



# MILTON ABBEY

## Safeguarding Policy and Child Protection Procedures

Issue Date:	April 2024
Review Date:	September 2024 or as required
Policy contact:	Chris Barnes, DSL
Approved by:	James Watson, Headmaster
Local Safeguarding Partner:	Pan-Dorset Safeguarding Children's Partnership

**Signed and Approved on behalf of the Council of Milton Abbey School by:**

.....  
**Ian G Bromilow**  
Chair of Governors

.....  
**Date**

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## Safeguarding Leadership

### Safeguarding Governor



**Ian Bromilow**  
Chair of Governors  
(Accountability)



### Headmaster



**James Watson**  
Headmaster  
(Accountability)

### Designated Safeguarding Lead (DSL)



**Chris Barnes**  
Senior Deputy Head  
(Lead responsibility for safeguarding)

### Senior Deputy Designated Safeguarding Lead



**Sarah Badley**  
Head of Personal Development and Community Engagement  
(Staff Induction and Training, Online Safety, Behaviour, MyConcern & Safeguarding Practice Reviews Oversight and Learning)

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**Milton Abbey Safeguarding Team 2023-2024**  
**Deputy Designated Safeguarding Leads**



**Zoe Livingstone**  
Deputy Head Pastoral  
(Pupil Welfare)



**Ashley Garrett**  
Senior Nurse Manager  
Physical and Mental Health and Wellbeing



**Claudia Hindle**  
Deputy Head Development and Admissions  
(Visitors to Site, Volunteers & Pupil Induction)



**Jane Naylor**  
Learning Development Teacher  
(Supporting Children Through the Curriculum –  
Special Educational Needs and Disability)



**Martyn Peel**  
Head of Boarding  
(Supporting Children Through the Curriculum - Boarding)



**Piers Webb**  
Assistant Housemaster  
(Equality, Diversity & Inclusion (EDI),  
Social, Moral, Spiritual and Cultural Development (SMSC))

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## Safeguarding Policy

The safeguarding policy for Milton Abbey School is based on a template provided by the Dorset Safeguarding and Standards Team; it reflects the [Pan-Dorset Inter-Agency Safeguarding Procedures](#) (on the Pan-Dorset Children's Partnership website), '[Keeping Children Safe in Education](#)' 2023, and the Independent Schools Standards Regulations 2014.

This policy consists of four main documents:

- The overarching safeguarding policy (statement of principles)
- Detailed child protection procedures
- Child protection summary sheet. The latter is printed separately and provided routinely for those adults who will not have the opportunity to read this policy in its entirety but will have unsupervised contact, even as a 'one-off', with pupils on a temporary or intermittent basis such as supply, peripatetic or visiting professionals.
- Low-Level Concerns Policy and Procedures for Managing Allegations against Staff, Volunteers, the Headmaster or Governors

This policy applies to all staff, including the Senior Leadership Team, teachers, peripatetic staff, regular volunteers (i.e. those who come into school once a week or more or 4 times in a 30-day period, or overnight (between 02:00 and 06:00)<sup>1</sup>, trainee teachers, governors, non-teaching staff, contractors and/or apprentices, working in or on behalf of the school. It provides information about the actions the school expects from all staff.



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<sup>1</sup> Independent Schools Inspectorate Commentary on the Regulatory Requirements September 2022 (page 194)

## A. Safeguarding and Child Protection Policy

Milton Abbey School recognises that the welfare of the child is paramount: the needs and wishes of each child will be put first. Throughout this document, 'pupil' or 'child' refers to a young person under the age of 18 and any young person in the school's care.

The purpose of this policy is to:

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

We take seriously our duty to safeguard and promote the welfare of the children and young people in our care. Everyone at Milton Abbey who comes into contact with children and their families has a role to play in safeguarding children. School staff are important in the safeguarding promotion of the welfare of children. School staff form part of the wider safeguarding system for children to prevent concerns from escalating. Our local, national and international community of full-time boarders and day pupils require support specific to their needs and their ability to access support partnerships around the globe.

As a boarding school we are alert to signs of abuse and work closely with the host local authority and, where relevant, local authorities that have placed their children here. The school also recognises that children can be particularly vulnerable in residential settings and are alert to the potential for child-on-child abuse. The school will comply with its obligations as set out in the [National Minimum Standards for Boarding](#) 2022 in relation to safeguarding at all times.

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

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

The governing body will carefully consider how the school supports pupils with regard to particular protected characteristics as defined in the Equality Act 2010. The school will take positive action, where proportionate, to deal with particular disadvantages affecting pupils with certain protected characteristics in order to meet their specific need, for example by making reasonable adjustments for disabled children and supporting girls if there is evidence they are being disproportionately subjected to sexual violence or harassment.

We will work with Children's Social Care, the Police, Health services and other relevant agencies to promote the welfare of children and protect them from harm. Milton Abbey is committed to ensuring that all pupils are safeguarded in line with [Keeping Children Safe in Education](#) 2023 and its statutory duties to promote the welfare of young people. It is incumbent upon teachers (in line with the [Teacher Standards](#) 2012) ~~should~~ to safeguard children's wellbeing and maintain public trust in the profession as part of their professional duties.

Safeguarding children is everyone's responsibility. '[Working Together to Safeguard Children](#)' 2023, HM Government statutory guidance, defines safeguarding as:

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

Effective safeguarding systems must be child centred as problems can arise in safeguarding systems when sight is lost around the needs and views of the children within them or place the interests of adults ahead of the needs of children. Everyone working with children and families must seek the voice of the child and

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reflect and respond to it in all aspects of work. This is rooted in legislation and good practice. Being subjected to harassment, violence and or abuse, may breach children's rights as set out in the Human Rights Act. A child-centred approach is supported by:

- The [Children Act 1989](#) (as amended by [Section 53 of the Children Act 2004](#)).
- The [Equality Act 2010](#) and
- The [United Nations Convention on the Rights of the Child \(UNCRC\)](#).

Everyone working in or for our school must share the objective to help keep children and young people safe by:

- Providing a safe environment for children and young people to learn and develop in our setting.
- Identifying and responding to 'early help' needs of children and families.
- Identifying children and young people who are suffering or likely to suffer significant harm, and taking appropriate action with the aim of making sure they are kept safe both at home and in our school setting.
- Maintaining a culture of vigilance and an attitude of 'it could happen here'.
- **All staff should know what to do if a child tells them they are being abused, exploited or neglected.**
- **Staff should know how to manage the requirement to maintain an appropriate level of confidentiality and be able to reassure victim that they are being taken seriously.**
- **Children who report abuse should be supported and kept safe.**
  - **They should never be given the impression that they are creating a problem by reporting abuse, sexual violence, or sexual harassment.**
- **A victim should never be made to feel ashamed for making a report.**

The Governing Body will act in accordance with [Section 175](#) / [Section 157](#) of the [Education Act 2002](#) ensuring that there are effective safeguarding policies and procedures in place that take into account local risks, statutory guidance issued by the Secretary of State and any LA guidance/locally agreed inter-agency procedures.

The Governing Body will also support statutory guidance from KCSIE, '[Working Together to Safeguard Children](#)' 2023 and '[Prevent Duty Guidance](#)' 2015 (updated 2021) to safeguard and promote the welfare of children in this school. Governors also ensure that those staff who work directly with children read at least 'Part One' and 'Annex B' of KCSIE, and those staff that do not work directly with children read either 'Part One' or 'Annex A' of KCSIE.

This is achieved through:

- Governors' accountability to ensure that the school meets its statutory responsibilities for safeguarding and that all policies, procedures, training and teaching are in place and effective.
- Governors ensure that mechanisms are in place to assist staff in understanding and discharging their role and responsibilities as set out in 'Part One' or 'Annex A' of KCSIE.
- Setting out an individual on the board who takes leadership responsibility for the wider safeguarding arrangements, including the Prevent duty.
  - **The Designated Safeguarding Governor is [Ian Bromilow](#), Chair of Governors.**
- Ensuring there is a senior member of the school's Leadership team designated to take lead responsibility for dealing with safeguarding issues, providing advice and support to other staff; liaising with the LA and working with other agencies.
  - **The Designated Safeguarding Lead is [Chris Barnes](#), Senior Deputy Head and a member of the school's Leadership team.**

It is a Dorset Safeguarding Standard (recommended by the Pan-Dorset Children's Partnership) that governors receive an annual report from the Designated Safeguarding Lead (DSL) and Nominated Governor in order to help monitor compliance with statutory responsibilities. Based on these recommendations the DSL provides updates to The Council of Milton Abbey School Limited and follows the outlined reporting cycle:

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- Term 1: Safeguarding Policy Review.
- Term 2: Safeguarding Annual Report.
- Term 3: Pan-Dorset Children’s Partnership Audit Review *(or sooner dependent on Dorset County Council timescales).*

Safeguarding is a standing discussion/ agenda item at Senior Management Meetings, Housemaster/ Housemistress Meetings, Governors’ Meetings and The Education Committee (A Council of Milton Abbey Sub-Committee) Meetings. There are also termly meetings with the Designated Safeguarding Lead and Nominated Governor for Safeguarding, these meetings also include at least one Deputy Designated Safeguarding Lead. The Independent Schools Inspectorate (ISI) is the approved body to inspect Milton Abbey school and will report on its safeguarding arrangements within their framework.

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

### **Supporting Children and Working in Partnership with Parents**

Milton Abbey recognises that children’s welfare is paramount. Good safeguarding, child protection practice and securing good outcomes for children rely on a positive, open and honest working partnership with parents/carers.

Whilst we may, on occasion, need to make referrals to Children’s Social Care without consultation with parents, we will make every effort to maintain a positive working relationship with them whilst fulfilling our duties to protect children.

Children will be given an explanation, appropriate to their age and understanding of what action is being taken on their behalf and why.

We will endeavour to preserve the privacy, dignity and right to confidentiality of the child and parents/carers whilst discharging our statutory duties in accordance with our Data Protection Policy.

### **Supporting Children and Working in Partnership with External Agencies**

Milton Abbey recognises that it is essential to establish positive and effective working relationships with other agencies, particularly those that are partners of the Pan Dorset Safeguarding Children Partnership.

Milton Abbey staff should expect to support social workers and other agencies following any referral.

There is a joint responsibility on all these agencies to share information to ensure the safeguarding of all children, working together to secure positive outcomes which is achieved through Dorset’s agreement to include:

- Social workers/ police attending the school following a Strategy discussion, which has found a child to be at risk of significant harm.
- Ensuring that all staff are aware of the Early Help Services available in order to make timely referrals for support.
- The appropriate member of staff will attend /lead on Team Around the Family (TAF) and Team around the child (TAC) meetings as required.

### **Supporting Children Through the Curriculum**

Milton Abbey recognises that preventative education is most effective in the context of a whole-school approach that prepares pupils for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment. The school will have a clear set of values and standards, upheld and demonstrated throughout all aspects of school life. These will be underpinned by the school’s Behaviour Policy and pastoral support system, as well as by a planned programme of evidence-based RSE delivered in regularly timetabled lessons and reinforced throughout the

whole curriculum. The program is fully inclusive and developed to be age and stage of development appropriate especially when considering the needs of children with SEND and other vulnerabilities.

Governors will ensure that pupils at the school are taught about how to keep themselves and others safe, including online. It is recognised that effective education will be tailored to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs and/or disabilities.

Pupils are briefed on the school's expectations of their personal responsibilities within the Milton Abbey community. The 'Welfare and Safeguarding Briefing' for pupils is delivered through the Personal Social Health and Economic (PSHE) curriculum and as a standard part of new pupil induction at the start of the academic year. Should pupil join at a non-standard entry point in the term, a separate induction is arranged through Admissions.

Pupils are engaged and provided the opportunity to ask questions in regard to their civic duties, with specific attention to the school anti-bullying policy, behaviour policy, online safety policy, code of conduct and school conventions. Pupils are introduced to the safeguarding team and the pastoral support network they can access for help and guidance.

- They are regularly reminded about online safety and bullying procedures and taught how to conduct themselves and behave in a responsible and respectful manner.
- Opportunities are provided for pupils to learn about democracy and the rule of law, positive relationships and safe choices.
- All pupils know there is a Designated Safeguarding Lead (DSL) responsible for their safety and welfare and who this is and that they have a right to speak to this member of staff, or any other, if they are worried or concerned.
- All pupils know there is an Independent Listener, an adult outside of the staff or leadership structures, who is available to pupils who may want to discuss concerns or problems.
- Boarders are advised during the boarders' induction process of where they can seek help, and information is posted on noticeboards around houses.
- Pupils are reminded that confidentiality cannot be guaranteed, but that they will be listened to, heard and informed of what steps can be taken to protect them from harm and that feedback will be sought, so that their views about actions are known.
- There is a display in the school identifying the DSLs and the Independent Listener and children are made aware of this and are actively encouraged to talk to staff about their concerns.

Safeguarding is explored and promoted through the PSHE Curriculum which also encompasses Relationship and Sexual Health Education. Milton Abbey provides a spiralling course throughout the school that addresses themes around the core structures of:

- Beliefs and Values
- Relationships
- Careers
- Health and Wellbeing

### **Commitment to Safeguarding**

We will endeavour to safeguard children and young people by:

- always acting in their best interests
- valuing them, listening to and respecting them (including involving them in decisions which affect them)
- never tolerating bullying, homophobic behaviour, racism, sexism or any other forms of discrimination, including through use of technology

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- promoting a whole school approach to preventing child on child violence and sexual harassment, including ‘up-skirting’
- ensuring a broad balanced curriculum which affords a range of opportunities to learn about safeguarding particularly when:
  - using technology;
  - considering different types of relationships and issues related to Relationships and Sex Education (RSE).
- exercising our duties under the Counter-Terrorism and Security Act 2015 by ensuring all staff attend ‘Prevent’ training in respect of radicalisation and extremist behaviour and by assessing the risk of our pupils being drawn into terrorism
- supporting attendance and taking action if a child is absent from education, particularly on repeat occasions and/or for prolonged periods to help identify any risk of abuse, neglect or exploitation, and prevent the risk of their disappearance in future
- appointing a senior member of staff from our Senior Management Team as the Designated Safeguarding Lead (DSL) and ensuring this person has the time, funding, training, resources and support to perform the role effectively
- appointing at least one Deputy Designated Safeguarding Lead to ensure there is always someone available during school hours for staff to discuss any safeguarding concerns
- in the event of having children who are ‘looked after’ we will appoint a Designated Teacher to promote the educational achievement of children who are Looked-After (in care) and to work closely with appropriate agencies to support their progress.
- ensuring that staff working with Looked-After Children (LAC) have information appropriate to their role regarding, for example, the child’s care arrangements, legal status and contact with birth parents
- making sure all staff and volunteers are aware of and committed to the safeguarding policy and child protection procedures and also understand their individual responsibility to take action
- ensuring that all those named above (i.e. DSLs and Deputy DSLs; Designated Teacher; Headmaster, Governors, all staff and regular volunteers) have training appropriate to their roles as set out in statutory guidance or as recommended by the Pan-Dorset Safeguarding Children’s Partnership including online safety training which amongst other things includes an understanding of the expectations and responsibilities relating to filtering and monitoring
- identifying any concerns early and providing appropriate help to prevent them from escalating, including working with parents/carers and other agencies as appropriate. Early help is offered to pupils via:
  - Tutoring system, House Teams (Housemasters/ Housemistresses (HSMs), Assistant HSMs (AHMs), Resident Tutors (RTs), Matron), Health Centre, relationship with GP and Doctor’s Surgery, School Counselling Service, Individual Pastoral Plans, Care Plans, and Individual Risk Management Plans as required in conjunction with the DSL/Senior Deputy DSL.
    - Individual Pastoral Plans are owned by the HSM and aim to add additional pastoral support as deemed necessary by an individual pupil’s pastoral context.
    - Care Plans are owned by the Health Centre and aim to provide specific medical care plan appropriate to an individual pupil’s health needs and pastoral context where appropriate.
    - Individual Risk Management Plans are owned by the DSL/Senior Deputy DSL and aim to identify, assess, and mitigate risk for an individual pupil as appropriate to their medical and pastoral context to ensure that reasonable adjustments can be made to allow safe attendance in all aspects of school life.
  - There is a clear differentiation between those requiring early help and those who have suffered or are at risk of suffering significant harm.
- sharing information about child safeguarding concerns with agencies who need to know, and involving children and their parents/carers appropriately
- acknowledging and actively promoting that multi-agency working is the best way to promote the welfare of children and protect them from harm

- taking the right action, in accordance with the PDSCP interagency safeguarding procedures ([Pan-Dorset Safeguarding Children Partnership inter-agency safeguarding procedures](#)) if a child discloses or there are indicators of abuse
- keeping clear, accurate and contemporaneous safeguarding and child protection records
- recruiting staff and volunteers (including host families) safely, ensuring all necessary checks are made in accordance with statutory guidance and legal requirements and also making sure that at least one appointment panel member has undertaken safer recruitment training
- providing effective management for staff through induction, support and regular update training appropriate to role
- adopting a code of conduct for all staff and volunteers which includes acceptable use of technologies, staff/pupil relationships and communications including the use of social media
- ensuring our online safety process includes appropriate filters and monitoring systems on school devices and school networks to prevent children accessing inappropriate material in accordance with the school's Online Safety Policy.
- ensuring staff and volunteers understand about 'whistle blowing' and how to escalate concerns about pupils or staff if they think the right action has not been taken to safeguard children
- promoting a culture in which staff feeling able to report to senior leaders what they consider to be unacceptable behaviour or breaches of the school Code of Conduct by their colleagues, having faith that they will be listened to and that appropriate action will be taken
- dealing appropriately with any allegations/concerns about the behaviour of staff or volunteers in accordance with the process set out in statutory guidance

This safeguarding policy forms part of a suite of policies and other documents which relate to the wider safeguarding responsibilities of the school. In particular it should be read in conjunction with:

- staff behaviour policy (code of conduct)
- pupil behaviour policy
- employment manual
- online safety policies for pupils and staff, which include use of mobile technology
- safer recruitment policy and procedures
- procedures to handle allegations against members of staff and volunteers, including referring to the Disclosure and Barring Service (DBS) when appropriate
- whistle-blowing policy
- procedures to respond appropriately when children are missing education
- anti-bullying policy
- policy and procedures for visiting speakers
- resident staff guidance
- visitor's policy
- mental health policy and procedure for responding to mental health concerns
- critical incident plan\*

These policies and procedures are either available on the school network (Gateway), school website or via the Headmaster's Office.

### **\*Declaring a Critical Incident**

An incident may be designated as critical where the result is likely to be serious disruption to the running of the school, or to have a major impact on pupils and staff or where there is likely to be significant public and/or media attention on the school. This includes incidents resulting in serious harm, injury or death of a child, young person or adult.

Staff should refer to the school's Critical Incident Plan for guidance on what to do in the case of a critical incident.

The aims of the critical incident plan are:

- to ensure that swift and appropriate action to safeguard pupils, staff and visitors is taken the moment

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- that the school is made aware of a critical incident
- to ensure that staff are aware of general principles for handling unusual or extreme situations
- to enable the school to maintain, as far as possible, the normal routines of school life, to offer a secure framework and to provide continuity to pupils and staff

The decision to declare an incident 'critical' and trigger the critical incident plan rests with the Headmaster.

## Early Help

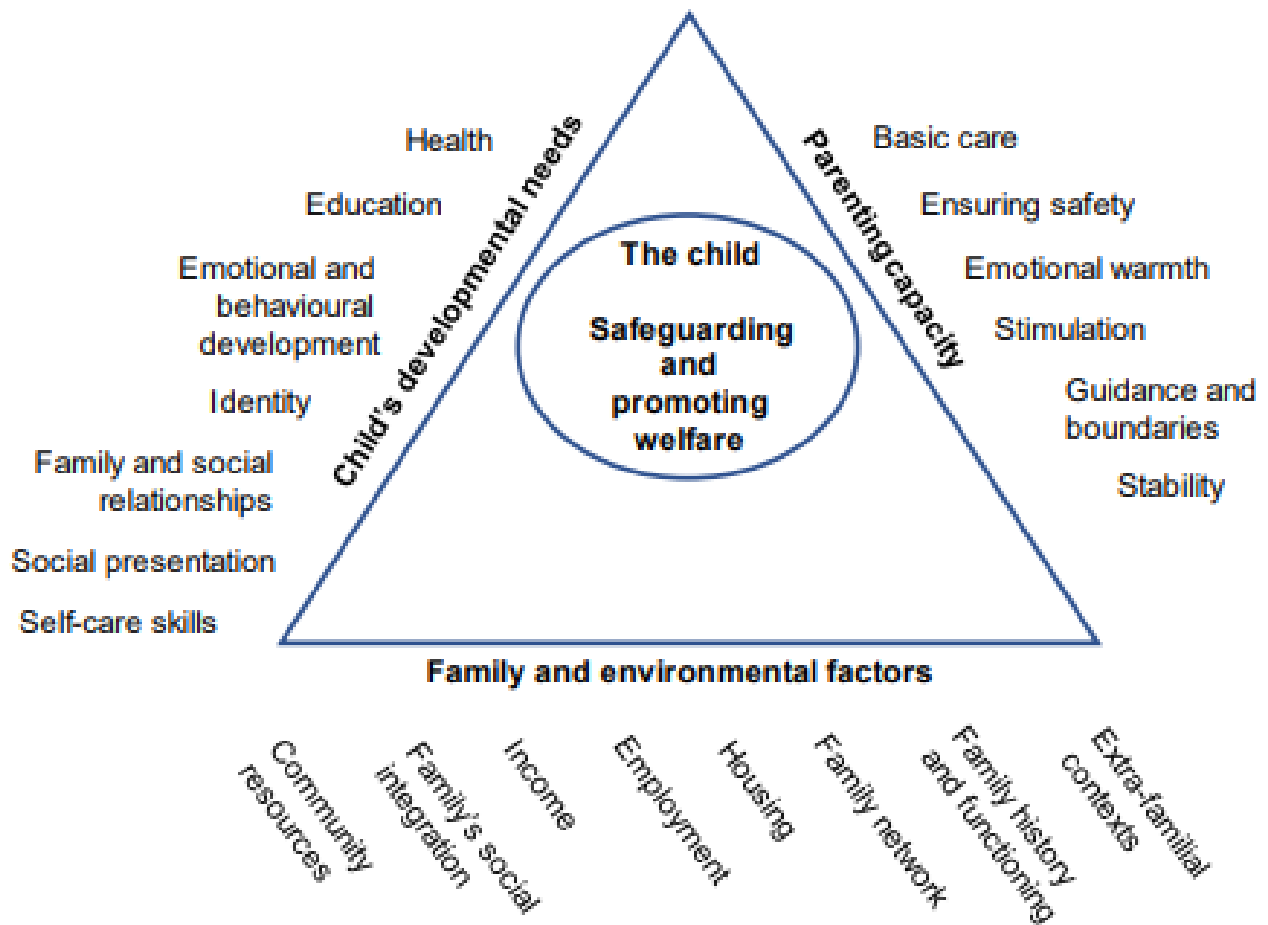
Early help means providing support as soon as a problem emerges, at any point in a child's life. It can be provided at any stage of a child or young person's life to parents, children or whole families. Any pupil may benefit from early help, but staff should be particularly alert to the potential need for early help for pupils who:

- Are disabled or have certain health conditions and have specific additional needs.
- Have special educational needs (whether or not they have a statutory EHC plan).
- Have a mental health need.
- Are young carers.
- Show signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
- Are frequently missing/going missing from care or from home.
- Misuse drugs or alcohol.
- Are at risk of modern slavery, trafficking, or sexual or criminal exploitation.
- Are in a family circumstance presenting challenges such as substance abuse, adult mental health problems or domestic abuse.
- Are returned home to their family from care.
- Show early signs of abuse and/or neglect.
- Are at risk of being radicalised or exploited.
- Have a family member in prison, or are affected by parental offending.
- Are at risk of 'honour-based' abuse such as FGM or forced marriage.
- Are privately fostered.
- Are persistently absent from education, including persistent absences for part of the school day.

Early help will also be used to address non-violent harmful sexual behaviour to prevent escalation.

