



## SAFEGUARDING AND CHILD PROTECTION POLICY

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The Safeguarding and Child Protection Policy is in accordance with the most recent version of the ISSRs and locally agreed inter-agency procedures, specifically in accordance with Milton Keynes local safeguarding partner guidance MK Together for dealing with any concerns about a child.

*The school recognises that from 1<sup>st</sup> September 2019, in place of MKSCB's, local safeguarding arrangements became the responsibility of three 'safeguarding partners' and this policy is written in accordance with that change.*

This policy is applicable to all staff and parents of children within the school, including the Early Years Foundation Stage.

This document is available in written format upon request and a copy can also be located on the school's website.

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### 1 INTRODUCTION

The safety and well-being of all children at the school, including those in the Early Years Foundation Stage, is the school's highest priority. The school aims to know every child as an individual and to provide them with a secure and caring environment, so that they can develop and learn in safety. All those who come into contact with children and families in their everyday work, including practitioners who do not have a specific role in relation to safeguarding children, have a duty to safeguard and promote the welfare of children.

All members of staff have a duty to act in the child's best interests at all times so that every child feels positive about themselves as an individual and is able to reach their full potential. The school expects respect, good manners and fair play to be shown by everyone. All children should care for and support each other.

The school recognises that the welfare of the child is paramount and that all children, regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation have the right to equal protection from all types of harm or abuse. The school also understands that some children are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other needs.

All staff share the responsibility to ensure that the school provides a safe, caring, positive and stimulating environment that promotes the social, physical and moral development of the individual child.

The school fosters a listening environment where children are encouraged to speak to any staff member about any concerns they may have and where staff understand the importance of listening to the child and placing the child's need first.

Parents and guardians have an important role to play in supporting the school. The school encourages parents and guardians to raise any issues or worries that they may have with the school.

The school will always respond immediately if there is a concern and/or allegation of child abuse/sexual abuse/sexual harassment/neglect or where a child is identified as being at risk. Providing early help is vital to promoting the welfare of the child. Staff are trained to be alert to any potential concerns and risks to a child's welfare. All staff are trained to immediately inform one of the Designated Safeguarding Leads, if they have any concerns about a child's welfare.

**Safeguarding** is defined as protecting children from maltreatment, preventing impairment of children's health or development, ensuring that children are growing up in circumstances consistent with the provision of safe and effective care and taking action to enable all children to have the best possible outcomes.

**Child protection** is a part of safeguarding and promoting welfare. This refers to the activity that is undertaken to protect specific children who are suffering or likely to suffer significant harm.

The school's procedures for safeguarding children have regard and adhere to the following statutory and non-statutory guidance:



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- Counselling in Schools: A Blueprint for the future (February 2016)
- Keeping Children Safe in Education (KCSIE, September 2021).
- Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers (July 2018).
- Levels of Need when Working with Children, Young People and their Families in Milton Keynes (MKSCB, July 2020).
- MK Together - Safer, Happier, Healthier (Partnership Handbook, 2021)
- Prevent Duty Guidance for England and Wales (April 2021).
- Disqualification under the Childcare Act 2006 (Aug 2018)
- Safer Recruitment in Schools - Toolkit (MKC, June 2020).
- Mental Health and Behaviour in Schools (Nov 2018)
- Promoting children and young people's emotional health and well-being (Sep 2021)
- Safer Recruitment Consortium: Guidance for Safer Recruitment (May 2019) and COVID addendum (April 2020)
- The Education (Independent Schools Standards) Regulations (2014).
- The Prevent Duty: Departmental Advice for Schools and Childminders (August 2015).
- The Statutory Framework for the Early Years Foundation Stage (2021).
- The Use of Social Media for On-line Radicalisation (July 2015).
- Working Together to Safeguard Children (July 2018) (updated in 2020 but without changing the date on the published version) (WT)
- What to do if you're worried a child is being abused (March 2015).
- Teaching Regulation Agency (Teacher Misconduct: The Prohibition of Teachers, October 2018).
- When to call the police, non-statutory guidance from the National Police Chief's Council (information available from DSL Mrs Hanley)
- The use of social media for on-line radicalisation
- The UK Safer Internet Centre (<https://www.saferinternet.org.uk/about>)
- CEOP's Thinkuknow website ([www.thinkuknow.co.uk](http://www.thinkuknow.co.uk))
- The Relationships Education, Relationships and Sex Education (RSE) and Health Education (England) Regulation 2019 – *Please refer to separate document: Relationships Education Policy.*

The school will continually review this policy following updates and guidance from the Independent Schools Inspectorate (ISI) and any statutory and local authority guidance.

### 2 THE AIMS OF THIS POLICY

- To ensure that the Proprietor, Head and Governors fulfil their obligations in respect of the governance of safeguarding and child protection and Prevent awareness, including the conduct of an annual review of safeguarding and the effectiveness of the implementation of this policy.
- To raise awareness in all staff of their responsibilities to safeguard children, including the requirement to prevent children from being radicalised or drawn into extremism and ensure that staff are able to identify and report possible cases of abuse/neglect and children at risk.
- To provide a means of monitoring children known or thought to be at risk of harm, including the risk of radicalisation and ensure that the school contributes to assessments of need and support plans for those children.



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- To acknowledge the need for effective and appropriate communication between all members of staff in relation to safeguarding children.
- To develop structured procedures within the school which all members of the school will follow.
- To protect children from online risks, including online safety education and training, policies and procedures governing use of IT and procedures to manage any incidents which may occur; and filter and monitor online activity.
- To ensure that all staff understands the particular vulnerabilities of children with special educational needs and/or disabilities (SEND) including particular vulnerability to peer-on-peer abuse
- and the need of extra pastoral support.
- To develop effective working relationships with all other agencies involved in safeguarding children.
- To provide an environment in which children feel safe, secure, valued and respected and to support the children in ways that will foster confidence, resilience and ensure they know how to approach adults if they are in difficulties.
- To ensure that all adults within the school, who have access to children, have been checked as to their suitability to work in the school.
- Raise awareness of child protection issues and equip children with the skills needed to keep themselves safe and support their mental well-being.

### **3 PROCEDURES**

- All members of staff, part-time staff and volunteers are trained to identify and know how to respond to a child who discloses abuse or neglect or who is possibly at risk of radicalisation and knows how to follow the procedures when sharing a concern of possible abuse/neglect, the disclosure of abuse/neglect or the risk of radicalisation. All parents/carers are made aware of the school's responsibilities and safeguarding procedures through publication of the school's Safeguarding and Child Protection Policy.
- The school's Safer Recruitment Policy and related procedures include all checks on staff suitability including Barred List, Disclosure and Barring Service Enhanced Disclosures and Prohibition Order checks, as recommended by KCSIE (September 2021) and by the MKTP and in accordance with current legislation.
- All new staff will be given a copy of the following, as part of their induction into the school:
  - The Safeguarding and Child Protection Policy (including Children Missing Education)
  - The names of the school's Designated Safeguarding Leads.
  - The school's Code of Conduct for Staff.
  - Keeping Children Safe in Education Part 1 and Annex B (September 2021).
  - The school's Whistleblowing Policy.
  - The school's Behaviour Policy
  - Online Safety Policy
  - Acceptable Use of Technology Policy



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### **4 RESPONSIBILITIES**

The school understands its responsibilities to safeguard children requires that all staff share any concerns they may have about children.

#### **4.1 The Proprietor, Head and Governing Body**

The Proprietor, Head and Lead Safeguarding Governor facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of all systems, processes, and policies.

Safeguarding and Prevent responsibilities are achieved through the following:

- Comply with their duties under legislation and to ensure that there is a robust Safeguarding and Child Protection Policy in place and that the policy is reviewed annually.
- Ensure that the key activities of the DSL and DDSL roles are included in the Job Descriptions.
- Ensure that DDSLs have additional time, funding, training, resources and supervision and support to fulfil their child welfare and safeguarding responsibilities effectively.
- Ensure there is an effective staff Code of Conduct policy in place.
- Record the efficiency with which any related duties have been discharged and ensure any deficiencies in the policy or practices are immediately rectified.
- Monitor the effectiveness of the implementation and compliance with the policy.
- Ensure that all staff are aware of the school's Safeguarding and Child Protection Policy and the procedures, follow them and know how to recognise and refer any concerns.
- Ensure that all staff knowledge and training is up to date for safeguarding and child protection and Prevent awareness training.
- Ensure that the Chair of Governors, as the lead Safeguarding Governor, liaises with the LADO and partner agencies in the event of allegations of abuse made against the Head.
- Ensure that the DSL and DDSLs and the Safeguarding Governor contribute to inter-agency working as and when required to do so.
- Ensure that all staff know that if there is a risk of immediate serious harm to a child a referral should be made to children's social care immediately.
- Ensure that all staff know that anybody can make a referral.
- Ensure that there are safe and effective recruitment policies in place, which adhere to KCSIE statutory guidelines (September 2021).
- Ensure that all records pertaining to safeguarding and child protection are kept securely.
- Ensure that the school operates appropriate filtering and monitoring systems to safeguard children online.

