



# Safeguarding and Child Protection Policy

<b>Updated:</b>	October 2021
<b>Review:</b>	September 2022 or as necessary
<b>Responsible Member of Staff:</b>	Sarah Bisschop, Designated Safeguarding Lead (Deputy Head Pastoral)
<b>Responsible Governor:</b>	Liz Hungin

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## Annex A: Peer-on-Peer Abuse Policy

## Contact Details for Safeguarding Team

### Ms Sarah Bisschop, Designated Safeguarding Lead

Direct Line: 01753 649314/310

[SJB@caldicott.com](mailto:SJB@caldicott.com)

### Mr Jeremy Banks, Headmaster

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### Mr Craig Legge, Deputy Designated Safeguarding Lead

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[CAL@caldicott.com](mailto:CAL@caldicott.com)

### Ms Lindsay Pollicott, Additional Designated Safeguarding Lead

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[LA.Pollicott@caldicott.com](mailto:LA.Pollicott@caldicott.com)

### Mrs Liz Hungin, Governor responsible for Safeguarding

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### Designated Safeguarding Leads (abbreviations to be applied throughout the document)

- “Designated Safeguarding Lead” - shall be referred thereafter as “DSL”
- “Deputy Designated Safeguarding Lead” - shall be referred thereafter as “DDSL”
- “Additional Designated Safeguarding Lead” - shall be referred thereafter as “ADSL”
- “The Local Authority Designated Officer “ - shall be referred thereafter as “LADO”

**Summary Statement of Policy:** Caldicott is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment.

**Links to other policies:** This policy links to and should be read in conjunction with the school’s policies on Behaviour, Anti-bullying, SENDA, Equality, E-safety, Remote Learning, Images of pupils for record keeping and promotional purposes (photographs, videos and electronic media), Medical, Use of Physical Restraint, Peer-on-Peer Abuse, Prevent, Visiting Speakers, Whistleblowing, Relationships, Sex and Health Education (RSHE), and KCSIE 2021.

All policies can be found on our School Website <https://www.caldicott.com/Policies.aspx>

or the Staff Portal: <https://intranet.caldicott.com/staff/home/staffdocs.php?f=ppolicies>

# 1. Introduction

- 1.1 The policy is reviewed and updated whenever necessary, kept up-to-date with safeguarding issues as they emerge and evolve, including lessons learnt. It is ratified annually at the Governors' meeting in November and this is recorded in the minutes.
- 1.2 The school is committed to safer recruitment in education. (see the Safer Recruitment Policy, June 2020)
- 1.3 This policy and its implementation procedures set out the arrangements to safeguard and promote the welfare of pupils at the school, and have been prepared in compliance with, and with regards to:

Reference Document	Source
<ul style="list-style-type: none"> <li>• <i>The Children Acts 1989 and 2004</i></li> </ul>	<i>Legislation.gov.uk</i>
<ul style="list-style-type: none"> <li>• <i>Education Regulations 2016</i></li> <li>• <i>Independent Schools Standards – April 2019</i></li> </ul>	<i>DfE</i>
<ul style="list-style-type: none"> <li>• <i>Safeguarding Vulnerable Groups Act 2006</i></li> </ul>	<i>Legislation.gov.uk</i>
<ul style="list-style-type: none"> <li>• <i>The Protection of Freedoms Act 2012</i></li> </ul>	<i>Legislation.gov.uk</i>
<ul style="list-style-type: none"> <li>• <i>The Education Act 2002</i></li> </ul>	<i>Legislation.gov.uk</i>
<ul style="list-style-type: none"> <li>• <i>Serious Crimes Act 2015</i></li> </ul>	<i>Legislation.gov.uk</i>
<ul style="list-style-type: none"> <li>• <i>What to do if you are worried a Child is being Abused, March 2015</i></li> </ul>	<i>Department for Education (hereafter “DfE”)</i>
<ul style="list-style-type: none"> <li>• <i>Working Together to Safeguard Children 2018</i> <i>(A guide to inter-agency working to safeguard and promote the welfare of children)</i></li> </ul>	<i>DfE</i>
<ul style="list-style-type: none"> <li>• <i>Disqualification under the Childcare Act 2006 – updated 2018 (Incorporated in KCSIE)</i></li> </ul>	<i>DfE</i>
<ul style="list-style-type: none"> <li>• <i>Keeping Children Safe in Education September 2021</i></li> </ul>	<i>DfE</i>
<ul style="list-style-type: none"> <li>• <i>Relationships Education, Relationships and Sex Education (RSE) and Health Education – Published 2019 (updated September 2021)</i></li> </ul>	<i>DfE</i>
<ul style="list-style-type: none"> <li>• <i>Information Sharing: advice for practitioners providing safeguarding services childcare 2018</i></li> </ul>	<i>DfE</i>
<ul style="list-style-type: none"> <li>• <i>DBS Barring Referral Guidance – updated 12 May 2016</i></li> <li>• <i>Making barring referrals to the DBS – 20 November 2017</i></li> </ul>	<i>Disclosure and Barring Service (hereafter “DBS”)</i>
<ul style="list-style-type: none"> <li>• <i>National Minimum Standards for Boarding Schools, April 2015</i></li> </ul>	<i>DfE</i>
<ul style="list-style-type: none"> <li>• <i>Teacher misconduct: regulating the teaching profession Updated September 2018</i></li> </ul>	<i>DfE</i> <i>National College for Teaching and Leadership (part of DfE)</i>
<ul style="list-style-type: none"> <li>• <i>Use of Reasonable Force in Schools 2013</i></li> </ul>	<i>DfE</i>
<ul style="list-style-type: none"> <li>• <i>Preventing and Tackling Bullying July 2017</i></li> </ul>	<i>DfE</i>
<ul style="list-style-type: none"> <li>• <i>Prevent Duty Guidance - June 2015 (updated April 2021).</i></li> </ul>	<i>DfE</i>
<ul style="list-style-type: none"> <li>• <i>Channel Duty Guidance - 2015</i></li> </ul>	<i>HMG</i>
<ul style="list-style-type: none"> <li>• <i>Schools COVID-19 operational guidance (August 2021 – updated September 2021)</i></li> </ul>	<i>DfE</i>