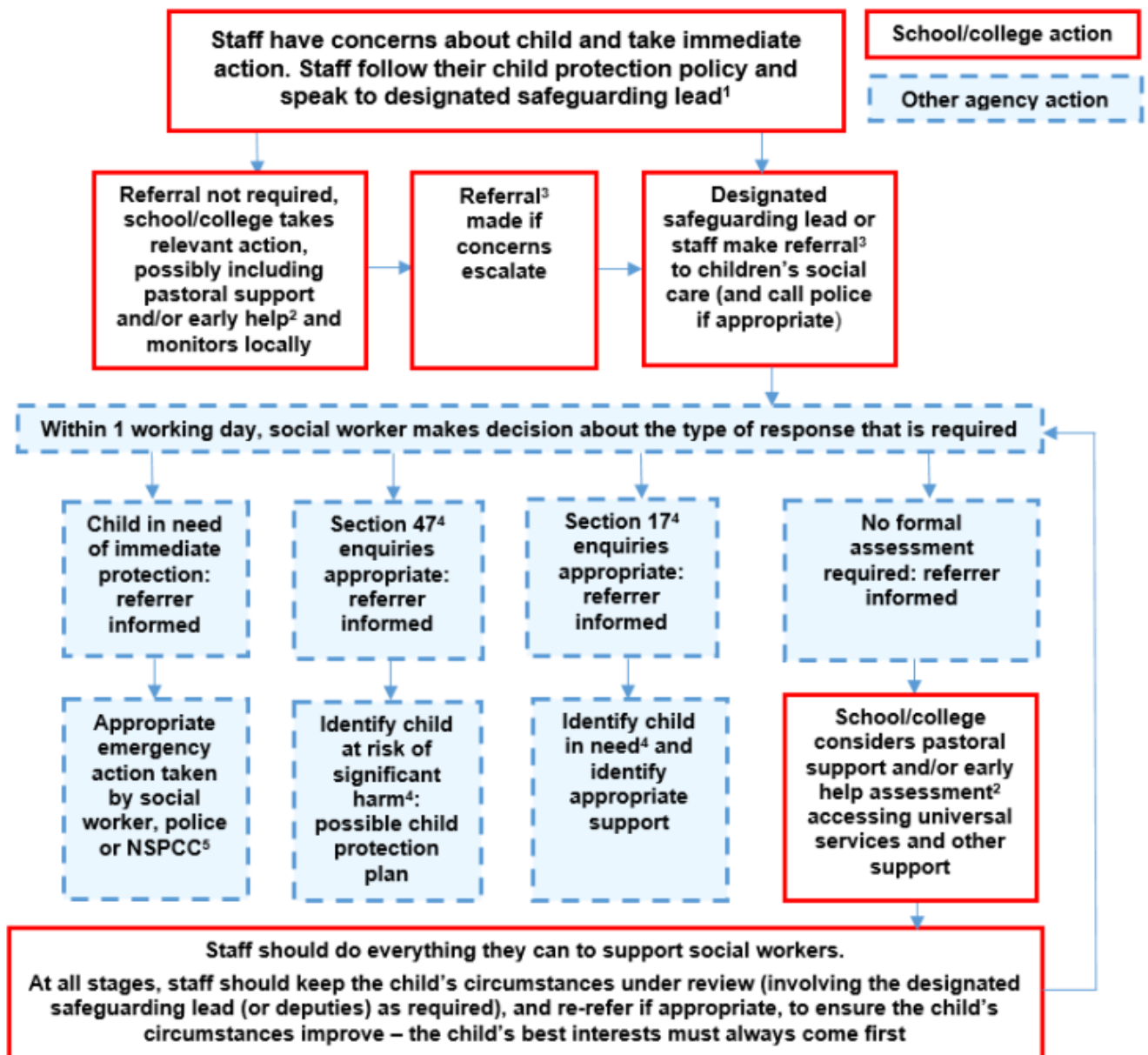
Any member of staff who considers that a pupil may benefit from early help should share their concerns with the DSL or a Deputy in the first instance. The DSL will consider the appropriate action to take in accordance with the [Pan-Dorset Children's Safeguarding Partnership guidance and threshold document](#). The DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate.

If early help is appropriate, staff may be required to support other agencies and professionals in an early help assessment and will be supported by the DSL in carrying out this role. Any such cases will be kept under review and consideration given to a referral to children's social care for assessment for statutory services if the situation does not appear to be improving or is getting worse.



Source: *Working Together to Safeguard Children 2023*

## Actions where there are concerns about a child



<sup>1</sup> In cases which also involve a concern or an allegation of abuse against a staff member, see Part four of Keeping Children Safe in Education 2023.

<sup>2</sup> Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one . [Working Together to Safeguard Children](#) provides detailed guidance on the early help process.

<sup>3</sup> Referrals should follow the process set out in the [local threshold document](#) and local protocol for assessment. Chapter one of . [Working Together to Safeguard Children](#).

<sup>4</sup> Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of . [Working Together to Safeguard Children](#).

<sup>5</sup> This could include applying for an Emergency Protection Order (EPO)

**Source: Keeping Children Safe in Education 2023**

## B. Child Protection Procedures

These procedures should be read in conjunction with 'Keeping Children Safe in Education, Part One: Information for all School and College Staff'.

**All incidents and concerns about a child's welfare should be referred to the DSL.**

- **It is the responsibility of any staff or volunteers within the Milton Abbey community to share any concern where there is a suspicion that a child's safety or welfare is at risk. 'If you see something, say something'.**
- **Concerns should be raised through the school's reporting software, MyConcern.**
  - **In the event of an emergency, a member of the safeguarding team should be contacted immediately.**

**The DSL will:**

- **Assess any concern/risk, and also inform the Headmaster and where appropriate relevant Housemaster/ Housemistress.**
- **Inform parents/guardians unless there is good reason to believe that involving parent/guardians would put the young person at risk of harm.**
  - *The school will endeavour to ensure that each pupil on roll has at least two emergency contacts as per the guidance in KCSIE.*
- **Seek advice or make a referral via the Dorset Safeguarding Standards Team, the Children's Advice and Duty Service (ChADS) and/or the police immediately if at any point there is a concern a young person has been harmed or is at risk of significant harm.**

### 1. What Is Child Protection?

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

### 2. What Is Significant Harm?

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

### 3. Purpose of These Procedures

These procedures explain what action should be taken if there are concerns that a child is or might be suffering harm. A 'child' is a person under 18 years, but the principles of these procedures apply to all pupils at this school, including those over 18.

### 4. Responsibilities and Roles (Refer Section D for Safeguarding Leadership Roles)

**All staff and volunteers will:**

- Fully comply with the school's policies and procedures, attend appropriate training, and inform the Designated Safeguarding Lead of any concerns. The Governing Body will ensure that the mechanisms are in place to support all staff to understand and discharge their role and responsibilities to safeguarding all pupils in our school.
- The Senior Leadership team, DSLs and DDSLs and the Governing Body will read and sign to say they have read the full guidance of Keeping Children Safe in Education.
- All staff who work directly with children will read and sign to say they have read and understood Part One and Annex B of KCSIE

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- All staff in the school who do not have regular contact and do not work directly with children will read and sign to say they have read and understood Annex A and Annex B of KCSIE.

Governing bodies are accountable for ensuring their school has an effective child protection policy. Governors receive appropriate safeguarding and child protection training at induction and at regular intervals. The Safeguarding Governor will ensure that training provides governors with the knowledge to ensure that the school's safeguarding policies and procedures are effective. This policy is reviewed by The Council of Milton Abbey School Limited on an annual basis. The policy is also available publicly via the school website.

The statutory safeguarding guidance for schools, Keeping Children Safe in Education states that all schools and colleges should have 'a senior board level (or equivalent) lead to take leadership responsibility' for safeguarding.

The person who takes **leadership responsibility for safeguarding on the governing body** of this school is: **Ian Bromilow**

This school has a Designated Safeguarding Lead (DSL). This is the person who takes lead responsibility for safeguarding. Any concerns about children should be discussed with/ reported to the DSL who will decide what action to take including referring to Children's Social Care or Police as appropriate. More information about the DSL role can be found in Annex C of KCSIE.

The **Designated Safeguarding Lead** in this school is: **Chris Barnes**.

The **Deputy Designated Safeguarding Leads** in this school are **Sarah Badley (Senior Deputy DSL), Zoe Livingstone, Ashley Garrett, Claudia Hindle, Jane Naylor, Martyn Peel, and Piers Webb**.

*Note: The Senior Deputy Head is also the Designated Safeguarding Lead and a member of the senior management team. Records and sharing of information between the two roles to maintain oversight of pupil wellbeing and welfare will be amended within this Policy should the post holder or job description change. All members of the Safeguarding Team will have the required 'Multi-Agency Working Together in Safeguarding' (previously Level 3) training as provided by Pan-Dorset Safeguarding Children's Partnership and update this training every two years.*

In addition, [Dorset Children's Social Care](#) can provide advice and guidance on safeguarding and child protection matters. See [Appendix 1](#) for contact details.

All action is taken in line with the following guidance:

- DfE guidance – Keeping Children Safe in Education (2023)
- [Working Together to Safeguard Children 2023](#) – published by HM Government
- Bournemouth, Dorset and Poole [Inter-Agency Safeguarding Procedures & Guidance](#), accessed through the Pan-Dorset Children's Partnership website [www.dorsetlscb.co.uk](http://www.dorsetlscb.co.uk)
- [What to do if you're worried a child is being abused](#) – Government Guidance (2015)

The designated teacher on commencement of sections 4 to 6 of the Children and Social Work Act 2017, has the responsibility to promote the educational achievement of children who are looked after (as above) and those children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from the state care outside England and Wales.

A previously looked after child potentially remains vulnerable and all staff should have skills knowledge and understanding to keep previously looked after children safe. When dealing with looked after children and previously looked after children it is important that all agencies work together, and prompt action is taken on concerns to safeguard these children, who are a particularly vulnerable group.

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The Designated teacher must have appropriate training and the relevant qualifications and experience. The **Designated Teacher** in this school is: **Chris Barnes**.

### **What staff need to know**

All staff should be aware of systems within the school which support safeguarding, and these are explained as part of staff induction. This should include:

- child protection policy (which should amongst other things also include the policy and procedures to deal with child-on-child abuse)
- behaviour policy and anti-bullying policy (which includes measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying)
- staff behaviour policy (staff code of conduct)
- policy for managing low-level concerns and allegations against staff, governors and volunteers
- whistleblowing policy
- safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods and
- role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies).

Copies of policies and a copy of Part one (or Annex A, if appropriate) of Keeping Children Safe in Education is provided to all staff at induction.

All staff should receive appropriate safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) at induction. The training should be regularly updated. In addition, all staff should receive safeguarding and child protection (including online safety) updates (for example, via email, e-bulletins, and staff meetings), as required, and at least annually, to continue to provide them with relevant skills and knowledge to safeguard children effectively.

All staff should be aware of their local early help process and understand their role in it.

All staff should be aware of the process for making referrals to local authority children's social care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.

All staff should know what to do if a child tells them they are being abused, exploited, or neglected. Staff should know how to manage the requirement to maintain an appropriate level of confidentiality. This means only involving those who need to be involved, such as the designated safeguarding lead (or a deputy) and local authority children's social care. Staff should never promise a child that they will not tell anyone about a report of any form of abuse, as this may ultimately not be in the best interests of the child.

All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse and/or neglect. Nor should a victim ever be made to feel ashamed for making a report.

All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or are being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the designated safeguarding lead if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

## 5. What is Child Abuse?

### i) Abuse

A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. 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. Children may be abused by an adult or adults or by another child or children.

### ii) Physical Abuse

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

### iii) Emotional Abuse

The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to 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 the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

### iv) Sexual Abuse

A form of abuse that 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.
- Grooming a child in preparation for abuse (including via the internet).

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

### v) 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 because of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food and clothing, 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 caretakers)
- Ensure access to appropriate medical care or treatment
- It may also include neglect of, or unresponsiveness to a child's basic emotional needs.

It is accepted that in all forms of abuse there are elements of emotional abuse, and that some children are subjected to more than one form of abuse at any one time. In most cases multiple issues will overlap with one another.

## **6. Recognising Child Abuse – Signs and Symptoms**

Keeping Children Safe in Education is clear that all school and college staff members should be aware of the signs of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection.

### **6.1 Assessment of Risk Outside the Home (formerly Contextual Safeguarding)**

It is also important that staff are aware and consider the impact of environmental factors that are present in a child's life that may be a threat to their safety and/or welfare. 'Contextual Safeguarding' relates to incidents that are associated with factors or other pupils within or external to the school setting. Children can be vulnerable to multiple extra-familial harms including, but not limited to:

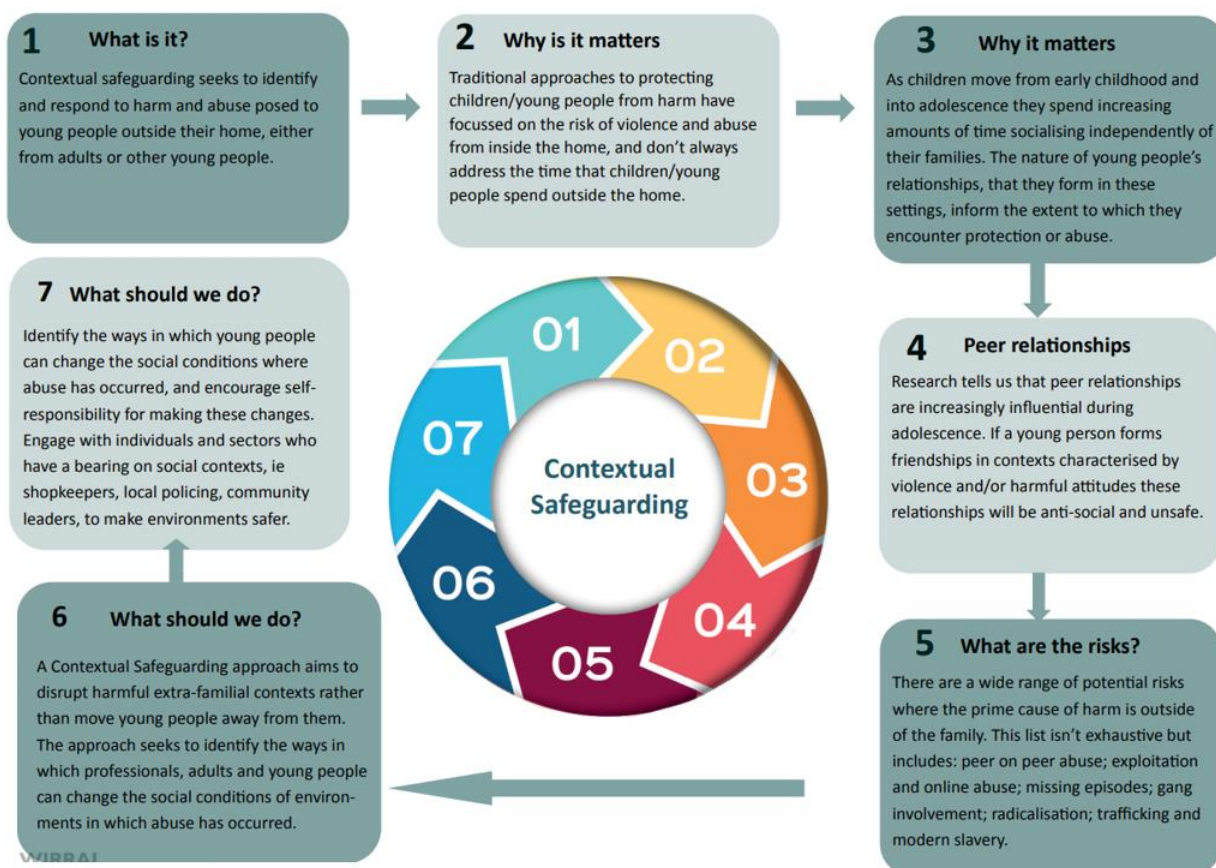
- Sexual exploitation
- Sexual abuse
- Serious youth violence
- Criminal exploitation
- County lines

These factors are an important part of discussing and sharing concerns with the DSL, awareness and associated risks should be considered to understand the measure in place to manage these.

Assessment of risk outside of the home is an approach to understanding, and responding to, young people's experiences of significant harm and risk beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships.

Children's social care practitioners and school staff need to engage with individuals and sectors who do have influence over/within extra-familial contexts, and recognise that assessment of, and intervention with, these spaces are a critical part of safeguarding practices.

Assessment of risk outside of the home, therefore, expands the objectives of child protection systems in recognition that young people are vulnerable to abuse in a range of social contexts. If we are concerned a child is being exploited in an extra-familial context, as previously outlined, we will follow the procedures set out in this document and consult or refer to children's social care. (<https://contextualsafeguarding.org.uk/>)



Recognising child abuse is not always easy, and it is not the responsibility of school staff to decide whether or not child abuse has definitely taken place or if a child is at significant risk. They do, however, have a clear individual responsibility to act if they have a concern about a child's welfare or safety or if a child talks about (discloses) abuse. They should maintain an attitude of 'it could happen here' and always act in the best interests of the child.

Knowing what to look for is vital to the early identification of abuse and neglect. If staff are unsure, they should **always** speak to the Designated Safeguarding Lead (or Deputy). Any concerns about a child's welfare, should be acted upon immediately.

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

## 6.2 Responding to Abuse

All staff should be aware of the [process for making referrals to Children's Social Care](#) and for statutory assessments under the Children Act 1989, especially [section 17](#) (children in need) and [section 47](#) (a child suffering or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.

**Appendix 3 details examples of possible indicators of each of the four kinds of abuse.**

## 6.3 Mental Health

Milton Abbey has an awareness that mental health problems can in some cases be an indicator that a child is suffering or has suffered abuse, neglect or exploitation.

Staff would not attempt to make a Mental Health diagnosis; however, they are in a good position to observe the children on a daily basis and identify those whose behaviour indicates they may be experiencing a mental health problem or be at risk of developing one. All staff need to have an awareness that mental health

problems can in some cases be an indicator that a child is suffering or has suffered abuse, neglect or exploitation.

When Children have suffered **adverse childhood experiences (ACEs)**, this may impact on them throughout their lives. This can also then have an impact on their behaviour, their ability to learn and affect their mental health.

If staff have a concern about the mental health of a child, they will follow school policy and report their concerns to the DSL.

#### **6.4 Children with Special Educational Needs and who are Disabled (SEND)**

Research shows that children with special educational needs and who are disabled (SEND) are especially vulnerable to abuse and adults who work with them need to be vigilant and take extra care when interpreting apparent signs of abuse or neglect. Staff at Milton Abbey need to be alert to the extra vulnerabilities of SEND children in a boarding setting and be alert to inappropriate pupil relationships and the potential for child-on-child abuse, particularly as there is an unequal distribution of boys and girls in the school as well as a high proportion of pupils with SEND.

Additional barriers can exist for adults who work with SEND children in respect of recognising abuse and neglect. These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- Children with SEN and who are disabled can be disproportionately impacted by things like bullying without outwardly showing any signs;
- Communication barriers and difficulties in overcoming these barriers.

The child protection procedures will be followed in a child with SEND discloses abuse or there are indicators of abuse or neglect. There are no different or separate procedures for children with SEND.

Staff responsible for intimate care of children will undertake their duties in a professional manner at all times and in accordance with the school's Intimate Care Policy.

The Lead SENCO at Milton Abbey is Laura Kleiser.

#### **6.5 Children who are Lesbian, Gay, Bisexual or Trans (LGBT)**

The school recognises that the fact a child or young person may be LGBT is not in itself an inherent risk factor for harm, however children who are LGBT can be targeted by other children. The school also recognises that children who are perceived by others to be LGBT regardless of whether they are or not, can be just as vulnerable as those who identify as LGBT.

All staff should endeavour to reduce additional barriers faced by children and young people who are LGBT by providing a safe space for them to speak out or share their concerns.

LGBT inclusion is part of the Relationships Sex Education curriculum at Milton Abbey.

### **7. Online Safety**

The breadth of issues classified within online safety is considerable but can be categorised into four areas of risk:

- **Content:** being exposed to illegal, inappropriate or harmful material
- **Contact:** being subjected to harmful online interaction with other users
- **Conduct:** personal online behaviour that increases the likelihood of, or causes, harm
- **Commerce:** risks such as online gambling, inappropriate advertising, phishing and/or financial scams

*Taken from Keeping Children Safe in Education Part One*

The school recognises that its pupils will use mobile phones and computers at some time. They are a source of fun, entertainment, communication and education. However, we know that some adults and young people will

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use these technologies to harm children. The harm might range from sending hurtful or abusive texts and emails, to enticing children to engage in sexually harmful conversations, behaviours, web cam photography or face-to-face meetings. Cyber-bullying by pupils via emails and texts will be treated as seriously as any other type of bullying and managed through our anti-bullying procedures.

Chatrooms and social networking sites are the most obvious sources of inappropriate and harmful content and behaviour, which pupils are not allowed to access in school. Some pupils will undoubtedly 'chat' on mobiles or social networking sites at home and the school encourages parents to consider measures to keep their children safe when using social media.

The school has an [Online Safety Policy](#) that is known to all staff and pupils and is addressed through the school induction programme for staff and pupils.

### **7.1 Use of Mobile Technology**

The school has a clear Online Safety Policy which includes the use of mobile technology (including phones and cameras) which reflects the fact that many children have unlimited and unrestricted access to the internet via mobile phone networks. This access means some children whilst at school can sexually harass, bully, and control others via their mobile and smart technology, share indecent images consensually and non-consensually (often via large chat groups) and view and share pornography and other harmful content.

The school's Online Safety Policy and Acceptable Use Policy for pupils sets out the expectations on pupils.

All staff should use mobile devices in accordance with the guidance set out in the Staff Code of Conduct, Online Safety Policy and Acceptable Use Policy for staff.

### **7.2 Filters and monitoring**

The Governing Body will do all that they reasonably can to limit children's exposure to the above risks from the school's IT system. As part of this process, the governing body will ensure there are appropriate filters and monitoring systems in place. Whilst considering their responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn, taking into consideration the age range and number of pupils, and how often they access the IT system. The appropriateness of any filters and monitoring systems will be informed in part by the risk assessment required by the Prevent Duty. (<https://www.saferinternet.org.uk/>).

Whilst filtering and monitoring are an important part of the online safety picture for the school to consider, it is only one part. The Governors will consider a whole school approach to online safety which will include a clear policy on the use of mobile technology in the school in accordance with KCSIE.

The Governing Body will regularly review the effectiveness of school filters and monitoring systems in place, ensuring that "over blocking" does not lead to unreasonable restrictions as to what children can be taught with regard to online teaching and safeguarding.

The Governing Body will ensure that the senior leadership team:

- Are aware of and understand the systems in place
- Manage systems effectively
- Know how to escalate concerns when identified

Governors will ensure that, as part of the requirement for staff to undertake regularly updated safeguarding training and the requirement to ensure children are taught about safeguarding, including online safety, that online safety training for staff is integrated, aligned and considered as part of the overarching safeguarding approach. The Governing Body must complete Safeguarding training on appointment to their role and the Chair and Safeguarding Lead governor must undertake training every 2 years.

Staff will be aware of the filtering and monitoring systems in place and will know how to escalate concerns where they are identified. Staff will be made aware of their expectations and responsibilities relating to filtering and monitoring systems during their induction.

The school will communicate with parents and guardians to reinforce the importance of children being safe online. Links to resources and webinars are included on the school's safeguarding page on the school website.

## **8. Children who harm others (child-on-child abuse)**

Our school recognises that the harm caused to children by the harmful and bullying behaviour of other children can be significant. Even if there are no reported cases of child-on-child abuse, the school acknowledges that this does not mean that it is not taking place. Particular vigilance should be observed in the boarding houses where there may be greater potential for inappropriate relationships and child-on-child abuse given the unique nature of boarding accommodation and risks associated with children sharing overnight accommodation.

Children who harm others should be held responsible for their harmful behaviour and the school staff alerted to the fact that they are likely to pose a risk to other children in the school, home and community. Where this harm involves sexual abuse, serious physical or serious emotional abuse, the safeguarding procedures set out in this policy will be applied. This school recognises that children who harm others are likely to have considerable needs themselves and may have experienced or be experiencing significant harm themselves.

Where a child has caused significant harm to another child, through sexual abuse or serious physical or emotional abuse, the school will make separate referrals, where thresholds are met, to Children's Social Care of the victim(s) and perpetrator(s).

Such children and young people are likely to be children in need and some will, in addition, be suffering, or at risk of suffering, significant harm, and may themselves be in need of protection. Children and young people who abuse others should be held responsible for their abusive behaviour, while being identified and responded to in a way that meets their needs as well as protecting others.

At Milton Abbey, we aim to create an environment that enables pupils to build a secure emotional platform to support their personal, social and academic wellbeing. This environment should enable pupils and staff to cultivate an inclusive community that fosters positive attitudes, relationships and a sense of personal wellbeing and fulfilment. This is achieved throughout our curriculum, but also through ensuring pupils have clear guidance on what is expected of them within the school community.

The Behaviour Policy and Anti-Bullying Policy outline the school's expectations of pupils' conduct and behaviour. The Welfare and Safeguarding briefing delivered to all pupils each academic year provides an opportunity for pupils to ask questions and check their understanding of these expectations. There is also pastoral support available for pupils through their House and Tutoring teams and the Health Centre, which includes access to counselling services where appropriate.

Children with Special Educational Needs or who are disabled (SEND) are especially vulnerable to abuse, adults who work with them need to be vigilant and take extra care when interpreting apparent signs of abuse or neglect. There are no different or separate procedures for such children if there are indicators of abuse or neglect. This policy does however recognise that children with SEND can be disproportionately impacted by things like bullying, without outwardly showing any signs.

Milton Abbey recognises that children are capable of abusing other children. The school will assess if any behaviours are potentially abusive by considering if there is a large difference/imbalance of power (e.g. through age, size, ability or development) between the pupils concerned; or if the perpetrator has continually tried to harm one or more pupil(s) or if the perceived intentions of the perpetrator are of concern.