#### **4.2 Designated Safeguarding Leads**

- Mrs Emma Hanley, the Head of EYFS, is the Designated Safeguarding Lead (DSL) who understands the role as per Part 2 of KCSIE (September 2021) and understands the obligation to liaise with the local authority and work with other agencies in line with the Working Together to Safeguard Children (July 2018).
- The Designated Safeguarding Leads are named in Appendix 1.





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- The DSL and DDSL's will undergo child protection training every two years, in line with advice from the Milton Keynes local safeguarding partner guidance MK Together Partnership (MKTP) and this will incorporate Prevent awareness training. The DDSLs, as well as the DSL, will have overall responsibility for online safety at the school.
- The school recognises the important role that the DSL and DDSLs have to play and will support them with the training necessary to carry out their roles effectively. In addition to their formal training, the knowledge and skills of the DDSLs will be updated regularly and at least annually. This can be in the form of referring to the most recent version of KCSIE, bulletins from the MKTP, on the publication of new DfE guidance and other safeguarding updates and communications via meetings.
- The DSL and DDSL will refer a child to the Milton Keynes Multi-Agency Safeguarding Hub (MASH) in accordance with the Milton Keynes local safeguarding partner (MKTP) guidance and procedures, if there are concerns about a child's welfare and/or possible abuse or neglect, Police (cases where a crime may have been committed) and to the Channel programme where there is a radicalisation concern.
- Allegations of abuse by a member of staff will be referred to the Local Authority Designated Officer (LADO). A written record of the referral will be emailed to the LADO as soon as possible within the school day.
- An allegation of abuse by someone outside of the school setting will be referred by the DSL to the Milton Keynes Multi-Agency Safeguarding Hub (MASH).
- The DSL will ensure that detailed and accurate written records of concerns about a child are kept even if there is no need to make an immediate referral.

***Safeguarding is everyone's responsibility and anyone can make a referral to the Milton Keynes Multi-Agency Safeguarding Hub (MASH).***

***The school will not tolerate any form of abuse.***

### **5 PROCEDURES FOR A CHILD REPORTING ABUSE**

Children who have a problem may speak to someone whom they trust. It is important that the member of staff to whom the child wishes to speak about a concern, does not promise confidentiality.

All children will be reassured that they are being taken seriously and that they will be supported and kept safe. A child will never be given the impression that they are creating a problem by reporting abuse, sexual violence, or sexual harassment. Nor will they ever be made to feel ashamed for making a report or have their experience minimised.

A child who is insistent upon confidentiality should be referred to an external source, such as ChildLine. A list of contacts is provided in Appendix 1. The contact details for ChildLine are displayed throughout the school.

However, if there is a concern that the child is suffering or at risk from suffering significant harm, regardless of the fact they want to maintain confidentiality, the matter must be referred to the DSL who will in turn, refer the matter to the Milton Keynes Multi-Agency Safeguarding Hub (MASH). Parental consent is not required to make a referral when there are grounds to believe the child may be at risk of significant harm.

- If the child is only prepared to speak if absolute confidentiality is guaranteed, the member of staff should terminate the conversation at that point. It should be explained



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to the child that confidentiality cannot be promised. Explain to the child that the member of staff is obliged to inform the DSL.

- The adult, to whom the child has spoken, should immediately provide the DSL with a written account of what has transpired.
- If a child decides to speak to a member of staff about the fact that either he/she, or a child known to them, is being bullied, harassed, exploited or abused/neglected, the member of staff should listen to the child's account and not ask leading or detailed questions. Allow the child to tell his or her own story.

**All staff to note:** It is important to understand that subsequent enquiries could be prejudiced by asking detailed and/or leading questions in school. Defendants have been acquitted where leading questioning or inappropriate investigations have been proven.

- The DSL will refer the concern immediately to Milton Keynes Multi-Agency Safeguarding Hub (MASH) which will decide how the matter will be investigated or assessed.
- The DSL will liaise with and receive guidance from the Milton Keynes Multi-Agency Safeguarding Hub (MASH) about how best to support and monitor the child concerned through any process of investigation and about any liaison with parents, carers or other agencies involved.
- Explain to the child that only those who have a professional 'need to know' will be told and, if appropriate, measures will be set up to protect the child from retaliation and further abuse.
- Reassure the child that he or she was right to tell, and that he/she is not to blame for having being bullied or abused.
- The school will collaborate with MKTP in any investigations, assessments or planning processes.

Where there are evident signs of physical injury the Milton Keynes Multi-Agency Safeguarding Hub (MASH) must be immediately notified. In such a case, parental consent is not required to make a referral.

### 6 ALLEGATIONS OF ABUSE AGAINST TEACHERS AND OTHER STAFF, INCLUDING SUPPLY STAFF AND CONTRACTORS

The school makes reference to KCSIE Part 4, section one "Allegations that may meet the harms threshold" and section two "Concerns that do not meet the harm threshold" (September 2021) and the requirements of the most recent version of the Independent Schools Standards Regulations.

#### 6.1 Allegations that may meet the harm threshold

The school understands that a child may make an allegation against any member of staff, including the Head, the DSL and DDSLs, teaching and non-teaching staff, part-time, temporary, voluntary, supply staff, contractors, visiting staff such as musicians, religious ministers, sports coaches and Governors. If an allegation is made, then the member of staff receiving the allegation must inform the Case Manager, who will be the Head and will lead any investigation, or where the Head is the subject of an allegation, the chair of governors or proprietor. Where an allegation is against the head, the head must not be informed of the allegation prior to contact with the chair and LADO. The LADO should be informed within one working day 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. All





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discussions will be recorded in writing and the school will follow the procedures agreed with the LADO. GDPR will not be allowed to stand in the way of safeguarding children.

In the absence of the Head, the member of staff must inform the Chair of Governors. Contact details for the LADO and the Chair of Governors are contained in Appendix 1.

If the allegation made is concerned with the Proprietor, the Head or one of the DDSLs, then the member of staff receiving the allegation must inform the Chair of Governors, without informing the Head. The Chair of Governors should immediately refer to the LADO. Should there be a conflict of interest, the LADO will be informed directly.

If the school finds:

- that a child has been harmed
- that there may be an immediate risk of harm to a child
- if the situation is an emergency,

children's social care should be contacted and as appropriate the police immediately in accordance with the processes set out in part one of KCSIE.

The Case Manager and the DSL are fully aware of the local authority arrangements for managing allegations, including contact details and the information the LADO will need. Prior to contacting the LADO, the school may – in line with local procedures – conduct basic enquiries to establish facts that will help determine whether there is any foundation to the allegation. The DSL will refer to KCSIE for sample questions to aid with the basic enquiries.

Contact with the LADO will be made as soon as any basic enquiries are conducted.

When an allegation is made, the school will not undertake its own investigations of the allegations without prior consultation with the LADO or, in the most serious cases, the Police, so as not to jeopardise statutory investigations. In borderline cases, discussions with the LADO can be held informally and without naming the school or individual. Discussions will be recorded in writing, and any communication with both the individual and the parents of the child/children agreed.

The school will consider whether the circumstances of the case warrant suspension or whether alternative arrangements should be put in place. The school will act in accordance with plans derived through discussions with the LADO and/or the Police when making a decision about suspension, including the views of KCSIE and WT.

The school will make every effort to maintain confidentiality and guard against unwanted publicity. These restrictions apply up to the point where the accused person is charged with an offence, or the Department for Education (DfE) and /or the Teacher Regulation Agency (TRA) publish information about an investigation or decision in a disciplinary case.