<ul style="list-style-type: none"> <li>• <i>HM Government advice on Information Sharing (updated in July 2018).</i></li> </ul>	HMG
<ul style="list-style-type: none"> <li>• <i>Safeguarding and remote education during coronavirus (COVID-19) – April 2020 – updated March 2021</i></li> </ul>	DFE
<ul style="list-style-type: none"> <li>• <i>Sexual Violence and Harassment (September 2021)</i></li> </ul>	DfE
<ul style="list-style-type: none"> <li>• <i>Teaching online safety in school (DfE, June 2019)</i></li> </ul>	DfE
<ul style="list-style-type: none"> <li>• <i>The use of social media for on-line radicalisation (July 2015)</i></li> </ul>	DfE

- 1.4 It is the responsibility of all members of staff\*, teaching and non-teaching, to play an active role in ensuring that children who have specific needs e.g. those suffering from issues such as eating disorders, mental and physical health, and body image and self-harm, are supported along with those children who are at risk of harm or are suffering significant harm. The DSL (or in their absence, the DDSL or ADSLs) will contact Social Services for support in all of these areas.
- 1.4.1 \*Wherever the word “staff” is used, it covers ALL staff, including ancillary, supply and self-employed staff, contractors, volunteers working with children etc.
- 1.5 The governing body takes seriously its responsibility under section 157 of the *Education Act (2002)* to safeguard and promote the welfare of pupils; and to work together with other agencies to ensure adequate arrangements within our school to identify, assess, and support those children who are suffering from harm.
- 1.6 The Governing body, Head and SLT facilitate a whole school approach to safeguarding, ensuring it underpins all relevant aspects of process and policy development. All systems, processes and policies are designed to operate with the best interests of the child at their heart.
- 1.7 It is the role of the Headmaster to ensure that the schools policies and procedures are understood and followed by all staff.
- 1.8 All members of staff are expected to be aware of and follow the school Safeguarding and Child Protection procedures which follow South Bucks Child Protection and Safeguarding Procedures. The procedures have been updated to comply with 'Working Together to Safeguard Children' (2018).
- 1.9 Staff need to be aware of their duty to report concerns, the guidance for identifying child abuse, what to do if a child makes an allegation of child abuse and issues around confidentiality.
- 1.10 Generally speaking, it is the DSL who consults with local authorities and other outside agencies about pupils who are at risk or in need. However, anyone can make a referral. Contact details are shown in Section 7 of this policy, or, to find a phone number, one can enter a postcode on this website: <https://www.gov.uk/report-child-abuse-to-local-council>  
A member of school staff has a responsibility (under the government’s directions) to take action if he or she has concerns about the safety or welfare of a child and feels they are not being acted upon by the school.
- 1.11 Deficiencies: the Headmaster, staff and all adults should be aware that although this document is on an annual review cycle, interim amendments may occur and any deficiencies immediately rectified. In these circumstances, you will be notified and will be required to read and be familiar with the amended document.
- 1.12 A copy of this policy is available on the school’s website. This policy links with the other policies outlined on pages 3 and 4 of this policy document.

**Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:**

- protecting children from maltreatment.