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## 8.1 Bullying

Bullying is behaviour by an individual or group, can be an isolated event or repeated over time, that intentionally hurts another individual or group either physically or emotionally. Bullying can take many forms (for instance, cyber-bullying via text messages or the internet), and is often motivated by prejudice against particular groups, for example on grounds of race, religion, gender, sexual orientation, or because a child is adopted or has caring responsibilities. It might be motivated by actual differences between children, or perceived differences. Stopping violence and ensuring immediate physical safety is obviously a school's first priority but emotional bullying can be more damaging than physical.

While bullying between children is not a separate category of abuse and neglect, it is a very serious issue that can cause considerable anxiety and distress. At its most serious level, bullying can have a significant effect on a child's wellbeing and in very rare cases has been a feature in some young people taking their own lives.

All incidences of bullying, including cyber-bullying and prejudice-based bullying must be reported and will be managed through our anti-bullying procedures which pupils are informed of through their induction process. Bullying is addressed at regular intervals in the (PSHE) curriculum. If the bullying is particularly serious, or the anti-bullying procedures are deemed to be ineffective, the Headmaster and the DSL will consider implementing safeguarding procedures.

The school takes all bullying and discrimination seriously. Negative behaviour toward people based on their personal characteristics can be especially harmful so this will be considered when the school is deciding on a response and may result in a more serious sanction.

For further information please see the DfE guidance, [Preventing and Tackling Bullying](#), 2017 and our school's Anti-bullying Policy.

## 8.2 Allegations Made by Children About Other Children (including Child-on-Child Abuse and Sexual Violence and Harassment)

Children can abuse other children (often referred to as child-on-child abuse) and it can take many forms. It can happen both inside and outside of school and online.

It is important that all staff recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports.

This can include (but is not limited to): bullying (including cyberbullying, prejudice-based and discriminatory bullying); abuse within intimate partner relationships; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexual violence and sexual harassment; consensual and non-consensual sharing of nude and semi-nude images and/or videos; causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party; up skirting and initiation/hazing type violence and rituals.

Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

It is more likely that girls will be the victims of sexual violence and more likely that sexual harassment will be perpetrated by boys.

Milton Abbey ensures that all staff are aware of the importance of:

- Making it clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up.
- Challenging behaviours (which are potentially criminal in nature) such as grabbing bottoms, breasts, vaginas and penises. Dismissing or tolerating such behaviours risks normalising them.

- Recognising that children with SEND can be especially vulnerable. Disabled and deaf children are three times more likely to be abused than their peers. Additional barriers can sometimes exist when recognising abuse in SEND children.
- The school will ensure that plans are in place to support all children at Milton Abbey and to ensure that they are protected and that any additional needs are taken into consideration as part of this process.
- When the school considers issues of sexual violence and harassment between children, we will seek support from our Children's Social Care partners.

If one pupil causes harm to another, it is not always necessary for it to be dealt with through a referral to Children's Social Care: sexual experimentation within 'normal parameters', bullying and fighting, for example, are not generally seen as child protection issues unless there is reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm. All incidents will, however, be taken seriously, parents/carers will be contacted, and appropriate action taken.

The nature and severity of the allegation or concern will determine whether staff will implement the school's anti-bullying or other school procedures or whether a referral needs to be made to social workers or the Police. The DSL should be consulted if there is any doubt about the right course of action.

A referral to Children's Social Care will be made in all cases of domestic abuse relating to young people who experience physical, emotional, sexual and/or financial abuse, or coercive or controlling behaviours in their intimate relationships.

A referral to Children's Social Care will be made if a child or young person displays sexually harmful behaviour. This involves one or more children engaging in sexual discussions or acts that are inappropriate for their age or stage of development. It is also considered harmful if it involves coercion or threats of violence or if one of the children is much older than the other.

The process for managing sexually harmful behaviour can be found in the inter-agency safeguarding procedures on the PDSCP website. In brief, a multi-agency meeting should be convened by Children's Social Care following a referral and an action plan agreed.

A school risk assessment will be put in place, preferably by way of a meeting, which includes parents/carers and other professionals where they are involved.

Staff should not dismiss abusive behaviour as 'normal' between young people and should not develop high thresholds before taking action. Staff responses should be underpinned by the principle that there is a **zero tolerance approach to abuse**.

Staff should be aware of the potential uses of information technology for bullying and abusive behaviour between young people.

The school's procedures in managing Sharing Nudes is included in Appendix 7 of this document.

### **8.3 Managing and Dealing with Allegations Against Other Pupils: (Refer to [Appendix 6](#))**

As a school we will minimise the risk of allegations against other pupils by:

- Providing a developmentally appropriate PSHE syllabus which develops pupils' understanding of acceptable behaviour and keeping themselves safe.
- Having systems in place for any pupil or parent to raise concerns with staff, knowing that that they will be listened to, believed and valued.
- Providing interventions and peer support to those pupils identified as being at risk.
- Developing robust risk assessments and providing targeted interventions for pupils identified as being a potential risk to other pupils.
- Having robust anti-bullying policies and procedures.
- Having and following our policy on Sex and Relationships.

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Allegations of child-on-child abuse will be investigated and dealt with as outlined in Appendix 6. Should an allegation be made by a pupil against another pupil, staff must consider whether the disclosure raises safeguarding and/or child protection concerns. If one child causes harm to another this will not necessarily be dealt with as abuse: bullying, fighting and harassment between children are not generally child protection issues and their behaviour will be dealt with under the school's anti-bullying and pupil behaviour and discipline policies.

The school recognises that children are vulnerable to abuse by other children and such abuse will be taken as seriously as abuse by adults. It is likely that such allegations will feature some of the following and therefore it might be appropriate to regard a young person's behaviour as abusive if:

- There is a difference in power (e.g. age, gender, size, intellect, development/SEND) between the young people concerned; and/or
- The perpetrator has repeatedly tried to harm one or more children; and/or
- There are concerns about the intention of the alleged perpetrator (e.g. the acts could be considered exploitative); and/or
- It is of a serious nature that is possibly a criminal offence.

**Staff must be alert to the gendered nature of child-on-child abuse; safeguarding issues may include physical, emotional and sexual abuse and/or exploitation. Staff must be alert to child-on-child abuse, or inappropriate pupil relationships especially where there is a gender imbalance in school intake, as at Milton Abbey.**

Examples of safeguarding and child protection issues made by a pupil against another may include:

- **Physical Abuse:** Aggression, coercion, violence and threats of violence (particularly pre-meditated). 'Hazing'; the practice of rituals and other activities involving harassment and/or humiliation used as a way of initiating a person into a House/group/team. Forcing others to use drugs or alcohol.
- **Emotional Abuse:** Blackmail, bribery or extortion, threats, intimidation and harassment including online. Targeted children may feel persistently frightened or in danger, anxious, discomfort and/or humiliation. Attempts may be made by the perpetrator to ensure secrecy or dismiss repeated verbal abuse as 'banter'.
- **Sexual Abuse, Harassment and/or Exploitation:** Indecent exposure and/or touching e.g. breast/bottom or sexual assaults and harassment. Exposing genitals or masturbating in public, sexual degradation, humiliation, of self or others. Photographing/recording or forcing other children to perform/watch indecent acts. Force, coercion and/or potential grooming activities involving indecent images, 'sexting' (youth produced sexual imagery) and/or use of sexual language which is offensive or makes explicit sexual suggestions and/or cyber-sexual bullying involving aggression.
- **Up-skirting:** The Voyeurism (Offences) Act 2019, which is commonly known as the Up-skirting Act, came into force on 12 April 2019. Up-skirting is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and/or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification or cause the victim humiliation, distress or alarm. Up-skirting is a criminal offence. Anyone of any sex can be a victim of up-skirting. We will ensure that all staff act immediately should an incident of up-skirting arise in our school and report this to the police / social care immediately.

It is not the responsibility of school staff to investigate suspected abuse. The school is not an investigation or intervention agency for child protection, but it has an important role to play at the recognition and referral stages, the school will take into account the procedures published by PDSCP when dealing with allegations of child-on-child abuse. Refer to Appendix 6.

## 8.4 The use of 'Reasonable force'

We do not routinely use any form of physical contact in order to manage the children however there may be occasions when the school staff have to physically restrain pupils using 'reasonable force' only to prevent them from hurting themselves or others, from damaging property, or from causing disorder.

This may include guiding a child to safety by the arm, or breaking up a fight, to prevent violence or injury and this action should be taken using no more force than is needed.

Physical restraint is used a last resort.

If a child has some additional needs, a care plan will be put in place to address actions to be taken prior to using any form of positive handling, this may be by distraction techniques, removing any objects which could cause harm to the child, and using de-escalation strategies.

School staff will:

- Familiarise themselves with the school's policy on the use of reasonable force and the DfE's guidance regarding use of reasonable force in school: '[Use of Reasonable force, Advice for headteachers, staff and governing bodies](#)' July 2013 and with Keeping Children Safe in Education Part One.
- Follow the school's Behaviour Policy

The school will offer training to staff in appropriate use of physical intervention and/or restraint.

## 8.5 Sexual Violence and Harassment

All staff should recognise that children can abuse other children. All staff should be clear about the school's policy and procedure about child-on-child abuse.

Sexual violence and harassment can occur between two children of any age or sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Sexual violence and sexual harassment exist on a continuum and may overlap. They can occur online and offline (both physical and verbal) and are never acceptable.

The school's initial response to a report from a child is important. It is essential that **all victims are reassured that they are being taken seriously and that they will be supported and kept safe**. Children should also be reassured that the law is in place to protect rather than to criminalise them.

Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT (lesbian, gay, bisexual and transgender) children are at greater risk.

Ultimately, any decisions are for the school to make on a case-by-case basis, with the DSL or deputy taking a lead role and using their professional judgement, supported by other agencies, such as Children's Social Care and the police as required.

The school acknowledges that it should be part of discussions with statutory safeguarding partners to agree the levels for different types of assessment and services to be commissioned and delivered. Early help and the option to manage a report internally are not mutually exclusive and the DSL can seek early help for both the victim and the perpetrator while managing a report of sexual violence or harassment.

Reports of sexual violence and sexual harassment are likely to be complex and require difficult decisions to be made, often quickly and under pressure. Pre-planning and effective policies will provide the school with the foundation for a calm, considered and appropriate response to any reports.

Following a report of sexual violence, the DSL (or deputy) should make an immediate risk and needs assessment considering:

- the victim;
- the alleged perpetrator;

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- all the other children (if appropriate adult students and staff).

The school needs to consider the following options for managing a report of sexual violence or sexual harassment:

- Manage internally;
- Early Help;
- Safeguarding children – referral to Children’s Social Care;
- Reporting to the Police – in parallel to Children’s Social Care.

If children require safeguarding and a referral to Children’s Social Care is made the process for managing sexually harmful behaviour can be found in the inter-agency safeguarding procedures on the PDSCP website. In brief, a multi-agency meeting should be convened by Children’s Social Care following a referral and an action plan agreed.

A school risk assessment will be put in place, preferably by way of a meeting, which will consider:

- The wishes of the victim in terms of how they want to proceed
- The nature of the alleged incident
- The ages of the children involved
- The developmental stages of the children involved
- Any power imbalance between the children
- Is the incident a one off or a sustained pattern of abuse?
- Are there ongoing risks to the victim, other children, school staff?
- Contextual safeguarding
- The importance of understanding intra familial harms and any necessary support for siblings following incidents
- All staff should act in the best interests of the child.

Staff should not dismiss abusive behaviour as ‘normal’ between young people and should not develop high thresholds before acting. Staff should be aware of the importance of:

- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- Not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and
- Challenging and reporting behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras, lifting up skirts and up skirting.
- Dismissing or tolerating such behaviours risks normalising them

There may be delays to a criminal process, but the school should not wait for the outcome before protecting the victim, alleged perpetrator and other children in the school.

The school needs to manage the balance between supporting the victim and ensuring the alleged perpetrator has an education and safeguarding support themselves. Appropriate ongoing support should be offered to the victim.

**The underpinning principle at the school is that there is a zero-tolerance approach to sexual violence and sexual harassment, and it is never acceptable and will not be tolerated.**

## 9. Pupils Engaging in Under-Age Sexual Activity

Sexual activity where one of the partners is under the age of 16 is illegal, although prosecution of young people who are *consenting partners of a similar age* is not usual. DSLs will exercise professional judgement when deciding whether to refer or take advice from social workers, taking into account such things as any imbalance of power, wide difference in ages or developmental stages etc.

Any form of sexual activity between pupils of any age is prohibited and constitutes serious misconduct under our Behaviour Policy.

Where a child is under the age of 13, penetrative sex is classified as rape under the Sexual Offences Act 2003 so must be reported to appropriate agencies (which may include social services or the police) in every case.

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

Staff should respond to allegations of abuse, sexual violence and sexual harassment in line with reference 8.4.

## **10. Serious Violence and Child Exploitation (Inc. Child Sexual Exploitation)**

### **10.1 Criminal Networks and Gangs**

Children could be at risk of becoming involved in serious violent crime or with individuals associated with criminal networks or gangs. Any concerns about this will be discussed with the DSL who will take appropriate action, which might include completing a [CAROLE](#) (Children At Risk Of or Linked to Exploitation) risk assessment (as outlined by the Pan Dorset Safeguarding Children Partnership) or by sharing 'soft intelligence' with Dorset Police and/ or Children's Services.

Staff should familiarise themselves and be aware of indicators that may signal a child is at risk of or involved in serious crime. This may include the following:

- Increased absence from school
- Changes in friendships or relationships with older individuals or groups
- A significant decline in performance
- Signs of self-harm
- A significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions are also an indicator that a child may have been approached by or involved with individuals associated with criminal networks or gangs<sup>2</sup>.

### **10.2 County Lines**

'County Lines' refers to criminal networks involved in exporting illegal drugs, using dedicated mobile phones lines or other forms of 'deal line'. This involves young people through gangs or drug debt using the internal trafficking of young people for criminal exploitation. Young people are groomed using the same techniques as above, with them completing a task on behalf of another individual or group of individuals which is of a criminal nature, this can also involve threats of serious violence and kidnap towards victims and their families. Children are "trafficked" as part of the exploitation. They have their transport arranged for them to sell drugs, firearms or sex. Young people will go missing for extended periods of time, missing or persistently absent from education and moving away from their friendship groups.

### **10.3 Child Sexual Exploitation (CSE)**

Child Sexual Exploitation is a form of abuse that involves exploitative situations, contexts and relationships where young people receive something (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money, mobile phones) as a result of their performing, and/or another or others performing on them, sexual acts. It can occur through the use of technology without the child's immediate recognition; e.g. being

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<sup>2</sup> Further advice can be found in the Home Office's '[Preventing Youth violence and Gang Involvement](#)' and its '[Criminal exploitation of Children and Vulnerable Adults: County Lines guidance](#)'.  
(<https://www.gov.uk/government/publications/serious-violence-strategy>)

persuaded to post sexual images on the Internet/mobile phones without immediate payment or gain. Indicators can be related to changes in emotional well-being, substance misuse, children who go missing or stay out late and children who miss school, or do not take part in school.

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

As set out in the [Serious Violence Strategy](#) published by the Home Office, criminal exploitation is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18 into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. Child criminal exploitation does not always involve physical contact; it can also occur through the use of technology.

Recognition of child exploitation is part of staff training. We note that any child or young person may be at risk, regardless of family background or other circumstances, and can experience significant harm to physical and mental health.

Due to the grooming methods used by abusers, it is common for young people not to recognise they are being abused and may feel they are 'in a relationship' and acting voluntarily.

Any concerns about child sexual exploitation/criminal exploitation, county lines or serious violence will be discussed with the DSL who will take appropriate action, which might include completing a risk assessment form. The form and more detailed local procedures are in the inter-agency safeguarding procedures on the PDSCP website.

#### **10.5 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.

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff.

It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: [www.actionagainstabduction.org](http://www.actionagainstabduction.org) and [www.clevernevergoes.org](http://www.clevernevergoes.org).

#### **10.6 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).

Cyber-dependent crimes include:

- Unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded;
- Denial-of-service or distributed denial-of-service (DoS or DDoS) attacks or 'booting'. These are attempts to make a computer, network, or website unavailable by overwhelming it with internet traffic from multiple sources; and,

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- Making, supplying, or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets, and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skill 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 DSL (or a deputy), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests. Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Additional advice can be found at: [Cyber Choices, 'NPCC- When to call the Police'](#) and [National Cyber Security Centre](#) - NCSC.gov.uk.

## 10.7 Modern Slavery

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the National Referral Mechanism is available in the statutory guidance "[Modern slavery: how to identify and support victims \(May 2022\)](#)".

## 11. Forms of Abuse Linked to Culture, Faith or Belief

All staff in this school will promote mutual respect and acceptance of those with different faiths and beliefs. Some forms of abuse are linked to these and staff should strive to suspend professional disbelief (i.e. that they 'could not happen here') and to report promptly any concerns to the DSL who will seek further advice from statutory agencies, prior to contacting parents/carers.

### 11.1 Honour Based Abuse (HBA)

Honour Based Abuse is a crime or incident which has or may have been committed to protect or defend the honour of the family and/or community. It can exist in all communities and cultures and occurs when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code. Females are predominantly, but not exclusively, the victims and the violence is often committed with some degree of approval and/or collusion from family or community members.

All forms of so-called honour- based violence are abuse, regardless of the motivation, and should be referred accordingly. However, there are some significant differences in the immediate response required as involving families in cases of forced marriage is dangerous:

- It may increase the risk of serious harm to the victim. Experience shows that the family may punish them for seeking help;
- Relatives, friends, community leaders and neighbours should not be used as interpreters – despite any reassurances from this known person.

Any suspicion or disclosure of violence or abuse against a child in the name of honour will be treated seriously and an immediate referral to Children's Social Care will be made with reference to the appropriate thresholds tool for that child's local authority.

### 11.2 Female Genital Mutilation (FGM)

Female Genital Mutilation is illegal and involves intentionally altering or injuring female genital organs for

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non-medical reasons. It can have serious and long-lasting implications for physical health and emotional well-being.

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

In addition to reporting any concerns to the DSL, teachers (along with regulated health and social care professionals) have a **statutory duty to report personally to the Police** if they discover that female genital mutilation has or appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions.

### **11.3 Forced Marriage**

Forced Marriage is a crime in England and Wales. A forced marriage occurs where one or both people do not or, in cases of people with learning disabilities, cannot consent to the marriage and pressure or abuse is used. It is not the same as arranged marriage. Young people at risk of forced marriage might have their freedom unreasonably restricted or be 'monitored' by siblings. There might be a request for extended absence from school or the pupil might not return from a holiday abroad. We recognise that school staff can play an important role in safeguarding children from forced marriage.

Since February 2023 it has also been a crime to do anything to cause a child to marry before their eighteenth birthday, whether or not violence, threats or any other form of coercion or deception are used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

### **11.4 Radicalisation and Extremism**

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Extremism is defined by HM Government as 'vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs; and/or calls for the death of members of our armed forces, whether in this country or overseas'.

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Terrorism is an action that endangers or causes serious violence. The use of threat must be designed to influence government or intimidate the public to advance a political, religious or ideological cause.

#### Indicators of Extremism or Radicalisation:

This list is **not** exhaustive. Signs and indicators are taken from the [NSPCC Website](#) and [ChildLine](#).

Radicalisation can be really difficult to spot as the signs do not always indicate radicalisation is taking place; it may be normal teenage behaviour or a sign something else is wrong.

Signs that may indicate a child may be being radicalised can include:

- isolating themselves from family and friends
- talking as if from a scripted speech
- unwillingness or inability to discuss their views
- a sudden disrespectful attitude towards others
- increased levels of anger
- increased secretiveness, especially around internet use.



In this school we recognise that safeguarding against radicalisation and extremism is no different from safeguarding against any other vulnerability. There is no single route into extremism, nor is there a single profile that may fit an individual who is drawn into extremism.

Our curriculum promotes respect, acceptance and diversity. Children are entitled to, and encouraged to share, their own and different values and opinions. However, in the context of sharing these opinions and values, they should not engage in extremist behaviours to influence others. We recognise that children with low aspirations may be susceptible to radicalisation and therefore we strive to equip our pupils with confidence, self-belief, respect and acceptance as well as encouraging them to set high standards and expectations for themselves.

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

Any concerns about pupils becoming radicalised or being drawn into extremism will be reported to the Designated Safeguarding Lead who will not speak to parents/carers or other family members at this stage but will take prompt advice from the Police.

### 11.5 Prevent

Prevent is about safeguarding people and communities from the threat of terrorism and violent extremism. Prevent is part of CONTEST, the Government's counter-terrorism strategy. It aims to stop people becoming terrorists or supporting terrorism.

The Prevent strategy:

- Responds to the ideological challenge we face from terrorism and aspects of extremism, and the threat we face from those who promote these views.
- Provides practical help to prevent people from being drawn into terrorism. It ensures they are given appropriate advice and support.
- Works with a wide range of sectors (including education, criminal justice, faith, charities, online and health) where there are risks of radicalisation that we need to deal with.
- Prevent covers all forms of terrorism and extremism and some aspects of non-violent extremism.

The Home Office works with local authorities, a wide range of government departments, and community organisations to deliver the Prevent strategy. The police play a significant role in Prevent, in much the same way as they do when taking a preventative approach to other crimes.

- The main aim of Prevent is to stop people from becoming terrorists or supporting violent extremism.
- At the heart of Prevent is safeguarding children and adults. Providing early intervention to protect and divert people away from being drawn into terrorist activity is crucial.
- Prevent addresses all forms of extremism but continues to ensure resources and efforts are allocated based on threats to our national security.

To support people who are at risk of radicalisation or extremism an individual is referred to the Channel process. This involves several agencies working together to give individuals access to services such as health and education, specialist mentoring and diversionary activities. It is entirely voluntary and therefore once a person enters the Channel process, they will be made aware of the referral. Channel is about early intervention to protect those susceptible to extremist ideologies and radicalisation from being drawn into committing terrorist-related activity and addresses all types of extremism.

Staff and governors in this school have either attended a WRAP (Workshop to Raise Awareness of Prevent) session or have completed on-line Prevent training.

If the school is responding to an incident where there is a belief that a child has been exposed to radicalisation/extremism, in addition to following the procedures as outlined by the Prevent Duty, the school will also assess if this incident should be designated as 'critical' and refer to the Critical Incident Plan as appropriate.

Any concerns about pupils becoming radicalised or being drawn into extremism will be reported to the DSL who will *not* speak to parents/carers or other family members at this stage but will take prompt advice from the Dorset Prevent Team who are contacted via :

- [preventreferrals@dorset.pnn.police.uk](mailto:preventreferrals@dorset.pnn.police.uk)
- 01202 229319

Non-emergency support and advice can also be sought via the DfE helpline (020 7340 7264) and mailbox ([counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk)); 101 (non-emergency police number) or Dorset Police (01202 222222).

Further information may be found in:

- [The prevent duty: for schools and childcare providers](#) (June 2015)
- [Revised Prevent Duty Guidance](#) (April 2021)
- [The use of social media for online radicalisation](#) (July 2015)

At Milton Abbey the DSL is also the Prevent Lead.

## **12. Familial Context**

### **12.1 Children who are absent from education**

All staff understand that children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. It is important the school's response to persistently absent

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pupils and children missing education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community.

Where reasonably possible the school should hold three emergency contact numbers for each pupil. This goes beyond the legal minimum and is good practice to give the school additional options to contact a responsible adult when a child missing education is also identified as a welfare and/or safeguarding concern.

We recognise that a child going missing from education or who is persistently absent is a potential indicator of abuse and neglect, including the specific types of abuse detailed above and/or travelling to conflict zones.

All staff will follow the school's procedure for dealing with unauthorised absence, particularly on repeat occasions, to help identify vulnerable pupils and to help prevent the risks of their going missing in future.

Actions could include involving other professionals and, if any of the criteria are met, informing the local authority where a pupil's name has been removed from the school roll.

The Children Missing Education Policy has been written with regard to the DfE updated (2016) statutory guidance on [children missing education](#).

The school has clear procedures in the management of unauthorised attendance and the keeping of records via its Management Information System.

**There is more information about specific safeguarding issues including links to websites in Part one and Annex A of 'Keeping Children Safe in Education'.**

Further information and support, includes:

- Guidance on school attendance '[Working together to improve school attendance](#)'
- Information regarding schools' duties regarding children missing education, including information schools must provide to the local authority when removing a child from the school roll at standard and non-standard transition points, can be found in the department's statutory guidance: [Children Missing Education](#).
- General information and advice for can be found in the Government's [Missing Children and Adults Strategy](#).

## **12.2 Elective Home Education (EHE)**

Where parents inform the school that they wish to home educate their child they must do so in writing. The school will inform the Elective Home Education Administrator (EHE) who will implement the [Elective Home Education' procedure](#).

## **12.3 Child Student Visa Policy and Procedures**

*Refer to Student Visa Compliance Manual and Child Student Visa Policy for Housemasters/ Housemistresses.*

The UK Child Student Visa Immigration system came into effect on 1 January 2021 replacing the Tier 4 system.

