduct in the early stages will make it less likely that serious misconduct cases will develop and escalate
- Welfare conversations will also be offered to members of staff who are logged for a low-level concern, where needed
- If appropriate, further training would be offered to members of staff who are subject to low-level concerns
- Low-level concerns will be dealt with efficiently, to avoid unsettling and open-ended investigations. Delays will be rare and for reasons that cannot be avoided (e.g., staff absence). If a concern must be escalated beyond a low-level concern, then this may take longer.

21.13 Concerns raised by third parties should be addressed to the Headmaster in writing or via email to: **hm@rbcs.org.uk** . Alternatively, third parties may wish to arrange a meeting with the Headmaster, in which they can explain the circumstances surrounding a concern about a member of staff. The Headmaster will record and log any concerns raised by a third party in the same way as concerns reported within the School. As with other raised concerns, the anonymity of the individual reporting a concern will be maintained, when request, as far as possible.

21.14 Where a member of staff or a third party wishes to raise a low-level concern in a purely anonymous way, they can do so in writing ('FAO the Headmaster: Private and Confidential'), in a sealed envelope, sent by post or delivered to the School's post box. However, it should be noted that purely anonymous submissions (without the means for further communication) may be more difficult to investigate where there are gaps in the information provided.

21.15 This section of the policy is also contained as an annex to the RBC *Staff Code of Conduct*, as per the suggestion of *KCSIE*. This response to low-level concerns is an extension of the processes already set out in the RBC *Staff Code of Conduct*.

22) Monitoring and Review of Policy

22.1 Any child protection incidents at the School will be followed by a review of the safeguarding procedures in the School and a report to the Governors. Where an incident involves a member of staff, the LADO will be asked to assist in this review, to determine whether any improvements can be made

to the School's procedures. The DSL will monitor the content and operation of this policy and present an annual report to the Board of Governors.

22.2 The DSL will take part in regular Safeguarding Committee meetings with Governors, which will include regular discussion of policy and procedure, and any necessary updates to this and related policies.

23) Bibliography, Statutory Guidance, and Recommended Resources

23.1 This policy has been drafted in consultation with Government Guidance, which is listed in the Introduction, above. The links to these documents online are listed below:

Statutory guidance: *Keeping Children Safe in Education (2024)*
Statutory guidance: *Working Together to Safeguard Children (2023)*
Statutory guidance: *Prevent Duty Guidance (2023)*
Statutory guidance: *The Right to Choose (2022), updated April 2023*
Statutory guidance: *Relationships Education, Relationships and Sex Education and Health Education (2019)*
Guidance: *What to do if you are Worried a Child is Being Abused (2015)*
Guidance: *Sharing Nudes and Semi-Nudes: Advice for Education Settings Working with Children and Young People (2020)*
Guidance: *Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers (2024)*
TRA guidance collection: *Teacher Misconduct (2012), updated January 2024*
UK Legislation: *Children Act (1989)*
UK Legislation: *Sexual Offences Act (2003)*
DfE collection: 'Safeguarding and Social Care for Children'
The Independent Schools Standards (2019)

23.2 Other recommended sites and resources include:

Berkshire West Safeguarding Children Partnership
The Children's Society
Children's Society Report: *Counting Lives (2019)*
County Lines Toolkit for Professionals
EduCare / TES
The Independent Inquiry into Child Sexual Abuse
Mind
MyConcern
NPCC: *When to Call the Police*
NSPCC
NSPCC: *What is Child Abuse?' (2018)*
NSPCC CASPAR: summary of changes in *KCSIE 2024*
OFSTED *'Review of Sexual Abuse in Schools and Colleges' (2021)*
Thames Valley Police (includes news and briefings)
ThinkUKnow (National Crime Agency's CEOP education)
Zurich safeguarding resources