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

**1.13 The aims of the policy are:**

- 1.13.1 To support the child’s development in ways that will foster security, confidence, and independence. The policy endeavours to keep the child’s best interest at the forefront of all practice.
- 1.13.2 To provide an environment in which children and young people feel safe, secure, valued, and respected, and feel confident, and know how to, approach adults if they are in difficulties, believing they will be effectively listened to.
- 1.13.3 To raise the awareness of all teaching and non-teaching staff of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse.
- 1.13.4 To provide a systematic means of monitoring children known or thought to be at risk of harm, and ensure we, the school, contribute to assessments of need and support packages for those children. The policy and its procedures aim to highlight the value and importance of early intervention wherever possible.
- 1.13.5 To emphasise the need for good levels of communication between all members of staff.
- 1.13.6 To develop a structured procedure within the school, this will be followed by all members of the school community in cases of suspected abuse.
- 1.13.7 To develop and promote effective working relationships with other agencies, especially the Police and Social Care.
- 1.13.8 To provide good lines of communication with trusted adults, supported friends and an ethos of protection.
- 1.13.9 To recognise and protect our children who may be vulnerable to radicalisation or exposed to extremist views.

## 2. Safe School, Safe Staff

### 2.1 We will ensure that:

2.1.1 All members of the governing body understand and fulfil their responsibilities. There is a designated Governor responsible for overseeing safeguarding. The governing body annually review the school's policies and procedures and the efficiency with which the related duties have been discharged.

2.1.2 The Governors will sign off this policy on an annual basis.

2.1.3 We have a Designated Safeguarding Lead (DSL) and a deputy (DDSL), all of whom have undertaken the necessary Safeguarding Training and who undertake to update their training at least every 2 years.

2.1.4 The Headmaster and all other staff and governors, have child protection awareness training, to be arranged by the DSL on a regular basis, in line with the advice of the BSCP (Bucks Safeguarding Children Partnership), to maintain their understanding of safeguarding issues, including the signs and indicators of abuse.

2.1.5 All members of staff, volunteers, and governors are provided with child protection awareness training at induction. They know how to respond to a pupil who discloses abuse and who to discuss a concern with.

2.1.6 All parents/carers are made aware of the responsibilities of staff members with regard to child protection procedures through publication of the school's Safeguarding Policy.

2.1.7 We will seek to ensure that in line with Part 3 of the DfE's guidance 'Keeping Children Safe in Education' (KCSIE 2021), all staff working within our school have been checked as to their suitability to work with children by adhering to statutory responsibilities to undertake checks on all staff, including verification of their identity, qualifications, a satisfactory Enhanced DBS check and Barred List check (where appropriate), as well as taking proportionate decisions on whether to ask for any checks beyond the minimum required, and ensuring volunteers are appropriately supervised. Further to the DBS check, anyone appointed to carry out teaching work will require an additional check to ensure they are not prohibited from teaching by order of the Secretary of State. Those undertaking management posts will be subject to prohibition from management of independent schools checks. When 'homestays' are arranged in the UK, parents (and others over 18) hosting children will be subject to an enhanced DBS and a barred list check (See external visits policy).

New and existing staff who are employed or provide childcare in "later years", i.e. under the age of 8 are covered by the guidance relating to Disqualification by Association, covered by Disqualification under the Childcare Act 2006 (as amended, 2018). The guidance is that such staff are disqualified from working in a school when they "live or work in the same household" as someone who is barred from working with children or young people, even if they would not otherwise be disqualified themselves.

Disqualification means where the person is either on the Children's Barred List, or has:

- Been cautioned for or convicted of certain violent and sexual criminal offences against children and adults;
- Had certain care orders made relating to the care of children;
- Had registration refused or cancelled in relation to childcare or children's homes or being disqualified from private fostering.

The regulations apply to all staff in schools who work in early years provision and childcare provision such as breakfast clubs and after school care and clubs for children up to the age of eight.

These staff are required to volunteer relevant information if they learn that someone they live or work with has received any convictions or cautions or certain violent and sexual criminal offences against children and adults or has been disqualified under the 2018 Childcare Disqualification Regulations. If such a declaration is made then the DSL will meet with you to obtain further details.

The DSL will then undertake an immediate risk assessment, taking any necessary steps to limit or supervise contact with children as appropriate. They will then contact the Ofsted helpline, advise that a risk assessment has taken place, and ask for advice.

### **Waiver of disqualification**

When the school becomes aware that a member of staff meets the disqualification criteria, the implications will be explained and the individual will be advised that they can apply to Ofsted for a waiver of disqualification. In this circumstance the school is required to:

- Ask new staff (full, part-time, self-employed and unsupervised volunteers) to complete and sign a declaration confirming that they do not meet the "disqualification/disqualification by association" criteria.
- Ask existing staff to complete and sign a Declaration that they do not meet the "disqualification by association criteria".
- Record, on the Single Central Register, that a self-declaration form has been completed (but not the result of the yes/no Declaration).
- Obtain further information and undertake an immediate risk assessment on any member of staff who provides a positive response to the declaration question.
- Inform Ofsted of any individuals meeting the disqualification or "by association" criteria within 14 days.