It is important to note the TRA took over the regulation of the teaching profession and the handling of misconduct hearings from the National College for Teaching and Leadership (NCTL) and is an executive agency of the DfE. The school will promptly report to the Disclosure and Barring Service (DBS) any person leaving the school (whether employed, contracted, a volunteer or student) whose no longer used for regulated activity or due to



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dismissal, non-renewal of a fixed-term contract, no longer engaging/refusing to engage a supply teacher provided by an employment agency, terminating the placement of a student teacher or other trainee, no longer using staff employed by contractors, no longer using volunteers, resignation, and voluntary withdrawal from supply teaching, contract working, a course of initial teacher training, or volunteering (or would have been, had the person not left the setting first) because he or she is considered unsuitable to work with children (that is, they have caused harm or posed a risk of harm to a child). Reports will include as much evidence about the circumstances of the case as possible. The school understands that failure to make a report constitutes a criminal offence. Compromise agreements cannot be used to either prevent a referral being made to the DBS when it is legally required, nor can an individual's refusal to cooperate with an investigation. The school will be required to keep detailed and accurate written records and preserve these for the term of the independent enquiry into child sexual abuse and at least until the accused has reached normal pension age or for 10 years from the date of the allegation if it is longer.

The Proprietor understands the legal duty to respond to requests from the DBS for information the school already hold.

The school will consider making a referral to the Teacher Regulation Agency (TRA) for any teacher that has been dismissed (or would have been dismissed had he/she not resigned) and a Prohibition Order may be appropriate. The reasons such an order would be considered are 'unacceptable professional conduct, 'conduct that may bring the profession into disrepute' or a 'conviction, at any time, for a relevant offence'. Further guidance is published on the TRA website (Teacher Misconduct: The Prohibition of Teachers, October 2018).

As per the KCSIE 2021 guidance, the school will handle allegations against supply staff by taking the lead and keeping the supply agency fully informed and involved. Under no circumstances will the school cease to use supply staff for safeguarding reasons without involving the agency and/or other authorities.

### **6.2 Concerns that do not meet the harm threshold ('low-level concerns')**

The school is committed to create and embed a culture of openness, trust and transparency in which the school's values and expected behaviour as set out in the staff code of conduct are constantly lived, monitored and reinforced by all staff. This serves to enable the early identification of concerning, problematic or inappropriate behaviour, minimise the risk of abuse, ensure that adults working in schools are clear about and act within professional boundaries in accordance with the values and ethos of the school, and protect those working in or on behalf of schools from potential false allegations or misunderstandings.

These may arise from a variety of sources, including suspicion, complaint, a disclosure (by child or adult) or during vetting checks. The school understands that a culture should be created in which all concerns about adults are shared responsibly and with the right person, recorded and dealt with appropriately.

A low-level concern does not mean 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 may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate contact outside of work



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- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

These behaviours can exist on a wide spectrum, from inadvertent to that which is ultimately intended to enable abuse. They include, for example:

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

Low-level concerns about a member of staff must be reported to the Head. Staff should feel confident to self-refer. Low-level concerns about someone employed by a supply agency or contractor should be shared with the head, the concern recorded, and their employer notified so that potential patterns of inappropriate behaviour can be identified. Should patterns be identified, the Head/Case Manager will take appropriate action, depending on the severity of the behaviour.

Where a third party has raised the concern, the Head will collect as much evidence as possible by speaking:

- directly to the person who raised the concern (if known)
- to the individual involved and any witnesses

The Head will record all low-level concerns in writing. This will include:

- details of the concern
- the context in which it arose
- evidence collected by the DSL where the concern has been raised via a third party
- the decision categorising the type of behaviour
- action taken
- the rationale for decisions and action taken
- the name of the individual sharing the concerns (respecting any wish to remain anonymous as far as possible).

The school will refer to KCSIE as to when a low-level concern should be referred to in a reference.

### 6.3 Record Keeping

Records are confidential, held securely and comply with the Data Protection Act 2018 and the UK GDPR. They are reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where such a pattern is identified, the school will either take action through disciplinary procedures or, if it meets the harms threshold, refer to the LADO. The school may also consider whether there are wider cultural issues within the school that enabled the inappropriate behaviour to occur and will therefore support staff where necessary, i.e., staff training. Information is kept at least until the individual leaves' employment.

For all allegations, other than those found to have been malicious or false, the following information will be kept on the file of the person accused:

- a clear and comprehensive summary of the allegation



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- details of how the allegation was followed up and resolved
- a note of any action taken, and decisions reached and whether the outcome was substantiated, unsubstantiated or unfounded.
- a copy provided to the person concerned, where agreed by children's social care or the police
- a declaration on whether the information will be referred to in any future reference

Substantiated allegations will also be included in references, provided that the information is factual and does not include opinions.

### 7 STAFF CODE OF CONDUCT

The school's staff code of conduct policy is given to all staff upon induction to the school. The policy is given to provide clear guidance about behaviour and acceptable actions so as not to place pupils or staff at risk of harm or of allegations of harm to a pupil.

*Please refer to the separate document: Staff Code of Conduct*

### 8 PEER-ON-PEER ABUSE, SEXUAL VIOLENCE AND SEXUAL HARASSMENT

This procedure is for dealing with abuse by one or more children against another child. All peer-on-peer abuse is unacceptable and will never be tolerated. Peer on peer abuse can take many forms, for example, making abusive comments, which should not be passed off as 'banter' or 'having a laugh' or 'part of growing up', engaging in abusive interactions, making abusive comments and/or engaging in activity of a sexualised nature (including sexual activity without consent, sexual violence and harassment), physical abuse, initiation ceremonies or rituals or hazing-type violence, upskirting and sexting (youth-produced sexual imagery) or any type of bullying, including online bullying, prejudice-based bullying or discriminatory bullying. The school understands that sexual violence and sexual harassment can occur between two children of any age and sex and within intimate personal relationships between peers. Sexual violence and sexual harassment can overlap and can take place online. When there is 'reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm' then any such abuse will be referred to the DSL and the Milton Keynes Multi Agency Safeguarding Hub (MASH) as a child protection concern. The school recognises the importance that all staff must challenge any form of abusive behaviour between peers.

Sexting, for the purposes of this policy, is defined as the generation and/or sharing of images or videos by children under the age of 18 where such images or videos are shared with another child or children or adult via a mobile phone, tablet, laptop, computer or website. Sexting is classed as illegal. *Further guidance can be sourced from the DfE Searching Screening and Confiscation Advice and the UK Council Child for Internet Safety (UKCIS): Sexting in Schools and Colleges.*

The school recognises the gendered nature of abuse i.e. that girls are more likely to be victims and boys more likely to be perpetrators. However, the school will always be clear that all peer-on-peer abuse is unacceptable and will be taken seriously. Staff recognise that children are capable of abusing their peers (including online) and therefore understand the importance of the school's policies and procedures with regard to peer-on-peer abuse.

Abuse that occurs online or outside of the school will not be downplayed and will be treated equally seriously.



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### 8.1 Prevention of peer-on-peer abuse

The school recognises that peer-on-peer abuse can occur even with the most robust policies and support processes in place. Even if there are no reported cases of peer-on-peer abuse, such abuse may still be taking place and is simply not being reported. Therefore, the school encourages an environment where children can feel safe to share information about anything which worries them or causes them to feel upset. Appropriate behaviour is regularly reinforced through assemblies, form time discussions, PSHE lessons and in the SMSC curriculum. Children are signposted to support such as ChildLine and the school's Anti-Bullying Poster is prominently displayed throughout the building.

### 8.2 Procedures for dealing with peer-on-peer abuse

Staff, to whom the concerns are reported, should listen to child's concerns and offer immediate support. Staff will not dismiss anything reported to them which appears to be 'banter' or 'just growing up'. Staff should refer the child immediately to the DSL, or, in their absence, a DDSL.

- The DSL will reassure the child that they have done nothing wrong and that it was the right thing to report. If appropriate, immediate medical treatment/advice should be sought.
- If the concerns relate to sexting, then staff must not share or copy the images with other staff members.

The DSL will listen to the child and make a written record of the incident, identify evidence and seek witnesses. The DSL will not guarantee confidentiality of information and will inform the child that the school will be speaking to inter-agency bodies and the alleged abuser(s).

- The DSL will inform parents.
- The school will report to Milton Keynes Multi Agency Safeguarding Hub (MASH) within 24 hours of a disclosure or suspicion of abuse.

In the event of a disclosure about child on child abuse, the school will treat all children involved, whether perpetrator or victim, as being 'at risk' and the school will provide support to all the children.

Where there has been a report of sexual violence, the DSL will make an immediate risk and needs assessment which should be recorded in writing, and which considers:

- The victim and their need for protection and support.
- The alleged perpetrator, their proximity to the victim and if steps need to be taken to keep them apart, if sharing a class or school transport, for example.
- All other children, where there is a need to protect them.