As a Child Student Visa Sponsor, the school has the following specific safeguarding responsibilities:

- Appropriate policies and procedures are in place to ensure the safety, wellbeing and protection from exploitation of the children which it sponsors. The Child Protection Policy and Procedures apply to all pupils registered at the school.

- Sites at which children will be taught or accommodated meet all legally required standards for those purposes (Head of Admissions to verify that Guardian accommodation meets national minimum standards).
- *All staff who come into contact with the children have a current enhanced Disclosure and Barring Check (see Safer Recruitment Policy).*
- Keep records of UK Educational Guardian contact details, apply the school Guardianship policy to all guardians.
- Keep records of parental/legal guardian consent to reception and care arrangements for the child while living in the UK.
- Monitor pupil attendance and notify the Home Office (see Children Missing Education Policy) if a child misses defined set of contact points or fails to engage with study, including reporting Information which indicates that the child is living with someone who does not have parental responsibility for them for a period of more than 28 days (known as Private Fostering).

#### **12.4 Private Fostering**

Private fostering occurs when a child under the age of 16 (under 18 for children with a disability) is provided with care and accommodation by a person who is not a parent or person with parental responsibility for them or a relative in their own home.

A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer.

Such arrangements may come to the attention of school staff through the normal course of their interaction, and promotion of learning activities, with children.

Where the arrangements come to the attention of the school (and the school is not involved in the arrangements), they should then notify the local authority to allow the local authority to check the arrangement is suitable and safe for the child.

If the school is involved (whether or not directly) in arranging for a child to be fostered privately must notify local authorities of the arrangement as soon as possible after the arrangement has been made.

Notifications must contain the information specified in Schedule 1 of The Children (Private Arrangements for Fostering) Regulations 2005 and must be made in writing.

Comprehensive guidance on private fostering can be found here: [Private fostering: local authorities.](#)

#### **12.5 Domestic Abuse**

The cross-government definition of domestic violence and abuse is: *Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality.*

The abuse can encompass, but is not limited to:

- psychological;
- physical;
- sexual;
- financial; and
- emotional

Domestic abuse can impact on children through seeing, hearing or experiencing the effects of domestic abuse and/or experiencing it through their own intimate relationships.

Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children.

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Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life. As with any child under 18, where there are concerns about safety or welfare, the school's safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.

### **12.6 Operation Encompass**

Milton Abbey is an Operation Encompass school.

Operation Encompass operates in all police forces across the UK, it assists the police and schools to work together to provide emotional and practical help to children who are victims of Domestic abuse.

The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult before the child or children arrive at school the following day.

At Milton Abbey School the **Key adults** are **Chris Barnes** and **Sarah Badley**.

This ensures that the school has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs.

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

These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The DSL will be aware of such pupils in school and will advise guide and support staff using [NICCO](#) website which provide resources for school staff to support children in such circumstances.

### **12.8 Children and the Court System**

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age-appropriate guides to support children [5-11 year olds](#) and [12-17 year olds](#) available on the gov.uk website.

The guides explain each step of the process and support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. The school may refer some parents and carers to this service where appropriate.

### **12.9 Homelessness**

Being homeless, or at risk of homelessness presents a real risk to a child's welfare. The school should be aware of potential indicators of homelessness including household debt, rent arrears, domestic abuse, and anti-social behaviour, as well as a family being asked to leave a property.

If staff are made aware or suspect that a pupil may be at risk of homelessness they should talk to the DSL in the first instance.

Whilst referrals to the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not and should not replace a referral to the LADO where a child has been harmed or is at risk of harm, in accordance with this policy

### 13. Responding to the Child who Discloses (Talks About) Abuse

All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected and may not recognise their experiences as harmful. This could be due to their vulnerability, SEND, sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have any concerns about a child.

If a child does disclose abuse to a member of staff or a volunteer, the staff/volunteer will:

- Listen carefully to what is said and avoid showing shock or disbelief;
- Observe the child’s demeanour;
- Find an appropriate opportunity to explain that the information will need to be shared with others. They will not promise to keep the information confidential or a ‘secret’;
- Allow the child to continue at her/his own pace and not interrupt if the child is freely recalling events. They will not stop him/her in order to find a ‘witness’ as this could inhibit the child from saying more;
- Avoid asking questions or pressing for more information. Ask for clarification only. If questions are necessary, they should be framed an open manner and not ‘lead’ the child in any way: Tell me.... Explain.... Describe...;
- Reassure the child, if necessary, that s/he has done the right thing in telling;
- Explain what will happen next and with whom the information will be shared;
- Not ask the child to repeat the disclosure to anyone else in school – including the DSL - or ask him/her or any other children who were present to write a written account or ‘statement’.

Remember to...	Avoid...
<p> <b>Be available to talk</b> Show that you're interested in how the child is doing. Let the child tell you what they choose to tell, when they are ready and able.</p>	<p> <b>Playing detective</b> Trying to gather all the facts can be harmful to the child, who will have to tell their story again to professionals.</p>
<p> <b>Remain calm</b> If the child senses you are upset, they may think they did something wrong or worry about your feelings.</p>	<p> <b>Asking "why"</b> Asking why it happened, or why the child waited to tell, suggests the abuse was the child's fault.</p>
<p> <b>Listen</b> Let the child use their own words, and try not to insert words when they are talking.</p>	<p> <b>Judgmental comments</b> Avoid judgmental comments about the suspect, who may be someone the child loves and cares about.</p>
<p> <b>Reassure the child</b> Tell the child that they haven't done anything wrong, it was brave to tell, and you are going to get help.</p>	<p> <b>Contacting the suspect</b> Telling the suspect what the child said, or that you filed a report, can be harmful to the child and the investigation.</p>
<p> <b>Keep the child informed</b> Let the child know you have a responsibility to tell other adults to make sure they are safe.</p>	<p> <b>Asking leading questions</b> Avoid asking questions that suggest what you think happened. Instead of "Did someone do that to you?" ask "How did you get hurt?"</p>

#### 13.1 Taking Action

All staff must read and follow the statutory guidance for schools and colleges as outlined within this policy.

It is not the responsibility of school staff to investigate welfare concerns or determine the truth of any disclosure or allegation. Accordingly, all concerns regarding the welfare of pupils will be recorded and discussed with the DSL or the Deputy DSL prior to any discussion with parents/carers.

#### All School Staff Must Immediately Report

- Any suspicion that a child is injured, marked, or bruised in a way which is not readily attributable to the normal knocks or scrapes received in play.
- Any explanation given which appears inconsistent or suspicious.
- Behaviours which give rise to suspicions that a child may have suffered harm.
- Any concerns that a child may be suffering from inadequate care, ill treatment, or emotional maltreatment.
- Concerns that a child is presenting signs or symptoms of abuse or neglect.
- Any significant changes in a child’s presentation, including non-attendance.

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- Any hint or disclosure of abuse about or by a child or young person.
- Concerns regarding person(s) who may pose a risk to children (e.g. those living in a household with children present).
- Information which indicates that the child is living with someone who does not have parental responsibility for them for a period of more than 28 days (Private Fostering).

If in exceptional circumstances, the designated safeguarding lead (or deputy) is not available, this should not delay appropriate action being taken.

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

Any disclosure or indicators of abuse will be reported verbally to the DSL or Deputy straightaway or, where they are not available, and concerns are immediate, ensure a referral is made without delay to Children's Social Care.

Staff at schools with boarding provision can seek advice in the first instance from the ChAD- [Children's Advice and Duty Service](#) when the child's home address is not Dorset. (See [Appendix 1](#) for contact details).

Where the child already has an allocated social worker, that person or a manager or duty worker in the same team must be contacted promptly.

A written record will then be made using the reporting software, MyConcern, noting what was said, including the child's own words, as soon as possible and given to the DSL.

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

The DSL will decide whether to contact parents at this stage, judging whether to do so, it is necessary to consider if contacting the parents/carers is likely to place the child at risk of harm from their parent's/carers actions or reactions - for example in circumstances where there are concerns that a serious crime such as sexual abuse, domestic violence or induced illness has taken place. If in any doubt, the DSL or staff member will call the Children's Social Care first and agree when parents/carers should be contacted and by whom. The reason for the decision not to contact parents first will be recorded in the child's school safeguarding file.

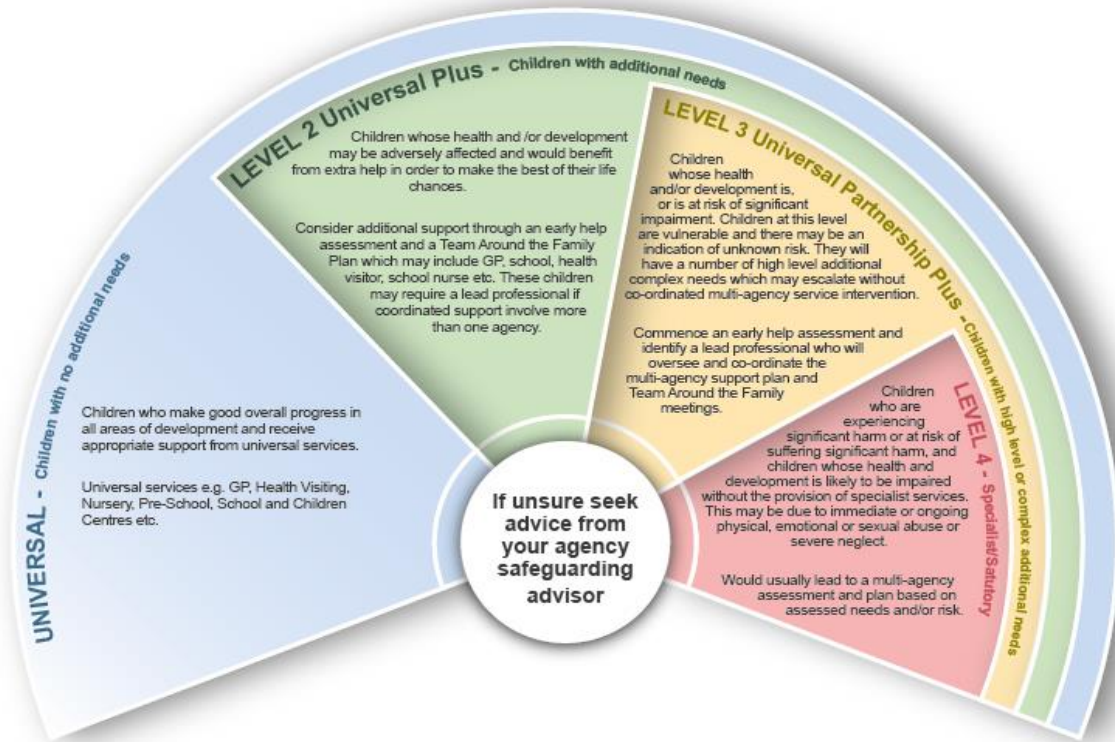
A child protection referral from a professional cannot be treated as anonymous.

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

[The Pan-Dorset Safeguarding Children Partnership's 'Continuum of Need'](#) should be used to help clarify the pathway required for a child: whether concerns will be managed within the school; or with the help of other agencies as part of early help; or whether they require specialised support such as a social work assessment or referral to [Child and Adolescent Mental Health Services](#) (CAMHS).

A member of staff who reports concerns to the DSL should expect some feedback, although confidentiality might mean in some cases that this is not detailed. If the member of staff is not happy with the outcome s/he can press for reconsideration and if following this, s/he still believes the correct action has not been taken, will refer the concerns directly to Children's Social Care.





*Pan Dorset Safeguarding Children Partnership Continuum of Need: Levels of Vulnerability and Need.*

Staff should be aware of when they should call the Police. Keeping Children Safe in Education refers to the [National Police Chief’s Council \(NPCC\) – When to call the police](#) Guidance for schools and colleges to help clarify when to consider calling the police and what to expect when a report is made. DSLs, their deputies and senior leaders should be made aware of the NPCC guidance and use it when considering whether to make a Police report and when liaising with the Police on safeguarding issues.

**13.2 Confidentiality**

Information sharing is essential for effective safeguarding and promoting the welfare of children and young people. It is a key factor identified in many Child Safeguarding Practice Reviews (CSPR) where poor information sharing has resulted in missed opportunities to take action that keeps children and young people safe.

The GDPR and Data Protection Act 2018 does not prevent, or limit, the sharing of information for the purposes of keeping children and young people safe. (Ref: [2018. Information sharing. Advice for practitioners providing Safeguarding Services to children, young people, parents and carers. HM Government](#))

Milton Abbey has a clear and explicit procedure around pupil confidentiality, however, where there is a concern that the child may be suffering or is at risk of suffering significant harm, the child’s safety and welfare must be the overriding consideration.

The school will ensure:

- Information is shared with Children’s Social Care and/or Police where the child/young person is or may be at risk of significant harm;
- Pupil’s and/or parent’s/carer’s confidentiality is respected;
- Any information shared is necessary, proportionate, relevant, adequate, accurate, timely and secure.

### 13.3 Pupil Information

The school's record-keeping policy for child welfare and child protection is consistent with the Pan Dorset Safeguarding Children Partnership, guidance which is known to all staff (refer to Appendix 8).

In order to keep children safe and provide appropriate care for them, our school requires accurate and up to date information regarding:

- Names and contact details of persons with whom the child normally lives;
- Names and contact details of all persons with parental responsibility (if different from above);
- Emergency contact details (if different from above);
- Details of any persons authorised to collect the child from school (if different from above);
- Any relevant court orders in place including those, which affect any person's access to the child (e.g. Residence Order, Contact Order, Care Order, Injunctions etc.);
- If the child is or has been subject to a Child in Need, Child Protection or Care Plan;
- Name and contact detail of GP;
- Any other factors which may impact on the safety and welfare of the child.

The Designated Safeguarding Lead will collate, securely store and agree appropriate access to this Child Protection information. The school uses **MyConcern** safeguarding software for this purpose.

Milton Abbey became a MyConcern school in 2020. Historical 'hard copy' documents and files are kept in line with GDPR and safeguarding guidelines as follows:

- All child protection documents will be retained in a 'Child Protection' file, separate from the child's main school file.
- The main file will clearly show an alert that a child protection file exists and the location of this.
- This child protection file will be securely stored and only accessible to the Headmaster and the Designated Safeguarding Lead and Deputies.
- These records will be transferred when a child moves to another school or setting, clearly marked 'Child Protection, Confidential, for attention of Designated Safeguarding Lead'.

### 13.4 Photography and Images

Most of the people who take, or view photographs or videos of children do so for entirely understandable and acceptable reasons. However, some people abuse children through taking or using images, so we must ensure that we have safeguards in place.

To protect pupils, we will:

- Seek their consent for photographs to be taken or published (for e.g. on our website or in newspapers or publications);
- Seek parental consent;
- Use only the pupil's first name with an image;
- Ensure pupils are appropriately dressed;
- Only use school equipment to make images of children (no personal devices are permitted for this purpose);
- Encourage pupils to tell us if they are worried about any photographs that are taken of them.

### 13.5 Action by the Designated Safeguarding Lead (or the Deputy DSL in their absence)

Following any information raising concern, the DSL will:

- Consider the child's wishes and feelings, but not promise confidentiality;
- Consider any urgent medical needs of the child;
- Make an immediate referral via a discussion **with Children's Advice and Duty Service (ChADS)** if there has been a disclosure and/or allegation of abuse or there are clear grounds for concerns about the child's safety and well-being;
- Wherever possible, talk to parents, unless to do so may place a child at risk of significant harm, impede any police investigation and/or place the member of staff or others at risk;

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- Consider whether to make a child protection referral to social care because a child is suffering or is likely to suffer significant harm and if this needs to be undertaken immediately;
  - Contact the designated officer for safeguarding in another agency if that agency is working with the family;
- OR**
- Decide not to make a referral at this stage, but retain the information in written notes on the child's school safeguarding file;
  - Consider if Early Help support will be helpful to the child and family at this time. If this is appropriate referrals will also be progressed via the **Dorset - Children's Advice and Duty Service (ChADS)**.

All information and actions taken, including the reasons for any decisions made, will be fully documented. If a child is resident outside of the Dorset area the referral should be made to their local Social Care services.

#### **14. Responding to Concerns Reported by Parents or Others in the Community**

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

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

It is preferable if the parent / community member who witnessed or knows about the concerns or incident makes a call to Children's Social Care themselves as they will be better able to answer any questions. They can ask for their name not to be divulged if a visit is made to the family. The DSL will advise accordingly and later confirm that this referral has been made.

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

#### **15. Managing Concerns / Suspicions of Abuse**

**Any suspicion or concern that a child or young person may be suffering or at risk of suffering significant harm, MUST be acted on. Doing nothing is not an option. Any suspicion or concerns will be reported without delay to the DSL or a Deputy.**

During term time the DSL and/or a Deputy should always be available (during school hours) for staff to discuss any safeguarding concerns. However, if for whatever reason they are not available, the staff member will discuss their concerns as soon as possible with either

- another senior member of staff or
- the duty worker in the Help and Protection Team – single point of contact (ChADS)

##### **Anyone can make a referral, not just the DSLs.**

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

This applies regardless of the alleged 'perpetrator': whether the child raises concerns about a family member or someone outside school, a member of staff or another child/pupil.

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

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

A school child protection file will be started in the child's name, where the child is not already known to social workers. If a file already exists, the new information will be added to the chronology.

See [Appendix 9](#) below for detailed record keeping guidance.

## **16. School Referrals to Social Care**

### **16.1 Response from Children's Social Care to a School Referral**

The Designated Safeguarding Lead or other appropriate member of staff will:

- Maintain contact with the child's allocated Social Worker;
- Contribute to any Strategy Discussion and/or Strategy Meeting as required;
- Provide a report for, attend and contribute to any initial or review Child Protection Conference;
- Provide a written report to the conference organiser, 3 days prior to the Initial Child Protection Conference (ICPC) or 5 days prior to the Review Child Protection Conference (RCPC);
- Share the content of this report with the parent/carer, prior to the meeting;
- Attend Core Group Meetings for any child subject to a Child Protection Plan, Attend TAF meetings in order to be part of a plan for the child/ren;
- When a child on a Child Protection Plan moves from the school or goes missing, immediately inform the child's Social Worker

### **16.2 Social Care Processes:**

#### **Referral**

Once a referral is received by the team, a manager will decide on the next course of action within one working day. When there is concern that a child is suffering, or likely to suffer significant harm, this will be decided more quickly, and a strategy discussion held with the Police and Health professionals and other agencies as appropriate (section 47 Children Act 1989). The DSL should be told within three working days of the outcome of the referral. If this does not happen s/he will contact the duty worker again.

#### **Assessment**

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

#### **S47 Enquiries (regarding significant harm)**

The process of the investigation is determined by the needs of the case, but the child/young person will always be seen as part of that process and sometimes without parents' knowledge or permission. On occasions, this will mean the child/young person is jointly interviewed by the Police and social workers, sometimes at a special suite where a videorecording of the interview is made.

#### **The Child Protection Conference**

If, following the s47 enquiries, the concerns are substantiated and the child is judged to be at risk of significant harm, a Child Protection Conference (CPC) will normally be convened. The CPC must be held within 15 days of the first strategy discussion and school staff will be invited to attend - normally the DSL or

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Headmaster. This person will produce a written report in the correct format (a pro forma is available on the PDSCP website). This will be shared with the child/young person and his/her family before the conference is held. A copy will also be sent to the person chairing the initial CPC at least 24 hours in advance. More information is in the inter-agency safeguarding procedures ('Child Protection Conferences') on the PDSCP website.

### **16.3 Dealing with Disagreements and Escalation of Concerns**

If the DSL disagrees with the decisions made by social workers regarding the outcome of the referral, the conclusions of the assessment or any actions taken, the matter should be discussed and if necessary escalated to more senior managers *particularly* if the child's situation does not appear to be improving.

Professional disagreements can arise in a number of areas, but are most likely to arise around:

- Levels of need;
- Roles and responsibilities;
- The need for action;
- Progressing plans and communication.

Where school staff consider that the practice of other professionals is placing children at risk of harm, they must be assertive, act swiftly and ensure that they challenge the relevant professionals in line with this policy and be aware that:

- The safety of children and young people are the paramount consideration in any professional activity;
- Resolution should be sought within the shortest timescale possible to ensure the child is protected;
- As a guide, professionals should attempt to resolve differences through discussion within one working week or a timescale that protects the child from harm (whichever is shortest);
- Disagreements should be resolved at the lowest possible stage.

The Designated Safeguarding Lead or other appropriate member of staff will:

- Contact the line manager in Children's Social Care if they consider the response to a referral has not led to the child being adequately safeguarded.
- Contact the line manager in Children's Social Care if they consider that the child is not being adequately safeguarded by the child protection plan.
- Use the [PDSCP escalation policy](#) if this does not resolve the concern.

## **17. Safeguarding Concerns, Complaints or Allegations about Staff or Volunteers**

The school has procedures for dealing with allegations against staff (including the Headmaster), Governors and volunteers who work with children that aim to strike a balance between the need to protect children from abuse and the need to protect staff and volunteers from false or unfounded allegations.

Detailed guidance is given to staff and volunteers to ensure that their behaviour and actions do not place pupils or themselves at risk of harm or of allegations of harm to a pupil. This guidance is contained in the Staff Code of Conduct Policy and includes details of additional safeguarding arrangements where staff engage in one-on-one teaching and meetings with pupils.

The school's separate Whistle-blowing Policy sets out the procedure for reporting wrongdoing by staff in the workplace that does not involve the safeguarding and welfare of children.

The school's Low-Level Concerns Policy and Procedures for Managing Allegations Against Staff, Volunteers and Governors details the procedures and responsibilities through which concerns and allegations are managed at the school (see section D of this policy).

Refer to KCSIE, *Part 4- Safeguarding concerns and allegations made against teachers, volunteers and contractors* for further information.

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## Definitions

**Concerns:** A concern is considered to be something that worries you, makes you anxious or leaves you feeling uncomfortable. There may be a pattern to what is noticed or examples of poor working practices. In these instances, it is always important to **discuss your concerns with the Headmaster**.

**Complaints:** A complaint refers to unsatisfactory or unacceptable behaviours or practices. A complaint can take the form of a breach of the Staff Code of Conduct. **These matters should be referred to the Headmaster** who will take appropriate action.

**Allegations:** An allegation is a claim or assertion that someone has done something illegal or wrong. There is not always evidence to accompany an allegations. An allegation is made when a person has allegedly acted in a way that has likely caused a young person harm. Allegations **must always be reported directly to the Headmaster**.

### Where to go:

If your concern, complaint or allegation is about...

- A member of staff/ volunteer – direct to the **Headmaster**
- The DSL – direct to the **Headmaster**
- The Headmaster – direct to the **Chair of Governors** or the **Local Authority Designated Officer (LADO)**

**There are 2 recognised levels of allegations or concerns:**

- 1. Allegations that may meet the harms threshold.**
- 2. Allegation/concerns that do not meet the harms threshold – referred to as ‘low level concerns.’**

## 17.1 Low Level Concerns (Concerns That Do Not Meet the Threshold for Harm)

The term ‘low-level’ concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ - that an adult working in or on behalf of the school or college may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- Does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

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

- Being over friendly with children;
- Having favourites;
- Taking photographs of children on their mobile phone, contrary to school policy;
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or
- Humiliating pupils.

Concerns may arise in several ways and from several sources. For example: suspicion, complaint, or disclosure made by a child, parent, or other adult within or outside of the organisation, or as a result of vetting checks undertaken. Schools must have appropriate policies and processes in place to manage and record any such concerns and take appropriate action to safeguard children. **Staff should be able to confidentially share their concern with the Headmaster** who will make the final decision on how to respond. Where appropriate, this will be done in consultation with the DSL.

The DSL should be informed if staff have any concerns about supply staff or contractors. The DSL should notify the appropriate employer of any concerns raised about their staff so that any potential patterns of inappropriate behaviour can be identified.

If there is any doubt as to whether the information which has been shared about a member of staff as a low-level concern meets the harm threshold, the Headmaster or DSL will consult with the LADO.

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Staff are encouraged to self-refer where they may have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or where on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

All low-level concerns should be recorded in writing and will be logged on the school's Confide reporting system by the Headmaster and/or DSL. Records will include details of the concern, the context in which the concern arose, and action taken. The school will review records so that potential patterns of concerning, inappropriate, problematic or concerning behaviour can be identified. Where a pattern of such behaviour is identified, the school will decide on a course of action, either through the disciplinary procedure or where a pattern of behaviour moves from a low-level concern to meeting the harm threshold, referred to the LADO. Consideration will also be given to whether there are wider cultural issues within the school that enabled the behaviour to occur and where appropriate, policies will be reviewed and revised or extra training delivered to minimise the risk of it happening again.

### **17.2 Allegations that Meet the Threshold for Harm:**

In all cases of allegations against staff or volunteers, the Headmaster and/or Chair of Governors, will contact the LADO without delay and follow the correct procedures as set out in the separate school policy. Any allegation against a member of staff, or any volunteers who work with children, or the Headmaster or a Governor must be reported **immediately** in accordance with the procedures set out in the policy.