24) Document History

Author(s):	Dr Guy Williams
Associated Policies:	• Staff Code of Conduct • Anti-Bullying Policy • Behaviour, Rewards, and Sanctions Policy • Recruitment, Selection, and Disclosure Policy • E-Safety, Digital Communication, and Student Device Policy • Acceptable Use Policy • Supervision Policy • Registration, Attendance, and Students Missing Education Policy • Drugs and Drug Testing Policy • Relationships and Sex Education Policy • Visitors and Vetting Visiting Speakers Policy • Whistleblowing Policy
Date:	Previous review and amendment dates: Sep 2021 – annual update ratified by Governors Dec 2021 – amendment ratified by Governors Sep 2022 – annual update ratified by Governors Nov 2023 – annual update ratified by Governors Sep 2024 – annual update ratified by Governors
Review Frequency:	Annually (with additional changes following any update to guidance)
Next Review Date:	September 2025
Agreed by:	 Clare Freeman (Safeguarding Governor)
Date of Governor Agreement:	September 2024

Annex A: Summary of Changes in *KCSIE, 2024*

The main Government statutory guidance has been updated again for the school year beginning September 2024. The changes are fully summarised in Annex F of *KCSIE,* and it is recommended that staff review the table there. As a summary, main points of change include:

- Amendment to the definition of safeguarding, to bring it into line with the new *Working Together* guidance (2023).
- Revised criteria for Early Help, to bring it into line with the new *Working Together* guidance (2023). This includes absence from education, students who have experienced multiple suspensions and / or are at higher risk of permanent exclusion.
- References to abuse include circumstances in which children see, hear, or experience the effects of domestic violence.
- Safeguarding issues around missing education amended to include 'unexplainable and/or persistent absence'.
- Reference to new DfE Data Protection guidance for schools.
- Clarification that a school remains responsible for safeguarding children who are attending alternative provision.
- Links added to NSPCC advice on protecting children with SEN; and deaf/disabled children and young people.
- Additional text regarding 'Children who are lesbian, gay, bisexual, or questioning their gender' and use of terminology that reflects new (draft) DfE guidance on gender questioning children and young people.
- New guides for 'Children and the Court System'.

NB – for a more detailed summary of changes, see:
Keeping children safe in education – updates from 2022, 2023 and 2024 (nspcc.org.uk)