The immediate consideration will be what support to provide to the child, the alleged perpetrator and other children involved/impacted. The wishes of the victim, the nature of the allegations and the protection of all children in the school will be of paramount importance when considering immediate actions to take. In the event of any disclosure about pupil-on-pupil abuse that all children involved, whether perpetrator or victim, will be treated as being "at risk" and placed on the school Watchlist record, which is help and reviewed by the Heads



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of Department. The DSL will follow guidance provided by the Milton Keynes Multi Agency Safeguarding Hub (MASH).

Each case reported will be considered on an individual basis. The DSL, in conjunction with any guidance provided by the Milton Keynes Multi Agency Safeguarding Hub (MASH), will consider the following options:

1. To manage the case of sexual harassment internally, if the children involved are not in need of early help or statutory intervention and that it would be appropriate to manage the incident internally.
2. To consider if multi-agency early help is the appropriate course of action.
3. If the child has been harmed, or is at risk of harm, or is in immediate danger, the DSL should make a referral to Milton Keynes Multi Agency Safeguarding Hub (MASH) for advice or to make a referral, or out of hours Emergency Social work team. Such referrals will be made immediately.
4. To report to the Police. If this option is chosen, then a parallel report will be made to the Milton Keynes Multi Agency Safeguarding Hub (MASH). The school will inform parents unless, to do so, would put the child at additional risk.

The school will provide appropriate on-going support to the children involved, where appropriate and in conjunction with multi-agency professionals.

The DSL may consider referring to the departmental advice: *Sexual Violence and Sexual Harassment Between Children in Schools and Colleges*.

### **9 ALLEGATIONS OF ABUSE AGAINST PERSONS OUTSIDE OF THE SCHOOL AND ONLINE**

In the case of allegations of abuse by persons outside of the school where a child's welfare, possible abuse or neglect is of concern, then the member of staff will refer the matter to the Head, the DSL or a DDSL if the Head is not available. The DSL will then liaise with the Milton Keynes Multi Agency Safeguarding Hub (MASH) in the first instance. A written record of the referral will be e-mailed to the Milton Keynes Multi Agency Safeguarding Hub (MASH) as soon as possible within the same school day. The DSL will be required to keep detailed and accurate written records of all concerns about a child, even if there is no need to make an immediate referral.

### **10 GUIDANCE IF INAPPROPRIATE BEHAVIOUR IS NOTICED BY ANOTHER MEMBER OF STAFF**

If a member of staff has concerns about the behaviour of another member of staff towards a child, he/she should report the concerns immediately to the DSL. The Any concerns will be thoroughly investigated. If there is evidence of criminal activity, the Police will always be informed. Wherever possible and subject to the rights of the child, the member of staff will be informed of the outcome of the investigation.

All staff are trained to report and manage a genuine concern with impunity.

### **11 INFORMATION SHARING**

Sharing information is essential for effective safeguarding and promoting the welfare of children. All staff are reminded that the General Data Protection Regulation (GDPR)





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introduced in May 2018 and the Data Protection Act 2018 are not barriers to justified information sharing to protect a child from harm or the risk of harm.

When a child moves school, in addition to handing over any child protection file securely within 5 days, the DSL may proactively share information with the new school to enable the new school to have support in place when a child arrives and to ensure that key staff, such as the SENCO, are aware of any needs.

The safeguarding of children at risk is a condition that allows safeguarding practitioners to share information legally without consent, if, to gain consent, could place a child at risk.

Relevant personal information can be shared lawfully if it is to keep a child safe from neglect or physical, emotional or mental harm, or if it is protecting their physical, mental or emotional well-being.

### 12 PREVENTION

The school recognises that it plays a significant role in preventing harm to children in the following ways:

- Across the curriculum, opportunities are provided that equip children with the skills they need to stay safe from harm and to know to whom they should turn to for help.
- The school will ensure children are taught about how to stay safe, based on a wide view of what may happen to pupils, not only in schools but also beyond it. This will include staying safe online and the dangers of cyberbullying and sexting – even if pupils in a particular faith community are not meant to use mobile phones or have limited access to the internet.
- The topics will be conveyed through the curriculum, IT, PSHE lessons and Relationships and Sex Education. Particular attention will be paid to the school's practices to help children to adjust their behaviours in order to build resilience and reduce risks, including those of radicalisation. They will also be taught about the importance of telling a teacher/other member of staff if they come across something online which makes them uncomfortable, especially staying safe online and the dangers of cyberbullying or sexting, even in cases where children only have limited internet or mobile phone access.
- Ensure that all children know there is an adult in the school whom they can approach if they are worried or in difficulty.
- Establish and maintain an ethos, which is understood by all staff, which enables children to feel secure and encourages them to talk knowing that they will be listened to.
- All children have access to a public telephone should they need to call a helpline (ChildLine) for support.
- Leadership training is provided to Head Boys and Girls, Deputies and House Captains, which specifically covers the importance of offering support and assistance to younger children.
- The school has an appropriate policy in place when dealing with abuse by one or more children against another child when there is 'reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm' including that any such abuse will be referred to the local authority as a child protection concern. The school will ensure that in the event of any disclosures about child on child abuse that all children involved, whether perpetrator or victim, are treated as being 'at risk'.



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Any school decision to seek support for a child in need or at risk, or about whom there are concerns (including concerns relating to radicalisation) would normally be taken in consultation with parents. Parent consent would not be required where there are reasonable grounds to believe that a child is a risk of significant harm.

### 12.1 Anti-Bullying

The school will not tolerate any kind of bullying, harassment, victimisation or discrimination. The school takes any kind of bullying, both physical and emotional (which may cause psychological damage) very seriously, including any bullying on the basis of a protected characteristic. The school will treat all children and parents fairly and with consideration and we expect them to reciprocate towards each other, the staff and the school. Any kind of bullying is unacceptable. The school's Anti-Bullying Statement is displayed publicly and provides advice on where children can seek help.

- *Please refer to the separate document: Anti-Bullying Policy.*

### 12.2 Children Missing Education

It is recognised that one of the signs of children being at risk of or being harmed is when the child is missing from school without explanation, particularly on a regular basis. The school works with parents to ensure that it is able to account for every child who is absent from school. Parents are asked to telephone the school on the first and every successive day of illness. In exceptional circumstances, the Heads may authorise absence from school during term-term and only where the absence will have an educational value.

When a child is not in school without an explanation, then the school will contact parents for an explanation. The school will hold a minimum of two emergency contacts for each child. Where a child is missing from school and contact cannot be made with parents, then the Head or the DSL will contact Milton Keynes Multi Agency Safeguarding Hub (MASH) for further advice. Failure to report a child missing in education regularly or where the child is absent without authorisation for more than 10 school days, would be non-compliance with the duty to have regard to KCSIE (September 2021).

### 12.3 Child Sexual Exploitation (CSE)

This is a form of sexual abuse where children are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young children are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation can include both contact and non-contact sexual activity and can also occur through the use of technology. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point.

As part of their safeguarding training, staff are taught to recognise possible signs of sexual abuse. If a member of staff suspects that a child may be at risk or suffering from child sexual abuse, he/she must immediately report this to the DSL who will liaise with the Milton Keynes Multi Agency Safeguarding Hub (MASH) and follow its procedures for notification of child sexual exploitation.



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### **12.4 Child Criminal Exploitation (CCE)**

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity in exchange for something the victim needs or wants. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology. CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country, forced to shoplift or pickpocket, or to threaten other young people.

As part of their safeguarding training, staff are taught to recognise possible signs of criminal exploitation. If a member of staff suspects that a child may be at risk or suffering from child criminal exploitation, he/she must immediately report this to the DSL who will liaise with the Milton Keynes Multi Agency Safeguarding Hub (MASH) and follow its procedures for notification of child criminal exploitation.

### **12.5 Female Genital Mutilation (FGM)**

As the school has female pupils, when a member of staff discovers that an act of FGM appears to have been carried out, he/she must immediately report this to the DSL. It is mandatory for the DSL to inform the Police. Milton Keynes Multi Agency Safeguarding Hub (MASH) will be involved as appropriate.

### **12.6 Online Safety**

The school ensures that robust monitoring and filtering systems are in place to safeguard children online. All devices on the school premises are networked and do not use 3G or 4G to establish a connection to the internet. This is to protect children from:

- Being exposed to inappropriate, harmful, extremist or illegal material.
- Being subjected to harmful online interactions with other users.
- Potentially harmful online behaviour that may expose them to harm.

Children are regularly taught, in an age-appropriate way, about how to keep themselves safe online, how to recognise inappropriate material and are taught about the importance of raising any concerns they may have to staff.