Allegations that might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in the school constitutes an 'Allegation that Meets the Threshold for Harm'. The guidance should be followed where it is alleged that anyone working in the school, including supply teachers, volunteers and contractors has:

- **Behaved in a way that has harmed a child, or may have harmed a child**
- **Possibly committed a criminal offence against or related to a child; or**
- **Behaved towards a child or children in a way that indicates he or she would pose a risk of harm if he or she works regularly or closely with children.**

Any allegations not meeting these criteria will be dealt with in as a 'Low Level Concern' in accordance with KCSIE and Dorset Safeguarding Children Partnership procedures. Advice from the Designated Officer (LADO) will be sought in borderline cases.

### **17.3 Learning Lessons**

Throughout the process in handling allegations and at a conclusion of a case, whether substantiated or not, the case manager and LADO should review the circumstances of the case to determine whether there are any improvements to be made to the school's procedures to help prevent similar events in the future.

## **18. Safer Working Practice**

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

We promote a culture whereby members of the school community should feel able to raise with the Headmaster, or any member of the Senior Leadership Team, any concerns about staff conduct. If the reporter feels that the issue has not been addressed they should contact someone outside of the school, such as the Chair of Governors or the LADO (see [Appendix 1](#) below for contact numbers).

The school acknowledges its role in multi-agency safeguarding arrangements in line with statutory guidance 'Working Together to Safeguard Children'. This includes new safeguarding partners and child death review partners outlined within the Pan Dorset Safeguarding Partnership. Milton Abbey pays full regard to the statutory guidance for schools and colleges; Keeping Children Safe in Education Part Three, Safer Recruitment. We ensure that all appropriate measures are applied in relation to everyone who works in the

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school and who is therefore likely to be perceived by the children as a safe and trustworthy adult. This includes volunteers, supervised volunteers and staff employed by contractors.

Safer recruitment practice includes scrutinising applicants, verifying identity and academic/vocational qualifications, obtaining professional references, checking employment history and ensuring that a candidate has the health and physical capacity for the job. It also includes undertaking interviews and checks with the Disclosure and Barring Service (DBS).

In line with statutory changes, underpinned by regulations, the following will apply:

- DBS and barred list checks will be undertaken for all posts that are deemed regulated activity, and for all other posts an enhanced DBS check will be undertaken unless they are supervised roles that are deemed not to meet the definition of regulated activity.
- Our school is committed to keeping an up-to-date Single Central Record which details a range of checks carried out on our staff.
- All new appointments to our school workforce who have lived outside the UK will be subject to additional checks as appropriate.
- Our school ensures that supply staff have undergone the necessary checks and will be made aware of this Safeguarding Policy.
- Identity checks must be carried out on all appointments to our school workforce before the appointment is made as part of the recruitment process.
- Staff responsible for recruiting and appointing must be suitably qualified and have completed training on recruitment and selection, with a minimum of one trained staff member sitting on interview panels.

In line with good practice outlined in Keeping Children Safe in Education 2023, as part of due diligence checks, online searches will be carried out on all shortlisted candidates and candidates will be informed of this. For further information refer to the school's Recruitment Policy.

## **19. Training**

The school's DSL and governor with designated responsibility for safeguarding will undertake appropriate safeguarding and child protection training when taking up their appointments and attend refresher training at two yearly intervals.

All governors will receive appropriate safeguarding and child protection training (including online safety) at induction. This training will equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place at the school are effective and support the delivery of a robust whole school approach to safeguarding. Their training will be regularly updated.

All other school staff, including non-teaching staff, will undertake appropriate induction training and safeguarding/ child protection training to enable them to carry out their responsibilities for safeguarding effectively. Safeguarding training will include online safety training which will include an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring. Staff will receive safeguarding and child protection training regularly, including a yearly update. The school will maintain a register of who has undertaken training and when.

All staff (including temporary staff, volunteers, supervised volunteers and staff employed by contractors) are provided with the school's safeguarding policy and informed of school's safeguarding arrangements on induction. The school will maintain a register of who has received this information and when.

Child protection will be part of induction for all staff and regular volunteers new to the school. They will be given a copy of this policy, the Code of Conduct, details about the role of the DSL and Part One of 'Keeping Children Safe in Education: information for all school and college staff' or Annex A if they are considered as not working directly with children.



This will be followed up by basic child protection training that equips individuals to recognise and respond appropriately to concerns about pupils.

A proportional risk-based approach will be taken regarding the level of information provided to all temporary staff and volunteers. As a minimum they will be provided with, and will be expected to follow, the child protection summary sheet which forms part of this policy.

Staff who do not have designated responsibility for safeguarding and child protection, including the Headmaster, will undertake suitable refresher training at appropriate intervals. The PDSCP recommends this is at least every three years.

All staff will have training in preventing radicalisation and extremism ('Prevent') – either by attending a Workshop to Raise Awareness of Prevent (WRAP) or completing an on-line course. The DSL is the Prevent Lead and will attend WRAP.

In addition, all staff members will receive regular safeguarding and child protection updates from the DSL as required, but at least annually. This will include learning from local and national serious cases when the learning becomes available.

When DSLs and Deputies take up the role, they will attend enhanced multi-agency (level 3) training provided by the Pan Dorset Safeguarding Children's Partnership. They must be updated a two-yearly intervals after that. In addition, their knowledge and skills will be updated regularly - at least annually. These individuals are expected to take responsibility for their own learning about safeguarding and child protection by, for example: taking time to read and digest newsletters and relevant research articles; attending training offered by PDSCP on matters such as domestic abuse, attachment and child sexual exploitation; completing on-line training on FGM; attending local DSL forums etc.

Designated Teachers for Looked-After Children (mandatory for maintained schools and academies; good practice in independent schools which have or likely to have Looked-After Children) will undertake appropriate training. In Dorset this is provided by the Virtual School for Children in Care.

See [Appendix 1](#) for contact details.

The Headmaster and at least one governor will complete safer recruitment training (mandatory in maintained schools; best practice in others) either through a multi-agency taught session or by completing the NSPCC on-line course.

It is recommended by the PDSCP that all governors attend training, briefings or other input which equips them to understand fully and comply with their legal safeguarding duties *as governors*, set out in 'Keeping Children Safe in Education'. Attendance includes those who also work with children and have attended child protection training in that role.

## **20. Extended School and Off-Site Arrangements**

Where extended school activities are provided by and managed by the school, our own safeguarding and Child Protection policy and procedures continue to apply. Events run through Milton Abbey (via Milton Abbey School Services (MASS) or the Milton Abbey Association (MAA) also adhere to the school safeguarding policy and procedures.

Where residential visits or activities involve vulnerable adults or children, MASS and The MAA will ensure that appropriate risk assessments and safeguarding procedures are provided in line with school policy.

Where activities are provided separately by another body, the governing board will seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place, including inspecting these as needed. The governing board will also ensure that there are arrangements in place to liaise with the school on these matters where appropriate. The governing board will ensure safeguarding

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requirements are included in any transfer of control agreement, i.e. a lease or hire agreement, as a condition of use and occupation of the premises, and specify that failure to comply with this would lead to termination of the agreement.

Therefore, if other organisations provide services or activities on our site, we will ensure that they have appropriate procedures in place to keep children safe. The school will check that arrangements are in place for:

- health and safety
- safeguarding and child protection
- safer recruitment procedures to check the suitability of staff and volunteers
- governance arrangements that include a clear complaints procedure and an effective whistleblowing policy

Should the school receive an allegation relating to an incident that happened when an individual or organisation was using the school premises for the purposes of running activities for children the school will follow our own policy and procedures for managing allegations against staff, volunteers and governors, which include informing the LADO.

Further information on the requirements for other organisations providing services or activities on our site are detailed in the non-statutory guidance '[Keeping children safe during community activities, after-school clubs and tuition: non-statutory guidance for providers running out-of-school settings](#)', update 4<sup>th</sup> April 2022.

When our pupils attend off-site activities, including day and residential visits and/or other activities, we will ensure that effective safeguarding arrangements are in place. We will also undertake appropriate and robust risk assessments for the venue, location, and activity to be undertaken in accordance with the school's Risk Assessment protocol

## **21. Raising Concerns About Safeguarding Practice in Our School**

In this school we promote a culture where any staff or volunteers feel able to raise with the Headmaster any concerns about safeguarding or child protection practice.

Any issues which they have not been able to resolve with the Headmaster should be reported to the governors in the first instance. If they are still not satisfied, they should approach the Director for Children's Services or, if the issue relates to the conduct of or allegation against a member of staff, should contact the Local Authority Designated Officer (also known as the LADO).

Staff should refer to the school's whistle-blowing policy for more information or can use the NSPCC whistle blowing helpline: 0800 0280285.

## **22. Information for Parents and Carers**

At this school we are committed to keeping our pupils safe. Our first priority is your child's welfare and we will usually discuss with you any concerns we have about your child. There might be rare occasions, however, when we have to provide information to or consult other agencies such as Children's Social Care before we contact you. This will include situations where we judge that to tell you first will or might put your child at risk of significant harm.

Our responsibilities are set out in this policy. It reflects statutory guidance and the Inter-Agency Safeguarding Procedures, which can be found on the Pan-Dorset Children's Partnership website.

If you have any questions about this please speak to the Designated Safeguarding Lead: Chris Barnes.

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### **23. Monitoring and Review**

This policy is reviewed at least annually by the DSL and the Headmaster. This policy will be updated as needed to ensure that it is up-to-date with safeguarding issues as they emerge and evolve, including any lessons learnt.

Any changes made to this policy will be communicated to all members of staff. All staff and volunteers at the school are required to familiarise themselves with all processes and procedures outlined in this policy as part of their induction programme.

The next scheduled review date for this policy is September 2024.

## C. Child Protection Summary for all Visiting Professionals

### Milton Abbey School

As an adult working directly with children in this school you have a duty of care towards all pupils. This means you must always act in a way that is consistent with their safety and welfare.

It is your responsibility to keep your child protection training up to date; you might be asked for evidence of this.

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

If the behaviour of another adult in the school gives rise to concern you must report it as soon as possible to the [Headmaster](#).

If you have a concern about a child, particularly if you think s/he may be suffering or at risk of suffering harm, it is your responsibility to share the information promptly with the DSL, Chris Barnes, the Senior Deputy DSL, Sarah Badley, or another deputy.

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

- Seeing a physical injury which you believe to be non-accidental;
- Observing something in the appearance of a pupil which leads you to think his/her needs are being neglected;
- A pupil telling you that s/he has been subjected to some form of abuse.

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

If a pupil makes a report to you about (discloses) any form of abuse (including sexual or physical), you should:

- Listen carefully without interruption, particularly if s/he is freely recalling significant events;
- Only ask enough questions to clarify what you have heard. You might not need to ask anything but, if you do, you must not 'lead' the pupil in any way so should only ask 'open' questions;
- Make it clear you are obliged to pass the information on, but only to those who need to know
- Tell the DSL or Deputy without delay ;
- Write an account of the disclosure as soon as you are able (definitely the same day), date and sign it and give it to the DSL.

Do not ask the pupil to repeat the disclosure to anyone else in school, ask him/her or any other pupil to write a 'statement', or inform parents. You are not expected to make a judgement about whether the child is telling the truth. **Remember** – share any concerns, don't keep them to yourself.

### Useful Contacts

**Children's Advice and duty Service:** [01305 228558](tel:01305228558)

This service is used for making referrals for both Children's Social Care and Early Help Services.

### Quality Assurance and Partnerships Team

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

- The **Safeguarding Advisors** who offer advice and support to schools in relation to safeguarding and child protection issues.  
Tel: [01305 221122](tel:01305221122) Email: [SafeguardingAndStandardsAdvisors@dorsetcouncil.gov.uk](mailto:SafeguardingAndStandardsAdvisors@dorsetcouncil.gov.uk)
- The **Local Authority Designated Officer (LADO)** to whom allegations against adults who work with children in education establishments must be reported.  
Tel: [01305 221122](tel:01305221122) Email: [lado@dorsetcouncil.gov.uk](mailto:lado@dorsetcouncil.gov.uk)

**PRINT separately for all supply/peripatetic/temporary staff  
who work unsupervised with children, even if just for part of a day.**

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# Welcome to Milton Abbey School

## Security

All visitors must sign in at Reception and be issued with a Visitor's Badge.

Badges must be:

- ✓ Worn at all times
- ✓ Returned to Reception (or the internal mailbox outside Reception if it is closed)

Visitors to the school may be asked to present formal identification to Reception and should be prepared to do so.

Visitors must always be accompanied on site by their host.

Visitors are asked to comply with the COVID measures in place at Milton Abbey.



## Safeguarding

Milton Abbey School recognises that the welfare of the child is paramount: the needs and wishes of each child will be put first.

**If during your visit you have any concerns about the well-being of a pupil, please report this to your host, Reception or a member of the Safeguarding Team:**



**Chris Barnes**  
Designated Safeguarding Lead  
Senior Deputy Head  
chris.barnes@miltonabbey.co.uk  
01258 881807



**James Watson**  
Headmaster  
head@miltonabbey.co.uk  
01258 881241



**Sarah Badley**  
Senior Deputy Designated Safeguarding Lead  
Head of Personal Development & Community  
Engagement  
sarah.badley@miltonabbey.co.uk  
01258 881310



**Zoe Livingstone**  
Deputy Designated Safeguarding Lead  
Deputy Head Pastoral  
Zoe.livingstone@miltonabbey.co.uk  
01258 881201



**Ashley Garrett**  
Deputy Designated Safeguarding Lead  
Senior Nurse Manager  
ashley.garrett@miltonabbey.co.uk  
01258 881868



**Claudia Hindle**  
Deputy Designated Safeguarding Lead  
Deputy Head Development and Admissions  
claudia.hindle@miltonabbey.co.uk  
01258 882373



**Jane Naylor**  
Deputy Designated Safeguarding Lead  
Learning Development Teacher  
jane.naylor@miltonabbey.co.uk  
01258 882374



**Martyn Peel**  
Deputy Designated Safeguarding Lead  
Head of Boarding  
martyn.peel@miltonabbey.co.uk  
01258 882297



**Piers Webb**  
Deputy Designated Safeguarding Lead  
Athelstan Assistant Housemaster  
piers.webb@miltonabbey.co.uk  
01258 881253

LEARN  
DIFFERENTLY

## **D: Low-Level Concerns Policy and Procedures for Managing Allegations Against Staff, Volunteers, the Headmaster or Governors**

Milton Abbey School understands the importance of acknowledging, recording and reporting all safeguarding concerns, regardless of their perceived severity. We understand that, while a concern may be low-level, that concern can escalate over time to become much more serious.

Our school prides itself on creating a safe and prosperous environment for pupils, and our staff are expected to adhere to high standards of behaviour when it comes to professional conduct regarding pupils. The school has clear professional boundaries which all staff are made aware of and will adhere to. We are committed to ensuring that any safeguarding concerns are dealt with as soon as they arise and before they have had a chance to become more severe, to minimise the risk of harm posed to our pupils and other children.

The school promotes an open and transparent culture in which all concerns about all adults working in or on behalf of the school are dealt with promptly and appropriately. This policy sets out the procedures and responsibilities through which we manage allegations against staff, volunteers, the Headmaster or Governors.

This policy operates in conjunction with the following:

- Child Protection Policy and Procedures (including Keeping Children Safe in Education 2023 and associated government legislation).
- School Staff Code of Conduct
- Whistleblowing Policy
- Disciplinary Procedure
- Pupil Behaviour Policy

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to the following:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- DfE (2023) 'Keeping children safe in education 2023'
- DfE (2023) 'Working Together to Safeguard Children'

The school may receive an allegation relating to an incident that happened when an individual or organisation was using the school premises for the purposes of running activities for children. As with any safeguarding allegation, the school will follow our Safeguarding Policy and Child Protection Procedures which include informing the LADO.

### **Roles and responsibilities**

The governing board will be responsible for:

- Ensuring that the school complies with its duties under child protection and safeguarding legislation.
- Ensuring that policies, procedures, and training opportunities with regard to reporting safeguarding concerns are compliant and effective.
- Guaranteeing that there is an effective Staff Code of Conduct that outlines behavioural expectations.
- Ensuring that a suitably trained DSL has been appointed, alongside deputy DSLs where appropriate.
- Ensuring that there are robust reporting arrangements, including inter-agency collaboration.
- Ensuring that there are appropriate procedures in place to handle allegations and low-level concerns reported against members of staff.

The Headmaster will be responsible for:

- Being a point of contact for all staff when they have safeguarding concerns, whether serious or low-level.
- Assessing whether safeguarding concerns about staff members meet the threshold for being termed an allegation, or whether they are low-level concerns.
- Implementing this policy, and all related policies, throughout the school, and ensuring that staff adhere to it at all times.
- Safeguarding pupils' wellbeing and maintaining public trust in the teaching profession.
- Ensuring that all staff have undertaken safeguarding training.
- Ensuring that all staff have an ongoing awareness of low-level concerns and reporting procedures.

The Designated Safeguarding Lead (DSL) will be responsible for:

- Being a point of contact for all staff when they have safeguarding concerns, whether serious or low-level.
- Assessing whether safeguarding concerns about staff members meet the threshold for being termed an allegation, or whether they are low-level concerns.
- Following all procedures outlined in this policy for acting upon low-level concerns.
- Liaising with the headmaster, staff members, the governing board and all relevant agencies to act upon concerns, where necessary.
- Keeping detailed, accurate and secure records of all low-level concerns and any actions taken.

Staff will be responsible for:

- Adhering to all the relevant policies and procedures, including acting within the Staff Code of Conduct at all times.
- Interacting with pupils in a way that is respectful and appropriate for their level of authority and has due regard to the power imbalance between pupils and staff members.
- Understanding the importance of reporting low-level safeguarding concerns.
- Reporting any and all safeguarding concerns they may have about pupils immediately.
- Reporting any and all safeguarding concerns they may have about the behaviour of a member of staff immediately to the Headmaster, or where the concern is about the Headmaster to report this direct to the Chair of Governors or the LADO.

## **Concerns, Complaints or Allegations about Staff or Volunteers**

The school has procedures for dealing with allegations against staff (including the Headmaster), Governors and volunteers who work with children that aim to strike a balance between the need to protect children from abuse and the need to protect staff and volunteers from false or unfounded allegations.

- Detailed guidance is given to staff and volunteers to ensure that their behaviour and actions do not place pupils or themselves at risk of harm or of allegations of harm to a pupil. This guidance is contained in the Staff Code of Conduct and includes details of additional safeguarding arrangements where staff engage in one-on-one teaching and meetings with pupils.
- The school's separate Whistle-blowing Policy sets out the procedure for reporting wrongdoing by staff in the workplace that does not involve the safeguarding and welfare of children.
- Refer to *Keeping Children Safe in Education 2023 Part 4- Allegations of abuse made against teachers and other staff, including supply staff and volunteers.*

Patterns of behaviour in and towards young people can be key in identifying acts of abuse or harm. Child Safeguarding Practice Reviews (previously known as Serious Case Reviews) often enable us to reflect with

hindsight on moments of concern or feelings of discomfort that when pieced together create a broader picture for young people.

There are types of behaviour which may indicate a person poses, or might pose, a risk of harm if they continue to work in regular or close contact with children. This is more commonly known as the 'harm test': a person has 'behaved or may have behaved in a way that indicates they may not be suitable to work with children'. This may be indicated by risk if an incident occurs outside of school and did not involve children but could have an impact on their suitability to work with them. For example, being involved in a domestic violence incident at home, where violent behaviour is triggered and could pose a risk to children at school. This is known as transferable risk.

**There are 2 recognised levels of allegations or concerns:**

- 1. Allegation/concerns that do not meet the harms threshold – referred to as 'low-level concerns.'**
- 2. Allegations that may meet the harms threshold.**

**In all cases, any concern or allegation about a member of staff, volunteer, or governor must be reported directly to the Headmaster.**

**Any concern or allegation about the Headmaster must be reported directly to the Chair of Governors or the LADO.**

## **Self-reporting**

On occasion, a member of staff may feel as though they have acted in a way that:

- Could be misinterpreted.
- Could appear compromising to others.
- They realise, upon reflection, falls below the expected professional standards set out in the Staff Code of Conduct or violates professional boundaries.

The school will ensure that an environment is maintained that encourages staff members to self-report if they feel as though they have acted inappropriately or in a way that could be construed as inappropriate upon reflection. The headmaster and DSL will, to the best of their abilities, maintain a culture of approachability for staff members, and will be understanding and sensitive towards those who self-report.

Staff members who self-report will not be treated more favourably during any resulting investigations than staff members who were reported by someone else; however, their self-awareness and intentions will be taken into consideration.

## **Low-Level Concerns (Concerns That Do Not Meet the Threshold for Harm)**

Milton Abbey School understands the importance of acknowledging, recording and reporting **all** safeguarding concerns, regardless of their perceived severity. We understand that while a concern may be low-level, that concern can escalate over time to become much more serious.

Milton Abbey School staff are expected to adhere to high standards of behaviour when it comes to professional conduct regarding pupils. The school has clear professional boundaries which all staff are made aware of and will adhere to. We are committed to ensuring that any safeguarding concerns are dealt with as soon as they arise and before they have had a chance to become more severe, to minimise the risk of harm posed to our pupils and other children.

Concerns may arise in several ways and from several sources. For example: suspicion; complaint; or disclosure made by a child, parent, or other adult within or outside of the organisation; or as a result of vetting checks undertaken. Schools must have appropriate policies and processes in place to manage and record any such concerns and take appropriate action to safeguard children.

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All staff should feel confident that they can share confidentially any concerns about a member of staff or volunteer with the Headmaster who will make the final decision on how to respond and whether they meet the threshold for harm. The LADO will be consulted if there is any doubt as to whether the information shared meets the harm threshold.

The DSL should be informed if staff have any concerns about supply staff or contractors. The DSL should notify the appropriate employer of any concerns raised about their staff.

The term 'low-level' concern means that the behaviour towards a child does not meet the threshold for harm. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school may have acted in a way that:

- is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the Local Authority Designated Officer (also known as the LADO).
- Examples of such behaviour could include, but are not limited to:
  - *being over friendly with children;*
  - *having favourites;*
  - *taking photographs of children on their mobile phone;*
  - *engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,*
  - *using inappropriate sexualised, intimidating, or offensive language.*
- Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.
- It is crucial that any such concerns, including those which do not meet the harm threshold are shared responsibly and with the Headmaster, and recorded and dealt with appropriately.
- Ensuring they are dealt with effectively should also protect those working in or on behalf of the school from potential false allegations or misunderstandings.
- Occasionally a member of staff may find themselves in a situation which could be misinterpreted or might appear compromising to others. Equally, a member of staff may, for whatever reason, have behaved in a manner which, on reflection, they consider falls below the standard set out in the School's Staff Code of Conduct. Self-reporting in these circumstances can be positive for a number of reasons, and staff are encouraged to self-report on the basis that:
  - it is self-protective, in that it enables a potentially difficult issue to be addressed at the earliest opportunity;
  - it demonstrates awareness of the expected behavioural standards and self-awareness as to the member of staff's own actions or how they could be perceived; and
  - crucially, it is an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

Rigorous recruitment and selection procedures and adhering to the school's code of conduct and safer working practice guidance will hopefully mean that there are relatively few allegations against or concerns about staff or volunteers. However, if a member of staff, or any other person, has any reason to believe that another adult has acted inappropriately or abused a child or young person, they ~~will~~ must take action by reporting this to the Headmaster.

Where the Headmaster is notified of a safeguarding concern, they will use their professional judgement to determine if the concern is low-level or if it must be immediately escalated (e.g. where a child is at immediate risk of harm). When deciding if a concern is low-level, the Headmaster will discuss the concern with the DSL/Senior Deputy Head, and will seek advice from the LADO where there is any doubt about whether the concern in fact meets the harm threshold. When seeking external advice, the Headmaster will ensure they adhere to the Data Protection Policy and the information sharing principles outlined in the Child Protection Policy.

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The Headmaster can take action through contacting the LADO in the Local Authority Safeguarding and Standards Team or referring concerns/complaints to Children’s Social Care or to the Police via the Children’s Advice and Duty Service (ChADs). Even though it may seem difficult to believe that a colleague may be unsuitable to work with children, the risk is far too serious for any member of staff to dismiss such a suspicion without taking action.

If the concern/complaint or allegation is about the Headmaster, the person with concerns must contact the Chair of Governors or report directly to the LADO.

The LADO can also be contacted directly to discuss a new concern, or a concern that they are already aware of via:

**Phone: 01305 221122**

**Email: [LADO@dorsetcouncil.gov.uk](mailto:LADO@dorsetcouncil.gov.uk)**

**Referral Form: [Referral – Management of Allegations against people who work with children \(Dorset\)](#)**

The school will retain all records of low-level concerns, including those that were found to be unfounded. The Headmaster will ensure that all records include the most accurate and up-to-date information. The Headmaster will ensure that all low-level concerns are stored together, in an organised and consistent manner, to ensure that they can be easily reviewed and analysed where necessary.