2.1.8 All members of the SLT have undergone Safer Recruitment training through Educare.

2.1.9 A single central record of appointments is kept for audit. We operate safe recruitment procedures in compliance with Independent School Standards Regulations and this is reflected in the School's Safer Recruitment, Selection and Disclosures Policy and Procedure.

2.1.10 We will seek assurance that appropriate child protection checks and procedures apply to any staff employed by another organisation and working with the school's pupils on another site.

- 2.1.11 We will ensure that all child protection concerns or allegations against adults working in school are referred to the LADO (Local Authority Designated Officer) for advice.
- 2.2 Our procedures will be annually reviewed and up-dated. Any deficiencies or weaknesses in the procedures will be remedied without delay.
- 2.3 The name of the Designated Safeguarding Lead and their deputy will be clearly publicised in the school, with a statement explaining the school's role in referring and monitoring cases of suspected abuse.
- 2.4 All new members of staff will be given a copy of our Safeguarding and Child Protection Induction pack which includes either electronic links to, or paper copies of the Safeguarding Policy, the Staff Code of Conduct, the Whistleblowing Policy, Online Safety Policy, Pupil Behaviour Policy, and Part 1 (and Annex A and/or B where relevant) of the latest version of Keeping Children Safe in Education. It also has the DSL's and DDSL's names clearly displayed, as part of their induction into the school.
- 2.5 The DSL produces an annual safeguarding report for the governors demonstrating how Caldicott is meeting its statutory responsibilities for safeguarding. This report will be shared with Bucks.
- 2.6 This policy is available publicly on the school's website.



### 3. Responsibilities

3.1 The following staff form the Safeguarding team at Caldicott and have special responsibility for Safeguarding and Child Protection matters:

Ms Sarah Bisschop	Designated Safeguarding Lead
Mr Jeremy Banks	Headmaster
Mr Craig Legge	Deputy Designated Safeguarding Lead
Ms Lindsay Pollicott	Additional Designated Safeguarding Lead
Mrs Liz Hungin	Governor responsible for Safeguarding

3.2 According to statutory guidance (KCSIE, 2021) the Governors have appointed the Deputy Head Pastoral, Sarah Bisschop, to take responsibility for Safeguarding and Child Protection. The Deputy Head Pastoral, Sarah Bisschop, has the status and authority within the school to carry out the duties of the post including committing resources and, where appropriate, supporting and directing other staff. Craig Legge (Head of History) is the Deputy DSL. The role of DSL and DDSL is included in their job descriptions.

#### 3.1 Job Description of the Designated Safeguarding Lead

Whilst the DSL will take lead responsibility, the DDSL will assist and be available to step in in the absence of the DSL if and when required. They will have an equivalent job description and working knowledge of all elements of the DSL's role to enable this. Ultimate responsibility will lie with the DSL

##### 3.1.1 Availability

During term time either the DSL or DDSL will be available during school hours to discuss any safeguarding concerns. Whilst generally speaking the DSL or DDSL would be expected to be available in person, in exceptional circumstances availability via phone and or Skype or other such media may be deemed acceptable.

##### 3.1.2 Procedure:

- a) Holding and being conversant with current local and national Safeguarding and Child Protection procedures, including Online Safety.
- b) Keeping up to date through training. It is a requirement that this takes place at least every two years.
- c) Obtain access to resources and attend any relevant or refresher training courses.
- d) Reviewing and updating the school's Safeguarding and Child Protection policies and inter agency working. Any deficiencies or weaknesses in the policies and procedures must be remedied without delay.
- e) Promoting educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are

experiencing, or have experienced, with teachers and school leadership staff. This includes ensuring staff know who these children are, and that they understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children.

- f) Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.

### 3.1.3 **Raising Awareness**

The DSL should create a culture of safeguarding and vigilance within the school and ensure the school's policies are known and used appropriately.

- a) Ensure staff have access to the schools Safeguarding and Child Protection Policy and procedures, especially new and part time staff. The DSL is responsible for organising and delivering child protection induction, and for regularly updating all school staff on Safeguarding developments, for example, through staff meetings, emails and notices.
- b) Ensure the school's Safeguarding and Child Protection Policy is reviewed annually and the procedures and implementation are updated and reviewed regularly, and work with governors regarding this.
- c) Ensure Online Policy and practice is effective and compliant
- d) Monitor the effectiveness of policies and procedures in practice
- e) Maintain an overview of safeguarding within the school
- b) Ensure the Safeguarding and Child Protection Policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this.
- c) Link with the Buckinghamshire Safeguarding Children Partnership to make sure staff are aware of training opportunities and the latest local policies on safeguarding.
- e) Providing, with the Headmaster and the Safeguarding Governor, an annual report for the governing body, detailing any changes to the policy and procedures; training undertaken by the DSL, and by all staff and governors; number and type of incidents/cases, and number of children with child protection plans (anonymised).
- f) Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff.

