

| | |
|--|---|
| <p>Approving Body: SLT/Nominated Governor for Safeguarding</p> <p>Date of Review: Michaelmas 2023</p> <p>Date of Approval: 4 October 2023</p> | <p>Issue Number: 3.5</p> <p>Review Due: Michaelmas 2024</p> |
| <h1>Sherborne Girls'</h1> <h2>Safeguarding and Child Protection Policy</h2> | |
| <p>Owner: Deputy Head Pastoral (DSL)</p> | <p>Author: Deputy Head Pastoral (DSL)</p> |

- | |
|--|
| <input checked="" type="checkbox"/> Required by ISI <input checked="" type="checkbox"/> ISI requires publication on website <input type="checkbox"/> Internal decision to publish on website <input checked="" type="checkbox"/> Required reading for all staff |
|--|

Executive Summary

This policy is for all staff and Governors and consists of three main documents:

- **Part 1:** the overarching safeguarding policy
- **Part 2:** detailed child protection procedures
- **Part 3:** a separate child protection summary sheet

Please note that throughout this document, 'child' refers to a young person under the age of 18. However, at Sherborne Girls, Child Protection is extended to all members of our pupil body irrespective of age. The terms child/children/pupils are used synonymously throughout this document.

Our Nominated Governor for Safeguarding is
Canon Nicki Edwards

Our Designated Safeguarding Lead is
Mrs Jessica Briggs

Our Deputy Designated Safeguarding Leads are
Mrs Debbie Miller (Assistant Head - Safeguarding)
Ms Leonie Cole (Operational Safeguarding Manager)
Mrs Louise Orton (Senior Deputy Head)
Mrs Jayne Dart (Deputy Head Operations and Co-curricular)
Mrs Alice Beard (Health Centre Manager)
Mr Ian McClary (Assistant Chaplain)

Supporting documents

This policy should be read in conjunction with the following School documents:

- Staff Code of Conduct
- Online Safety policy
- Recruitment, Selection and Disclosure policy
- Whistleblowing Policy
- Anti-Bullying Policy
- Pupil Code of Conduct
- PSHEE and RSE policy
- Special Educational Needs and Disability policy
- Supervision of Pupils and Missing Pupil procedures
- Visiting Speakers Policy
- Low-Level Concerns policy

*To request a copy of any of the documents listed above please contact the Policies, Inspection and Strategy Coordinator:
g.shavesmythies@sherborne.com*

Glossary of Abbreviated Terms

- CAF – Common Assessment Framework
- CCE – Child Criminal Exploitation
- ChAD – Dorset Child and Adolescent Duty service
- Channel – a programme set up in April 2007 as part of the government’s wider Prevent strategy which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism
- CPOMS – Child Protection Online Management System
- CSE – Child Sexual Exploitation
- DBS – Disclosure and Barring Service
- DSL – Designated Safeguarding Lead
- DDSL -Deputy Designated Safeguarding Lead
- FGM – Female Genital Mutilation
- GDPR – General data protection regulations
- HM – Housemaster/Housemistress
- ISI – Independent Schools Inspectorate
- KCSiE – Keeping Children Safe in Education 2023
- LADO – Local Authority Designated Officer
- MASH - Multi Agency Safeguarding Hub
- NSPCC – National Society for the Prevention of Cruelty to Children
- PDSCP – Pan-Dorset Safeguarding Children Partnership
- Prevent – Government led, multi agency programme to stop terrorism
- PSHEE – Physical, Social, Health and Economic Education
- RSE – Relationships and Sex Education
- SAR – Subject access request
- SG – Sherborne Girls School
- TAF – Team around the Family
- Toot Toot – An app pupils can use to report concerns
- Whistleblowing – raising of a genuine concern about the conduct of another person

Contents

| | |
|---|----|
| Part 1: Safeguarding Policy | 5 |
| Part 2: Child Protection Procedures..... | 8 |
| 1. What is Child Protection? | 8 |
| 2. What is significant harm? | 8 |
| 3. Purpose of these procedures..... | 8 |
| 4. Responsibilities and roles..... | 8 |
| 5. Multi-Agency Working | 9 |
| 6. Sharing of Information | 9 |
| 7. What is child abuse? | 10 |
| Physical abuse | 10 |
| Emotional abuse | 10 |
| Sexual abuse | 10 |
| Neglect | 11 |
| 8. Recognising child abuse – signs and symptoms..... | 11 |
| 9. Under-age sexual activity..... | 12 |
| 10. Allegations made by children about other children | 12 |
| 11. Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) | 12 |
| 12. Children absent from education | 13 |
| 13. Contextual Safeguarding..... | 14 |
| 14. Serious Crime / County Lines | 14 |
| 15. Forms of abuse linked to culture, faith or belief | 14 |
| Female Genital Mutilation | 14 |
| Forced Marriage..... | 15 |
| ‘Honour-based’ Abuse | 16 |
| Anti-radicalisation and extremism..... | 16 |
| 16. Hate Incidents | 18 |
| 17. Child-on-child abuse | 18 |
| 18. Sexual Harassment and Sexual Violence..... | 19 |
| 19. Domestic Abuse | 20 |
| 20. Homelessness..... | 20 |
| 21. Online abuse / e-safety (including filtering and monitoring) | 20 |
| 22. Responding to a pupil who discloses (talks about) abuse | 21 |
| 23. Taking action | 21 |
| 24. Responding to concerns reported by parents or others in the community | 22 |
| 25. Response from Children’s Services Family Support (Social Care) to a school referral | 23 |

| | |
|--|----|
| 26. Early Help | 23 |
| 27. Responding to allegations or concerns about staff or volunteers..... | 24 |
| 28. Low-Level Concerns | 25 |
| 29. Children who are disabled | 26 |
| 30. Safer Working Practice..... | 26 |
| 31. Training | 26 |
| 32. Teaching of Safeguarding Related Issues..... | 27 |
| 33. Information for parents and carers | 27 |
| 34. Review by Governors | 27 |
| 35. Inspection..... | 28 |
| Part 3: Child Protection Summary for all Temporary Staff - SG..... | 29 |
| Appendix 1: Useful Contacts..... | 30 |
| Dorset Children’s Advice and Duty service (ChAD)..... | 30 |
| Safeguarding and Standards Team | 30 |
| Dorset LADOs | 31 |
| Dorset Virtual School for children who are in care/ Looked After | 31 |
| Appendix 2: Possible Indicators of Abuse..... | 32 |
| Physical Abuse | 32 |
| Emotional Abuse | 33 |
| Sexual Abuse | 33 |
| Neglect | 34 |
| Appendix 3 (For DSLs and DDSLs): Response from Children’s Services Family Support (Social Care) to a school referral | 35 |
| Referral | 35 |
| Assessment | 35 |
| S47 Enquiries (regarding significant harm)..... | 35 |
| S17 Enquiries (Child in Need)..... | 35 |
| The Child Protection Conference | 35 |
| Appendix 4: SG Response to Incidents Involving Youth Produced Sexual Imagery (nudes and semi nudes) 36 | |
| What to do if an issue involving sexual imagery is suspected | 36 |
| Information to establish | 36 |
| Viewing the image | 37 |
| Deleting the imagery..... | 37 |
| Response | 37 |
| Supporting parents/guardians/carers..... | 38 |

| | |
|---|----|
| Useful Contacts | 38 |
| Appendix 5: Sexual Violence and Sexual Harassment | 39 |
| Sexual Violence | 39 |
| Sexual Harassment..... | 39 |
| Response to an allegation of Sexual Harassment or Sexual Violence | 39 |
| Appendix 6: When to Call the Police..... | 42 |
| Appendix 7: Summary of Changes | 43 |

Part 1: Safeguarding Policy

At Sherborne Girls (SG), we recognise that the welfare of the child is paramount: the needs and wishes of each child will be put first. We take seriously our duty to safeguard and promote the welfare of the children and young people in our care.

Safeguarding children is everyone’s responsibility and it is essential that everybody working at SG understands their safeguarding responsibilities. [Keeping Children Safe in Education 2023](#) defines safeguarding as:

- protecting children from maltreatment
- preventing impairment of children’s mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes

The SG Governing Body will act in accordance with Section 175 / Section 157 of the Education Act 2002 and the supporting statutory guidance ‘[KCSiE \(September 2023\)](#)’ to safeguard and promote the welfare of children in this school. They will also act in accordance with the [Prevent Duty Guidance for England and Wales \(2023\)](#). As a boarding school SG is aware that the school has additional factors to consider with regard to safeguarding and complies fully with the [National Minimum Standards for Boarding \(2022\)](#).

The SG Governing Body is accountable for ensuring that the School meets its statutory responsibilities for safeguarding and that all policies and procedures are in place and effectively carried out.

It is a Dorset Safeguarding Standard recommended by the Pan-Dorset Safeguarding Children Partnership (www.pdscp.co.uk) that Governors receive a termly report from the Designated Safeguarding Lead (DSL) and Nominated Governor for Safeguarding in order to help monitor compliance within their statutory responsibilities.

The Dorset Standards also requires each school and college to complete and submit to the Safeguarding Children Board an annual audit of its safeguarding and child protection arrangements, including an action plan. SG last completed the audit in November 2022.