The records will include:

- A clear and comprehensive summary of the concern;
- The context in which the concern arose;
- Details of how the concern was followed up and resolved;
- A note of any action taken, decisions reached and the outcome;
- The name of the individual sharing concerns – if the individual wishes to remain anonymous this will be respected as far as possible.

## **Allegations that Meet the Threshold for Harm**

In all cases of allegations against staff or volunteers, the Headmaster or Chair of Governors will contact the LADO without delay and follow the correct procedures below. Any allegation against a member of staff, or any volunteers who work with children, or the Headmaster or a Governor must be reported **immediately** in accordance with the procedures set out below.

Allegations that might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in the school constitutes an ‘Allegation that Meets the Threshold for Harm’. This guidance should be followed where it is alleged that anyone working in the school, including supply teachers, volunteers and contractors has:

- **Behaved in a way that has harmed a child, or may have harmed a child**
- **Possibly committed a criminal offence against or related to a child; or**
- **Behaved towards a child or children in a way that indicates he or she would pose a risk of harm if he or she works regularly or closely with children.**

Any allegations not meeting these criteria will be dealt with in as a ‘Low Level Concern’ accordance with KCSIE and Pan Dorset Safeguarding Children Partnership procedures. Advice from the Designated Officer (LADO) will be sought in borderline cases.

Whilst we acknowledge that some allegations may be false, malicious, or misplaced, we also acknowledge that they may be founded. It is, therefore, essential that all allegations are investigated properly, in line with agreed procedures and that outcomes are recorded. All school staff will maintain a culture of vigilance based on the notion that ‘it could happen here’, in line with the **Staff Code of Conduct**.

In line with Dorset Safeguarding procedures: ***All such allegations must be dealt with as a priority and referred to the Designated Officer (LADO) within one working day<sup>3</sup>.***

Staff will be encouraged to use the **Whistle Blowing Policy** if they have concerns regarding the conduct or behaviour of a colleague and they feel that matter has not been addressed appropriately by the school.

When an allegation is made, the school will:

- **Look after the welfare of the child.**
  - The Designated Safeguarding Lead (DSL) is responsible for ensuring that the child is not at risk and referring cases of suspected abuse to the local authority children's social care.
- **Investigate and support the person subject to the allegation.**
  - Investigations will be conducted in line procedures as laid out in Keeping Children Safe in Education and advised by the Pan Dorset Local Authority.
  - The case manager should discuss with the LADO, the nature, content and context of the allegation, and agree a course of action.
- When dealing with allegations, the school will:
  - apply common sense and judgement;
  - deal with allegations quickly, fairly and consistently; and
  - provide effective protection for the child and support for the person subject to the allegation.

#### **Initial Action by person receiving or identifying an allegation or concern**

- Treat the matter seriously and keep an open mind.
- Make a written record of the information.
  - Include the time, date and place of incident/s, persons present and what was said and sign and date this.
- Share this record with directly with:
  - Low Level Concern: The Headmaster.
  - Allegation Meeting Threshold for Harm: The Headmaster.
  - Concern/Allegation about The Headmaster: The Chair of Governors.
    - The Headmaster can be contacted via: [head@miltonabbey.co.uk](mailto:head@miltonabbey.co.uk).
  - My Concern: is to be used to log the concern rather than the details of any allegation. This will be coordinated by The Headmaster.
  - This ensures staff and pupils maintain their reasonable expectation of privacy from wider visibility of any allegations made (staff will be made aware where appropriate and necessary).
- The Head: (or where delegated, appropriate member of SLT) will record details of the allegation as case manager. These will be filed through the Headmaster's Office.
- All records must include the time, date and place of incident/s, persons present and what was said and sign and date this.
- Immediately report the matter to the Headmaster (unless the allegation is against the Headmaster, in which case report directly to the Chair of Governors).

#### **Responding to Initial Action**

- **The school will:**
  - Obtain written details of the concern or allegation, but will not investigate or interview the child, adult or witnesses.
  - Contact the Local Authority Designated Officer (LADO) within 1 working day.
  - Inform the Chair of Governors of the allegation.

#### **Subsequent Action by the Headmaster (or designated person)**

- In consultation with HR conduct a disciplinary investigation if an allegation indicates the need for this.

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<sup>3</sup> [https://pandorsetscb.proceduresonline.com/p\\_alleg\\_against\\_staff.html](https://pandorsetscb.proceduresonline.com/p_alleg_against_staff.html)

- Contribute to the child protection process by attending professional strategy meetings.
- Maintain contact with HR.
- Ensure clear and comprehensive records regarding the allegation, and action taken, and outcome are retained on the staff member's personnel file.
- Consider along with Human Resources and the LADO whether a referral to the DBS should be made.

#### **Reporting allegations against staff, the Headmaster, Governors or volunteers**

- Where an allegation or complaint is made against any member of staff, a volunteer or a Governor, the matter must be reported immediately to the Headmaster.
- If the allegation involves the Headmaster, the DSL/ Senior Deputy Head will liaise directly with the Chair of Governors without notifying the Head first.
- Where an allegation is made against the DSL, the matter must be reported immediately and directly to the Headmaster.
- The Chair of Governors can be contacted via email: [ian.bromilow@miltonabbey.co.uk](mailto:ian.bromilow@miltonabbey.co.uk).

#### **Pan Dorset Local Authority Procedures**

As a Dorset based school, Milton Abbey will follow guidance as outlined by the Pan Dorset Safeguarding Partnership (PDSCP).

The Local Authority will be informed of any concern/allegation against a person who works with children in Dorset. An e-referral can be made via PDSCP: [Referral – Management of Allegations against people who work with children \(Dorset\)](#). This referral form will be sent directly to the LADO, who will respond to the query as soon as possible.

Dorset also offer advice and guidance via the e-referral if there is further clarity required to assess if a concern meets the Management of Allegations threshold. The LADO will then respond using the supplied contact details to discuss any query further.

The LADO can also be contacted directly to discuss a new concern, or a concern that they are already aware of via:

**Phone: 01305 221122**

**Email: [LADO@dorsetcouncil.gov.uk](mailto:LADO@dorsetcouncil.gov.uk)**

**Referral Form: [Referral – Management of Allegations against people who work with children \(Dorset\)](#)**

The Designated Officer (LADO) will be informed of allegations that come to the attention of the school or that are made directly to the police as soon as possible, within one working day. It is the responsibility of the Headmaster or Chair of Governors, as appropriate, to report the matter to the Designated Officer (LADO) ([lado@dorset.gov.uk](mailto:lado@dorset.gov.uk) / 01305-221122) and to act in accordance with any strategy formulated by the relevant agencies. In cases of serious harm, the police will be informed from the outset. All allegations will be discussed with the Designated Officer (LADO) before further action is taken and this discussion will be recorded in writing.

**The person with responsibility for contacting the Designated Officer (LADO) in accordance with the procedures described above is known as the 'case manager'.**

#### **Transferable Risk**

If concerns arise about the person's behaviour in relation to their own children, the police and/or Children's Social Care must consider informing the employer / organisation to assess whether there may be implications for children with whom the person has contact at work / in the organisation, in which case this procedure will apply.

Where appropriate an assessment of transferable risk to children with whom the person works should be undertaken. If in doubt seek advice from the local authority designated officer (LADO).

Allegations of historical abuse should be responded to in the same way as current concerns. In such cases, it is important to find out whether the person against whom the allegation is made is still working with children and if so, to inform the person's current employer or voluntary organisation or refer their family for assessment<sup>4</sup>.

**The person with responsibility for contacting the Designated Officer (LADO) in accordance with the procedures described above is known as the 'case manager'.**

**Disclosure of Information:** The case manager will inform the accused person of the allegation as soon as possible after the Designated Officer (LADO) has been consulted. The parents or carers of the child(ren) involved will be informed of the allegation as soon as possible. If the member of staff for which an allegation has been made resides on the school site or in boarding accommodation alternative arrangements will be made to accommodate the staff member off-site, for the duration of the investigation. The 'case manager' will seek assurance from the Designated Officer (LADO) before allowing the staff member to resume their teaching duties at the school or re-enter boarding/on-site accommodation. Where the Designated Officer (LADO) advises that a strategy discussion is needed, or the police or the local authority's social care services need to be involved, the case manager should not inform the accused or the parents or carers until these agencies have been consulted and it has been agreed what information can be disclosed. The parents or carers should be kept informed of the progress of the case, including the outcome of any disciplinary process. The reporting restrictions preventing the identification of a teacher who is the subject of such an allegation in certain circumstances will be observed.

**Further action:** The School has a duty of care towards its employees and as such, it will ensure that effective support is provided for anyone facing an allegation. The school will take action in accordance with part four of *Keeping Children Safe in Education (2023)*.

**Ceasing to use staff:** If the School ceases to use the services of a member of staff (or a Governor or volunteer) because he or she is unsuitable to work with children, a settlement/compromise agreement will not be used and a referral to the Disclosure and Barring Service will be made as soon as possible if the criteria are met. Where a referral is made to the DBS, [PO Box 181, Darlington, DL1 9FA Tel: 01325 953795], a separate referral will also be made as soon as possible to the National College for Teaching and Leadership (NCTL) in cases of serious professional misconduct. Any such incidents will be followed by a review of the safeguarding procedures within the school, with a report being presented to the Governors without delay.

**Resignation:** If a member of staff (or a Governor or volunteer) tenders his or her resignation, or ceases to provide his or her services, any child protection allegations will be followed up by the school in accordance with this policy and a referral will be made to the Disclosure and Barring Service (PO Box 181, Darlington, DL1 9FA Tel: 01325 953795) as soon as possible if the criteria are met and a separate referral will also be made as soon as possible to the Department for Education and Teaching Regulation Agency (TRA) in cases of serious professional misconduct.

Where a teacher has been dismissed or would have been dismissed had he/she not resigned, in circumstances where the threshold for a DBS referral have not been met, separate consideration will be given as to whether the matter should be referred to Department for Education and Teaching Regulation Agency (TRA). This will include matters where there has been unacceptable professional conduct, conduct which may bring the teaching professional into disrepute, conviction at any time of a relevant offence or where a prohibition order may otherwise be appropriate.

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<sup>4</sup> [https://pandorsetscb.proceduresonline.com/p\\_alleg\\_against\\_staff.html](https://pandorsetscb.proceduresonline.com/p_alleg_against_staff.html)

## **Allegation Outcomes**

The definitions that should be used to determine the outcome of an allegation are set out below:

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

### **Unsubstantiated, unfounded, false or malicious allegations:**

In these circumstances the LADO and case manager should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances a referral to children's social care may be appropriate. Where an allegation by a pupil is shown to have been deliberately invented or malicious, the Headmaster will consider whether to take disciplinary action in accordance with the school's Pupil Behaviour Policy. Where a parent has made a deliberately invented or malicious allegation the Headmaster will consider whether to require that parent to withdraw their child or children from the school on the basis that they have treated the school or a member of staff unreasonably. Whether or not the person making the allegation is a pupil or a parent (or other member of the public), the school reserves the right to contact the police to determine whether any action might be appropriate. Where an allegation or report by a member of staff is determined to be deliberately invented or malicious the school will consider whether any disciplinary action is appropriate against the individual who made the report in line with our Disciplinary Procedures and Staff Code of Conduct.

### **Record Keeping**

Details of an allegation will be recorded on the employee's file and retained at least until the employee reaches the normal retirement age or for a period of ten years from the date of the allegation, if this is longer, unless the allegation was proven to have been false, unsubstantiated, unfounded, or malicious, in which case it will not be referred to in any reference.

Substantiated allegations will be included in references, provided that the information is factual and does not include opinions. Allegations found to be malicious or false will be removed from personnel records.

Records will include:

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

### **Learning Lessons**

Learning lessons applies to all cases, not just those which are concluded and found to be substantiated.

Throughout the process in handling an allegation, and at conclusion of a case in which an allegation is substantiated, the LADO should review the circumstances of the case with the case manager to determine whether there are any improvements to be made to the school's procedures to help prevent similar events occurring in the future. For all other cases where an allegation is concluded to be either unfounded, false, malicious or unsubstantiated, the case manager (and the LADO if they have been involved) should consider the facts and determine whether any lessons can be learned and if improvements can be made.

**Non recent allegations**

Where an adult makes an allegation to the school that they were abused as a child, the individual will be advised to report the allegation to the police. Non recent allegations made by a child, will be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations. The LADO will coordinate with local authority children social care and the police. Abuse can be reported no matter how long ago it happened.

**Monitoring and review**

This policy will be reviewed annually by the Headmaster and the DSL, and in response to any new safeguarding requirements or concerns surrounding the wider cultural issues in the school.

The next scheduled review for this policy is September 2024.

## Appendix 1. Safeguarding Leadership

### Role of the Headmaster:

#### It is the responsibility of the Headmaster to ensure that:

- The policies and procedures adopted by the Governors are fully implemented and followed by all staff.
- All pupils are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online, relationship education and extra-familial risks including Children Criminal exploitation.
- Sufficient resources and time are allocated to enable the DSL and the deputy to carry out their roles effectively, including the attendance at initial and review child protection conferences, core group and other necessary meetings.
- All staff and volunteers feel able to raise concerns about poor or unsafe practice regarding children, and such concerns are addressed sensitively and effectively in a timely manner in accordance with the agreed Whistle Blowing Policy.
- They have completed Safer Recruitment training.
- To manage reports of concerns, complaints or allegations against members of staff in line with the Child Protection Policy and the Staff Code of Conduct.
- The procedure for managing allegations against staff is known to all staff and is readily available to all staff.
- The operate the procedure for managing allegations effectively and refer relevant concerns to the Local Authority Designated Officer (LADO).
- Anyone who has harmed or may pose a risk to a child is referred to the DBS and any other relevant professional body.
- A senior manager is appointed to deal with allegations against staff in the absence of the Headmaster.



## Role of the Governing Body:

### Oversight

The governing body as a whole has overall responsibility for ensuring that:

- Safeguarding policies and procedures meet legal and regulatory requirements and that pupils are suitably safeguarded at all times.
- The governors monitor how statutory responsibilities are met.

The governing body as a whole has overall responsibility for ensuring effective governance in safeguarding:

- Takes strategic leadership responsibility for the school's wider safeguarding arrangements.
- Has arrangements in place to ensure they carry out their functions with a view to safeguarding and promoting the welfare of children and have regard to the statutory guidance in considering what arrangements are needed.
- Makes sure they have the knowledge and information needed to perform their functions, understand their responsibilities and assure themselves that the school's safeguarding arrangements are robust.
- Ensures that staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children
- Creates an environment where staff feel supported in their safeguarding role and able to raise concerns
- Ensures '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.
- Ensures that the school's safeguarding policies are reviewed at least annually, including an update and review of the effectiveness of procedures and their implementation.

### Policy and Procedures:

The Governing Body ensures that:

- An effective Child Protection Policy and Procedures policy is in place and easily accessible in accordance with statutory guidance and locally agreed inter-agency procedures and implemented in whole school practice.
- The school follows safe recruitment procedures, and the single central register of staff is in order, ensuring provision meets statutory requirements and advice, particularly ensuring appropriate checks are carried out on staff and volunteers who work with children.
- Staff undergo safeguarding and child protection training (including online safety) at induction.
- The school follows the Pan Dorset Safeguarding Children Partnership, guidance, and the statutory guidance Keeping Safe in Education, for dealing with allegations of abuse against staff and volunteers.
- School safeguarding and child protection policies are up to date and risks assessed at regular intervals.
- Areas requiring action are dealt with immediately and any deficiencies or weaknesses are remedied without delay.
- Safeguarding responses to children missing from or are persistently absent from education, particularly on repeat occasions and help identify the risk of abuse, neglect or exploitation and prevent the risk of them going missing in the future.
- The DSL is of suitable 'status and authority' to take responsibility and carry out the role as part of the school's leadership team.
- There is a named Governor for safeguarding, a DSL and DDSL within the school.
- Staff /volunteers attend relevant child protection training that is in line with local authority procedures.
- Support the Headmaster in responding to concerns, complaints or allegations made against members of staff.
- Support the Chair of Governors in responding to concerns, complaints or allegations made against the Headmaster.
- Allegations are managed swiftly, correctly and safely.

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- Any information required by the local authority regarding safeguarding is passed to them swiftly.
- A member of the Governing Body (the Chair of Governors) is responsible for liaising with the LADO in the event of an allegation of abuse being made against the Headmaster, and appropriate action is taken to minimise any further possible risk to the children in the school.
- Safeguarding matters are placed on governors' agendas to ensure they are constantly informed of changes and concerns by the Headmaster, the DSL and the nominated governor.
- The safeguarding governor meets regularly with the DSL and conducts an annual review of staff knowledge and the efficiency and implementation of safeguarding procedures.
- This review involves the scrutiny of the training records of staff, safeguarding issues dealt with over the year, how they have been handled and the contribution the school has made to multi-agency working.
- Governing body meeting minutes record the form and findings of the review fully.
- Staff follow requirements of the Code of Conduct.
- Where services or activities are provided on the school premises by another group or individual, the school will check they have appropriate policies and procedures in place to safeguard children and have 'hire agreements' with external groups and individuals.
- Prevent guidance will be followed to ensure any hire agreements with external groups and individuals are not promoting extremist ideologies.
- Policies and procedures are reviewed annually and provide information to the Local Authority as part of the annual Audit about how the above duties have been discharged.

## Role of the Designated Safeguarding Governor

### Oversight

The Designated Safeguarding Governor will:

- Take strategic leadership responsibility for the school's wider safeguarding arrangements.
- Ensure the school has an effective:
  - Child Protection Policy and Procedures documentation.
  - Staff code of conduct.
  - Policy for handling allegations against staff and volunteers.
  - Safeguarding responses to children become absent from education, particularly on repeat occasions and/or prolonged periods.
  - Online monitoring systems, filters and processes.
- Be notified of safeguarding incidents.
  - Incidents involving staff or volunteers are managed in consultation with the Headmaster and DSL to consider:
    - Making a referral to where a teacher has been dismissed (or would have been dismissed had he/she not resigned).
    - Whether the matter is sufficiently serious to be referred to:
      - The Teacher Regulation Agency.
      - The police (in cases where a crime may have been committed).

### Accountability for Safeguarding

The Designated Safeguarding Governor will:

- Ensure that the school has appointed:
  - A Designated Safeguarding Lead who a member of the senior leadership team.
  - A member of staff designated to promote the achievement of looked after children.
- Ensure the curriculum covers safeguarding, including online safety.
- Monitor and reviews safeguarding practices and procedures.
- Check reviews of the Single Central Record.
- Provide updates to the Council of Milton Abbey School on the monitoring of safeguarding.
  - Keep the Council up to date.
  - Inform the Council if there are any changes to be implemented in light of new legislation or learning from a safeguarding incident/concern.
- Be informed of safeguarding concerns or incidents.

### Partnership with Designated Safeguarding Lead

The Designated Safeguarding Governor will:

- Meet with the DSL regularly.
- Ensure the DSL has appropriate status, authority, time, funding, training and resources to carry out their role effectively.
- Review safeguarding through monitoring the DSL and questioning practice and policy.

### Training

The Designated Safeguarding Governor will:

- Attend Level 3 Safeguarding training in-line with Pan-Dorset Safeguarding Children's Partnership expectations and KCSIE.
  - Training should be updated every 2 years.
- Attend governor training.
- Ensure induction and training is attended by:
  - The full Council of Milton Abbey School.
  - Milton Abbey Staff and volunteers.

## Role of the Designated Safeguarding Lead

### Scope of Role:

To take lead responsibility for safeguarding and child protection, including online safety and understanding the filtering and monitoring systems and processes in place, and for mental health, that helps to promote the welfare and educational outcomes for pupils by:

- Sharing information about the welfare, safeguarding and child protection issues that children (including children with a social worker), are experiencing, or have experienced, appropriate staff, leadership and agencies.
- Ensuring staff are aware of who these pupils are and contextualise their progress and attainment in a culture of high aspirations.
- Supporting staff to identify the challenges that children in this group may face, and the additional support or reasonable adjustments required to provide the best support possible.

During term time, the designated safeguarding lead always be available, or ensure a deputy is available, during school hours for staff in the school to discuss any safeguarding concerns.

- The DSL and DDSLs arrange adequate and appropriate cover out of term time.

The DSL is appointed from the Senior Leadership Team.

### Oversight of Safeguarding

The DSL will:

- Maintain an overview of safeguarding within the school and sustain the high profile of safeguarding for adults and pupils within the school community.
- Ensure that the school operates within legislative frameworks and recommended guidance.
- Act as a source of advice and expertise to staff on matters of safety and safeguarding.
- Ensure children receive the right help at the right time by the right people, in order to address risks and prevent issues escalating.

### Raising Awareness

The DSL will:

- Ensure the Safeguarding Policy is updated and reviewed annually and work with the Governing Body regarding this.
- Ensure parents are made aware of the Safeguarding Policy which will alert them to the fact that referrals may be made by the DSL or a member of school staff to ensure parents are clear of the school's safeguarding responsibilities and to avoid conflict later.
- Ensure that when a child leaves the school that the child protection file is copied for the new setting in a timely manner and transferred to the new school separately from the main pupil file, as well as ensure the pupil's Social Worker is informed.
- The DSL and the Safeguarding Governor complete the Annual Audit return for the PDSC, to ensure that the school is meeting its requirements under statutory guidance.

### Training

The DSL will:

- Recognise how to identify signs of abuse and know when it is appropriate to make a referral to children's social care
- Have knowledge of the PDSCP Escalation policy and the Local Authority Designated Officer (LADO) role
- Have a clear understanding of the process involved for a child protection case conference and be able to attend and contribute to these
- Ensure that all staff have access to and understand the school's safeguarding and Child Protection Policy.
- Ensure that all staff have induction safeguarding training and receive regular updates.
  - Induction will ensure that staff are aware of systems within the school including:

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- The Child protection Policy
  - Responding to child-on-child abuse
  - The Behaviour policy
  - Staff Code of Conduct
  - The Children Missing from Education Policy
  - Roles and identities of the DSL and DDSLs
  - Copies of Part One to KCSIE
- Access resources and attend any relevant or refresher training courses at least every two years.
  - Level 3 Safeguarding trained is required in-line with Pan-Dorset Children’s Partnership expectations and KCSIE. This training should be updated every 2 years.
- Ensure that all staff are trained/updated in child protection regularly in line with advice from the PDSCP (including Prevent Duty and Online safety).
- To supplement regular formal staff training with informal updates as required, but at least annually.

### Legislation

The DSL will be aware of any changes in statutory requirements and alter school documentation accordingly. This includes:

- Updating the Milton Abbey Child Protection Policy and Procedures annually (unless legislation requires otherwise).
- Ensuring the staff body, including governors are updated.
- Attending network meetings and appropriate training.
- Adapting swiftly to changing regulations.
- Monitoring the effectiveness of policies and procedures, and their implementation.

### Safeguarding Team Management

The DSL will:

- Lead a staff team and monitor, evaluate and record their effectiveness in implementing safeguarding procedures.
- Liaise with the **Headmaster and Deputy Safeguarding Leads** in:
  - Ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
  - Welfare and safeguarding concerns raised within the school community.
  - Assess risk management for pupils directly or indirectly involved with safeguarding concerns.
  - Review practice, policy and intervention strategies to support best practice and ensure policy compliance.
- Liaise with the **Safeguarding Governor and Full Council of Milton Abbey School** to:
  - Report:
    - Annual summary of safeguarding concerns and actions.
    - Legislative updates and guidance including policy implications or changes.
    - Training strategies and needs.
    - Pan-Dorset Safeguarding Partnership Audit review.
  - Ensure policy and procedures are in line with statutory regulations and implemented correctly.
  - Inform of any safeguarding concerns or incidents.
- Liaise with **External Agencies** to:
  - Submit reports (where appropriate).
  - Ensure the school’s attendance at, child protection conferences or case reviews.
  - Contribute to decision making and commit to the delivery of actions planned to safeguard the child at such conferences or case reviews.
  - Open channels and communicate effectively (verbally and in writing).
  - Be a representative of the school at appropriate meetings as an effective member of a multi-agency, local authority team.

## Management of Welfare and Safeguarding Concerns

### Reports, Concerns and Allegations

The DSL will:

- Understand the importance of acting on and referring the early signs of abuse and neglect, keeping clear records, listening to views of the child and reassessing concerns when situations do not improve.
- Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required.

### Action

The DSL will:

- Present a calm and efficient disposition in a crisis.
- Listen objectively, actively and non-judgementally.
- Follow procedures accurately and make informed decisions.
- Decide whether to make a referral always liaise with relevant agencies for advice.
- Act as a support to pupils and staff, follow up and document progress in relation to all concerns regularly.
- Liaise with parents in response to safeguarding concerns where appropriate.