Access to the Internet is only permitted during lesson-time and is always supervised by a member of staff.

Children are not allowed to bring mobile phones into school. They are however, taught about the safe use of mobile phones during IT and PSHE lessons, assemblies and during form time.

- *Please refer to the separate document: Policy for Online Safety.*

### **12.7 One to One Teaching**

When children receive one-to-one specialist teaching, for example, music lessons or dyslexia coaching, the child will be collected from their class with the permission of the class teacher. The school gives special attention to the safeguarding of children arrangements where certain children are engaged in one to one teaching.

*Please refer to separate document: One to One Teaching Policy*



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### 12.8 Prevent Awareness (Radicalisation)

The school will adhere to the obligations set out in The Prevent Duty (2015). Protecting children from the risks of radicalisation is part of the school's wider safeguarding duties. Radicalisation refers to the process by which a person comes to support terrorism and other of extremism. The school will build children's resilience to radicalisation by promoting fundamental British Values throughout the curriculum and through the provision of PSHE, form time and assemblies.

It is essential that staff are able to identify children who may be vulnerable to radicalisation and know what to do when they are identified. Staff should be alert to changes in behaviour in children that may indicate that the child might be in need of help or protection. Where a staff member identifies a concern, then the staff member must consult with the DSL.

When there are significant concerns about a child, the DSL may seek advice and/or make a referral to the most appropriate body, either Channel, Children's Social Care or Milton Keynes Multi Agency Safeguarding Hub (MASH). Further contacts are provided in Appendix 1.

The Prevent Duty requires the school to ensure that any visiting speakers are suitable and appropriately supervised. A member of staff will always be present when any visiting speaker addresses children. It is the responsibility of the member of staff inviting the visitor, to ensure that references are sought prior to the visit and that the member of staff is assured as to the suitability of the speaker to address children.

### 12.9 Taking Photographs of Children

The school will use photographs as a way to share and celebrate achievements in school. Parents will themselves often enjoy seeing their children's photographs in school. The school wishes to ensure that everyone can continue to enjoy these activities safely. Only school cameras are to be used to take photographs of approved activities in school. Mobile phones are not to be used. This applies to the whole school, including EYFS.

- *Please refer to the separate document: Policy on Taking, Storing and Using Images of Children.*

### 12.10 Use of Mobile Phones in School

Mobile phones provide staff with important contact with their families and, therefore, it is accepted that staff will have the devices in school. However, they must only be used in the staff room and restricted office areas.

- *Please refer to the separate document: Mobile Phone Policy.*

Parents are requested not to use their mobile phones in school.

### 12.11 Domestic Abuse

Domestic abuse is defined as any incident or pattern of incidents of violence or the threat of violence, intimidating or threatening behaviour or abuse between persons aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can include, but is not limited to physical, psychological, sexual, emotional and financial.



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It is recognised that domestic abuse can have long-lasting and damaging effects on a child's emotional and psychological development.

All staff should be alert to any sign or symptom that a child may be vulnerable to, experiencing, witnessing or at risk of domestic abuse. Where a staff member identifies that a child may be at risk or is exposed to domestic abuse, then they must immediately inform the DSL. The school will follow guidance from the MKTP. The priority will be to support the child and follow guidance provided by the MKTP.

### **12.12 Gangs**

All staff should be alert to any changes in a child's behaviour which give cause for concern, including anti-social behaviour and indicators that the child may be exposed to or involved in gang-related activity. If a member of staff identifies any person or child to be at risk, they should immediately inform the DSL, who will then follow guidance provided by the MKTP.

### **12.13 Forced Marriage**

A forced marriage is defined as one entered into without the full and free consent of one or both parties and where violence, threats or other forms of coercion are used to cause the person to enter into a marriage. If a member of staff identifies any person or child to be at risk, they should immediately inform the DSL, who will then follow guidance provided by the MKTP.

### **12.14 Honour based violence (HBV)**

Honour based violence involved incidents or crimes carried out to protect the honour of the family and/or the community and can include female genital mutilation (see Section 11.5) and breast ironing. Such honour-based violence can often involve the wider family or community. Staff will be alert to any child being at risk of honour based violence and will treat any such risk as a safeguarding concern and report their concerns to the DSL immediately. The DSL will follow guidance provided by the MKTP.

### **12.15 Upskirting**

Upskirting involves taking a picture under a person's clothing and without them knowing in order to cause humiliation, distress or alarm of the victim. This is a form of an abuse and now considered a criminal offence. If a member of staff identifies any person or child to be at risk, they should immediately inform the DSL, who will then follow guidance provided by the MKTP.

### **12.6 County Lines**

A County Line is used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line". They are likely to exploit children and vulnerable adults to move [and store] the drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons. If a member of staff identifies any person or child to be at risk, they should immediately inform the DSL, who will then follow guidance provided by the MKTP.

### **12.17 Child Abduction and Community Safety Incidents**

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers.



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### **12.18 Children and the Court System**

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age-appropriate guides to support children [5-11-year olds](#) and [12-17 year olds](#). The guides explain each step of the process, support and special measures that are available.

### **12.19 Children with Family Members in Prison**

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

### **12.20 Modern Slavery and the National Referral Mechanism**

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

### **12.21 Cybercrime**

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), will consider referring into the **Cyber Choices** programme.

### **12.22 Channel**

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the school may be asked to attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages. The designated safeguarding lead will consider if it would be appropriate to share any information with the new school or college in advance of a child leaving.

### **12.23 Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Children's social care will be the lead agency for these children and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances.

## **13 THE USE OF RESTRAINT**

School has clear and precise policy on using the restraint on children on the premises of the school and during school hours and will only use reasonable force and when applicable as





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per DfE guidance on 'Use of Reasonable force', 2013. Physical contact with pupils may occur under other circumstances such as providing physical prompts, giving support in PE and supplying reassurance. The term restraint does not extend to these situations. Staff should not be inhibited in providing such contact when it is professional and appropriate to do so. School will never use force as a punishment. It is always unlawful to use force as a punishment.

As per the DfE guidance, locking pupils in rooms for any reason (including pupil or staff safety) is potentially illegal; it is not just a breach of the standards. The use of isolation booths/units has also been found potentially to give rise to safeguarding and human rights issues.

- *Please refer to the separate document: Restraint Policy.*

### **14 SUPPORTING CHILDREN**

Staff are trained to listen to children and be alert to any signs and symptoms which could indicate that a child needs early help. Early help means providing support as soon as a problem emerges at any point in a child's life. Early intervention can also help prevent problematic, abusive and/or violent behaviour in the future. (KCSIE, September 2021).

The school recognises that disabled children and children with special educational needs may face additional safeguarding challenges. Therefore, the school will review and undertake regular monitoring of these children.

Children who have suffered or are likely to suffer significant harm will be referred immediately to the Milton Keynes Multi Agency Safeguarding Hub (MASH) and the school will follow Milton Keynes Multi Agency Safeguarding Hub (MASH) procedures. Where decisions to seek support for a child in need or at risk would normally be taken in consultation with parents, no consent is required for a referral when there are reasonable grounds to believe that a child may be at risk of significant harm.

Where a child needs additional support from one or more agencies, the school will invoke inter-agency assessment using local inter-agency procedures:

- The Common Assessment Framework (CAF) is designed to enable early and effective assessment of children who might need additional support.
- The Multi Agency Referral Form (MARF) is designed to enable a non-urgent referral to be made to the Multi Agency Safeguarding Hub (MASH).

Where Child Protection or Child in Need procedures are invoked, the school will follow inter-agency practices and recommendations from the MKTP with regard to specific support to be put in place by the school for the child.

Where a child is identified as being at risk of radicalisation, the DSL will identify the most appropriate source of support for the child and the family. This could be via Channel or Multi Agency Safeguarding Hub (MASH). The relevant contacts are contained in Appendix 1.



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### **14.1 Looked After Children**

The school will ensure that staff have the skills, knowledge and understanding necessary to keep safe any children on roll who are looked after, or have been looked after, by the local authority.

This would include ensuring that a designated member of staff has responsibility for their welfare and progress and has up-to-date assessment information from the relevant local authority, the most recent care plan and contact arrangements with parents, and delegated authority to carers.

The school currently has 0 children on roll who are classed as looked after children.

### **14.2 Children with Special Educational Needs and Disabilities**

Children with special educational needs and disabilities (SEND) can face additional safeguarding challenges, including particular vulnerability to peer-on-peer abuse. Staff must be alert to the fact that additional barriers can exist when recognising abuse and neglect in this group of children. These may include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further explanation;
- Being more prone to peer group isolation than other children;
- The potential for children with SEN and disabilities to be disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- Communication barriers and difficulties in overcoming these barriers.