Annex B: Management of Non-Recent Abuse Allegations and Cases

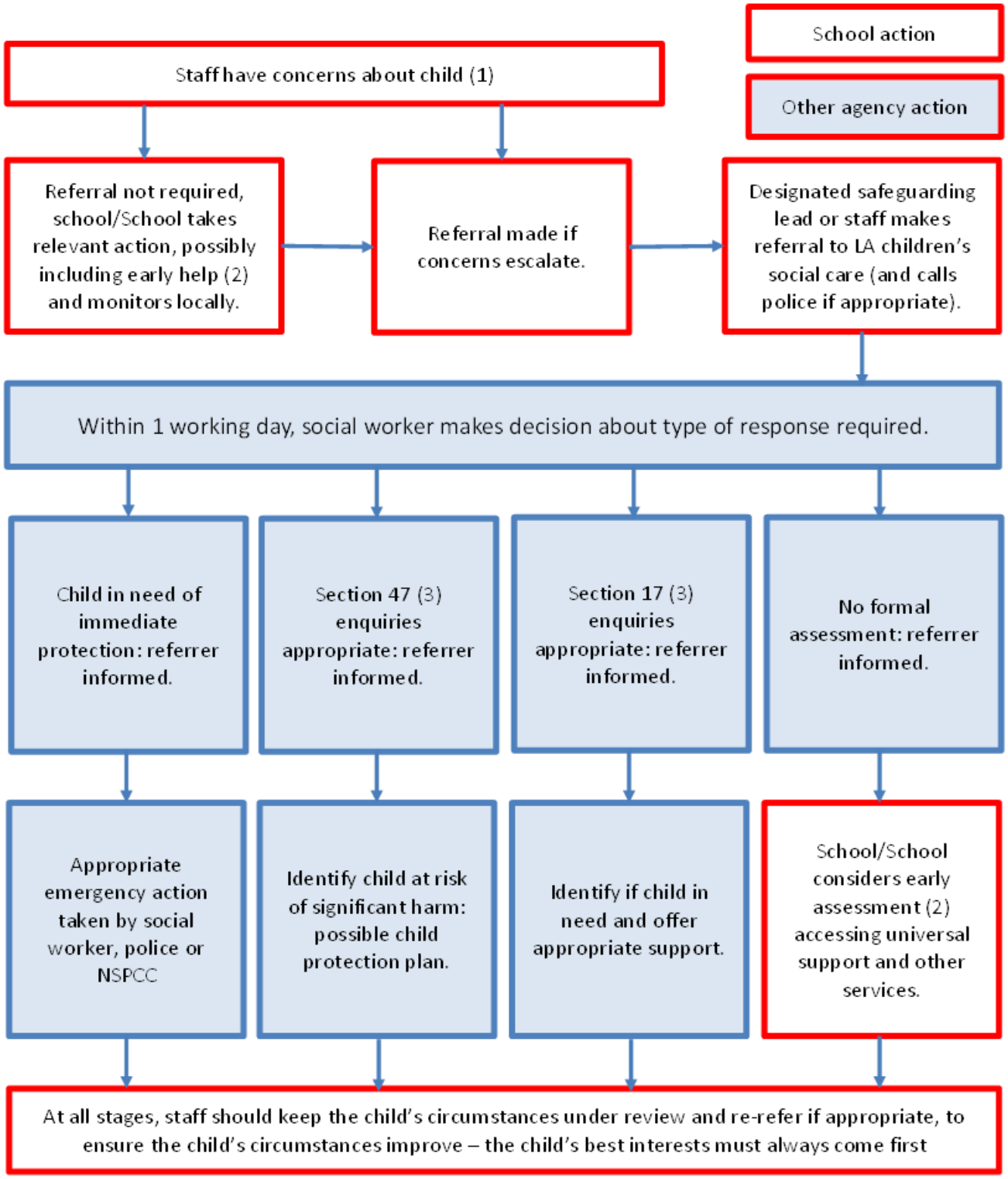
Context: Reading Blue Coat is a long-established school with an engaged body of former students ('Old Blues'). For much of the School's history, it operated as a boarding school, with day students being admitted from 1892 and the School reverting to day-only in September 2001. Therefore, many Old Blues will have had significant experiences of both the daily life of the School and the residential aspect of living on-site. Although RBC has long prided itself on providing a happy and safe environment for learning, it is also the case that Old Blues may have suffered abuse during their time in the School. For this reason, the following management plan is provided to guide RBC staff in the circumstance of receiving information about potential non-recent abuse (such as, historic sexual abuse). It is hoped that Old Blues will feel able to share any concerns about their school days, trusting the School to manage such concerns proactively and empathetically.

This plan is shaped by the analysis of historic abuse provided in the following report and will be cited below as 'Reference A': *'Farrer & Co. Child Sexual Abuse in Schools: Lessons from History, Guidance for the Future'*.
https://www.farrer.co.uk/globalassets/clients-and-sectors/safeguarding/child-sexual-abuse-in-schools---lessons-from-history-guidance-for-the-future.pdf

On receipt of information about non-recent abuse it is the School's policy to undertake the following:

Log the matter in the Safeguarding Risk Register *The folder will be stored in the Headmaster's office*	**Record of Actions Taken**
Make a record of the report.	*Attach record of the report.*
Consider taking telephone advice from one or more of the following on the reported abuse: 1) LADO 2) Solicitors 3) Police	
Establish the appropriate way to manage the report and particularly what needs to be said to the person reporting the instance and/or the reported recipient of the abuse.	
Investigation: The School has a responsibility to investigate for its own sake. It cannot be left to the Police [See Pg. 16 of Reference A]. Legal advice may be sought to guide the School if required.	
Reporting: The School will refer concerns to external agencies and may do so even for low-level concerns, on the principle that such concerns could be seen in light of information held by other agencies. (See Reference A). Specifically:	
To the Police: any historical allegations of abuse will be referred to the Police by the Headmaster or the Bursar	
To the LADO: The School should form a habit of referring concerns, including low-level concerns, to the LADO. Alleged perpetrators of abuse may still be working with children, even many years later. The referral will either be made by the Headmaster or delegated to the DSL.	
Administratively: The Bursar will notify the Charity Commission The Bursar will notify the Chairman of Governors The Bursar will notify the Insurer The Bursar will warn the School's PR advisor and, if appropriate, advice will be sought	
Follow Up Action: the list above will result in a decision by the Headmaster on what action should be taken to follow up on the initial report. All actions should be logged in the Safeguarding Risk Register.	