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

- age
- health or disability

Safeguarding and Child Protection Policy

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

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

The purpose of this policy is to:

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

This policy applies to the Head, all staff (including supply and peripatetic staff), regular volunteers, Governors or anyone working on behalf of the School, including those representing the School in its [Charity status](#).

The School will endeavour to safeguard children and young people by:

- valuing them, listening to and respecting them
- involving them in decisions which affect them
- never tolerating bullying, homophobic behaviour, racism, sexism or any other forms of discrimination
- ensuring the curriculum and Personal, Social, Health and Economic Education (PSHEE) lessons afford them opportunities to learn about keeping themselves safe, particularly when using technology and where appropriate in respect of radicalisation, extremist behaviour and preventing domestic abuse
- supporting attendance and taking action if a child is absent from school regularly
- having a senior member of staff as the DSL and ensuring this person has the time, support, training and resources to perform the role effectively
- ensuring that there is always cover for the DSL role, should the DSL be out of school
- having a Designated Teacher (Mrs Debbie Miller- Assistant Head Safeguarding) to promote the educational achievement of children who are looked after/in care (mandatory in maintained schools; best practice in others)
- making sure all staff, volunteers and Governors are aware of and committed to the safeguarding policy and child protection procedures and also understand their individual responsibility to take action
- ensuring that all staff and Governors have read at least Part One or Annex A of KCSiE. This applies not only to new staff but also to those already in post in April 2014 when KCSiE was first introduced. All teaching staff, Governors and house staff will read Part one. Every member of support staff and Foundation Trustees who have minimal direct contact with pupils will be required to read Annex A only. The final decision about who is required to read which document will sit with the DSL, following a discussion with the Head
- identifying any concerns early and providing appropriate help to prevent them from escalating
- sharing information about concerns with agencies who need to know, and involving children and their parents/carers appropriately
- acknowledging and actively promoting that multi-agency working is often the best way to support children and their families

- taking the right action, in accordance with Pan-Dorset Safeguarding Children Partnership (PDSCP) inter-agency safeguarding procedures, if a child discloses or there are indicators of abuse¹. Children who have suffered or are likely to suffer significant harm should be reported to Children's Social Care immediately. Those who are in need of additional support from one or more agencies should be guided towards inter-agency assessment using local processes, including use of the Common Assessment Framework (CAF) and "Team around the Family" (TAF)
- in the event of pupils being identified as being at risk of radicalisation the school will consider the level of risk to identify the most appropriate referral, which could include Children's Social Care or Channel or Children's Social Care, for example
- keeping clear, accurate and contemporaneous safeguarding and child protection records
- recruiting staff, including temporary staff and volunteers safely ensuring all necessary checks are made in accordance with statutory guidance and legal requirements and also making sure that at least one appointment panel member has undertaken safer recruitment training (mandatory in maintained schools; best practice in others)
- ensuring that the Single Central Register (SCR) is kept up to date and that it is checked on a termly basis by the nominated Governor for Safeguarding
- providing effective management for the above through induction, support and regular training appropriate to the role
- adopting a Staff Code of Conduct for all staff and volunteers, which all staff are required to read and sign to say they have done so
- ensuring staff and volunteers understand about 'whistleblowing'
- promoting a culture in which staff feel able to report to senior leaders what they consider to be unacceptable behaviour or breaches of the School Staff Code of Conduct by their colleagues, having faith that they will be listened to, and appropriate action taken
- dealing appropriately with any allegations/concerns about the behaviour of staff or volunteers in accordance with the process set out in statutory guidance
- ensuring that the School's filtering and monitoring systems are robust and that all staff understand their roles and responsibilities with regards to filtering and monitoring
- having appropriate procedures in place to ensure that safeguarding continues to the highest standard when the school premises is used for a non-school activity

¹ SG staff recognise that children are not always ready or able to talk about their experience of abuse and/or may not always recognise that they are being abused.

Part 2: Child Protection Procedures

1. What is Child Protection?

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

2. What is significant harm?

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

3. Purpose of these procedures

These procedures explain what action should be taken if there are concerns that a child is or might be suffering harm. As defined in the Executive Summary on the title page of this document, a 'child' refers to a young person under the age of 18 years, however, at Sherborne Girls, Child Protection is extended to all members of our pupil body irrespective of age.

4. Responsibilities and roles

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

Governing bodies are accountable for ensuring their school has an effective child protection policy which should be reviewed annually and available publicly. All Governors have an active role in the safeguarding of the pupils at the School. Governors are made aware of their roles and responsibilities through training delivered by the DSL and regular updates through briefing documents, reports and Committee meetings. The Governors understand that they have a role to play in ensuring that aspects of this policy are discharged correctly. The PDSCP recommends that each governing body will nominate an individual member to work closely with the DSL and to provide a link between the School and the governing body to monitor whether mandatory policies, procedures and training are in place and effective.

The Nominated Governor at SG is Canon Nicki Edwards
She is also the nominated Governor Prevent Lead

SG has a DSL. This is the person with whom concerns about children should be discussed and reported. The School also has an Assistant Head (Safeguarding), an Operational Safeguarding Manager and a team of three other Deputy Safeguarding Leads (DDSLs). One of the DSL or DDSLs is contactable at all times during the working day and can be reached outside of School hours by email and/or mobile phone.

The DSL at SG is Mrs Jessica Briggs. She is also a member of the Senior Leadership Team.

The Assistant Head - Safeguarding at SG is Mrs Debbie Miller. She is also the School's Prevent Lead, Online Safety Coordinator and FGM lead.

The Operational Safeguarding Manager is Ms Leonie Cole.

The Deputy Safeguarding Leads are Mr Ian McClary, Mrs Louise Orton, Mrs Alice Beard. Mrs Jayne Dart is the DDSL for the Oxley Sports Centre.

Mr Steve Hurley is the Designated Senior Person for Safeguarding for the Oxley Sports Centre.

For the School's events and holiday lets there are two members of staff who are trained to Safeguarding Level 3: Mrs Samantha Welch and Mrs Jennifer Brewer. This ensures that robust safeguarding procedures and policies are in place when the school premises is used for non-school activities.

In addition, the PDSCP can provide advice and guidance on safeguarding and child protection matters. See [Appendix 1](#) for contact details.

All action is taken in line with the following guidance:

- [KCSiE \(September 2023\)](#)
- [Working together to safeguard children 2023: statutory guidance \(publishing.service.gov.uk\)](#)
- Bournemouth, Dorset and Poole Inter-Agency Safeguarding Procedures & Guidance, accessed through the [Pan-Dorset Safeguarding Children Board website](#)
- [What to do if you're worried a child is being abused](#)

This policy is in accordance with the locally agreed inter-agency procedures of PDSCP.

5. Multi-Agency Working

SG is committed to having a multi-agency approach to Safeguarding, including Child Protection. This means liaising and information sharing as needed and appropriate with the local authorities, the Police and Health authorities.

SG will assist social workers from any relevant local authority in speaking to pupils so that they can conduct, or consider whether to conduct, a section 17 or a section 47 assessment.

6. Sharing of Information

In accordance with [KCSiE \(September 2023\)](#) appropriate information will be shared with the relevant local authority, the Police and the pupil's GP. This will be done in a timely fashion in order to help identify, assess and respond to risks or concerns about the safety and welfare of all children and young people. The School is mindful that early information sharing is vital for the effective identification, assessment, and allocation of appropriate service provision, whether this is when problems first emerge, or where a child is already known to Local Authority Children's Social Care.

Where possible consent from the pupil, to share safeguarding information, will be sought however, it is recognised that safeguarding children and individuals at risk allows information to be shared without consent being sought provided that there is good reason to do so. Such as: it is not possible to gain consent; it cannot be reasonably expected that consent is sought; or if to gain consent would place a child at risk.

A record that information was shared will be logged on the Child Protection Online Management System (CPOMS) in either the 'Safeguarding' or 'Child Protection' category as appropriate. CPOMS is the record keeping system used at SG.

If a General Data Protection Regulations Subject Access Request (GDPR SAR) is sought, then a pupil's personal data may be withheld where a serious harm test is met. If this is considered relevant, legal advice will be sought by the School before continuing.

When a pupil joins SG it is the responsibility of the DSL to contact the pupil's previous school and the local authority (Dorset Council). When a pupil leaves SG to go to another school it is the responsibility of the DSL to inform the local authority (Dorset Council) and share appropriate information once contacted by the DSL of the school the pupil is moving to. Although SG will always seek to accept and support pupils any time they apply to join the School, abnormal entry points for SG are U5 (Year 11) and U6 (Year 13). Abnormal exit points for SG are M5 (Year 10), L6 (Year 12) and mid-year.

7. What is child abuse?

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 include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse.' It is generally accepted that there are four main forms of child abuse. The following definitions are from [KCSiE \(September 2023\)](#):

Physical abuse

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

Emotional abuse

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

Sexual abuse

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

not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.

Neglect

The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance use. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- protect a child from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate caregivers)
- ensure access to appropriate medical care or treatment
- neglect of, or unresponsiveness to, a child's basic emotional needs.

It is accepted that in all forms of abuse there are elements of emotional abuse, and that some children are subjected to more than one form of abuse at any one time.

It is recognised that abuse can take place anywhere. This can include wholly online, wholly offline or a combination of the two.

8. Recognising child abuse – signs and symptoms

KCSiE (September 2023) is clear: 'All staff should be aware of indicators of abuse and neglect understanding that children can be at risk of harm inside and outside of school, inside and outside of home and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection.'