### Referrals

The DSL will:

- Act as a source of support, advice and expertise within our school and have access to the Pan Dorset Safeguarding Children Partnership, guidance and procedures (PDSCP).
- Consult with and/or refer cases of suspected abuse or allegations to Children's Social Care and maintain a record of all referrals.
- Liaise with the Headmaster to advise of any issues and ongoing investigations and ensure there is always cover for the DSL role. Keep the Headmaster informed of ongoing enquires under section 47 of the Children Act 1989 and police investigations. The DSL will be aware of the requirement for children to have an Appropriate Adult (see statutory guidance – [PACE Code C 2019](#)).
- Attend and contribute to safeguarding and child protection meetings as appropriate.
- Monitor and support Child in Need and Child Protection plans.
- Keep detailed, accurate and securely stored written or electronic records, which will include the outcomes of all actions taken.
- Refer all cases of suspected abuse to either/or:
  - The appropriate local authority Children/Adult Services.
  - The local authority designated officer (LADO) for child protection concerns (particularly all cases which concern a staff member).
  - Ensure due process has taken place in informing the Disclosure and Barring Service where appropriate in cases where a person is dismissed or left due to risk/harm to a child.
  - In consultation with the Headmaster, and informing the safeguarding governor, consider:
    - Making a referral to where a teacher has been dismissed (or would have been dismissed had he/she not resigned).
    - Whether the matter is sufficiently serious to be referred to:
      - The Teacher Regulation Agency.
      - The police (in cases where a crime may have been committed).

### Record Keeping

The DSL will:

- Keep records of all meetings ensuring they are clear, comprehensive and dated.
- Ensure school records in relation to Safeguarding are comprehensive, updated and accessible. Safeguarding records are to be kept in a secure location, separate from pupils' central files.
- Child protection files are to be:

- Full, informative and contain all the information (duly dated) relating to the child in question.
  - Inclusive of details of all communications with external agencies, parents and carers.
- Ensure the child protection records of any pupil who leaves the school and has a child protection file are copied for the new school and transferred separately from the main pupil file.
- In addition to handing over child protection file to new school, to share information proactively with the new school to enable the school to have support in place when a child arrives and to ensure that key staff, such as the SENDCO, are aware of any needs.

## Role of the Deputy Designated Safeguarding Lead

### Oversight

The Deputy DSL will:

- Be familiar with the role and expectations of the DSL.
- Be available to support the DSL in whatever capacity is required.
- Be observant and a good communicator.
- Have the knowledge and skill to perform the duties of the DSL when requested.
- Assume the role of DSL whenever requested and when the DSL is not available or on site.
- Understand the organisation and functioning of external agencies, including child protection cases and case conferences.

### Training

The Deputy DSL is Level 3 Safeguarding trained is required in-line with Pan-Dorset Children's Partnership expectations and KCSIE.

- Training should be updated every 2 years.

### Support to the DSL

The Deputy DSL will support the DSL to:

- Ensure all staff and volunteers understand their responsibilities in being alert to the signs of abuse.
- Assist the DSL in producing reports for senior managers and governors, as appropriate.
- Attend child protection and case conferences, as appropriate.
- Be responsible for dealing with all matters relating to safeguarding and follow the school procedures accurately.
- Share information on all matters brought to their notice with the Headmaster and, should matters involve child protection, with the Local Authority Designated Officer (LADO) immediately, for advice.
- Share any concerns that are reported and involve the Headmaster with the Chair of Governors as well as the LADO.
- Support staff at all levels in their implementation of the school's child protection procedures.
- Although the responsibility for all safeguarding matters remains with the DSL, specific responsibilities are outlined as follows:
  - **Staff Induction and Training, Online Safety, Child Safeguarding Practice Reviews Oversight and Learning, MyConcern Oversight and Learning and Senior Deputy DSL:** Sarah Badley (Head of Personal Development and Community Engagement)
  - **Pupil Welfare:** Zoe Livingstone (Deputy Head Pastoral)
  - **Physical and Mental Health and Wellbeing:** Ashley Garrett (Senior Nurse Manager)
  - **Visitors to Site, Volunteers and Pupil Induction:** Claudia Hindle (Deputy Head Development and Admissions)
  - **Supporting Children Through the Curriculum** (with a specific focus on Boarding): Martyn Peel (Head of Boarding)
  - **Supporting Children Through the Curriculum** (with a specific focus on SEND): Jane Naylor (Learning Development Teacher)
  - **Equality, Diversity and Inclusion (EDI), Social, Moral, Cultural and Spiritual (SMSC) Development:** Piers Webb (Assistant Housemaster)



## Appendix 2: Useful Contacts

### New Referrals & Advice:

*(Concerns about children which require a social work assessment and safeguarding concerns)*

- **Children's Advice and Duty Service (ChADs)**
    - 01305 228558
  - **Out of Hours Service**
    - 01305 228558
- 

### Dorset Safeguarding Partnership

#### Pan-Dorset Safeguarding Children Partnership



The Dorset Safeguarding Partnership is comprised of 4 partners

- **BCP- Bournemouth Christchurch and Poole Children's Services** *(covered by Partnership, not within Milton Abbey Local Authority catchment).*
- **DC- Dorset Council Children's Services** (as accessed via ChADs)
- **Dorset Police**- via 111 or 999 in an emergency
- **DCG Clinical Commissioning Group** - Health provision in Dorset

### Dorset Safeguarding and Standards Team

- 01305 228 329 / 328
- [safeguardingandstandardsadvisors@dorsetcouncil.gov.uk](mailto:safeguardingandstandardsadvisors@dorsetcouncil.gov.uk)

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

- *The Education Safeguarding Standards Advisor who offers advice and support to Heads and Designated Safeguarding Leads in relation to safeguarding and child protection issues.*
- *The Local Authority Designated Officer (the LADO) to whom allegations against adults who work with children in education establishments must be reported.*
- *The Children's Services 'Prevent' Lead.*

### Local Authority Designated Officer (LADO)

- 01305 221122
- [lado@dorsetcouncil.gov.uk](mailto:lado@dorsetcouncil.gov.uk)

### Looked After Children/Children In Care:

- Dorset Virtual School for children who are in care/ Looked After
  - 01305 228350

### Governor Services:

- 01305 224 156
- [governorhelp@dorsetcouncil.gov.uk](mailto:governorhelp@dorsetcouncil.gov.uk)

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# Appendix 3: Safeguarding Team Contacts



**Ian Bromilow**  
Safeguarding Governor

Responsibility: Accountability

[ian.bromilow@miltonabbey.co.uk](mailto:ian.bromilow@miltonabbey.co.uk)



**Chris Barnes**  
DSL

Responsibility: Safeguarding Lead

SDH's Study 807



**James Watson**  
Head

Responsibility: Accountability

Head's Study 801



**Sarah Badley**

Responsibility: Senior Deputy DSL  
Staff Induction and Training, Online Safety, Behaviour, MyConcern & Practice Reviews  
Oversight and Learning

Ma3  
 310



**Ashley Garrett**

Responsibility: Deputy DSL  
Physical and Mental Health and Wellbeing

Health Centre  
 868



**Jane Naylor**

Responsibility: Deputy DSL  
Supporting Children Through the Curriculum – Special Educational Needs and Disability (SEND)

LD Dept  
 374



**Martyn Peel**

Responsibility: Deputy DSL  
Supporting Children Through the Curriculum - Boarding

HOB Office  
 297



**Zoe Livingstone**

Responsibility: Deputy DSL  
Pupil Welfare

Deputy Head's Study  
 201



**Claudia Hindle**

Responsibility: Deputy DSL  
Visitors to Site, Volunteers, Pupil Induction

Deputy Head's Study  
 373



**Piers Webb**

Responsibility: Deputy DSL  
Equality, Diversity & Inclusion (EDI), Social, Moral, Spiritual and Cultural Development (SMSC)

Athelstan  
 253

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## Appendix 4: Possible Indicators of Abuse

The following information is not designed to turn school staff into experts, but it will help them to be more alert to the signs of possible abuse. The examples below are not meant to form an exhaustive list; Designated Safeguarding Leads and other staff will find it helpful to refer to Government advice 'What to do if you are worried about a child being abused' (2016) and the inter-agency safeguarding procedures on the Pan-Dorset Safeguarding Children's Partnership website.

### i) Physical Abuse

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

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

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

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

Other physical signs of abuse can include:

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

Changes in behaviour which can also indicate physical abuse:

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

### ii) Emotional Abuse

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

The physical signs of emotional abuse can include:

- a failure to thrive or grow, particularly if the child puts on weight in other circumstances (e.g. in hospital or away from parents' care);

- sudden speech disorders;
- developmental delay, either in terms of physical or emotional progress.

Changes in behaviour which can also indicate emotional abuse include:

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

### iii) Sexual Abuse

Adults who use children to meet their own sexual needs abuse both girls and boys of all ages, including infants and toddlers. It is important to remember that children can also be sexually abused by other children (i.e. those under 18).

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

The physical signs of sexual abuse can include:

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

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

- sudden or unexplained changes in behaviour, e.g. becoming aggressive or withdrawn;
- fear of being left with a specific person or group of people;
- having nightmares;
- missing school;
- running away from home;
- sexual knowledge which is beyond their age or developmental level;
- sexual drawings or language;
- bedwetting;
- eating problems such as overeating or anorexia;
- self-harm or mutilation, sometimes leading to suicide attempts;
- saying they have secrets they cannot tell anyone about;
- alcohol / substance / drug use;
- suddenly having unexplained sources of money;
- not being allowed to have friends (particularly in adolescence);
- acting in a sexually explicit way towards adults or other children.

### iv) Neglect

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

The physical signs of neglect can include:

- constant hunger, sometimes stealing food from other children;

- being constantly dirty or smelly;
- loss of weight, or being constantly underweight;
- inappropriate dress for the conditions.

Changes in behaviour which can also indicate neglect can include:

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

#### **v) Mental Health**

A young person may present in a state of mental or emotional distress. This presentation may take different forms and be masked through learning or communication challenges, or behaviours concerns. These contextual safeguards must be considered in conjunction with this process.

Keeping Children Safe in Education and Mental Health & Behaviour In Schools (2018) advice recognises that, while only professionals should diagnose mental health problems, staff are well placed to identify behaviour which may indicate that a child is experiencing mental health problems or is at risk of developing one. Where a staff member identifies a young person in crisis, they are to inform the Health Centre immediately which will trigger a reactive process to support the pupils in the moment and establish a proactive intervention model going forward.

Staff should immediately raise any mental health concerns which are also safeguarding concerns

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

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






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

#### **vi) Domestic Abuse**

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, physical, sexual emotional or financial. Children can be victims of domestic abuse: they may see, hear or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships. All of these can have a detrimental and long-term impact on their health, well-being, development and ability to learn.

## Appendix 5: How to Respond to the Child who Discloses (Talks About) Abuse

All staff and volunteers will:

-  • Listen carefully to what is said
-  • Avoid showing shock or disbelief
-  • Observe the child's demeanour
-  • Find an appropriate opportunity to explain that the information will need to be shared with others. They will not promise to keep the information confidential or a 'secret'
-  • Allow the child to continue at her/his own pace and not interrupt if the child is freely recalling events. They will not stop him/her in order to find a 'witness' as this could inhibit the child from saying more
-  • Avoid asking questions or pressing for more information. Ask for clarification only. If questions are necessary they should be framed an open manner and not 'lead' the child in any way: Tell me.... Explain.... Describe...
-  • Reassure the child, if necessary, that s/he has done the right thing in telling
-  • Explain what will happen next and with whom the information will be shared
-  • Not ask the child to repeat the disclosure to anyone else in school – including the DSL - or ask him/her or any other children who were present to write a written account or 'statement'

## Appendix 6: Managing and Dealing with Allegations Against Other Pupils

All concerns and/or allegations against other pupils (child on child abuse) are to be handled sensitively, appropriately and promptly.

### A - Response

- Determine if it is appropriate for the alleged behaviour to be dealt with internally and, if so, whether any external specialist support is required.
- Seek advice from appropriate external agencies to assess the risk of harm for the parties involved and agree on a course of action.
- Refer to appropriate agencies external where appropriate, considering the contextual safeguards and where a crime is considered to have been committed, inform the police.
- Treat all children involved as being at potential risk.
  - The child allegedly responsible for the abuse, and the child who has allegedly experienced the abuse, may have considerable unmet needs and be at risk of harm themselves or others.
  - The school must consider contextualising the risk of harm to other children or adults in any risk assessment.
- Ensure a safeguarding response is in place for both the child who has allegedly experienced the abuse, and the child who has allegedly been responsible for it.
- Take into account:
  - The alleged abuse may indicate wider safeguarding concerns for any of the children involved and consider and address the effect of wider socio-cultural contexts (family, peer groups in and outside of school, community involvement on and offline).
  - That changes may need to be made to these contexts to address the child's/children's needs and to mitigate risk; and the complexities of child-on-child abuse (experience, choice and consent, particularly where choice does not indicate consent).
  - The views of the child/children affected.
    - Unless it is considered unsafe to do so (for example, where a referral needs to be made immediately), the DSL should discuss the proposed action with the child/children and their parents and obtain consent to any referral before it is made.
    - The school should manage the child/children's expectations about information sharing, and keep them and their parents informed of developments, where appropriate and safe to do so.

### B - Risk Management

As a school we will minimise the risk of allegations against other pupils by:

- Providing a developmentally appropriate PSHE syllabus which develops pupils understanding of acceptable behaviour and keeping themselves safe.
- Having systems in place for any pupil or parent to raise concerns with staff; knowing that that they will be listened to, believed and valued.
- Providing interventions and peer support to those pupils identified as being at risk.
- Developing robust risk assessments and providing targeted interventions for pupils identified as being a potential risk to other pupils.
- Having robust anti-bullying policies and procedures.
- Having and following our policy on Sex and Relationships

### C - Allegations

Should an allegation be made by a pupil against another pupil, staff must consider whether the disclosure raises safeguarding and child protection concerns. If one child causes harm to another this will not necessarily be dealt with as abuse: bullying, fighting and harassment between children are not generally child

protection issues and their behaviour will be dealt with under the school's pupil behaviour and discipline policies.

However, the school recognises that children are vulnerable to abuse by their peers; such abuse will be taken as seriously as abuse by adults, it will not be dismissed as 'part of growing up' and will be subject to the same child protection procedures. All child-on-child allegations of a safeguarding and child protection concern must be referred to the DSL immediately.

It is likely that such allegations will feature some of the following and therefore it may be appropriate to regard a young person's behaviour as abusive if:

- There is a difference in power (e.g. age, gender, size, intellect, development/SEND) between the young people concerned; or
- The perpetrator has repeatedly tried to harm one or more children; or
- There are concerns about the intention of the alleged perpetrator (e.g. the acts could be considered exploitative)
- It is of a serious nature that is possibly a criminal offence.

If the evidence suggests that there was an intention to cause significant harm to the victim, this should be regarded as abusive whether or not significant harm was actually caused. Additionally, high frequency and persistence of abusive acts are strong indicators of abuse; an identifiable pattern of abusive behaviour or 'modus operandi' by the perpetrator will increase the likelihood of such action to be defined as abuse.

**Staff must be alert to the gendered nature of child-on-child abuse; safeguarding issues may include physical, emotional and sexual abuse and/or exploitation. Staff must be alert to child-on-child abuse, or inappropriate pupil relationships especially where there is a gender imbalance in school intake, as at Milton Abbey.**

Examples of safeguarding and child protection issues made by a pupil against another may include:

- **Physical Abuse:** Aggression, coercion, violence and threats of violence (particularly pre-meditated). 'Hazing'; the practice of rituals and other activities involving harassment and/or humiliation used as a way of initiating a person into a House/group/team. Forcing others to use drugs or alcohol.
- **Emotional Abuse:** Blackmail, bribery or extortion, threats, intimidation and harassment including online. Targeted children may feel persistently frightened or in danger, anxious, discomfort and/or humiliation. Attempts may be made by the perpetrator to ensure secrecy or dismiss repeated verbal abuse as 'banter'.
- **Sexual Abuse, Harassment and/or Exploitation:** Indecent exposure and/or touching e.g. breast/bottom or sexual assaults and harassment. Exposing genitals or masturbating in public, sexual degradation, humiliation, of self or others. Photographing/recording or forcing other children to perform/watch indecent acts. Force, coercion and/or potential grooming activities involving indecent images, sharing nudes/'sexting' (youth produced sexual imagery) and/or use of sexual language which is offensive or makes explicit sexual suggestions and/or cyber-sexual bullying involving aggression. Up-skirting (a highly intrusive practice), which is typically the taking of a picture under a person's clothes (of any gender) without them knowing, with the intent of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress or alarm (this is a criminal offence).

#### **D - Procedure**

The school is not an investigation or intervention agency for child protection, but it has an important role to play at the recognition and referral stages. It is not the responsibility of School staff to investigate suspected abuse.

The school will take into account the procedures advised by Pan-Dorset Safeguarding Children's Partnership when dealing with allegations of child-on-child abuse, and those outlined statutory guidance found in

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'Keeping Children Safe in Education' (KCSIE). The school will also seek advice and guidance in line with these policies from appropriate external agencies.

### **Disclosure**

Any child-on child disclosure must be referred to the DSL immediately.

- Staff have now fulfilled their duty and should not take any further action or reveal information to anyone else.
- The DSL is aware that staff may need support following a disclosure.

### **Management of Disclosure**

- Child on child disclosures will be managed by the DSL on a case-by-case basis.
  - The DSL will immediately inform the Headmaster where a child protection concern regarding child-on-child abuse has been disclosed.
  - A factual record of the allegation will be sought by the DSL
  - Reports of harmful sexual behaviour including sexual violence and sexual harassment will, where possible, be managed with two members of staff present (one of them being the DSL or a Deputy).
  - Pastoral staff may be informed of the disclosure on a 'need to know' basis.
  - The welfare and wellbeing of those involved in the allegation will consider as part of a wider assessment of risk.
- The DSL may seek medical support and assessment on behalf of the victim from the school's medical staff.
- The DSL will seek advice and guidance from the Dorset Education Safeguarding Standards Advisor and/or the Children's Advice and Duty Service (ChADS).
  - The DSL will follow through the outcomes of the discussion and make a referral to Children's Social Services as appropriate if there is reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm.
  - Where it is clear from the allegation is that a crime has been committed and in cases of significant harm the Police will be contacted.
- The parents of pupils involved in the allegation will be informed and kept updated on the progress of the investigation as appropriate.
- The pupil who made the allegation will be informed of what the next steps will be.
- The School is aware that a child who has harmed another may also be a victim of abuse, both parties whether victim or perpetrator will be considered 'at risk'. However, the priority is the protection of the victim and potential future victims.
  - The school will ensure that the victim or a pupil who has given information about an abuser is protected from reprisals, intimidation or peer pressure following a disclosure of peer abuse.
  - The school will consider the nature of context of allegations made and follow the school behaviour policy in the event of a possible malicious allegation.
- It may be necessary to remove the alleged perpetrator from school site if they pose a risk of harm to other children. The DSL will take advice as appropriate from the local authority in such cases and act in accordance with the school's responsibilities as required by Keeping Children Safe in Education 2023 at all times.
  - It is possible that an alleged perpetrator may be suspended from school 'pending investigation'. All due regard will be provided for the continuing education and welfare of the alleged perpetrator.
  - If circumstances arise which means that a child cannot immediately be collected from the school on request of the Headmaster by a parent/guardian, they will be offered accommodation under the supervision of an appropriate adult with due regard for their

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welfare and well-being until collection. (This may include being accommodated safely in the Health Centre, elsewhere on site in appropriate accommodation, or off site with a vetted, appropriate adult.)

#### **E- Investigation**

- The DSL will maintain a record of the concern, decisions made and outcomes, including working in partnership with external agencies who may lead an investigation once an allegation is disclosed.
- The victim will be protected and supported during and after an allegation is made. A referral to counselling and/or medical services may be made.
- The perpetrator will be provided with support to prevent any reoccurrence of improper behaviour and address the cause.
- Both pupils will continue to be monitored and evaluated by the Housemaster/ Housemistress, and DSL.
- The school will consider a school disciplinary response to unacceptable behaviour in order to safeguard and protect the wellbeing of other pupils and may conduct an additional investigation to ascertain if there has been a breach of school policies.
- Any investigation that takes place may:
  - Engage appropriate external agencies to help conduct sensitive allegations.
  - Apply school polices to ascertain whether disciplinary action needs to take place.
- The school will ensure that before deciding on appropriate action, due consideration is given to its duty to safeguard all children from harm; the underlying reasons for a child's behaviour; any unmet needs, or harm or abuse suffered by the child; the risk that the child may pose to other children; and the severity of the child-on-child abuse and the causes of it.

## Appendix 7: Sharing Nudes

Sharing nudes or semi-nudes (formerly Youth Produced Sexual Images or 'Sexting').

This appendix should be used with reference to the following:

- Child Protection Policy and Procedures.
- Keeping Children Safe in Education.
- Online Safety Policy.
- Cyberbullying.
- Social Media Policy.
- Acceptable Usage Policy.
- Sharing nudes or semi-nudes. Advice for education settings working with children and young people. Responding to incidents and safeguarding children and young people. UKCIS

All members of staff are made aware of how to recognise 'sharing nudes' and their responsibility to refer any disclosures of incidents to the DSL immediately. Making, possessing and distributing any imagery of someone under 18 which is 'indecent' is illegal. The relevant legislation is contained in the Protection of Children Act 1978 (England and Wales) as amended in the Sexual Offences Act 2003 (England and Wales). For the purpose of this policy, 'indecent' is defined as imagery that contains a naked young person, a topless girl, and/or displays genitals or sex acts, including masturbation. Indecent images may also include overtly sexual images of young people in their underwear. Images and videos can be shared publicly online, in 1:1 messaging or via group chats on many types of online platforms, including messaging apps, email, social media or gaming.

The types of incidents involving 'sharing nudes' are:

- A person under the age of 18 creates and shares nudes or semi-nudes of themselves with a peer under the age of 18
- A person under the age of 18 shares nudes or semi-nudes created by another person under the age of 18 with a peer under the age of 18 or an adult
- A person under the age of 18 is in possession of nudes or semi-nudes created by another person under the age of 18

The above may also include incidents where young people find nudes and semi-nudes online and share them claiming to be from a peer or where they digitally manipulate an image of a young person into an existing nude online.

This policy does not cover:

- the sharing of nudes and semi-nudes of under 18s by adults (18 and over) as this constitutes child sexual abuse and education settings should always inform their local police force as a matter of urgency
- children and young people under the age of 18 sharing adult pornography or exchanging sexual texts which do not contain images

### Initial response

When an incident involving nudes and semi-nudes comes to the attention of any member of staff:

- the incident should be referred to the DSL as soon as possible
- the DSL will hold an initial review meeting with appropriate staff. (This may include the staff member(s) who heard the disclosure and the Deputy DSL responsible for online safety, and the Head)
- if appropriate, the DSL will carry out subsequent interviews with the young people involved
- parents or guardians will be informed at an early stage and involved in the process in order to best support the young people unless there is good reason to believe that involving them would put the young person at risk of harm (this decision will be taken together with children's social care and other agencies)

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- a referral will be made to children’s social care and/or the police immediately if there is a concern that a child or young person has been harmed or is at risk of immediate harm at any point in the process

### **Initial review meeting:**

The initial review meeting will consider the initial evidence and aim to establish:

- whether there is an immediate risk to a young person or young people if a referral should be made to Children’s Social Care and/or the Police
- if it is necessary to view the imagery in order to safeguard the young person (in most cases, imagery should not be viewed)
- what further information is required to decide on the best response
- whether the imagery has been shared widely and via what services and/or platforms (this may be unknown)
- whether immediate action should be taken to delete or remove images from devices or online services
- any relevant facts about the young people involved which would influence risk assessment
- if there is a need to contact another school, college, setting or individual
- whether to contact parents/guardians of the pupils involved (in most cases they should be involved)

### **Risk Assessment**

The DSL will use appropriate risk assessment tools to categorise the incidents and assess the behaviours of any young people involved (see Sharing nudes guidance document).

When assessing the risks and determining whether a referral is needed, the following should be also considered:

- why was the nude or semi-nude shared? Was it consensual or was the child or young person put under pressure or coerced?
- has the nude or semi-nude been shared beyond its intended recipient? Was it shared without the consent of the child or young person who produced the image?
- has the nude or semi-nude been shared on social media or anywhere else online? If so, what steps have been taken to contain the spread?
- how old are any of the children or young people involved?
- did the child or young person send the nude or semi-nude to more than one person?
- do you have any concerns about the child or young person’s vulnerability?
- Are there additional concerns if the parents or guardians are informed?

### **Outcome of review meeting:**

An immediate referral to children’s social care and/or police will be made if at this initial stage:

- The incident involves an adult
- There is reason to believe that the young person has been coerced, put under pressure to produce the imagery, blackmailed or groomed, or if there are concerns about their capacity to consent (e.g. owing to SEND or other vulnerabilities)
- What is known about the imagery suggests the content depicts sexual acts which are unusual for the young person’s developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the imagery is under 13
- There is reason to believe a pupil is at immediate risk of harm owing to the sharing of the imagery, for example, the young person is presenting as suicidal or self-harming

If none of the above apply, the School may decide to respond to the incident without involving the police or Children’s Social Care. The decision will be made by the DSL and Headmaster and will be based on consideration of the best interests of the young people involved. If at the initial review stage, a decision has

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been made not to refer to children's social care and/or police, the DSL will conduct a further review (including an interview with the young people involved) to establish the facts and assess the risks.