To address these additional challenges, children with SEND may require extra pastoral support. The additional vulnerabilities of pupils with SEND and the school's duty to make reasonable adjustments should be particularly carefully considered in situations where the use of reasonable force may be needed in response to risks presented by incidents involving children with SEND or medical conditions.

## **15 STRESS AND MENTAL WELLBEING**

The School is committed to providing a system to support good mental health for all children and to help minimise and alleviate stress and poor mental health. It is the school's intention to deal constructively and sympathetically with stress and poor mental health. Stress or poor mental health will not be treated as a sign of weakness.

We believe that all staff have a responsibility to promote positive mental health, and to understand about protective and risk factors for mental health. Some children will require additional help and all staff should have the skills to look out for any early warning signs of mental health problems and ensure that children with mental health needs get early intervention and the support they need.

All staff are aware that mental health problems can be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

All staff also understand about possible risk factors that might make some children more likely to experience problems, such as: physical long-term illness, having a parent who has a



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mental health problem, death and loss, including loss of friendships, family breakdown and bullying. They should also understand the factors that protect children from adversity, such as self-esteem, communication and problem-solving skills, a sense of worth and belonging and emotional literacy.

Through PSHE the school teaches knowledge and social and emotional skills that will help children to be more resilient, understand about mental health and be less affected by the stigma of mental health problems.

All concerns are reported to the Head, Mr Driver, and the DSL, Emma Hanley, and recorded. The school will then assess each concern on a case by case basis and ensure that children get the support they need, either from within the School or from an external specialist service. The school's aim is to put in place interventions as early as possible to prevent problems escalating.

The school also recognises that support for mental health and wellbeing is equally important for members of staff.

### 16 SUPPORTING STAFF

Staff working in the school who have become involved with a child who has suffered harm or appears to be likely to suffer harm may find the situation stressful and upsetting. The school will support such staff by providing an opportunity to talk through their anxieties with a DDSL and to seek further support.

Staff are also made aware of guidance to ensure that their behaviour and actions do not place children or themselves at risk of harm or of allegations of harm to a child (for example, in one-to-one tuition, performing arts, sports coaching, conveying a child by car, engaging in inappropriate electronic communication with a child, and so on).

*Please refer to separate document: Whistleblowing Policy*

### 17 CONFIDENTIALITY

The school recognises that all matters regarding the safeguarding of children are confidential.

- The Head, the DSL and or DDSLs will disclose personal information about a child to other members of staff on a need to know basis only.
- All staff have a professional responsibility to share information with other agencies in order to safeguard children, following MKTP inter-agency protocols for communication.
- All staff must not promise a child to keep any secrets that may compromise the child's safety or well-being or that of another child.
- Staff must not promise a child confidentiality when a child raises a safeguarding concern with them.
- The school will always undertake to share its intention to refer a child to the Milton Keynes Together Partnership (MKTP) with their parent's/carer's permission, unless to do so, could put the child at greater risk of harm, or impede a criminal investigation.
- A member of staff who reports another member of staff for inappropriate behaviour is entitled to have his/her name protected from being disclosed by the Head to the alleged perpetrator, without his/her prior approval. However, it has to be recognised that his/her evidence may be required by the Police to be used in any criminal proceedings.



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### **18 DESIGNATED SAFEGUARDING LEADS**

Mrs Emma Hanley, member of the Senior Management Team, is the Designated Safeguarding Lead (DSL) and has overall responsibility and sufficient independence for the school's safeguarding, prevent and online safety responsibilities and undergoes refresher training every two years.

The DSL's responsibility is to maintain an overview of safeguarding, manage referrals, prevent and on-line practices within the school, to open channels of communication with local agencies and to support staff in carrying out their safeguarding duties to monitor the effectiveness of policies and procedures in practice, share relevant information where necessary, keep child protection files up to date, advise on training requirements and raise awareness when necessary.

Safeguarding concerns for children should be referred, in the first instance, to Mrs Hanley, as the DSL. If Mrs Hanley is away from the school site, during normal school hours, she can be contacted via the school telephone number, 01908 642111 or [ehanley@mkps.co.uk](mailto:ehanley@mkps.co.uk). In the absence of Mrs Hanley, safeguarding concerns should be referred to Mr Simon Driver, who is also the school's Prevent Officer. In the absence of Mr Driver, safeguarding concerns should be referred to the DDSL's as follows: Mrs Hart, Mrs Robson, Mrs O'Neill, Mrs Foulger, Mrs S Pauley, Mr Shepherd or Ms Arnold.

Safeguarding concerns for children in the Early Years Foundation Stage (EYFS), should be referred to Mrs Emma Hanley, in the first instance. If Mrs Hanley is not available, then safeguarding concerns should be referred to Mr Driver, Headmaster. If the DSL and Headmaster are not available, then staff should refer the concern to another DDSL.

The DSL and DDSLs receive updated child protection training every two years. All training will be in line with the local requirements and will include local inter-agency working protocols and training in Prevent duties.

The Designated Safeguarding Lead and Deputies are named in Appendix 1.

Access to the school's records on Child Protection is restricted to the Head, the DSL and other DDSLs.

### **19 EARLY YEARS FOUNDATION STAGE**

The DSL with the lead responsibility for safeguarding is Mrs Hanley.

The DSL with the lead responsibility for the EYFS recognises that specific guidance for staff that teach in the EYFS is required.

Ofsted will be informed of any allegations of serious harm or abuse by any person working or looking after children on the school premises (whether that allegation relates to harm or abuse committed on the school premises or elsewhere), or any other abuse which is alleged to have taken place on the premises and of the action taken in respect of these allegations.

These notifications will be made as soon as is reasonably practicable, but at least within 14 days of the allegations being made. The school understands that as a registered provider who, without reasonable excuse, fails to comply with this requirement, commits an offence.



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The school has very specific guidelines on the use of mobile phones in school. Staff are not permitted to take photographs of EYFS children with their mobile phones. Only school cameras may be used for that purpose.

- *Please refer to the separate document: Mobile Phone Policy.*
- *Please refer to the separate document: Policy on Taking, Storing and Using Images of Children.*

### 20 SAFER RECRUITMENT

The school is committed to ensuring all appropriate safer recruitment checks and procedures are applied to any member of staff employed by the school before he/she begins their employment. This will include any staff employed by another organisation and working with the school's children in school or on any other site.

All members of staff will be supervised at all times until all Disclosure and Barring Service (DBS) checks have been completed.

All new teaching staff will be Prohibition Order checked.

All staff appointed to a management position from 12 August 2015 will be subject to a Prohibition from Management check. This applies to internal appointments as well as external appointments.

All necessary staff details and recruitment checks will be entered onto the school's Single Central Record (SCR) and will be reviewed regularly by the school's senior management team, including the Proprietor, Head and Chair of Governors.

Visiting speakers, whether invited by staff or by the school's pupils themselves, shall be suitably and appropriately supervised at all times whilst on the school premises. Checks on visiting speakers will include obtaining approval by the Head, with a clear understanding of why the speaker has been chosen. The school will also conduct appropriate checks on the suitability of the person, which may include internet searches and/or contacting other schools where the person may have spoken previously.

A member of the Senior Management Team and the HR Manager have completed a course on Safer Recruitment and shall refer to MKC 'Safer Recruitment in Schools – Toolkit'.

### 20.1 DISQUALIFICATION UNDER THE CHILDCRE ACT 2006

The school will not knowingly employ people to work in the setting or be directly concerned with its management if they themselves are directly disqualified from childcare.

*Please refer to the separate document: Safer Recruitment Policy.*



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### **21 TRAINING**

#### **21.1 Induction Training**

Every new member of staff receives induction training on their responsibilities to be alert to the signs of abuse and bullying. They will be informed of the names of the DSL and DDSLs to whom any safeguarding concerns should be referred. They will also receive induction training on the procedures for recording and referring any safeguarding concerns to the DSL and/or DDSLs.