Recognising child abuse is not always easy, and it is not the responsibility of school staff to decide whether or not child abuse has definitely taken place or if a child is at significant risk. They do, however, have a clear responsibility to act if they have a concern about a child's welfare or safety or if a child talks about (discloses) abuse. They should maintain an attitude of 'it could happen here'. All staff should be able to reassure victims² that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Appendix 2 details examples of possible indicators of each of the four kinds of abuse.

Adverse mental health can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse and exploitation. This abuse can have a long-lasting effect and may affect the pupil's mental health into adulthood. If staff are concerned about a pupil's mental health, they should log their concern on CPOMS, or speak directly to the pupil's HM or the DSL.

² Throughout this policy the term 'victim' is used as it is a widely recognised and understood term. At SG, we recognise that not everyone who has been subjected to abuse considers themselves a victim or would want to be described in this way. SG staff are conscious of this when managing incidents and are prepared to use any term with which the individual child is most comfortable.

9. Under-age sexual activity

Penetrative sex where one of the partners is under the age of 16 is illegal, although prosecution of consenting partners of a similar age is not usual. The DSL will report any incident of under-age sexual activity to social workers within 24 hours of being informed.

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

The inter-agency safeguarding procedures, on the PDSCP website, have more information about under-age sexual activity.

Consensual and non-consensual sharing of nudes and semi-nudes images and/or videos by children can be signs that they are at risk. Where a crime has not been committed, and following the Department for Education's guidance to schools, these incidents can be dealt with primarily as a safeguarding matter. See [Appendix 4](#) and [Sharing nudes and semi nudes](#) for further details.

10. Allegations made by children about other children

On occasion, children may be harmed by other children through child-on-child abuse, see [section 17 for further details](#). The nature of the allegation or concern will determine whether staff should implement the School's Anti-Bullying Policy or whether a referral for advice needs to be made to social workers.

Child protection procedures will be followed if a child or young person displays sexually harmful behaviour. This involves one or more children engaging in sexual discussions or acts that are inappropriate for their age or stage of development. It is also considered harmful if it involves coercion or threats of violence or one of the children is much older than the other. Any decisions about cases will be made on a case-by-case basis with the DSL taking a leading role. See [section 14](#) and [Appendix 5](#) for further details.

Following an incident of child-on-child abuse, a school risk assessment will be put in place preferably by way of a meeting, which may include the child, their parents/carers and other professionals where appropriate. The risk assessment will consider the victim, the perpetrator³ and all other children at the school.

11. Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Child Sexual Exploitation and Child Criminal Exploitation are forms of abuse and both occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual or criminal activity. In some cases, this will be (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however SG staff should be aware that girls are at risk of CCE too. It is recognised that young people who are criminally exploited may be at a higher risk of sexual exploitation.

The imbalance of power referred to previously may stem from a wide range of factors including age, gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. It includes 16–18-year-olds who can legally consent to have sex. Children can be exploited

³ Throughout this policy the term 'perpetrator(s)' is used as it is a widely recognised term. SG staff think very carefully about terminology, especially when speaking in front of children, not least because in some cases the abusive behaviour will have been harmful to the perpetrator/alleged perpetrator as well. SG staff are mindful of the use of appropriate terminology and each issue is dealt with on a case-by-case basis.

by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim.

Examples of CCE include children being forced or manipulated into transporting drugs or money through County Lines, working in Cannabis factories, shoplifting or pickpocketing, committing vehicle crime or threatening/committing serious violence to others.

Both CSE and CCE can occur through the use of technology without the child's immediate recognition, e.g., being persuaded to post sexual images on the Internet/mobile phone without immediate payment or gain. More information can be found [here \(Child Sexual Exploitation 2017\)](#).

Any child or young person may be at risk of sexual exploitation, regardless of family background or other circumstances, and can experience significant harm to physical and mental health. They may become trapped as perpetrators can threaten victims and/or families. Due to this, victims sometimes carry weapons to protect themselves.

Perpetrators may be individuals or groups of any age or gender. The abuse may be a one-off occurrence or a series of incidents and range from opportunistic to complex organised abuse.

Due to the grooming methods used by abusers, it is common for young people not to recognise they are being abused and to feel they are 'in a relationship' and acting voluntarily. The victim may have been sexually exploited even if the sexual activity appears consensual. This is the same for CCE. The young person who has been groomed may not present as a victim due to crimes they have committed but they may have been criminally exploited even if the activity appears to have been something that they have agreed to.

CSE can involve both contact (penetrative and non-penetrative acts) and non-contact sexual activity.

Any concerns about CSE or CCE must be referred to and discussed with the DSL. Indicators of CSE and CCE may include:

- children who appear with unexplained gifts/new possessions
- children who associate with other young people who are known to be involved in exploitation
- children who have boyfriends or girlfriends who are older by 5 years or more
- children experiencing one or more pregnancies or suffering from more than one Sexually Transmitted Infection
- children who suffer from changes in emotional well-being
- children who misuse drugs or alcohol
- children who go missing for periods of time or regularly come home late
- children absent from education

There are a range of risk factors which increase the likelihood of involvement in CCE, CSE and serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. Information about CSE can be found in the Government produced document [Child Sexual Exploitation](#).

12. Children absent from education

A child who is absent for a prolonged period of time, or on repeat occasions, or who goes missing from an education setting is a potential victim of abuse, neglect and/or a mental health concern.

Should the School become aware of a pupil's prolonged absence, appropriate measures must be taken to mitigate the risk of the pupil becoming a child absent from education in the future and, if necessary, the relevant external organisations would be contacted. SG has a clear missing child policy and staff understand the procedure to follow should a pupil go missing or should a pupil have unauthorised absence.

13. Contextual Safeguarding

Contextual safeguarding involves considering the context within which safeguarding incidents happen. This could involve physical spaces, online sites and friendships. At SG, we recognise that safeguarding incidents and/or behaviours can be associated with these factors out of School and may occur between children outside of this environment.

If necessary, a location linked with contextual safeguarding will be reported to Dorset Child and Adolescent Duty (ChAD) service and/or the Police. Where needed it will also be passed onto the DSLs of the other schools in Sherborne.

SG is an Operation Encompass School. 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 inform the DSL before the child/children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs. Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the Police and/or school will make a referral to Local Authority Children's Social Care if they are concerned about a child's welfare.

14. Serious Crime / County Lines

All staff should be aware that all pupils are at risk of becoming involved in serious crime. This can involve [gang related crime](#) (Preventing Youth Violence and Gang Involvement, 2015) and [Child Criminal Exploitation: County Lines](#) (Criminal Exploitation of children and vulnerable adults: County Lines guidance, 2018). Both of these issues can be linked to CSE. Staff should be aware of signs to look out for which include increased absence from School, a change in friendships or relationships with older individuals or groups, a significant decline in performance, self-harm, signs of assault or unexplained injuries, and unexplained gifts or new possessions.

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of County Lines criminal activity: drug networks or gangs groom and exploit children and young people to carry (and store) drugs or money from area to area often across County Lines / boundaries.

It can affect any child or young person irrespective of age or gender. There can still be exploitation even if it appears consensual however it is often accompanied by coercion, intimidation, violence or threats of violence (including sexual violence).

Perpetrators can be individuals or groups of any age or gender. There is often a power imbalance in favour of those perpetrating the exploitation.

If County Lines exploitation is suspected, a referral to the National Referral Mechanism should be considered. Information on this can be found [here](#).

15. Forms of abuse linked to culture, faith or belief

[Female Genital Mutilation](#)

Female Genital Mutilation (FGM) is illegal and involves intentionally altering or injuring female genital organs for non-medical reasons. It can have serious implications for physical health and

emotional well-being. Possible indicators include taking the girl out of school / country for a prolonged period or talk of a 'special procedure' or celebration.

Warning signs that FGM may be about to take place are:

- the pupil having an older sibling or cousin who has undergone FGM
- a pupil coming from a community known to practise FGM
- a pupil's family indicating that there are strong levels of influence held by elders and/or elders are involved in bringing up female children
- a pupil's family believing FGM is integral to cultural or religious identity
- a pupil's family having a limited level of integration within the UK community
- a pupil confiding to a teacher or other adult that she is to have a 'special procedure' or to attend a special occasion to 'become a woman'
- a pupil talking about a long holiday to her country of origin or another country where the practice is prevalent
- a pupil's parents stating that they or a relative will take the girl out of the country for a prolonged period
- a pupil's parent or family member expressing concern that FGM may be carried out on the girl
- a pupil's family not engaging with professionals (health, education or other)
- a family which is already known to Social Care in relation to other safeguarding issues
- a pupil requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
- a pupil talking about FGM in conversation, for example, a girl may tell other children about it – it is important to take into account the context of the discussion
- an attempt to withdraw a pupil from a practising community from PSHEE
- a pupil is unexpectedly absent from school

Warning signs that FGM may have already taken place on a pupil are:

- severe pain
- haemorrhage
- wound infections
- urinary retention
- injury to adjacent tissues
- genital swelling
- difficulty walking
- repeated urinary tract infections

Section 5B of the FGM Act 2003 places a statutory duty upon teachers to personally report it to the Police when they discover that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. The Mandatory reporting duty commenced in October 2015. Unless a teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve Children's Social Care as appropriate. Information on how to report an act of FGM can be found [here](#).