Annex C: Actions Where There Are Concerns about a Child (KCSIE 2024)



1. Cases where there is a concern or allegation made against a staff member refer to the Headmaster or LADO
2. Early help involves providing support as soon as problem emerges. Where coordinated early help is required, an early help inter-agency assessment will be arranged.
3. Referrals will follow the processes set out in Wokingham's (or other Authority's) threshold guidance

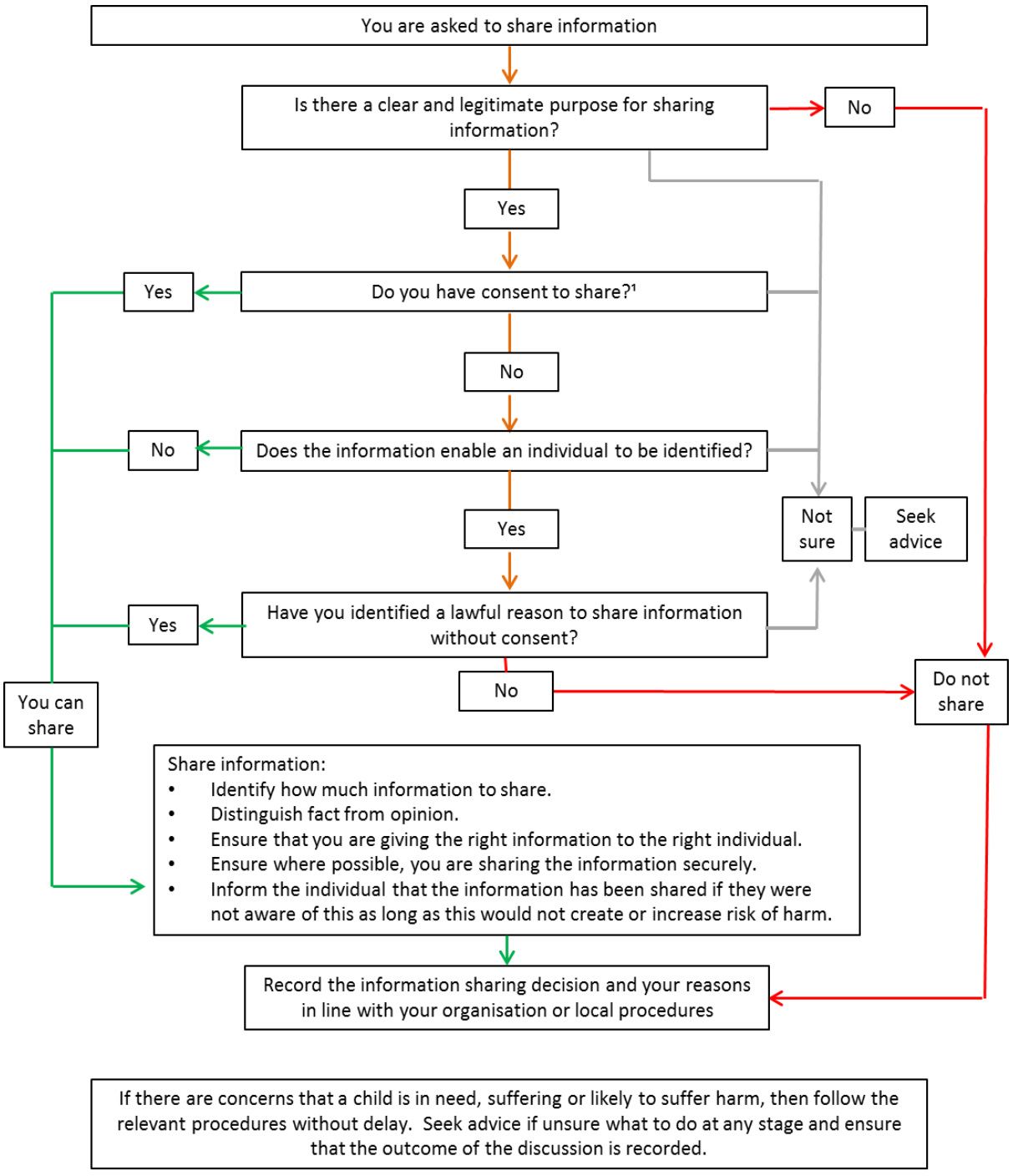
Annex D: Hackett's Continuum of Sexual Behaviours