During induction, new employees will be given copies of the following:

- The Safeguarding and Child Protection Policy, including Children Missing Education
- The names of the school's Designated Safeguarding Leads.
- The Code of Conduct for Staff.
- The Whistleblowing Policy.
- Acceptable Use of Technology Policy
- Missing Child Policy
- The Behaviour, Sanctions and Rewards Policy.
- Keeping Children Safe in Education Part 1 (including Annex: Further Information).
- Policy for Online Safety

#### **21.2 Training for the Heads, the DSL and DDSLs**

The Head, the DSL and the DDSLs attend refresher training in safeguarding and child protection and Prevent awareness training every two years (as determined by the MKTP), covering the following areas:

- The assessment process for providing early help and intervention.
- The MKTP practices for child protection case conferences and child protection review conferences and how to contribute effectively to these.
- Inter-agency working practices.
- How to support children in need or at risk.
- Online safety.
- Identifying children at risk of radicalisation (prevent)
- Record keeping protocols.
- Continuing to ensure that the school culture is one based on listening to children and taking account of their wishes and feelings.
- Understanding the impact on a child of adversity and trauma and how to promote educational outcomes in response to it.

As the local authority develops its services to support the Prevent Duty, it is anticipated that the DSL and DDSLs will undergo higher levels of training on how to be able to assess the risk of children being drawn into terrorism, including being drawn into support for extremist views.

The DSL and DDSLs are given copies of KCSIE including Annex B: Further Information, Annex C: Role of the Designated Lead and Annex D: Online Safety to support their understanding of their responsibilities as the Designated Safeguarding Lead and Deputy Designated Safeguarding Lead.





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The Head will ensure that the DSL and DDSs are given sufficient time, funding and supervision to fulfil their safeguarding responsibilities effectively.

### **21.3 Staff Training**

All members of staff, including part time, regular contractors and visitors, receive annual safeguarding training, prevent and on-line safety awareness training annually in order to:

- Develop their understanding of the Safeguarding and Child Protection Policy.
- Recognise the differences between a safeguarding concern and a child who is at risk of immediate harm.
- Recognise the signs and symptoms of abuse at the earliest opportunity. This includes:
  - Significant changes in a child's behaviour.
  - Signs of deterioration in a child's well-being.
  - Unexplained bruising, marks or other sign of possible abuse or neglect.
  - Parent comments which may give cause for concern.
  - Any reasons to suspect abuse/neglect outside the school setting, for example, the child's home.
  - Understanding the particular vulnerabilities of children with special educational needs and/or disabilities (SEND) who are at risk of greater harm.
  - Child on child sexual violence and sexual harassment.
  - Inappropriate behaviour displayed by staff or other persons working with children, for example, inappropriate sexual comments, excessive one-to-one attention beyond that which would be expected in the role or sharing of inappropriate images.
  - To not promise confidentiality, to listen, to be non-judgemental, not lead, takes notes and report to the DSL or one of the DDSs.
- Identify children who may be at risk of being exposed to extremism, how to challenge extremist ideas and how to refer children for further help.

A Training Register is maintained which records the Basic Safeguarding Training, Prevent and On-Line Safety awareness training provided to staff.

Training is given to part-time and voluntary staff.

Each time KCSIE is updated, staff will receive the updated version, to read and keep, along with Annex B: Further Information.

Staff who have English as a foreign language may be provided with Annex A, the condensed version of Part 1.

The school will follow advice from the MKTP with regard to determining the most appropriate level and focus for safeguarding training for staff.

Staff are also made aware of guidance to ensure that their behaviour and actions do not place children or themselves at risk of harm or of allegations of harm to a child (for example, in one-to-one tuition, sports coaching, conveying a child by car, engaging in inappropriate electronic communication with a child, and so on).



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The school considers the above training schedule to be of adequate frequency. However, the school will consult regularly with MKTP to determine the most appropriate schedule for training and will review annually, the level and focus of training required.

- *Please refer to the separate document: Code of Conduct for Staff.*

The Head will ensure that staff have the skills, knowledge and understanding necessary to keep safe children who are looked after by a local authority. This will include ensuring the appropriate staff have up to date assessment information from the relevant local authority, the most recent care plan and contact arrangements with parents, and delegated authority to carers, and information available to the DSL and DDSLs.

The school will ensure that all staff working with children will have regular reviews of their own practice and have opportunities to discuss any concerns they may have about safeguarding matters. This will include the personal and professional duty to report welfare and safeguarding concerns to the Headmaster and/or the DSL in the school, or, in their absence, directly to MKTP.

The school will ensure that all staff receive copies of the school's Safeguarding and Child Protection Policy when updated. Staff who do not have a clear understanding of the most recent version of KCSIE should seek further guidance from the Headmaster who will in turn inform the DSL and have the member of staff re-train in the necessary areas.

### **22 REVIEW OF POLICIES AND PROCEDURES**

The Proprietor is responsible for ensuring that the Safeguarding and Child Protection Policy and procedures are reviewed annually. The review will ensure that the policy is up-to-date with any guidance and advice provided by the Independent Schools Standards Regulations, statutory regulations and MKTP policy and procedures and will consider the efficiency with which the child protection duties have been discharged. The review will include the contribution to inter-agency working through effective communication and good cooperation with local agencies in line with 'Working Together to Safeguard Children' (2018). The review will be carried out in conjunction with the nominated Safeguarding Governor.

The Proprietor understands that responsibility for the annual review cannot be delegated. However, the Proprietor may make appropriate arrangements for the review to be carried out by suitable others. The review will then be reported to the Proprietor, the Headmaster and the Chair of Governors.

The implementation of these policy provisions will be checked through discussion with the Proprietor, the Head and the DSL and by scrutiny of the minutes of Governor meetings and available evidence underpinning the review. The review will also take into account, but is not limited to:

- Any written report or information presented to Governors to support the review.
- Training records.
- Referral information in respect of requests for help and support for individual children.
- Issues and themes which may have emerged in school and how these have been handled.
- The contribution the school is making to multi-agency working in individual cases.



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- Local discussions on safeguarding matters.

Information will be sufficiently detailed to demonstrate both breadth and depth of the review.

The Proprietor and Safeguarding/Prevent Duty Governor is responsible for overseeing the annual review and implementation of Safeguarding and Child Protection matters. They will carry out regular monitoring checks on safeguarding procedures and known practice amongst different cross sections of staff within the school to ensure that staff know who to go to in the case of suspected abuse and what they might do in terms of communicating with a child in this context.

Each time the Safeguarding/Prevent Duty Governor visits the school for this purpose, the findings will be recorded in written format and retained in the Safeguarding and Child Protection file.

The Proprietor and Safeguarding/Prevent Duty Governor are also responsible for:

- Approving amendments to safeguarding and child protection procedures in the light of changing regulations or recommended best practice.
- Ensuring that any identified deficiencies or weaknesses in safeguarding and child protection procedures are immediately remedied.
- Ensuring the school works with the LADO to determine whether there are any improvements to be made to the school's procedures or practice following a substantiated allegation against a member of staff.
- Ensuring the school's commitment to report promptly to the DBS any person (whether employed, contracted, a volunteer or student) whose services are no longer used because he/she is considered unsuitable to work with children. Ceasing to use a person's services includes: dismissal; non-renewal of a fixed-term contract; no longer engaging or refusing to engage a supply teacher provided by an employment agency; terminating the placement of a student teacher or other trainee; no longer using staff employed by contractors; no longer using volunteers; resignation and voluntary withdrawal from supply teaching, contract working, a course of initial teacher training or volunteering.
- The school will fully take the lead while keeping supply agencies fully informed and involved. In no circumstances will the school simply cease to use supply staff for safeguarding reasons.
- Ensuring staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children.
- Creating an environment where staff feel supported in their safeguarding role and able to raise concerns.
- Ensuring 'practitioners' (such as those who work directly with children) have regular reviews of their own practice so that they have knowledge, skills and experience which improve over time.

The Proprietor and Safeguarding/Prevent Duty Governor understand that:

- Failure to make a report constitutes an offence and as a consequence could lead to the school being removed from the register of independent schools.
- 'Compromise agreements' cannot apply in this connection.



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- The legal duty to respond to requests from the DBS for information that the school already holds and that the school does not have to find it from other sources.

The school will follow appropriate regulations for all peripatetic teaching staff and shall ensure the necessary safeguarding checks, as detailed in the most recent Independent School Standards Regulations are actioned.

**The Safeguarding and Child Protection Policy was reviewed in September 2021 and will be reviewed in or before September 2022.**

### **23 ADDENDUM – COVID-19**

#### **23.1 SUPPORTING CHILDREN IN SCHOOL**

The school is committed to ensuring the safety and wellbeing of all its students. The school will continue to be a safe space for all children to attend and flourish. The Head will ensure that appropriate staff are on site and staff to pupil ratio numbers are appropriate, to maximise safety. Government guidance provides ‘a framework for school leaders to put in place proportionate protective measures for children and staff, which also ensure that all pupils receive a high-quality education that enables them to thrive and progress’.