Forced Marriage

Forced Marriage is also illegal and occurs where one or both people do not or, in cases of people with learning disabilities, cannot consent to the marriage and pressure or abuse is used. Threats can be physical, emotional, or psychological. It is not the same as an arranged marriage. Young people at risk of forced marriage might have their freedom unreasonably restricted or being 'monitored' by

siblings. Since February 2023 it has been a crime for children to marry before their eighteenth birthday, this also applies to non-binding, unofficial marriages as well as legal marriages. An indicator of forced marriage might be a request for extended absence from school or that a pupil might not return from a holiday abroad.

Advice and information can be sought from the Forced Marriage unit. Contact 020 7008 0151 or email fm@fco.gov.uk . More information can be found [here](#).

'Honour-based' Abuse

So called 'honour-based' abuse is a crime or incident which has or may have been committed to protect or defend the honour of the family and/or community. It can exist in all communities and cultures and occurs when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code. Females are predominantly, but not exclusively, the victims and the abuse is often committed with some degree of approval and/or collusion from family or community members. All forms of so-called 'honour-based' abuse should be reported to the DSL as such.

Anti-radicalisation and extremism

The Counterterrorism and Security Act 2015 places a duty on education and other children's services to have due regard to the need to prevent people from being drawn into terrorism. This duty is known as the Prevent duty. The following guidance is written with regard to section 26 of the Counterterrorism and Security Act 2015 which defines extremism as vocal or active opposition to fundamental British values, including the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

In SG we recognise that safeguarding against radicalisation and extremism is no different from safeguarding against any other risk, as all children can be susceptible to being drawn into terrorism. There is no place for extremist views of any kind in our school. Our curriculum promotes respect, tolerance and diversity. Our pupils are encouraged to share their views and to understand that they are entitled to have their own different beliefs which should not be used to influence others.

We recognise that children with low aspirations are more susceptible to radicalisation and therefore we strive to equip our pupils with confidence, self-belief, respect, understanding and tolerance as well as setting high standards and expectations for themselves.

Our pupils are taught about how to stay safe when using the Internet and are encouraged to recognise that people are not always who they say they are online. They are taught to seek adult help if they are upset or concerned about anything they read or see online.

Any concerns about a child suspected of involvement in extremist groups, terrorism or could be vulnerable to radicalisation must be reported to the DSL or a DDSL. The DSL / DDSL will not speak to parents/carers or other family members at this stage but will take prompt advice from the Police by completing the Prevent referral form and e-mailing it to both the Safeguarding Referral Unit: PreventReferrals@Dorset.pnn.police.uk and the Dorset ChAD service (01305 228 558) so that an interagency investigation can happen.

- Sherborne Police Station – 01305 222 222
- Non-emergency Police number – 101
- DfE telephone helpline and mailbox for non-emergency advice for staff and Governors: 0207 3407 264 and counter-extremism@education.gsi.gov.uk

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

Identifying pupils at risk of radicalisation: There is no single way of identifying who is likely to be susceptible to being drawn into terrorism. Examples of influences that make individuals susceptible to engagement with an extremist group, cause or ideology include:

- a feeling of grievance and or injustice
- feeling under threat
- a need for identity, meaning and belonging
- a desire for status
- a desire for excitement and adventure
- a need to dominate and control others
- susceptibility to indoctrination
- a desire for political or moral change
- opportunistic involvement
- family or friends' involvement in extremism
- being at a transitional time of life
- being influenced or controlled by a group
- relevant mental health issues

Example indicators that an individual is engaged with an extremist group, cause or ideology include:

- spending increasing time in the company of other suspected extremists
- changing their style of dress or personal appearance to accord with the group
- their day-to-day behaviour becoming increasingly centred around an extremist ideology, group or cause
- loss of interest in other friends and activities not associated with the extremist ideology, group or cause
- possession of material or symbols associated with an extremist cause (e.g., the swastika for far-right groups)
- attempts to recruit others to the group/cause/ideology

Intent to cause harm: Not all those who become engaged by a group, cause or ideology go on to develop an intention to cause harm, so this dimension is considered separately. Intent factors describe the mindset that is associated with a readiness to use violence and address what the individual would do and to what end. They can include:

- over-identification with a group or ideology
- 'them and us' thinking
- dehumanization of those they consider the enemy
- attitudes that justify offending
- harmful means to an end
- harmful objectives

Example indicators that an individual has an intention to use violence or other illegal means include:

- identifying other groups as threatening in what they stand for and blaming that group for all social or political ills
- using insulting or derogatory names or labels for another group
- speaking about the imminence of harm from the other group and the importance of action now
- expressing attitudes that justify offending on behalf of the group, cause or ideology
- condoning or supporting violence or harm towards others
- plotting or conspiring with others

Capability to cause harm: Not all those who have a wish to cause harm on behalf of a group, cause or ideology are capable of doing so, and plots to cause widespread damage take a high level of personal capability, resources and networking to be successful. What the individual is capable of is therefore a key consideration when assessing risk of harm to the public.

Example indicators that an individual is capable of directly or indirectly causing harm include:

- having a history of violence
- being criminally versatile and using criminal networks to support extremist goals
- having occupational skills that can enable acts of terrorism (such as civil engineering, pharmacology or construction)
- having technical expertise that can be deployed (e.g., IT skills, knowledge of chemicals, military training or survival skills).

More information about safeguarding pupils from radicalisation and extremism can be found at www.educateagainsthate.com.

16. Hate Incidents

According to the NSPCC, an incident is considered a hate incident when the victim or anyone else believes that the incident was motivated by hostility or prejudice based on one of the following:

- disability
- race
- ethnicity
- religion or beliefs
- sexual orientation
- gender identity

When a hate incident becomes the level of a criminal offence, it becomes a hate crime. All hate crimes will be reported to the Police. All hate incidents will be logged on CPOMS.

17. Child-on-child abuse

Children can abuse other children. It can happen both inside and outside of school and online and can take many forms including: abuse in intimate personal relationships between children, bullying, sexual violence and harassment, 'upskirting', 'downblousing' physical abuse, consensual and non-consensual sharing nudes/semi nudes, and 'hazing initiations'. **Child-on-child abuse is not accepted at SG and will be dealt with as a serious issue.**

Aspects of child-on-child abuse can be linked to gender. It is recognised that a significant amount of child-on-child abuse happens between boys and girls, it should be remembered that it can also happen between pupils of the same gender. Homosexual, Bisexual and Transgender pupils are at particular risk of child-on-child abuse. SG takes a whole-school approach to sustain a culture which

does not tolerate any form of prejudice or discrimination. The School's values are underpinned by the Pupil Code of Conduct, the Pupil Behaviour, Rewards and Sanctions Policy and the pastoral support system. PSHEE lessons, the School's LGBT+ leads and the pupil 'Diverse Voices' group, support continued education, awareness and inclusion for all pupils (see LGBTQIA+ policy and Guidance on Supporting Transgender Pupils).

Whilst low level bullying will often be dealt with by the Housemistress/master, the DSL must be kept informed of all incidents either in person or via CPOMS. A Housemistress/master must refer to the DSL if there is a second incident from the perpetrator. The DSL will be central to most investigations into bullying.

Please see the SG Anti-bullying policy for further information.

SG maintains an 'it could happen here' mentality and staff understand that even if there are no reports, it does not mean it is not happening, it may be the case that it is just not being reported. We seek to minimise the risk of child-on-child abuse via the following ways:

- all staff challenge inappropriate behaviour
- PSHEE lessons – looking at anti-bullying, discrimination, relationship and sex education
- drawing room sessions in boarding houses to discuss attitudes towards behaviour in a supportive and open way, allowing attitudes towards inappropriate behaviour to be shared and where necessary, challenged
- the ability for pupils to report an issue anonymously through Toot Toot
- Care team meetings to discuss vulnerable pupils
- close links with Sherborne School to discuss pupil behaviour at both schools
- lectures and events
- Peer Supporters

All of the above create an ethos within the School where pupils are encouraged to recognise bullying, discrimination, unkindness, inappropriate behaviour and child-on-child abuse and report it early.

Any cases of Sexual Harassment or Sexual Violence towards or by a pupil must be dealt with as per [section 18](#) and [Appendix 5](#) of this policy.

Within the resolution of any child-on-child abuse cases, suitable support should be considered for both the victim and the perpetrator as well as any other necessary child or adult.

18. Sexual Harassment and Sexual Violence

Sexual violence and sexual harassment, including that once referred to as 'banter', is not acceptable, will never be tolerated and is not an inevitable part of growing up.

Staff must challenge unsuitable behaviour. This could include those behaviours described in [Appendix 5](#) as well as grabbing bottoms, breasts and genitalia, flicking bras, lifting up skirts/pulling down trousers and 'upskirting'. More information can be found [here](#) (Sexual Violence and Sexual Harassment between Children in Schools and Colleges, 2021).

It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting an issue. They should also never be made to feel ashamed for making a report.

If staff have a concern about a pupil or a pupil makes a report to them, they should follow the safeguarding referral process as set out in section 18 of this policy.

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

The DSL will ensure the School is engaging with Children's Social Care and specialist services as required.

The School has a zero-tolerance approach to sexual violence and harassment. When an investigation is being led by the School, each incident will be considered on a case-by-case basis and the School will consider whether any disciplinary action is appropriate for the perpetrator/s, as per the Pupil Code of Conduct.