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	

Reference: Hackett, S (2010). Children, young people and sexual violence. In Barter, C and Berridge, D (eds) *Children behaving badly? Exploring peer violence between children and young people*. London: Blackwell Wiley.

Annex E: Flowchart of How and When to Share Information



Annex F: Job Description of the DSL

Job description for the Designated Safeguarding Lead (DSL and DDSLs)	
The School is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment	
Summary of the role	• To take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems in place) occurring at the School and to support all other staff in dealing with any child welfare and child protection concerns that arise. • To provide advice and support to other staff on matters of child welfare, safeguarding and child protection. • To take part in strategy discussions and inter-agency meetings and to support other staff to do so, and to contribute to the assessment of students. • To promote and safeguard the welfare of students in the School. • Whilst the activities of DSL can be delegated to appropriately trained deputies (DDSLs), the ultimate lead responsibility for child protection remains with the DSL. This lead responsibility cannot be delegated.
Main duties and responsibilities	**Further specifics:**
Availability	You are expected to: • ensure during term time that you or a Deputy will always be available during School hours (8.35am – 4.10pm) to discuss any safeguarding concerns; and • arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.
Managing referrals	You are expected to refer cases: • of suspected abuse and neglect of any student at the School to the local authority children's social care and support staff who make referrals to local authority children's social care; • to the Channel programme where there is a radicalisation concern and support staff who make referrals to the Channel programme; • where a person is dismissed or left due to risk/harm to a child to Disclosure and Barring Service (**DBS**); and • where a crime has been committed to the Police.
Working with others	You are expected to: • act as a source of support, advice and expertise for all staff; • act as a point of contact with the three safeguarding partners: the local authority (Wokingham Borough) and other authorities where students reside; Integrated Care Systems; and the police; • liaise with the Headmaster to inform them of issues; especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations; • ensure that an 'appropriate adult' is present if a student is being questioned or detained by the police; • as required, liaise with the "case manager" (as per Part 4 of KCSIE) and the designated officer (LADO) at the local authority for child-protection concerns in cases which concern a staff member;

	• liaise with staff (especially tutors, pastoral support staff, IT staff, First Aiders, counsellors and the Head of Learning Support) on matters of safety, safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically; • promote supportive engagement with parents in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances; and • work with the Headmaster and relevant strategic leads, 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 issues might be having on children's attendance, engagement and achievement at the School. This includes: o ensuring that the School knows who its cohort of children are who 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 a lasting impact on children's educational outcomes.
Information sharing and managing the child protection files	You are expected to: • ensure that child protection files are kept up to date. • ensure that information is kept confidential and stored securely. • ensure that records include: o a clear and comprehensive summary of the concern; o details of how the concern was followed up and resolved; and o a note of any action taken, decisions reached and the outcome. • ensure that files are only accessed by those who need to see them and that where the file or content within it is shared, this happens in line with information-sharing advice, as set out in Part 1 and Part 2 of KSCIE. • ensure, when a student leaves the School, that: o their child protection file is transferred to the new school or School as soon as possible (within 5 days for an in-year transfer or within the first 5 days of the start of a new term); and o their child protection file is transferred separately from the student's main file in a secure manner and confirmation of receipt is received from the destination school or School; and • consider whether it is appropriate to share any information with the new school or School in advance of the student leaving.
Raising awareness	You are expected to: • ensure each member of staff has access to, and understands, the School's safeguarding policy and procedures, especially new and part-time staff; • ensure the School's safeguarding policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the Governing Body regarding this,