### 3.1.4 **Managing Referrals**

Receiving reports of alleged or suspected child abuse and neglect within the school, or reported by a child relating to incidents at home or outside the school, and referring these (as appropriate) to:

- Local Children's Social Care Services
- Channel programme
- The Disclosure and Barring Service (where a person is dismissed or left due to risk or harm to a child) and
- The police (cases where a crime may have been committed). This document may be of use: ['When to call the police'](#) produced by the National Police Chiefs Council (NPCC).

### 3.1.5 **Managing Child Protection Files**

- a) Keep detailed, accurate, secure written records of concerns and referrals. Keeping written records of concerns about a child even if there is no need to make an immediate referral. Ensuring that all such records are kept confidentially and securely, separate from pupil records and are copied on to the child's next school. Ensuring that an indication of further record-keeping is marked on the pupil records.
- b) Ensure child protection files are kept up to date.
- c) Passing on information to a new establishment when a child leaves the school. Files are transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This is transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt.
- d) Sharing any additional information with the new school prior to a child arriving to help them put in place the right support to safeguard this child and to help the child thrive in the school.

### 3.1.6 **Working with others**

- a) Open channels of communication with local statutory agencies.
- b) Liaison over safeguarding matters with the local Children's Social Care Services.
- c) Act as a source of support, advice and expertise for all staff.
- d) Liaising with all relevant staff (including SEN and nurses) on matters of safety, safeguarding and welfare when deciding to implement strategies or make referrals so that a child's needs are considered holistically.
- e) Promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.
- f) Liaising with the staff and keeping the Headmaster fully informed of all relevant issues.
- g) Liaising with the Headmaster to keep him informed of ongoing enquiries under section 47 of the Children Act 1989 and police, if relevant.
- h) Liaising with the Designated Governor.

### 3.1.7 **Training**

The DSL and DDSLs are fully trained for the demands of this role in child protection, interagency working and Prevent. They should regularly attend courses with child support agencies to ensure that they remain conversant with best practice and receive appropriate refresher training. This training is carried out at least every two years and in addition to formal training, their knowledge and skills should be refreshed at regular intervals, at least annually. All other staff will receive regular safeguarding and child protection updates as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. Safer Recruitment training is available to all relevant staff and governors who are involved in the recruitment process.

The DSL will ensure appropriate cover is in place, using the DDSLs and Safeguarding Team, should s/he not be able to carry out her DSL role due to Covid 19 or other such incapacity.

This training meets the requirements of the DfE's 'Keeping Children Safe in Education' (KCSIE 2021).

The key training elements are:

**Induction Training** – this is mandatory and should include;

- Safeguarding and Child Protection policy
- Pupil Behaviour Policy
- Staff Code of Conduct
- Online safety
- the safeguarding response to children who go missing from education;
- the role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies).
- KCSIE 2021 Part 1 (and where applicable Annexe and B)

### 3.1.8 **In addition:**

Covid 19 arrangements: the DSL is fully versed in our Covid Safe workplace policy and practice and will endeavour at all times to adhere to the prevailing guidance in the handling of any safeguarding issues.

## 3.2 **The Safeguarding Team**

The DDSL is appropriately trained and, in the absence of the DSL, carries out those functions necessary to ensure the on-going safety and protection of pupils. In the event of the long-term absence of the DSL, the DDSL will assume all of the functions above. Staff are reminded that they can always take advice from local children's social care (KCSIE 2021).

## 3.3 **The Governing Body is responsible for:**

3.3.1 Ensuring compliance with legal duties with relation to the management of Safeguarding and Child Protection in the school and that the policies, procedures and training in the school are effective and legally compliant. The governing body ensures that the following areas are appropriately managed:

### 3.3.2 Inter-agency working:

Ensuring that the school contributes to inter-agency working (Working Together to Safeguard Children 2018)

- i. the school's Safeguarding and Child Protection arrangements take into account the procedures and practice of the local authority
- ii. a member of the governing body is nominated to liaise with the designated officers from the local authority and partner agencies in the event of allegations of abuse made against the Headmaster.

### 3.3.3 Safeguarding Policies:

Ensuring that there are effective child protection and staff behaviour policies in place and operating effectively: there is an annual review of the school's Safeguarding and Child Protection policy and procedures, and the efficiency with which the related duties have been discharged.

### 3.3.4 Appointment of a Designated Safeguarding Lead:

This is currently the Deputy Head Pastoral, Sarah Bisschop, who is afforded the necessary time, training, resources and support to carry out her duties and responsibilities in this aspect of her role.