The school will refer to the latest Government guidance for education and childcare settings on how to implement safety measures continue to follow the advice from Public Health England on handwashing and other measures to limit the risk of spread of COVID-19.

Where it is necessary to provide personal and/or intimate care in respect of a child, the school will follow their substantive personal and intimate care policy including making a record of the nature/time/date and staff involved in respect of care provided.

School leaders will monitor the impact of any staff absence, in particular the posts of Designated Safeguarding Leads and first aid trained staff in order to ensure the safe and effective running of the school and take appropriate management action where necessary. It is also important for the school to remind children about the importance of safety while using online learning.

*Please refer to separate document: Policy for Online Safety*

#### **23.2 SUPPORTING CHILDREN WHO ARE SELF-ISOLATING**

Should children need to self-isolate due to contracting Covid-19, and feel well enough, the school will ensure that online learning is provided.

Staff will use school email accounts and devices rather than personal.

Children are constantly reminded about the importance of safety while using online learning.

*Please refer to separate document: Policy for Online Safety*



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### APPENDIX 1 CONTACTS

#### SCHOOL CONTACTS

- **Designated Safeguarding Lead (DSL) and DSL for EYFS:**
  - Mrs Emma Hanley Tel: 01908 642111 or email [ehanley@mkps.co.uk](mailto:ehanley@mkps.co.uk).
- **Deputy Designated Safeguarding Leads (DDSL's):**
  - Mr Simon Driver ([sdriver@mkps.co.uk](mailto:sdriver@mkps.co.uk))
  - Mrs Katherine Foulger ([kfoulger@mkps.co.uk](mailto:kfoulger@mkps.co.uk))
  - Mrs S Pauley ([spauley@mkps.co.uk](mailto:spauley@mkps.co.uk))
  - Mrs Lucy Homer ([lhomer@mkps.co.uk](mailto:lhomer@mkps.co.uk))
  - Mrs Louise Hart ([lhart@mkps.co.uk](mailto:lhart@mkps.co.uk))
  - Mrs Sam Robson ([srobson@mkps.co.uk](mailto:srobson@mkps.co.uk))
  - Mr Matthew Shepherd ([mshepherd@mkps.co.uk](mailto:mshepherd@mkps.co.uk))
  - Miss Natalie Arnold ([namold@mkps.co.uk](mailto:namold@mkps.co.uk))
- **Proprietor:**
  - Mrs Hilary Pauley, Milton Keynes Preparatory School, Tattenhoe Lane, Milton Keynes, MK3 7EG. Tel: 01908 642111
- **Chair of Governors and nominated Safeguarding and Prevent Governor:**
  - Mr David Pye, c/o Milton Keynes Preparatory School, Tattenhoe Lane, Milton Keynes MK3 7EG. Any correspondence should be marked as Strictly Confidential. Tel: 01908 642111.
- **Prevent Officer:**
  - Mr Simon Driver. Tel: 01908 642111 or email [sdriver@mkps.co.uk](mailto:sdriver@mkps.co.uk)
- **School telephone number:** 01908 642111.

#### INTER-AGENCY CONTACTS

Milton Keynes Council  
MK Together Partnership

01908 691691  
01908 253169/253170  
[mktogether@milton-keynes.gov.uk](mailto:mktogether@milton-keynes.gov.uk)  
01908 253169/70  
01908 265545  
[children@milton-keynes.gov.uk](mailto:children@milton-keynes.gov.uk)  
01908 254300  
[jo.clifford@milton-keynes.gov.uk](mailto:jo.clifford@milton-keynes.gov.uk)

Multi-agency Safeguarding Hub (MASH)  
Emergency Social Work Team (out of office hours)

LADO: Jo Clifford

If the LADO is not available, refer to Multi-agency Safeguarding Hub (MASH) on 01908 253169.

For further guidance please see the Milton Keynes local safeguarding partner MK Together Partnership (MKTP) website: [www.mkscb.org](http://www.mkscb.org)

#### OTHER CONTACTS

DBS Barring (DBS), PO Box 3963, Royal Wootton Bassett, SN4 4HH. 03000 200 190  
Ofsted, Piccadilly Gate, Store Street, Manchester, M1 2WD or [enquiries@ofsted.gov.uk](mailto:enquiries@ofsted.gov.uk)  
Ofsted 0300 123 1231  
NSPCC Helpline 0808 800 5000  
NSPCC 18 or under 0800 1111  
NSPCC Whistleblowing Advice Line 0800 800 5000



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Crimestoppers	0800 555 111
CEOP (Child Exploitation and Online Protection)	0800 1111
Child Exploitation and Online Protection Centre, 33 Vauxhall Bridge Road, London, SW1V 2W	
CEOP's Thinkuknow website	<a href="http://www.thinkuknow.co.uk">www.thinkuknow.co.uk</a>
Teacher Regulation Agency	0370 000 2288
The UK Safer Internet Centre	<a href="http://www.saferinternet.org.uk">www.saferinternet.org.uk</a>
Forced Marriage Unit	020 7008 0151 or fmu@fco.gov.uk

### **The Prevent Duty:**

DfE Non-emergency advice for staff and governors 020 7340 7264

For local advice: [preventreferrals@thamesvalley.pnn.police.uk](mailto:preventreferrals@thamesvalley.pnn.police.uk)

[counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk)

Contact local police force on 0845 8505 505 or dial 101 (the non-emergency telephone number)

### **APPENDIX 2 INDICATORS OF ABUSE AND NEGLECT**

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

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

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





## SAFEGUARDING AND CHILD PROTECTION POLICY

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**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. 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, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

### **GENERAL SIGNS OF ABUSE:**

Abused children may be afraid to tell anybody about the abuse. They may struggle with feelings of guilt, shame or confusion, particularly if the abuser is a parent, caregiver or other close family member or friend. Anyone working with children needs to be vigilant to the signs listed below.

**Whilst these signs do not necessarily mean that a child is being abused, they probably indicate that the child or family is having some problems that should be investigated.**

- Regularly experiencing nightmares or sleeping problems.
- Changes in personality.
- Outbursts of anger.
- Changes in eating habits.
- Showing an inexplicable fear of particular places or making excuses to avoid particular people.
- Self-harming (includes head banging, scratching, cutting).
- Not receiving adequate medical attention after injuries.
- Showing violence to animals, toys, peers or adults.
- Knowledge of 'adult issues' e.g. alcohol, drugs, sexual behaviour.
- Lacking in confidence or often wary/anxious.
- Regressing to the behaviour of younger children.
- Regular flinching in response to sudden but harmless actions, e.g. someone raising a hand quickly.

Whether or not a child's behaviour or appearance is concerning depends on their age or stage of development.



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**All staff should be aware that children with learning difficulties and/or special educational needs and/or physical disabilities may be particularly vulnerable to abuse/neglect.**

The school will refer to MKTP's guidance on 'Levels of Need' and also refer to guidance and practical support found in KCSIE (September 2021), including advice on a Child Missing from Education, Child Sexual Exploitation (CSE), Child Criminal Exploitation (CCE), Female Genital Mutilation (FGM) and Preventing Radicalisation.

### **APPENDIX 3 WHERE TO GET INFORMATION AND SUPPORT FOR MENTAL HEALTH AND WELLBEING**

For support on specific mental health needs:

Anxiety UK [www.anxietyuk.org.uk](http://www.anxietyuk.org.uk)

OCD UK [www.ocduk.org](http://www.ocduk.org)

Depression Alliance [www.depressoinalliance.org](http://www.depressoinalliance.org)

Eating Disorders [www.b-eat.co.uk](http://www.b-eat.co.uk) and [www.inourhands.com](http://www.inourhands.com)

National Self-Harm Network [www.nshn.co.uk](http://www.nshn.co.uk) [www.selfharm.co.uk](http://www.selfharm.co.uk)

Suicidal thoughts Prevention of young suicide UK – POPYRUS: [www.papyrus-uk.org](http://www.papyrus-uk.org)

For general information and support

[www.youngminds.org.uk](http://www.youngminds.org.uk) champions young people's mental health and wellbeing

[www.mind.org.uk](http://www.mind.org.uk) advice and support on mental health problems

[www.minded.org.uk](http://www.minded.org.uk) (e-learning)

[www.time-to-change.org.uk](http://www.time-to-change.org.uk) tackles the stigma of mental health

[www.rethink.org](http://www.rethink.org) challenges attitudes towards mental health