	• ensure the safeguarding policy is available publicly and parents know that referrals about suspected abuse or neglect may be made and the role of the School in this; • link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements; and • help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and School leadership staff.
Training, knowledge and skills	You are expected to ensure your child protection training and that of the DDSLs is sufficient and appropriate to provide the knowledge and skills required to carry out this role. This training must be updated every two years. All members of the DSL team should also undertake Prevent awareness training. In addition to the formal training, the knowledge and skills of members of the DSL team should be supplemented and refreshed at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role so that they: • understand the assessment process for providing early help and statutory intervention, including local criteria for action and local-authority children's social care referral arrangements; • have a working knowledge of how local authorities conduct a child-protection case conference and a child-protection review conference and be able to attend and contribute to these effectively when required to do so; • understand the importance of the role the Designated Safeguarding Lead has in providing information and support to children social care in order to safeguard and promote the welfare of children; • understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in response to this in promoting educational outcomes; • are 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; • understand the importance of information sharing, both within the School, and with the three safeguarding partners, other agencies, organisations and practitioners; • understand and support the School with regards to the requirements of the Prevent duty and be able to provide advice and support to staff on protecting children from the risk of radicalisation; • are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at School; • can recognise the additional risks that children with SEN and disabilities (SEND) face online (for example, from online bullying, grooming and radicalisation) and are confident they have the capability to support SEND children to stay safe online;

	• obtain access to resources and attend any relevant or refresher training courses; and • encourage a culture among all staff of listening to students and taking account of their wishes and feelings, in any measures the School may put in place to protect them.
Providing support to staff	Training should support the Designated Safeguarding Lead in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child-protection matters. This includes, specifically, to: • ensure that staff are supported during the referrals processes; and • support 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	It is important that all children feel heard and understood. Therefore, designated safeguarding leads should be supported in developing knowledge and skills to: • encourage 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, • understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.
Holding and sharing information.	The critical importance of recording, holding, using and sharing information effectively is set out in Parts 1, 2 and 5 of KCSIE, and therefore members of the DSL team should: • understand the importance of information sharing, both within the School, and with other schools and Schools on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners; • understand relevant data-protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation; and • be able to keep detailed, accurate, secure written records of concerns and referrals and understand the purpose of this record-keeping.

Annex G: Logging Safeguarding Reports on MyConcern

Where there is a concern about a child, this should be logged on the secure system MyConcern, which will automatically notify the DSL and DDSLs via email. This should be the usual way of logging safeguarding concerns, but where there is an urgent or time-critical concern then the DSL or DDSL should be seen in person or spoken with on the phone immediately (the School Secretary (Pastoral) can assist with making contact).

To log a concern on MyConcern, staff should:

- Access the system via RM Unify. Their username is their School email address. Staff members should create their own unique and secure passwords.
- When logged in, click on the red 'report a concern' button in the top right corner.
- Fill in as many details as possible, as per the best practice for making records of concerns as set out in this policy.
- Choose the year group from the 'send concern to' menus, to enable a notification to the student's Head of Year (in addition to the safeguarding team).

A member of the safeguarding team will acknowledge receipt of the concern via email. However, it remains good practice for staff members to show initiative and to check with the DSL that a concern has been received in full and understood.

Annex H: Low Level Concerns Referral Pro Forma

NB: This is for reporting concerns about staff and not for reporting concerns about students.

Thank you for reporting your concerns. We are grateful to you for taking the safety and welfare of our students seriously. Please fill in the below form, including as much detail as you can, and return it directly to the Headmaster or Chair of Governors. Please refrain from discussing this concern with anyone other than the Headmaster or the DSL until the matter has been dealt with. We ask that you keep all details, including the name of the staff member to whom the concern pertains, confidential.