19. Domestic Abuse

Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to: Psychological, physical, sexual, financial and emotional. More information can be found [here](#) (Domestic Abuse: How to Get Help. 2018).

Exposure to domestic abuse may have a long-lasting effect on a child both psychologically and physically. In some cases, a child/pupil may blame themselves for the abuse or may have had to leave the family home as a result.

More advice on identifying children who are affected by domestic abuse and how they can be helped is available via the following websites and links to relevant documents:

- <https://www.operationencompass.org/>
- [NSPCC – UK domestic-abuse Signs Symptoms and effects](#)
- [SafeLives: young people and domestic abuse](#)
- [Refuge](#)

20. Homelessness

Being homeless or at risk of becoming homeless presents a real risk to a child's welfare.

Being a full-boarding school, we are able to provide accommodation in term time, but this issue could still affect a pupil at the School.

House staff in particular should be mindful to the home situation of every girl in their house and ensure that they are not homeless in the holidays or during term time too for day girls / day boarders. Concerns regarding a pupil's home accommodation situation should be raised with the DSL as soon as known about.

21. Online abuse / e-safety (including filtering and monitoring)

It is essential that children are safeguarded from potentially harmful and inappropriate online material. SG has a whole school approach to online safety, and it is the responsibility of all staff to protect and educate children in their use of technology and identify, intervene in, and escalate any concerns to the DSL where appropriate. All staff receive cyber security training at least once annually and in addition to this have monthly cyber security modules to complete.

The DSL is the e-safety lead and she is supported in this role by the Assistant Head – Safeguarding.

SG takes steps to reduce the risk of pupils being abused, radicalised or accessing inappropriate material online. This includes having an Internet Filter / Firewall (Watch Guard) and teaching pupils

about the safety issues around Internet use via PSHEE. These topics include Cyberbullying, Safe use of social media, Revenge Porn and Extremism. The filtering and monitoring IT systems are reviewed at least annually by the DSL, Assistant Head – Safeguarding, Director of IT and the nominated Safeguarding Governor at SG.

Pupils risk of online abuse is further reduced by pupils in L4 – L6 (Year 7 to Year 12) handing in mobile 'phones, tablets and Surfaces/laptops every night before bedtime. L4 - U4 (Year 7 and Year 8) may only use their Surfaces/laptops and tablets within their boarding house when they are downstairs in common areas. SG staff understand that some pupils, who have a higher risk profile than others, may need more specific filtering and monitoring of their devices and additional measures. Support can be put in place to safeguard certain pupils who have specific needs. In order to safeguard our pupils, the use of 4G/5G mobile network while on school site is not allowed.

For further information about Online Safety / e-safety, please see the SG Online Safety Policy.

22. Responding to a pupil who discloses (talks about) abuse

All staff and volunteers will:

- listen carefully to what is said
- avoid showing shock or disbelief
- observe the child's demeanour
- find an appropriate opportunity to explain that the information will need to be shared with others on a need-to-know basis. They will not promise to keep the information confidential or a 'secret' but have a duty to respect the confidence of the information
- allow the child to continue at their own pace and not interrupt if the child is freely recalling events. They will not stop them in order to find a 'witness' as this could inhibit the child from saying more
- endeavour to ask the pupil if they agree that the adult can take notes during the discussion
- avoid asking questions or pressing for more information. They will ask for clarification only. If questions are necessary, they should be framed in an open manner and not 'lead' the child in any way. Remember TED: Tell me... Explain... Describe...
- reassure the child, if necessary, that they have done the right thing in telling
- explain what will happen next and with whom the information will be shared the pupil will be given the option of which member of the DSL team the information will initially be shared with
- not ask the pupil to repeat the disclosure to anyone else in School – including the DSL - or ask them or any other pupils who were present to write a written account or 'statement'
- take the pupil somewhere of their choosing so that they can have some quiet time in a safe environment. The Health Centre is recommended but their boarding house would be suitable too. If the pupil wishes, they can return to lessons.

23. Taking action

Where physical injuries have been observed, these will be carefully noted but not photographed. The staff member will not ask to see injuries that are said to be on an intimate part of the child's body.

Any disclosure or indicators of abuse will be reported verbally to the DSL or a DDSL as soon as possible or, where this is not possible and concerns are immediate, ensure a referral is made without delay to the relevant local authority team which covers the area in which the child and family live. If the child has two residences listed, the main residence should be used. See [Appendix 1](#)

for details. If it is likely that a crime has been committed, then the Police will be contacted by the DSL.

As soon as the staff member has passed over the details of the disclosure to the DSL or one of the DDSL's; or has, in an emergency, contacted the local authority team, then it is right for them to assume that their role in the disclosure is over. If a DDSL has had a disclosure referred to them, they will work with the DSL to progress the issue.

Where the pupil already has an allocated social worker that the School is aware of, that person or a manager or duty worker in the same team will be contacted promptly.

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

A written record will be made of what was said, including the pupil's own words, as soon as possible. All concerns, discussions and decisions made, and the reasons for those decisions, should also be recorded in writing, via CPOMS. Records should include:

- a clear and comprehensive summary of the concern
- details of how the concern was followed up and resolved
- a note of any action taken, decisions reached and the outcome

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

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

Where there is no disclosure by a child, but concerns are accumulating, such as in relation to neglect or emotional abuse, the DSL will ensure that all information is brought together. She will make a professional judgement about whether to refer to outside agencies.

A member of staff who reports concerns to the DSL / a DDSL should expect some feedback, although confidentiality might mean in some cases that this is not detailed. If the member of staff is not happy with the outcome they can press for reconsideration and should also refer the issue to the Head. If, following this, they still believe the correct action has not been taken, they can refer the concern directly to social workers or the NSPCC (NSPCC whistleblowing helpline 0800 0280285).

24. Responding to concerns reported by parents or others in the community

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

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

It is preferable if the parent / community member who witnessed or knows about the concerns or incident communicates with Social Care themselves as they will be better able to answer any

questions. They can ask for their name not to be divulged if a visit is made to the family being discussed. Contact details for Dorset Social Care can be found [here](#).

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

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

Any suspicion or concern that a child or young person may be suffering or at risk of suffering significant harm, MUST be acted on. Doing nothing is not an option. Any suspicion or concern must be reported without delay to the DSL or a DDSL. If they are not available, the staff member will discuss their concerns as soon as possible with either

- another senior member of staff or
- the duty worker in the Family Support (Social Care) Team responsible for the area where the child lives. See [Appendix 1](#) for contact details.

Anyone can make a referral to Social Care, not just the DSL or DDSLs.

It is important that everyone in the School is aware that the person who first encounters a case of alleged or suspected abuse is not responsible for making a judgement about whether or not abuse has occurred and should not conduct an 'investigation' to establish whether the child is telling the truth. That is a task for social workers and the Police following a referral to them of concern about a child. The role of School staff is to act promptly on the information received.

The paragraph above applies regardless of the alleged 'perpetrator': whether the child talks about a family member or someone outside School, a member of staff or another child/pupil.

A careful record will be made of what has been seen/heard that has led to the concerns and the date, time, location and people who were present. As far as possible, staff should record verbatim what was said and by whom.

The DSL will keep a record of the conversation with the duty worker and other social workers, noting what actions will be taken and by whom, giving the date and time of the referral. The referral will be confirmed in writing on the inter-agency referral form (available on the PDSCP website) as soon as possible and certainly within 48 hours. Any pre-existing assessments such as through the Common Assessment Framework should be attached.

25. Response from Children's Services Family Support (Social Care) to a school referral

Response from Children's Services Family Support (Social Care) to a school referral is to be found at [Appendix 3](#).

26. Early Help

Concerns about a pupil sometimes do not reach the threshold for referral to the Children's Advice and Duty service but the pupil may require extra help from Professionals. If this is the case, the DSL will consider using an 'Early Help' approach.

If Early Help is thought to be relevant, then the DSL or DDSL will contact the parents or carers and invite them for a 'Team Around the Family' meeting (TAF).

At the first TAF meeting, a Lead Professional will be decided on. The Lead Professional is responsible for leading on the case and ensuring issues are followed up.

The parents and child can request other people attend the meeting. This may include other people who help to support the family or who are involved with other children within the family.

A representative from the North Dorset Family Partnership Zone should also be invited by the DSL/DDSL if suitable.

The Lead Professional will be responsible for ensuring all matters discussed, decisions made (including reasons for those decisions) and tasks allocated are recorded. As per the PDCSP requirements, there is no need to record these officially on a Common Assessment Framework (CAF) although this can be used if thought to be helpful.

Early help should not continue indefinitely. If issues are not resolved within six-months, then an escalation to the ChAD service should be considered.

27. Responding to allegations or concerns about staff or volunteers

Rigorous recruitment and selection procedures and adhering to the School's Staff Code of Conduct and safer practice guidance will hopefully mean that there are relatively few allegations against or concerns about staff or volunteers.

However, a member of staff (including 'bank' or agency staff and volunteers) will report to the Head if they have any reason to believe that another adult in the School has:

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

Even though it may seem difficult to believe that a colleague may be unsuitable to work with children, the risk is far too serious for any member of staff to dismiss such a suspicion without taking action. If the Head is unavailable, then the allegation should be reported to the Chair of Governors or the nominated Governor for Safeguarding. The Chair of Governors and the nominated Governor for Safeguarding can be contacted via the Bursar. The reason for needing to speak to them should not be disclosed to the Bursar.