### **Supporting the Young People Involved**

It is likely that it will be necessary to speak with the young person or people involved to decide on the best course of action. Usually this will be with the DSL.

The purpose of the conversation is to:

- identify, **without viewing wherever possible**, what the image contains and whether anyone else has been involved
- find out whether the image has been shared between two people or shared further. This may be speculative information as images or videos may have been shared more widely than the child or young person is aware of
- discuss what actions and support might be needed, including preventing further distribution. This discussion should take into account the views of the child or young person as well as balancing what are considered to be appropriate actions for responding to the incident

When discussing the sharing of nudes and semi-nudes, the DSL will:

- reassure any young person who has come forward to report an incident that they have done the right thing
- reassure the young person that they are not alone, and the School will do everything that they can to help and support them. They should also be reassured that they will be kept informed throughout the process
- recognise the pressures that young people can be under to take part in sharing an image and, if relevant, support their parents and guardians to understand the wider issues and motivations around this
- remain solution-focused and avoid any victim-blaming questions such as 'why have you done this?' as this may prevent the young person from talking about what has happened. For example, use questions such as 'describe what happened' or 'explain to me who was involved'
- help the young person to understand what has happened by discussing the wider pressures that they may face and the motivations of the person that sent on the image(s)
- discuss issues of consent and trust within healthy relationships. Explain that it is not ok for someone to make them feel uncomfortable, to pressure them into doing things that they do not want to do, or to show them things that they are unhappy about (it is also not OK for a young person to do this to someone else). Let them know that they can speak to the DSL or equivalent if this ever happens
- explain the law on the sharing of nudes and semi-nudes. It is important to highlight that the law is in place to protect young people rather than criminalise them and should be explained in such a way that avoids alarming or distressing them
- signpost to the [JWF and Childline's Report Remove tool](#). Report Remove helps children and young people to report an image shared online, to see if it is possible to get the image removed. This must be done as soon as possible in order to minimise the number of people that have seen the picture
- ask young people in possession of nudes to delete them from their devices and accounts (including cloud storage) and not to share it
- ask young people who have shared nudes, who they have shared them with (adults or young people), what platforms have been used, and what the motivation for sharing the imagery was
- ask young people who have sent nudes, whether they asked for the photo or were initially sent it without requesting

### **Informing Parents or Guardians**

Parents will be informed of incidents from the outset. Any decision not to inform the parents will be made in conjunction with other services such as children's social care and/or the police, who would take the lead in deciding when the parent or guardians should be informed.

The DSL will work with the young people involved to decide on the best approach for informing parents. In some cases, the DSL may work to support the pupil to inform their parents themselves.

Parents and guardians will be given appropriate information and advice, including the process school will follow, how they can support their young person, the law, how to report online material for removal and external sources of support for themselves and their young person.

### **Viewing the imagery**

Staff should not view imagery unless there is good and clear reason to do so.

The decision to view imagery will be based on the professional judgement of the DSL. Imagery should never be viewed if the act of viewing will cause significant distress or harm to the child. If a decision is made to view imagery the DSL will have considered the following:

- It is the only way to make a decision about whether to involve external agencies such as the police and social services
- It is necessary to report the image to a website, app or suitable reporting agency to have it taken down, or to support the young person or parent in making a report
- It is unavoidable because a pupil has presented an image directly to a staff member or the imagery has been found on a school device or network

If it is deemed necessary to view youth produced sexual imagery, then the DSL will:

- Never copy, print or share the imagery as this is illegal
- Discuss the decision with the Headmaster
- Ensure viewing is undertaken by the DSL and Headmaster (or another member of the safeguarding team with delegated authority from the Headmaster). Where possible the person viewing the images will be of the same sex as the young person in the images. The second member of staff does not need to view the images. The viewing should ideally take place in a member of the senior leadership team's office.
- Ensure the School records that the imagery has been viewed in the school's safeguarding records, including who was present, why the image was viewed and any subsequent actions. If imagery has been unavoidably viewed by a member of staff either following a disclosure from a young person or as a result of a member of staff undertaking their daily role (e.g. ICT staff) the DSL will ensure that the staff member is provided with appropriate support.
- Ensure that if any devices need to be taken and passed onto the police, they are confiscated and the police contacted. The device will be disconnected from Wi-Fi and data and turned off immediately to avoid imagery being removed from the device remotely through a cloud storage service. The device should be placed in a secure place, for example in a locked cupboard or safe until the police are able to come and collect it.

Viewing nude imagery of young people can be distressing for both young people and adults and appropriate emotional support may be required.

### **Deleting of Imagery**

If the School has decided that no referral will be made to an external agency, imagery must be deleted.

- The pupils involved will be asked to delete imagery by a specific deadline and to confirm that they have deleted the imagery.

- Pupils will be asked to delete all images across all devices, online storage or social media sites and their parents informed of the request.
- Pupils involved will be reminded that possession of nudes and semi-nudes is illegal and will be informed that if they refuse or it is later discovered they did not delete the image/s they are continuing to commit a criminal offence and the police may become involved.
- Pupils involved in producing, sharing and distributing nudes and semi-nudes will be subject to the School's disciplinary procedures as outlined in the Pupil Behaviour Policy.

All confiscation of devices, viewing and deleting of imagery will be carried out in accordance with DfE Guidance on [Searching, screening and confiscation advice for schools 2022](#). The safeguarding team has the delegated authority to confiscate devices and search imagery where appropriate/necessary.

All incidents will be recorded on the Safeguarding record system MyConcern in line with Keeping Children Safe in Education.

Young people and parents will be advised that if nude or semi-nude imagery is on wider social media, they can usually report this via the platform's reporting options.

If there is no reporting function on the platform, the Internet Watch Foundation can assist in getting the content removed via [www.iwf.org.uk](http://www.iwf.org.uk) or [Report a nude image online | Childline](#)

## Appendix 8: Record Keeping Best Practice

All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. This will also help if/when responding to any complaints about the way a case has been handled by the school. Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child.

Records should include:

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

If in doubt about recording requirements, staff should discuss with the designated safeguarding lead or deputy.

### **This documentation is to be read and followed by all DSLs and Deputies**

#### **1. Introduction**

1.1 The importance of good, clear child welfare and child protection record keeping has been highlighted repeatedly in national and local Child Safeguarding Practice Reviews (formerly Serious Case Reviews). This appendix outlines guidance for effective record keeping at Milton Abbey.

1.2 It is the Designated Safeguarding Lead (DSL)'s responsibility to ensure that child protection files, access, storage and transfer meet the required professional standards as detailed in this document.

1.3 The common law of confidentiality, Data Protection, GDPR and Human Rights principles must be adhered to when obtaining, processing or sharing personal or sensitive information or records. In summary, the Data Protection Act requires that records should be securely kept, accurate, relevant, up to date and kept for no longer than is necessary for the purpose for which they were made. General Data Protection Regulations (GDPR) and the Data Protection Act 2018 states that: 'fears about sharing information must not be allowed to stand in the way of the need to promote and protect the safety of children'.

1.4 Any electronic record keeping system should comply with the general standards set out below. The 'MyConcern' reporting system has been checked for compliance.

#### **2. Record to be made by an adult receiving a disclosure of abuse (When A Child Talks About Abuse)**

2.1 This record should be made as soon as possible **after** the individual hearing the disclosure has reported it verbally to the DSL. The facts, not opinions (unless of particular relevance), should be accurately recorded in a non-judgemental way. It is important to remember that expressing an opinion as to whether the child is telling the truth is not helpful and can prejudice how a case proceeds.

A safeguarding for a pupil record is standardised through the use of 'MyConcern'. The software ensures that:

- The child's name, gender and date of birth
- Date and time of the conversation
- What was the context and who was present during the disclosure?
- What did the child say? – verbatim if possible
- What questions were asked? – verbatim
- Responses to questions –verbatim
- Any observations concerning child's demeanour and any injuries
- The name of the person to whom the disclosure was reported along with the date and time of the record being made.

2.2 The record about a disclosure of abuse is automatically shared with the safeguarding team should be passed to the DSL and retained in the pupil's child protection file in its original and contemporaneous form (as it could be used as evidence in court proceedings), even if later typed or if the information is incorporated into a report.

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2.3 School staff should never ask pupils, regardless of their involvement in a child protection matter (i.e. the subject of an allegation, a witness or the alleged 'perpetrator'), to write out their 'statements' of what has happened. In some cases, this could have the unintended consequence of jeopardising a child protection investigation. This applies regardless of whether the incident(s) took place within or outside school.

### **3. Records kept by the Designated Safeguarding Lead**

3.1 As stated at 2.2 above it is useful and recommended practice for school staff to have one standard pro forma for recording all 'welfare' and child protection concerns.

3.2 The concern form should be passed to the DSL who will make a judgement about what action needs to be taken, in accordance with local inter-agency safeguarding procedures, using the Threshold Tool, if necessary. The decision about any action, whether or not a referral is made to Social Care, will be recorded clearly by the DSL.

3.3 Concerns which initially seem trivial may turn out to be vital pieces of information later, so it is important to give as much detail as possible. A concern raised may not progress further than a conversation by the DSL with the parent, or, at the other end of the scale, could lead to matters being heard in a court.

3.4 All 'lower level' / pastoral concerns about a child's welfare, which will generally have been discussed with parents/carers, are kept in the child's main file. Alternatively, some schools have adopted their own systems of collating such welfare concerns, but whichever system is in place, these records should not be labelled 'child protection'.

3.5 It is never good practice to keep pupil welfare records in a diary or day-book system. Often it is only when a number of seemingly minor issues relating to an individual pupil over a period of time are seen as a whole that a pattern can be identified indicating a child protection concern.

### **4. Starting a school child protection file**

4.1 A school child protection file does not necessarily mean that the pupil is or has been the subject of a child protection conference or plan. 'Child protection file' denotes a high level of school concern which has warranted referral to/ involvement of, and in most cases assessment by, child care social workers.

4.2 It is the responsibility of the DSL to start a school child protection file when a social worker is or was involved, e.g.: -

- a) A formal referral is made by the school to Children's Social Care on an inter-agency referral form or
- b) Social Care inform the school they have commenced an assessment in relation to a pupil resulting from information from another source or
- c) A child protection file is forwarded to the school by a previous school or pre-school attended by the pupil or
- d) A child who is in care/looked after transfers into the school or
- e) A pupil is privately fostered

4.3 It is not good practice to make 'family files'; each child should have his/her own record which includes information specific to him/her and which will be sent to the next school at the time of transfer. The names of siblings and/or other children who live in the household who also attend the school should be clearly noted on individual files.

4.4 If two (or more) pupils at the school are referred to Social Care for the same concern (for example, an allegation of sexually harmful behaviour), then child protection files will be started on both/all pupils.

4.5 School child protection files are never 'closed' or de-categorised. Once a school has started a child protection file, the chronology is maintained so that any future concerns can be considered in the context of past events, even if Social Care ceases involvement.

*Note - If there is an allocated social worker because a child is disabled or a young carer and there are no child protection concerns then a child protection file should not be started.*

## **5. Adopted children**

5.1 Some older adopted children will have school child protection files because they were initially in care/looked after and were subsequently adopted. During the period when the child is 'placed for adoption' (prior to an adoption order being made) any file that contains information that identifies both the birth family and the adoptive family must be classed as highly sensitive and this information should only be shared on a strictly 'need to know' basis.

5.2 Once the adoption order has been made the DSL in the school that holds the child protection file must overhaul the file. The principle is that there must be nothing that identifies the child's birth name or the birth family. In sifting the file, it is acceptable to destroy documents that will continue to be held by other agencies: for example, child protection conference minutes and LAC review minutes which will be in Social Care records.

5.3 A chronology should be prepared that gives an overview of the information previously held in the file but **without giving the child's birth name or any details which would identify the birth family.**

5.4 The overhauled file should only contain the new chronology and any information that has originated from within school (for example concern forms). This file should now be in the child's new name, contain no information which identifies the birth name or birth family, will be held in the school as long as the child remains or sent onto a new school as described (at 9) below.

5.5 Please note that once a child is adopted, all school records, not just child protection files, must be amended so that there is nothing which gives the birth name or identifies the birth family.

## **6. The format of child protection files**

6.1 It is helpful if individual files have the key information about the pupil and contact details of parents/carers, social worker and any other relevant professionals.

6.2 If the child is Looked-After their file should include important information about legal status, parental responsibility, arrangements for contact with birth parents and extended family, levels of authority delegated to carers and the name of the virtual school Head in the authority that looks after the child.

6.3 If a pupil is or was subject of a child protection plan or in care/looked after, this should be highlighted in some way to make it immediately obvious to anyone accessing the record.

6.4 It is a multi-agency standard that children's child protection files must have an up to date chronology of *significant* incidents or events *and* subsequent actions/outcomes. Maintaining the chronology is an important part of the DSL role; it aids the DSL, Deputy and others to see the central issues 'at a glance' and helps to identify patterns of events and behaviours.

6.5 It should make sense as a 'stand-alone' document: anyone else reading the chronology should be able to follow easily what the concerns are/have been, whether the concerns have escalated and why plus the actions taken by the school to support and protect the child. This will be particularly useful for DSLs in receiving schools when pupils transfer, for professionals involved in collating information for Child Safeguarding Practice Reviews and for parents/pupils/ex-pupils if they view the record.

6.6 Once a chronology is started it should be updated as appropriate even if Social Care later ceases involvement (see 4.6 above).

6.7 The file should be well organised and include, as appropriate, school 'concern forms', copies of correspondence, school reports to and minutes of child protection conferences, documents relating to children in care/'looked after' etc. The DSL will decide which relevant information that pre-dates the starting of the child protection file, such as CAF or other pastoral care documentation, will also be included.

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7.1 All records relating to child protection concerns are sensitive and confidential so will always be kept in a secure (i.e. locked) filing cabinet, separate from other school files, and accessible through the DSL/the Deputy(ies).

7.2 The pupil's general (electronic) school file is marked with "SG" to indicate that a child protection file exists. All staff who may need to consult a child's school file should be made aware of what the symbol means and to speak to the DSL if necessary if they see this symbol and have concerns. For example, a member of the office staff who is looking in the main file for a parent's contact details because of unexplained absence might decide to report this to the DSL if they see the indicator, in case the absence is significant.

## **8. Sharing of and access to child protection records**

8.1 It is highly unlikely that all members of staff need to know the details of a child's situation, or that there should be widespread access to the records. Access to, and sharing of, information should be on a need-to-know basis, decided case by case. The DSL is the best person to decide this. Consideration must also be given to *what* needs to be shared. In general, the closer the day-to-day contact with the child, the more likely the need to have some information.

8.2 The child who is the subject of a child protection record has the right to access the file, *unless* to do so would affect his/her health or well-being or that of another person or would be likely to prejudice a criminal investigation or a Section 47 assessment (which relates to significant harm) under the Children Act 1989.

8.3 Parents (i.e. those with parental responsibility in law) are entitled to see their child's child protection file, with the same exemptions as apply to the child's right to access the record. Note that an older pupil may be entitled to refuse access to the record by his/her parents. As a guide, this applies to pupils who are 12 years of age or above, if they are of normal development or maturity.

8.4 References by name to children other than the pupil who is the subject of the file should be removed when disclosing records, unless consent is obtained from the individual/s concerned (or their parents/carer on their behalf). Care must be taken to ensure all identifying information is removed from the copy of the record to be shared.

8.5 Always seek advice from your legal advisor or Dorset Data Protection Officer if there are any concerns or doubt about a child or parents reading records. However, it is generally good practice to share all information held unless there is a valid reason to withhold it, e.g. to do so would place the child or any other person at risk of harm. Any requests to see the child's record should be made in writing to give time for confidential information, such as any details of other pupils, to be removed.

8.6 In respect of requests the school for educational records or welfare concerned the school will refer to its privacy policies and practice as outlined on its website.

8.7 Child protection information should not normally be shared with professionals other than those from Social Care, the Police, Health or the Local Authority. Ofsted and other school inspectors can view individual child protection files. Information should not be released to parents' solicitors on request; advice should be sought from the school's legal advisor in such cases.

8.8 Governors, including the Nominated Governor, should not access the records.

## **9. Transfer of child protection records**

9.1 When a pupil transfers to another school the DSL should inform the receiving school as soon as possible in person or by telephone that child protection records exist. The original records must be passed on either by hand or sent by recorded delivery, separate from the child's main school file. Care must be taken to ensure confidentiality is maintained and the transfer process is as safe as possible. MyConcern enables the secure digital transfer of files.

9.2 If the records are required to be posted, they should be copied, and these copies retained until there has been confirmation in writing that the originals have arrived at the new school. They can then be shredded.

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9.3 Whether child protection files are passed on by hand or posted, there should be written evidence of the transfer (such as a form or slip of paper signed and dated by a member of staff at the receiving school.) This receipt should be retained by the originating school for 6 years (in line with guidance from the Records Management Society).

9.4 If the pupil is removed from the roll to be home educated, the school should pass the child protection file to the LA EHE Administrator and a receipt obtained as described above.

9.5 If a pupil with a child protection record leaves the school without a forwarding address and no contact is received from a new school the DSL should follow the school's Child Missing Education (CME) procedures. If there is reason to suspect the pupil is suffering harm, then the DSL will refer to Social Care in the usual way.

9.6 If a child arrives in the school in an unplanned way and / or there are concerns about them from the outset, it is worth contacting the previous school for a discussion with the DSL. There might be a child protection file which has not been passed on.

9.7 School 'welfare' or pastoral records (i.e. where concerns or issues have been raised but there has been **no** referral to or involvement by a social worker) should also be passed on to the next school for their information and can be included in the main school file, for example. In respect of data protection, parents/carers should be made aware (either individually or through newsletters, for example) that information is transferred in this way to enable the next school to properly support their child. Most parents will understand the reason for this but if for whatever reason a parent disagrees with you passing on non-child protection documents, you should not do so.

## **10. 'Dual Registered' Pupils**

10.1 Where a pupil is on roll at the school and starts to attend a Learning Centre (LC), the chronology and other relevant information in the child protection file should be copied and passed to the DSL at the LC at the earliest opportunity. Because of the nature of such 'bespoke' arrangements for individual pupils, the two DSLs should agree on which one of them will keep the chronology updated and how best to communicate to each other significant events and issues in relation to that pupil.

## **11. Retention of records**

11.1 The school should retain the record for as long as the pupil remains in school and then transfer as described above.

11.2 Guidance from the Records Management Society is that when a pupil with a child protection record reaches statutory school leaving age (or where the pupil completed 6<sup>th</sup> form studies), the last school attended should keep the child protection file until the pupil's 25<sup>th</sup> birthday. It should then be shredded (and a record kept of this having been done, date, and why).

## **12. Electronic child protection records**

12.1 Electronic records must be password protected with access strictly controlled in the same way as paper records.

12.2 They should be in the same format as paper records (i.e. with well-maintained chronologies etc) so that they are up to date if/when printed, if necessary.

12.3 Electronic files must not be transferred electronically to other schools unless there is a secure system in place but should be printed in their entirety, linked with paper documentation such as conference minutes and transferred as described in section 9 above. When the receipt has been returned to confirm that the file has been received at the new school, the computer record should be deleted.

## **13. Sharing information with Further Education (FE) Colleges**

13.1 A protocol is in place with DSLs at FE colleges: at the start of each academic year they will send to secondary school DSLs a list of newly enrolled students who have previously attended the school, requesting any relevant information. Secondary school DSLs will use their professional judgement but should always

disclose if a young person is in care/looked after, is or has been subject of a child protection plan or is assessed as posing a risk to themselves or other students.

13.2 Note this applies only to Dorset schools and FE Colleges with whom the protocol has been agreed.

## Appendix 9: Training

<b>Recruitment:</b>  <b>New staff/ volunteers/ peripatetic staff</b>	<b>Induction:</b>  <b>New staff/ volunteers/ peripatetic staff/ governors</b>	<b>Contractors</b>	<b>Safeguarding/ Child protection training for existing staff and volunteers</b>	<b>Governors</b>	<b>DSLs and Deputies</b>
<p>As part of recruitment, all staff and volunteers MUST have completed safeguarding/ child protection training before their start date.</p> <p>Training will be provided by the school's DSL or deputy and will include an explanation of the child protection procedures within the school.</p> <p>The safeguarding team will record that the training has taken place on the staff safeguarding training record. HR will record the induction date on the SCR.</p>	<p>Safeguarding induction packs will be provided to all new staff and volunteers on their first day. Packs will include:</p> <ul style="list-style-type: none"> <li>• KCSIE Part one and Annex B for staff who work directly with children or Annex A only for staff who do not work directly with children. Members of SLT and governors will receive the full version of KCSIE.</li> <li>• Staff code of conduct</li> <li>• Child protection policy and procedures</li> <li>• Behaviour policy</li> <li>• Staff AUP</li> </ul> <p>Staff/ volunteers/ peripatetic staff/ governors will be required to sign that they have read and</p>	<p>Contractors arriving in school will all receive a summary of the school's child protection procedures.</p> <p>Before commissioning contractors, a company statement must be gathered confirming all relevant checks have been fully completed, with dates, and the company must provide its safeguarding policy. This will be held on file at the school and recorded on the SCR. Details of individuals will be provided by the company and these will be checked on arrival against the information provided.</p>	<p>Staff must have safeguarding/ child protection training and separate training on online safety at least every 3 years.</p> <p>The safeguarding team will monitor all staff have been trained on a three-year cycle from their start date.</p> <p>All staff must complete Prevent Awareness e-learning either through TesDevelop/EduCare or the Home Office course, which should be refreshed at least every three years or whenever the e-learning course is updated.</p> <p>In addition, the DSL will provide updates at the start of each term during staff inset. The updates will reflect any changes within statutory requirements, locally agreed protocols and current issues.</p>	<p>As part of their induction, all governors must attend safeguarding training with the DSL or deputy. In addition, all governors must access safeguarding/ child protection training that includes online safety specifically for governors within the first year of their term of office and every 3 years after that. Training is provided by the AGBIS e-learning course: 'Safeguarding Children A Guide of Governors of Independent Schools'. The Clerk to the Governors will provide governors with access to the e-learning course.</p> <p>A record of training will be held by the Clerk to</p>	<p>The DSL and deputies should complete training specific to the role at least every 2 years. This will be provided by PDSCP course 'Multi-Agency Working Together in Safeguarding'. The safeguarding team will hold and monitor staff training records.</p> <p>The DSL will attend PDSCP 'Supervision for Safeguarding' every 3 years. The safeguarding team will hold and monitor staff training records.</p> <p>The DSL or deputy identified as the Prevent Lead will complete the Home Office e-learning Prevent Referrals course which should be refreshed at least every</p>

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	<p>understood these documents.</p> <p>New staff will also be required to complete further safeguarding training in their first month of employment through TesDevelop/ EduCare e-learning courses that will be assigned according to their role in the school.</p> <p>Further training will be rolled out to specific staff over the course of their first year of employment covering various safeguarding topics.</p> <p>Training will be recorded and monitored by the safeguarding team.</p>		<p>The DSL will deliver the updates to all staff/ volunteers and keep a register of attendance.</p> <p>Dependent on their role, certain staff will be required to complete further safeguarding training through TesDevelop/ EduCare e-learning which should be refreshed every 3 years. The safeguarding team will hold and monitor staff training records.</p> <p>Staff with a safeguarding role (including members of SLT, Housemasters/ Housemistresses (HSMs) and Assistant HSMs, Health Centre staff, SENCO, Head of Operations, school independent listener) should complete level 3 training every 2 years. This will be provided by PDSCP course 'Multi-Agency Working Together in Safeguarding'. The safeguarding team will hold and monitor staff training records.</p> <p>Staff with responsibility for recruitment will complete PDSCP course 'Safer Recruitment' every 3 years. The safeguarding team will hold and monitor staff training records.</p>	<p>the Governors and with the safeguarding team.</p> <p>It is good practice for governors to complete Prevent Awareness e-learning either through the Home Office course. The safeguarding team will hold a record of all training.</p> <p>Named governors for safeguarding should complete training specific to the role at least every 2 years. This will be provided by PDSCP course 'Multi-Agency Working Together in Safeguarding'. The safeguarding team will hold and monitor staff training records.</p> <p>The Chair of Governors should complete the PDSCP course 'Managing Allegations – Dorset Workforce' every 2 years. The safeguarding team will hold and monitor staff training records.</p>	<p>three years or whenever the e-learning course is updated. The safeguarding team will hold and monitor staff training records.</p> <p>The Headmaster and the DSL should complete the PDSCP course 'Managing Allegations – Dorset Workforce' every 2 years. The safeguarding team will hold and monitor staff training records.</p> <p>All DSLs and deputies will keep themselves up to date with emerging safeguarding issues. Evidence of this will be monitored by the safeguarding governor.</p>
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**Governor visits will include checks that:**

- all new staff have completed safeguarding training
- induction packs have been issued and receipted for all new appointments
- DSL training is in line with current guidelines, including evidence of updates
- Governors are trained and kept up to date
- All staff training records are up to date
- evidence of how any information was disseminated to staff who could not attend in person updates delivered by the DSL or deputies

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