Your details	
Name (optional)	
Role	
Date and time of completing this form	
Details of individual whom the concern is about	
Name	
Role	
Relationship to the individual who is reporting the concern, e.g., manager, colleague	
Details of concern	
Please include as much detail as possible. Think about the following: What behaviour and/or incident are you reporting? What exactly happened? Why does the behaviour and/or incident worry you? Why do you believe the behaviour and/or incident is not consistent with our Staff Code of Conduct?	

Details of any students involved	
Name(s)	
Do you believe there is a risk of harm to students, either now or in the future, as a result of the individual's behaviour? Explain your answer.	
Next steps	
What would you like to see happen in response to your concern?	
Signature	
For use by safeguarding team upon receipt of concern	
Date and time concern received	
Signature of Headmaster or Chair of Governors	
Actions to be taken, e.g., no action, investigation, reclassification as allegation meeting the harms threshold.	

Annex I: Job Description of the Safeguarding Governor

NOMINATED SAFEGUARDING GOVERNOR

TERMS OF REFERENCE

1 OVERALL RESPONSIBILITY

1.1 Section 157 of the Education Act 2002 places a duty on governing bodies to ensure that suitable provision is made to safeguard and promote the welfare, health and safety of students. Statutory guidance sets out that a school should have a governor who understands the requirements of the safeguarding guidance and legislation and who advises the Governing Body accordingly. The Governors have therefore nominated the Safeguarding Governor to this role, as well as to ensure there are appropriate safeguarding procedures at the School and to champion best practice. **The Governing Body remains collectively responsible for safeguarding arrangements at the School,**

1.2 The Safeguarding Governor will work with the School's Designated Safeguarding Lead (**DSL**) and will also act as a point of contact for School staff in the first instance should there be need to escalate a child protection or safeguarding concern to Governor level.

1.3 The Governing Body recognises that it maintains overall responsibility for the safety of everyone that comes into contact with the School, as well as ensuring that all School staff and volunteers are provided with adequate safeguarding training. The Safeguarding Governor should therefore ensure that alongside the duties set out in this policy, safeguarding remains a priority with sufficient Governing Body time being applied to this area.

1.4 The Governing Body recognises that as part of its obligations in respect of safeguarding it must be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 and their local multi-agency safeguarding arrangements, as detailed in the Keeping Children Safe in Education 2024 guidance.

2 THE SAFEGUARDING GOVERNOR

2.1 Safeguarding Governor: Clare Freeman

2.2 The identity of and contact details for the Safeguarding Governor, together with an outline of their duties, will be publicised widely within the School community to ensure that students, parents/guardians, staff and other Governors understand the purpose and importance of the role.

3 DUTIES

3.1 To either produce and undertake, or procure regular appropriate Governor training so that:

3.1.1 the Governing Body fully understands its role including its responsibilities with regard to well-being, safeguarding and child protection and support the Safeguarding Governor in the performance of these duties; and

3.1.2 the Governing Body has sufficient knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place at the School are effective and support the delivery of a robust whole School approach to safeguarding.

3.2 To ensure that the School makes opportunities available to the Governing Body and staff to feed into the School's approach to safeguarding and safeguarding policies.

3.3 To champion the promotion of well-being, safeguarding and child protection issues at the highest level within the School.

3.4 To review and ensure the School complies with the Department for Education's "Keeping children safe in education" and "Working together to safeguard children" guidance, the Charity Commission's "Safeguarding for charities and trustees" guidance and the "Prevent duty guidance" (as may be amended from time to time).

3.5 To regularly monitor and evaluate the School's safeguarding procedures and policy and how they are applied in practice to ensure they remain fit for purpose and in line with current legislation, guidance and best practice and to report to the Governing Body on any necessary amendments.

3.6 To ensure that the School has met its statutory duties (under Section 157 the Education Act 2002) by overseeing annual safeguarding audits and by ensuring that any weaknesses identified are rectified by the School without delay through the execution of an action plan.