Following any report, the Head will contact the Local Authority Designated Officer ([LADO](#)) (Tel 01305 221 122 Email: LADO@dorsetcouncil.gov.uk) within one working day of receiving the allegation, to discuss the allegation, consider the nature, content and context of the allegation and agree a course of action including any involvement of the Police. These discussions should be recorded in writing and any communication with both the individual and the parents of the child/children agreed. Advice can also be sought from the LADO in less serious cases without naming the School or individual. If a child has been harmed, or may be at immediate risk of harm, or if the situation is an emergency, the Head will contact Children's Social Care and as appropriate, the Police immediately. If the Head is absent, the Chair of Governors will take this role.

The School will always deal with any allegation by establishing the facts and liaising with the LADO irrelevant of the role the adult has in the School. 'Bank' or agency staff and volunteers will not just cease to be used.

If, following the referral to the Head as detailed above, it is felt a School disciplinary procedure is required, this will be treated as a separate issue from Safeguarding children. A timely resolution of any allegation must be deemed a priority for the benefit of all concerned. Should it be necessary for the member of staff to be suspended as a result of an allegation, this will be a precautionary measure and will not be a presumption of guilt. At SG, suspension of a member of staff is a neutral act. If a member of the boarding staff is suspended pending an investigation, arrangements for alternative accommodation may be made. To avoid confusing the investigation, no detailed discussion of the allegation will take place at this stage.

If the allegation is against the Head, it should be reported to the Chair of Governors directly (see above).

If the allegation is against the Chair of Governors, it should be reported to the Head.

If there is an allegation against a person outside the School community the DSL will, in consultation with the Head, seek advice from external agencies, for example the LADO and/or the Police. The Head or the DSL will contact the parents of the child in question, as and when appropriate, normally after obtaining advice from the Local Authority Child Protection team.

If there is an allegation/incident when an individual organisation is using the school premises for a non-school activity then the school will ensure that its own safeguarding policies and procedures are followed. SG follows the UK Government's non-statutory guidance for [After-schools clubs, community activities and tuition safeguarding guidance for providers \(Department of Education, September 2023\)](#).

Where a teacher has been dismissed (or would have been dismissed had they not resigned) and a prohibition order may be appropriate, a referral will be made to the Teaching Regulation Agency (TRA) previously the National College for Teaching and Leadership (NCTL). The reasons such an order would be considered are: unacceptable professional conduct; conduct that may bring the profession into disrepute; a conviction at any time for a relevant offence. The member of staff would also be reported to the DBS.

28. Low-Level Concerns

If the behaviour towards a child does not meet the threshold set out in the above section then it will be treated as a low-level concern. This does not mean that it is insignificant.

A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the School may have acted in a way that is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside of work, and does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

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

- being over friendly with children
- having favourites
- taking photographs of children on their personal mobile phone
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- using inappropriate sexualised, intimidating or offensive language

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

ultimately intended to enable abuse. It is crucial that ANY such concerns, including those which do not meet the harm threshold (see the above section), are shared responsibly and with the Head, and recorded and dealt with appropriately. Ensuring concerns are dealt with effectively should also protect those working in or on behalf of SG from potential false allegations or misunderstandings. SG also has a low-level concerns self-reporting form, called a neutral notification form which is accessed via the school's intranet. The form is accessible to all members of SG staff to complete but only the Head is able to read and access entries. It is the Head's duty to follow up on any reports, this may be done in consultation with the DSL. Further details can be found in the School's Low-Level Concerns policy.

29. Children who are disabled

Research shows that children who are disabled are especially vulnerable to abuse and adults who work with them need to take extra care when interpreting apparent signs of abuse or neglect.

These child protection procedures will be followed if a child who is disabled discloses abuse or there are indicators of abuse or neglect. There are no different or separate procedures for children who are disabled.

30. Safer Working Practice

All adults who come into contact with children at SG will behave at all times in a professional manner which secures the best outcomes for children and also prevents allegations being made. Advice on safer working practice can be found in the School's Staff Code of Conduct.

As referenced in the Recruitment, Selection and Disclosure policy, all applicants for employment at SG are required to complete an application form containing questions about their academic and employment history and their suitability for the role. The Human Resources (HR) department check all applicants and follow up with each applicant called for interview, paying particular attention to any gaps in academic or employment history and seeking satisfactory explanations where necessary. Shortlisted candidates are informed that online searches will be completed as part of the School's due diligence checks. A curriculum vitae (CV) is not accepted in place of the completed application form.

31. Training

All new staff, including temporary staff, Governors and volunteers, will be provided with induction training that includes:

- the School's Safeguarding and Child Protection Policy
- the Staff Code of Conduct and the Whistleblowing Policy
- the identity of the DSLs
- a copy of [KCSiE Sep 2023 \(Part 1\)](#) (and/or the condensed Part 1 depending on their role)
- information about the Prevent Strategy

Induction training will be followed up by basic child protection training that equips individuals to recognise and respond appropriately to concerns about pupils. The depth and detail of the training will vary according to the nature of the role and the extent of involvement with children.

Staff who do not have designated responsibility for safeguarding and child protection, including the Head and qualified teachers, will undertake suitable refresher training at appropriate intervals. The PDSCP recommends this is at least every three years by a Dorset approved trainer with yearly updates by the School's DSL that all staff must attend. All staff attending Safeguarding training are

required to complete an attendance register which is kept by the HR Team. In addition, reminders on specific topics during staff meetings, quizzes and videos are used throughout the year.

When a DSL and DDSL takes up the role they will book onto enhanced (Level 3) training – provided through Dorset’s Local Safeguarding Children’s Board. They must be updated at 2 yearly intervals after that.

The Designated Teacher for Looked After Children (mandatory for maintained schools and best practice in others) will undertake appropriate training. In Dorset this is provided by the Virtual School for Children in Care. See [Appendix 1](#) for contact details.

All School Governors attend training, briefings or other input which equips them to understand fully and comply with their safeguarding duties as set out in [Keeping Children Safe in Education 2023](#). HR keeps records of who attends this training and will ensure that anyone who has missed training will be contacted and requested to attend the relevant course. Additional induction training sessions are provided by the DSL/DSLs every three weeks to ensure that all staff, no matter when they join SG, are fully informed and equipped to deal with Safeguarding matters.

32. Teaching of Safeguarding Related Issues

All pupils are taught about Safeguarding issues including, but not limited to Online Safety, FGM, Domestic Abuse, Sexual Violence and Sexual Harassment, Child-on-child abuse, So-called Honour Violence, Forced Marriage and Consent.

This information is taught formally through lessons within PSHEE according to the statutory guidance: [Relationship and Sex Education \(RSE\) and Health Education](#), and informally through Assembly, Prayers, Debating, Friday Series Lectures, House meetings, tutorial meetings.

More information can be found in the PSHEE and RSE policy.

33. Information for parents and carers

SG is fully committed to keeping all its pupils safe. Our first priority is the pupils’ welfare and we will usually discuss with parents/carers any concerns we have about their child. There might be occasions, however, when we have to provide information to or consult other agencies such as Children’s Services Social Care before we contact parents/carers. This will include situations where we judge that to tell parents/carers first will or might put the child at risk of significant harm.

Our responsibilities are set out in this policy. It reflects statutory guidance and the Inter-Agency Safeguarding Procedures, which can be found on the [Pan-Dorset Safeguarding Children’s Partnership website](#). If you have any questions about this, please speak to the DSL: Mrs Jessica Briggs: deputypastoral@sherborne.com

34. Review by Governors

The policy will be scrutinised at least annually, including an update and review of the effectiveness of procedures and their implementation, at the Pastoral Committee and by the Nominated Governor for Safeguarding. The policy will then be taken to the full Council of Governors, who will undertake an annual review of the policy and procedures and of the efficiency and effectiveness with which the related duties have been discharged. The Nominated Governor for Safeguarding also meets regularly with the DSL, reads the full DSL job description and completes a safeguarding report for the Council of Governors on an annual basis.

SG Governors are aware that they have a strategic and legislative role. Governors complete bespoke training, run by the DSL, every year and are included in the whole school yearly update in September, alongside any compulsory external training, such as Prevent.

35. Inspection

Safeguarding within SG is inspected by the Independent Schools Inspectorate (ISI).

A safeguarding audit is also required to be completed every year by the Dorset Safeguarding and Standards team.

Part 3: Child Protection Summary for all Temporary⁴ Staff - SG

As an adult working in this School you have a duty of care towards all pupils at SG. This means you must act at all times in a way that is consistent with their safety and welfare.

You must follow the principles of safer working practice, which includes use of technology – on no account should you take images of pupils on personal equipment, including your mobile 'phone.

If the behaviour of another adult in the School gives rise to concern you must report it to the Head (r.sullivan@sherborne.com). If the behaviour relates to that of the Head it must be reported to the Chair of Governors who may be contacted via the Bursar (bursar@sherborne.com; 01935 818207).

If you have a concern about a pupil at SG, particularly if you think they may be suffering or at risk of suffering harm, it is your responsibility to share the information promptly with the DSL Mrs Jessica Briggs, or one of the DDSLs who are Mrs Debbie Miller, Ms Leonie Cole, Mr Ian McClary, Mrs Louise Orton, and Mrs Alice Beard.