#### 3.3.5 Providing opportunities to teach safeguarding to pupils:

At Caldicott pupils are taught about safeguarding, including upskirting, through various teaching and learning opportunities, as part of providing a broad and balanced curriculum. Children are taught to recognise when they are at risk and how to get help when they need it. It is good practice to consult the Designated Safeguarding Lead when considering and planning any safeguarding related lessons or activities (including online) as they will be best placed to reflect and advise on any known safeguarding cases, and how to support any pupils who may be especially impacted by a lesson. [Teaching online safety in school (DfE, June 2019)].

#### 3.3.6 Inspection Compliance:

Ensuring compliance with all school inspection requirements.

#### 3.3.7 Safer Recruitment:

Ensuring that the school endeavours to prevent people who pose a risk of harm from working with children at the school. A deterrent to all such people is in place from the start of the recruitment process, continues through the process to appointment and throughout the employee lifecycle. An approach of “deter, detect and reject” is followed. This is outlined in the school’s Safer Recruitment, Selection and Disclosures Policy.

#### 3.3.8 Procedures to handle allegations of abuse made against staff or other children:

Ensuring that the school Safeguarding and Child Protection policy guidance covers how to handle allegations against staff, volunteers and other children.

#### 3.3.9 Meeting the additional requirements for boarding schools with regard to safeguarding:

Ensuring that the National Minimum Standards for Boarding Schools are met.

3.3.10 The Designated Governor will undertake training in Safer Recruitment and Safeguarding and Child Protection.

### **3.4 The Headmaster is responsible for:**

3.4.1 It is the role of the Headmaster to ensure that the schools policies and procedures are understood, implemented and followed by all staff.

3.4.2 Sufficient time is allocated to the DSL and the DDSs to carry out their roles effectively.

3.4.3 All staff are able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the School’s Whistleblowing Policy.

3.4.4 Pupils’ safety (including e-safety) and welfare are addressed through the curriculum.

## 4. Supporting Children

The school assesses the risks and issues in the wider community when considering the well-being and safety of its pupils. More information can be found on the Contextual Safeguarding Network's website: <https://contextualsafeguarding.org.uk/about/what-is-contextual-safeguarding>

- 4.1 The School's curriculum and pastoral systems are designed to foster the spiritual, moral, social and cultural development of all our pupils. All teaching staff play a vital role in this process, helping to ensure that all pupils relate well to one another and feel safe and comfortable within the school. We expect all the teaching and medical staff to lead by example and to play a full part in promoting an awareness that is appropriate to their age amongst all our pupils on issues relating to health, safety and well-being. All staff, including all non-teaching staff, have an important role in insisting that pupils always adhere to the standards of behaviour set out in our Behaviour Management Policy and in enforcing our Anti-Bullying Policy.
- 4.2 Time is allocated in PSHEE to discussions of what constitutes appropriate behaviour and on why bullying and lack of respect for others is never right. Assemblies, drama and RS lessons are used to promote tolerance and mutual respect and understanding.
- 4.3 All pupils know that there are adults to whom they can turn if they are worried, including the school counsellor, the chapel master and the medical staff. If the school has concerns about a child there is always a recognised requirement for sensitive communication and all staff members are aware of the need to avoid asking leading questions.
- 4.4 Our School Listeners and prefects have been trained to ensure that they are suitable for their duties and do not abuse their roles, which are specified clearly in writing. In particular, Listeners and prefects are given induction on appointment which includes how to contribute to the school's anti-bullying practice, how to respond to allegations of serious bullying or abuse and how to act if they hear allegations of abuse. Please see the Bucks Mind website for further details: <https://www.bucksmind.org.uk/services/children-and-young-peoples-services/peer-support-in-schools/>
- 4.5 A Child in Need refers to a pupil whose circumstances may require them to have extra support in order for them to live a life which does not compromise their ability to fulfil their potential. The School will refer to external agencies such as CAMHS (Child and Adolescent Mental Health Service) or Bucks County Council's Children's Social Services for advice and support.
- 4.6 A Child at Risk is a pupil who is in immediate risk of harm and such cases will be referred to First Response as a matter of urgency (normally within 24 hours).
- 4.7 We recognise that a child who is abused or witnesses violence may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self-worth. Staff are aware of indicators, which may signal that children are at risk from, or are involved with, serious violent crime.
- 4.8 We recognise that the school may provide the only stability in the lives of children who have been abused or who are at risk of harm.
- 4.9 We accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.
- 4.10 All Caldicott staff should be aware of the early help process and understand their role to take timely action to help a child if they have a safeguarding concern. Caldicott will support all pupils by:
  - a. Providing access to at least 2 telephone help lines and web addresses enabling them to call for support in private (see guidance below).
  - b. Providing every child with a homework diary or Pupil Planner which contains guidance on where to turn for advice. See below:

*“Your parents, your tutor, any adult member of staff or your friends can usually help you through times of anxiety. If you are still worried the following suggestions might help: (1.) The Outside Listener: Mrs Anne Dyer. She has her own children who have grown up. She has agreed to give her telephone number so that boys who feel that no one at school is listening to them can give her a call on 01753 644404 (2.) The Pupil Listeners: A group of 5<sup>th</sup> and 6<sup>th</sup> Form pupils have been trained by Bucks Mind staff to become peer mentors to pupils within the school and will be available at break times in Room A to listen to any concerns you have. A list of these pupils is on page 5. (3.) The Black Box: Some boys may find it difficult to talk about a worry and may find it easier to write the worry down. This is fine. Write your worries on a piece of paper and post it in the Black Box. The Deputy Head Pastoral will read your note and help you. (4.) The School Counsellor is Kate Brown. She does not work here but is very happy to come to Caldicott if she is needed. Boys should talk to the Headmaster or their tutor if they would like to meet her. We would need to ask your parents’ permission before this could happen. (5.) Childline is a national emergency number for children who need help. 0800 1111. The phone number for the Children’s Rights Commissioner (0800 528 0731) This is advertised on all school telephone booths.”*

- c. Displaying advice in the Medical Centre and Boarding Houses on where pupils can seek help, including confidential help lines and web addresses for external specialists such as ChildLine.
- d. Providing leadership training to our prefects which specifically covers child protection issues and the importance of offering support and assistance to younger and to vulnerable pupils.
- e. Providing regular lessons to pupils on e-safety and ensure that all pupils understand and adhere to the school’s guidelines in this area. This includes guidance on educating pupils to stay safe including e-safety and online protection. For more details on cyber-bullying and searching, screening and confiscation please refer to the school’s anti-bullying and e-safety policy and the guidance document 'Teaching online safety in school' (DfE, June 2019). The school recognises that most children will also access the internet outside and beyond the school infrastructure.
- f. Encouraging self-esteem and self-assertiveness, through the curriculum as well as our relationships, whilst not condoning aggression or bullying.
- g. Promoting a caring, safe and positive environment within the school.
- h. Drawing on the support of the half termly visiting clinical psychologist, who is charged with providing both advice and support. We have full triage facilities with Dr Wilmhurst's practice at Everlief so we can seek urgent support rapidly. Key issues tackled recently include supporting children in emotional distress such as anxiety, stress, low self-esteem as well as providing support and guidance with parenting and family issues. Please speak to the Deputy Head Pastoral for further information.
- i. Liaising and working together with all other support services and those agencies involved in the safeguarding of children.
- j. Notifying Social Care as soon as there is a significant concern.
- k. Providing continuing support to a pupil about whom there have been concerns who leave the school by ensuring that appropriate information is copied under confidential cover to the pupil's new school as a matter of priority.
- l. Ensuring the school medical records are returned to and signed for by parents upon a pupils departure.

- 4.11 Where the school has 'low level' concerns that do not amount to allegations or suspicions of specific abuse, but which may indicate the possibility of abuse occurring, the DSL should discuss these with Children's Social Care Services.
- 4.12 There may be times when staff, in the course of their duty may, in exceptional circumstances, have no option other than to use physical intervention to restrain children, either to stop them from harming themselves or others. Should this occur the Headmaster requires the member of staff involved in any such incident to report it to him (or in his absence the Deputy Head Pastoral). The Headmaster will make a record of the incident, in case the action is later questioned. In all and every instance where staff have used any physical intervention to restrain a child, the child's parents will be fully advised of the circumstances and the level of physical intervention applied the same day or as soon as practicable (see Behaviour Policy). Caldicott ensures that safeguarding and welfare concerns are taken into account when restraint is used on children with SEND. Caldicott uses individual plans in order to minimise the likelihood of challenging behaviour, and when it does occur, that there is less use of physical restraint and other restrictive methods.

## **Safeguarding children with SEND**

Children and young people with special educational needs and disabilities can face additional safeguarding challenges because:

- There may be assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration.
- These children can be more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- There is potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying without outwardly showing any signs.
- Difficulties may arise in overcoming communication barriers or reporting of challenges.

At Caldicott we identify pupils who might need more support to be kept safe or to keep themselves safe.

## **Provision for Listening and Early Help**

Pupils are frequently reminded of the avenues of support available to them and where they can turn should they need to speak to someone. This is communicated through assemblies, the tutor system and through the Pupil planners. Whilst at school boys have the following options available:

- Student Listener
- Any member of staff they feel they can relate to
- Tutor, Head of Year, Deputy Head Pastoral
- Outside Listener
- School Counsellor
- Childline's number is displayed in every phone booth
- Children's Rights Commissioner's number is displayed in every phone booth

Early help intervention is facilitated through the meeting of the Pastoral Committee once a week where children of concern are raised. This is attended by the Deputy Head Pastoral, DSL, DDSL, Heads of Year, Boarding House Parents and Head of Learning Support. Analysis of the Weekly Wellbeing Survey data is used at these meetings to assist early help intervention at these meetings. Proactive intervention is strived for. Appropriate early help action and intervention will be decided on a case by case basis and utilise independent support avenues or inter-agency assessment and intervention through local processes. Where



necessary a TAC (Team around the child ) meeting will be initiated to maximise support. The school uses its own Continuum of Need Threshold Guidance document which is integrated with the local Buckinghamshire Safeguarding Children Partnership Continuum of Need Threshold Document .