3.7 To monitor and evaluate the School's safer recruitment procedures and staff code of conduct.

3.8 To monitor and evaluate the Single Central Record (SCR) annually and sign it, or more frequently on occasions where staff turnover is high.

3.9 To ensure that the School appoints a DSL for child protection who is a member of the Senior Leadership Team and who has undertaken appropriate training.

3.10 To ensure that the DSL role is clearly defined in the role holder's job description and that the role has the appropriate status and authority within the School to enable the DSL to carry out the duties of the post.

3.11 To ensure that the DSL is given sufficient dedicated time, funding, training resources and support to carry out the role effectively.

3.12 To monitor and ensure that all School staff, including temporary staff and volunteers, are provided with the School's Child Protection and Safeguarding policy and Staff Code of Conduct.

3.13 To monitor and ensure training is implemented for all School staff and volunteers to ensure they continue to meet statutory requirements, have an awareness of safeguarding issues that can put children at risk of harm and know how to address safeguarding concerns if they do occur.

3.14 To monitor the complaints register for indications of trends that may indicate potential safeguarding issues.

3.15 To ensure that all staff receive information on induction about the School's safeguarding arrangements, Staff code of conduct and the role of the DSL.

3.16 To ensure there are appropriate measures and procedures in place, including the whistleblowing policy, to ensure staff feel able to escalate and report safeguarding concerns (including low-level concerns if applicable, as well as allegations against other staff, supply staff, volunteers and contractors) to the DSL, senior leadership team, or to the Safeguarding Governor or Deputy.

3.17 To monitor and evaluate the School's procedures for dealing with allegations of abuse and ensure these are in line with statutory requirements and are effective.

3.18 To ensure the School contributes to multi-agency working, in particular ensuring that the Governors' make appropriate disclosures of actual or alleged safeguarding incidents to the relevant bodies including the Local Authority Designated Officer (LADO), the Local Authority Children's Services, the relevant Multi-agency Safeguarding Hub, the police and the Charity Commission (including under the serious incident reporting regime), as necessary.

3.19 In conjunction with the DSL and Education Committee to monitor and evaluate the School's online safeguarding procedures and the provision of relevant training.

3.20 To contribute to ensuring any deficiencies in the School's safeguarding practices that are brought to the attention of the Governing Body, from any source, are investigated and addressed.

3.21 To ensure that staff have the necessary knowledge and understanding to keep looked after / previously looked after children safe, with identified staff tasked to promote their educational achievement and wellbeing.

3.22 To ensure staff teach children about how to keep themselves and others safe, including online, that online safety is a running and interrelated aspect of implementing a whole School approach to safeguarding, and that appropriate IT filters and monitoring systems are in place to prevent children from accessing harmful or inappropriate material online.

3.23 To ensure that the Governing Body is made aware of any proven incident or allegation (anonymised where appropriate) which has implications for the School's Child Protection and Safeguarding policy and/or Staff Code of Conduct Policy.

4 ACTING IN AN EMERGENCY

4.1 Should there be an occasion when there is an urgent safeguarding issue (whether a child protection issue or otherwise) which requires a Governor to become involved, either the Chair of Governors or the Safeguarding Governor shall have the authority to manage the situation internally with the Head, DSL and Senior Leadership Team as appropriate but shall report all such action weekly to the Governing Body and on each occasion seek continued authority to proceed.

4.2 However, the Safeguarding Governor does not have the authority to bind the Governing Body externally and therefore should there be a need to report matters to external bodies, regulators or agencies, the Safeguarding Governor will make recommendations to the

Governing Body for its collective approval.

5 REPORTING AND REVIEW

The Safeguarding Governor will keep the Governing Body up to date with their work through regular reports (which may be written or verbal and support reports given by the DSL to the Governing Body). However, in the event of a safeguarding incident, whether alleged or actual, the Safeguarding Governor shall provide more regular updates, as necessary for the Governing Body.

Effective from: 9 January 2023