The following is not an exhaustive list of safeguarding symptoms, but you might become concerned as a result of:

- seeing a physical injury on a pupil which you believe to be non-accidental
- observing something in the appearance of a pupil which leads you to think their needs are being neglected
- a pupil telling you that they have been subjected to some form of abuse

In any of these circumstances you must write down what you observed or heard, date and sign the account and give it to the DSL or a DDSL.

If a pupil talks to you about (discloses) sexual or physical abuse you:

- listen carefully without interruption, particularly if they are freely recalling significant events
- only ask sufficient questions to clarify what you have heard. You might not need to ask anything but, if you do, you must not 'lead' the pupil in any way so should only ask 'open' questions
- make it clear you are obliged to pass the information on, but only to those who need to know (pupils are offered the choice of who out of the DSL team will be initially informed)
- tell the DSL or a DDSL without delay
- write an account of the disclosure as soon as you are able (definitely the same day), date and sign it and give it to the DSL or, in her absence, a DDSL

Do not ask the pupil to repeat the disclosure to anyone else in school, ask them or any other pupil to write a 'statement' about this disclosure, or inform parents. You are not expected to make a judgement about whether the child is telling the truth. Once you have informed the DSL or DDSL of the disclosure, you can consider your responsibility for dealing with this issue over.

Remember – share any concerns, don't keep them to yourself.

⁴ Temporary staff are those who do not have permanent contracts.

Appendix 1: Useful Contacts

DSL

Jessica Briggs j.briggs@sherborne.com, Ext 338, 07711 002 937

DDSLs

Debbie Miller d.miller@sherborne.com, Ext 226 /279, 07971 669 041

Leonie Cole l.cole@sherborne.com, Ext 305

Louise Orton l.orton@sherborne.com, Ext 256, 07711 002 936

Alice Beard a.beard@sherborne.com, Ext 216, 07814 059 052

Ian McClary i.mcclary@sherborne.com, 07771 936 111

Dorset Children's Advice and Duty service (ChAD)

The DSL and other education professionals should use the Children's Advice and Duty service (ChAD) to report any concerns. ChAD can be contacted on 01305 228 558.

If families and members of the public wish to speak to somebody in the Pan-Dorset Safeguarding Children Partnership regarding a safeguarding concern they should call 01305 228 866.

These telephone numbers are staffed 8.30am – 10.00pm each day. If you need urgent help out of these times or you believe somebody is at risk of immediate harm, call 999.

Telephone numbers for other Local Authority areas can be found on their websites.

Safeguarding and Standards Team

Dorset Safeguarding and Standards Team 01305 221 122

If a child has an allocated social worker, then please contact the relevant office:

- Central Dorset including Sturminster, Blandford and Purbeck
01258 472 652 northdorsetchildcare@dorsetcc.gcsx.gov.uk
- South Dorset including Weymouth and Portland
01305 760 139 weymouthchildcare@dorsetcc.gcsx.gov.uk
- West Dorset including Bridport, Dorchester and Sherborne
01305 221 450 childrenwoodside@dorsetcc.gcsx.gov.uk
- East Dorset including Wimborne, Ferndown and Christchurch
01202 877 445 ferndownchildadmin@dorsetcc.gcsx.gov.uk

Safeguarding and Child Protection Policy

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

- the Education Safeguarding Standards Advisor who offers advice and support to Headteachers and DSLs in relation to safeguarding and child protection issues
- the Local Authority Designated Officer (LADO) to whom allegations against adults who work with children in education establishments must be reported

Dorset LADOs

Martha Sharp and Lynne Bowman 01305 221 122 lado@dorsetcouncil.gov.uk

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

Dorset Virtual School for children who are in care/ Looked After 01305 228 309

Appendix 2: Possible Indicators of Abuse

The following information is not designed to turn school staff into experts, but it will help them to be more alert to the signs of possible abuse. The examples below are not meant to form an exhaustive list; DSLs and other staff will find it helpful to refer to the inter-agency safeguarding procedures on the Dorset Safeguarding Children Board website for more detailed information.

Physical Abuse

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

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

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

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

Other physical signs of abuse can include:

- cigarette burns
- adult bite marks
- broken bones
- scalds

Changes in behaviour which can also indicate physical abuse:

- fear of parents being approached for an explanation
- aggressive behaviour or severe temper outbursts
- flinching when approached or touched
- reluctance to get changed, for example wearing long sleeves in hot weather
- missing school
- running away from home

Emotional Abuse

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

The physical signs of emotional abuse can include:

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

Changes in behaviour which can also indicate emotional abuse include:

- neurotic behaviour, e.g., sulking, hair twisting, rocking
- being unable to play
- fear of making mistakes
- self-harm
- fear of parents being approached

Sexual Abuse

Adults who use children to meet their own sexual needs abuse both girls and boys of all ages, including infants and toddlers.

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

The physical signs of sexual abuse can include:

- pain or itching in the genital/anal areas
- bruising or bleeding near genital/anal areas
- sexually transmitted disease
- vaginal discharge or infection
- stomach pains
- discomfort when walking or sitting down
- pregnancy

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

- sudden or unexplained changes in behaviour, e.g., becoming aggressive or withdrawn
- fear of being left with a specific person or group of people
- having nightmares
- missing school
- running away from home
- sexual knowledge which is beyond their age or developmental level
- sexual drawings or language
- bedwetting
- eating problems such as overeating or anorexia

- self-harm or mutilation, sometimes leading to suicide attempts
- saying they have secrets they cannot tell anyone about
- alcohol / substance / drug use
- suddenly having unexplained sources of money
- not being allowed to have friends (particularly in adolescence)
- acting in a sexually explicit way towards adults or other children

Neglect

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

The physical signs of neglect can include:

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

Changes in behaviour which can also indicate neglect can include:

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

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

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

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

Appendix 3 (For DSLs and DDSLs): Response from Children's Services Family Support (Social Care) to a school referral

Referral

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

The DSL should be told within three working days of the outcome of the referral. If this does not happen s/he will contact the duty worker again. If s/he disagrees with the decisions made by social workers or the outcome of the referral, the matter can be raised under the escalation policy (available on the PDSCP website).

Assessment

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

S47 Enquiries (regarding significant harm)

The process of the investigation is determined by the needs of the case, but the child/young person will always be seen as part of that process. On occasions, this will mean the child/young person is jointly interviewed by the Police and social workers, sometimes at a special suite where a videorecording of the interview is made.

S17 Enquiries (Child in Need)

If it is decided that a Child is in need of support from professionals but is not at risk of immediate harm, then they may be made subject to a Child in Need plan. The child/young person is always seen as central to that process.

The Child Protection Conference

If, following the Section 47 enquiry, the concerns are substantiated and the child is judged to be at risk of significant harm, a Child Protection Conference (CPC) will normally be convened. The CPC must be held within 15 days of the first strategy discussion and school staff will be invited to attend - normally the Head or DSL. This person will produce a written report in the correct format (a pro forma is available on the PDSCP website). This will be shared with the child/young person and his/her family before the conference is held. A copy will also be sent to the person chairing the initial CPC at least 24 hours in advance.

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

Appendix 4: SG Response to Incidents Involving Youth Produced Sexual Imagery (nudes and semi nudes)

This guidance is produced in accordance with the [UKCIS guidance on Sharing nudes and semi-nudes: how to respond to an incident 2020](#). This document should be referred to when dealing with an individual case.

Youth produced sexual imagery or 'nudes' as it is commonly called is a concerning problem and should be treated as a Safeguarding issue.

Youth produced sexual imagery is defined as the sending or posting of nude or semi-nude images, videos or live streams online by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services such as 'AirDrop'. It does NOT apply to adults sharing nudes or semi-nudes of young people under 18. This is a form of Sexual abuse and will be treated as such.

The response of SG in dealing with youth produced sexual imagery is to be supportive of the victim and ensuring that the matter will be treated with the utmost importance and sensitivity.

What to do if an issue involving sexual imagery is suspected

- The issue must be referred to the DSL as soon as possible. If the DSL is unavailable the issue should be referred to one of the DDSLs
- If possible, any relevant devices should be handed to the DSL / DDSL. The DSL / DDSL ensures that devices are locked away for the duration of the investigation and may need to hand them over to the Police depending on the outcome of the issue. The reporting member of staff should not view the images or delete them. The pupil should not be asked to delete them
- The DSL / DDSL will hold an initial meeting that includes but is not limited to themselves, the teacher who originally discovered the issue and the relevant HM
- The DSL / DDSL will speak to the pupil(s) concerned with the HM present. If the HM is not available, the relevant AHM or a House tutor would be a suitable alternative. The DSL / DDSL will reassure the pupil that they are not alone and that they will be supported. The conversation will remain solution-focused and avoid victim-blaming. The issue of consent within healthy relationships will also be discussed
- Parents should be informed at an early stage unless there is good reason to believe that this would put the pupil at risk of harm
- In discussion with the Head and/or Deputy Head Pastoral, the DSL / DDSL will decide what to do and will liaise with all the relevant parties. All discussions and decisions should be based on the best interests of the pupil

Information to establish

- Whether there is an immediate risk to the pupil
- Whether the imagery has been shared widely and via what platforms
- Whether immediate action has been taken to remove the imagery from devices or online services
- Any other relevant facts about the pupil involved which would influence any decisions
- If there is a need to contact another school, college, setting or individual

Viewing the image

In most cases, images should not be viewed. If the image has been viewed by accident, this will be reported to the DSL. When the DSL is unavailable the report should be made to a DDSL.

However, there may be cases where it is necessary to view the image/s. The decision to do so should be made by the Head, Deputy Head Pastoral and the DSL. It is acceptable for only two of these people to make the decision if needed.

If images are viewed intentionally, as stated in the paragraph directly above, the following procedure must be followed:

- The image should be viewed on a screen. It should not be printed, copied or shared as this is illegal
- The viewing should happen in the presence of a second member of the Senior Leadership team. This second person does not need to view the image
- The image should be viewed on the School site in a location where there is no risk of another person viewing the image accidentally. Ideally this would be in the office of a member of the Senior Leadership team
- The viewing of the image should be recorded in the Safeguarding records. Records should include who was present, why the image(s) was viewed and any subsequent actions. The form should be signed and dated by all present
- If the image is unavoidably viewed by a member of staff as a result of either a disclosure from a pupil or through undertaking their daily role, the DSL is responsible for ensuring that the member of staff is appropriately supported as this can be distressing. Appropriate emotional support may be required and must be offered

Deleting the imagery

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

- If the incident is passed on to the Police or Dorset Safeguarding, then the imagery should not be deleted. If this is the case, then the device will be disconnected from the Internet to prevent images being deleted remotely
- If the incident is dealt with by the School, then the image will be deleted wherever possible. If this is the case, any pupil who has the image on their device will be asked to delete the image/s and then confirm to the DSL that they have done this

Response

The Deputy Head (Pastoral)/DSL in discussion with the Head will decide how to respond. It should be dealt with primarily as a Safeguarding issue but may also become a disciplinary issue if there is evidence that either the images were taken without permission, or the images had been shared without permission.

Police and/or Dorset Safeguarding guidance must be sought if the image fulfils one or more of the following criteria:

- If the image was made or shared by an adult
- If there is reason to believe that the young person or people have been coerced, blackmailed or groomed
- If there were any concerns over the person's ability to consent i.e., for Special Educational Needs reasons, or due to intoxication

- If there is reason to believe that the image involves sexual acts involving violence or that are unusual for the young person's developmental stage
- If there is reason to believe that the image is of a sexual act and involves any person under 13
- If there is any reason to believe that the image was shared without consent and with malice
- If there is any reason that a young person is at immediate risk of harm owing to the sharing of the imagery e.g., the young person involved is presenting as suicidal or self-harming

Pupils should be asked and encouraged to remove sexual images from devices and/or social media for which they have control.

The [Internet Watch Foundation](#) should be contacted to see if it is possible to get the image removed if it has been shared more widely.

It is possible to report inappropriate use to most social media sites and the DSL can advise how to do this.

Supporting parents/guardians/carers

Parents/guardians/carers will be:

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

Useful Contacts

Internet Watch Foundation: www.iwf.org.uk

UK Safer Internet Centre: www.saferinternet.org.uk

CEOPS ThinkUKnow: www.thinkuknow.co.uk

Appendix 5: Sexual Violence and Sexual Harassment

Sexual Violence

Sexual violence are sexual offences under the Sexual Offences Act 2003 refer to:

- **Rape:** Intentional penetration of the vagina, mouth or anus by a penis without consent (and the perpetrator does not believe they have consent).
- **Assault by Penetration:** Intentional penetration of the vagina or anus by a part of the body or something else for sexual purposes without consent (and the perpetrator does not believe they have consent).
- **Sexual Assault:** Intentional touching of a sexual nature where the victim does not consent, and the perpetrator does not believe they have consent.

Consent is about having the freedom and capacity to choose. Consent may be given for some sexual acts but not others. Consent can be withdrawn at any time.

Sexual Harassment

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

Sexual harassment can include:

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

Response to an allegation of Sexual Harassment or Sexual Violence

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

Following an allegation, the DSL (or a DDSL) will be involved in the decision in how to proceed. Each case will be taken on a case-by-case basis with the wishes of the victim's wishes taken into account wherever practicable. Other considerations will be the nature of the alleged incident, whether a crime has been committed, the ages of the children involved, the developmental stages of the children involved, any power imbalance between the children, is the alleged incident a one-off or a sustained pattern, are there ongoing risks to the victim or other child or adults within the school, other related issues. Careful thought should also be made to how and when the alleged perpetrator is going to be told of the allegations.

Where there has been a report of sexual violence, the DSL / DDSL will make an immediate risk and needs assessment. This may also be considered for cases of sexual harassment.

The risk and needs assessment should consider the protection and support of the victim, the alleged perpetrator, and other children (and adults if appropriate) within the school. Risk assessments should be recorded and be kept under review.

There are four likely scenarios of how sexual violence and/or sexual harassment will be managed:

- Manage Internally: One-off incidents of sexual harassment.
- Early help: Useful to address non-violent harmful sexual behaviour and may prevent escalation of sexual violence. A TAF may be considered, and the Dorset Family partnership zone engaged with.
- Referral to Children's Social Care: This should be used when a child has been harmed, is at risk of harm or is in immediate danger.
- Report to the Police: This will in general also be accompanied by a referral to Social Care. It should be used in all cases of rape, assault by penetration or sexual assault. It is important that the DSL liaise closely with the Police to ensure that any disciplinary measures or support does not jeopardise a Police investigation.

When referring to children's social services or the Police, parents or carers will usually be told unless telling them puts a child at risk of harm.

At all times the response will be under-pinned by the principle that there is a zero-tolerance approach to sexual violence and sexual harassment. It is never acceptable and will not be tolerated.

All concerns, discussions, decisions and reasons for decisions will be recorded and kept as part of a safeguarding file.

The DSL / DDSL will not wait for the outcome of a Social Care or Police investigation before protecting the victim, alleged perpetrator and other children in the school.

The victim and alleged perpetrator will require on-going support. Substantial details of this can be found in Part 5 of [KCSiE \(September 2023\)](#). Victims may not talk about the whole picture immediately. They may be more comfortable providing information on a piecemeal basis. It is essential that dialogue is kept open and encouraged. When it is clear that ongoing support will be required, the victim will be asked if they would find it helpful to have a designated trusted adult (for example, their tutor, HM or the DSL) to talk to about their needs. The choice of any such adult should be the victim's (as far as reasonably possible).

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

If the victim decides that they wish to move schools, then the DSL will be responsible for passing on details of any support needs.

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

If the alleged perpetrator moves to another school, the DSL will be responsible for passing on any support needs and any potential risks to other children and staff.

If a report or allegation provided by a pupil is subsequently found to be deliberately invented or malicious, the School will consider whether any disciplinary action is appropriate against the individual who made it as per the Pupil Code of Conduct.

More information and guidance can be found [here](#) ([Sexual Violence and Sexual Harassment Between Children in Schools and Colleges, 2021](#)).

Appendix 6: When to Call the Police

It is recognised that involving the Police in incidents can feel a big step, but it should be remembered that the Police can give advice as well and will usually ask the victim about their wishes in how to proceed.

In an emergency where there is either danger to life or a crime is currently being committed, 999 will be called. In all other situations, the Police will be contacted using the 101 service.

The Dorset Safer Schools and Communities team can also be contacted on ssct@dorset.pnn.Police.uk.

If the Police are to be involved due to a Safeguarding issue, then as recommended in the NPCC guidance 'When to call the Police', the single point of contact will be the DSL. In her absence, one of the DDSL's will be the single point of contact and will remain so for that case.

If it is decided to contact the Police, then the following steps must be taken:

- The School's investigation of the incident must cease
- All investigation paperwork must be collected together and made available in case the Police wish to see it. This should, where possible, include any questions asked of the pupil and their response
- The investigation up to that point should be entered into CPOMS in a timely manner and where possible scanned copies of original notes should be added
- Any reference numbers given by the Police must be added into the incident report in CPOMS as well as the name and badge number of any investigating member of the Police

Involving the Police will be considered for:

- all incidents involving drugs
- sexual harassment
- online bullying
- theft (both on and off School site)

The Police will always be informed about incidents involving:

- sexual violence
- hate Crimes

If the Police are involved then the victim will always be informed and where known, the alleged perpetrator will be told. Where able, the parents of both the victim and alleged perpetrator will also be informed.

More information can be found in the NPCC (National Police Chiefs Council) guidelines '[When to Call the Police](#)'.

Appendix 7: Summary of Changes

Changes for Issue 3.3

- Steve Hurley is the DSL for the Oxley Sports Centre, replacing Ian McClary.
- Roles and responsibilities of governors clarified.
- Wording regarding staff with Level 3 Safeguarding training for events and holiday lets clarified.
- Updated to reflect changes in KCSiE 2023.
- Addition of role of Operational Safeguarding Manager.
- Updated to reflect new DDSLs as of September 2023

Changes for Issue 3.4

- Steve Hurley's role changed to Designated Senior Person for Safeguarding in line with the Oxley Sports Centre Safeguarding policy.
- Updated to refer to new guidance: 'After-schools clubs, community activities and tuition safeguarding guidance for providers (Department of Education, September 2023)'

Changes for Issue 3.5

- Use of 4G and 5G mobile network not allowed on site (pg. 21).
- Links updated.
- Jayne Dart added as DDSL.