## **5. Record Keeping and Confidentiality**

- 5.1 All records relating to Safeguarding and Child Protection preceding October 2018 are held in the locked Filing Cabinet, in the Head of Boarding's Office. All records from October 2018 onwards are logged via *MyConcern*, the software used for recording and managing all safeguarding concerns.
  - 5.1.1 All records relating to Safeguarding and Child Protection (adult) are held in a locked filing cabinet accessible only by the Headmaster, DSL and DDSL.
- 5.2 We recognise that all matters relating to safeguarding are confidential. Guidance about sharing information, can be found in the guidance document 'Information sharing: advice for practitioners providing safeguarding services' (DfE, 2018).
- 5.3 The Headmaster or DSL will disclose any information about a pupil to other members of staff on a need to know basis only.
- 5.4 All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children.
- 5.5 All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing.
- 5.6 We will always undertake to share our intention to refer a child to Social Care with their parents/carers unless to do so could put the child at greater risk of harm or impede a criminal investigation. If in doubt, we will consult with the First Response Team on this point.
- 5.7 Caldicott will retain these records until the child is 25 years old. They will then be destroyed in a responsible manner.

## 6. Staff Training

- 6.1 It is important that all staff have training to enable them to recognise the possible signs of abuse and neglect and to know what to do if they have a concern. Safeguarding is the responsibility of all members of staff and all staff should know what to do to raise a concern. New staff (including temporary staff), volunteers and governors will receive training during their induction. Induction training will include:
- The school's behaviour policy
  - The school's procedure for managing children who are missing from education
  - Familiarisation with this policy (Safeguarding and Child Protection Policy)
  - Staff Code of Good Practice
  - Whistleblowing Policy
  - Online Safety Policy
  - The identity of the DSL and DDSs and use of Concern Forms and *MyConcern*
  - Updates to Part I and Annex A and Annex B of the prevailing Keeping Children Safe in Education guidelines.
- 6.2 Staff training will take place at least annually, regular update training will be given as necessary, supplemented by informal updates throughout the year.
- 6.3 Training will also include alerting staff to the risks of radicalisation as set out in the Prevent Duty. Training in the Prevent Duty will include knowing how to identify children and young people at risk. This training will be updated on a regular basis in line with recommendations from the BSCP.
- 6.4 All staff will complete appropriate training in child protection. The level and type of this training will depend upon the individual's role. As appropriate, this may be 'Child Protection in Education level 2' through the online training programme, *EduCare*, blended and followed up with face-to-face training by member of the safeguarding team, or will be conducted by an external provider. At the end of all training, the 4 questions we ask staff are:

*What have you learnt [today] that you didn't know before?*

*What did you know before, but now see in a different way?*

*What further questions, has this session prompted you to ask?*

*What's one thing you're going to do differently from now?*

## 7. Child Protection Procedures

### 7.1 Recognising Abuse: The Four Categories of Significant Harm and Signs of Abuse

Somebody may abuse or neglect a child by inflicting harm, or by knowingly not preventing harm. Children may be abused in a family, the community, an institutional setting, or more rarely by a stranger. Most young people who are abused know their abuser. It is also important to recognise the particular vulnerabilities of those with SEN.

Working Together to Safeguard Children sets out definitions and examples of four broad categories of abuse:

**A) 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. Staff should be aware of indicators, which may signal that children are at risk from, or are involved with, serious violent crime.

**Some of the following signs may be indicators of physical abuse:**

- Children with frequent injuries.
- Children with unexplained or unusual fractures or broken bones.
- Children with unexplained bruises or cuts; burns or scalds or bite marks.

**B) Emotional abuse:**

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

**Some of the following signs may be indicators of emotional abuse:**

- Children who are excessively withdrawn, fearful, or anxious about doing something wrong;
- Parents or carers who withdraw their attention from their child, giving the child the 'cold shoulder';
- Parents or carers blaming their problems on their child; and
- Parents or carers who humiliate their child, for example, by name-calling or making negative comparisons.

**C) Sexual abuse:**

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). This also includes 'upskirting' which is a criminal offence and typically involves taking a picture under a person's clothing without them

knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

**Some of the following signs may be indicators of sexual abuse:**

- Children who display knowledge or interest in sexual acts inappropriate to their age;
- Children who use sexual language or have sexual knowledge that you wouldn't expect them to have;
- Children who ask others to behave sexually or play sexual games; and
- Children with physical sexual health problems, including soreness in the genital and anal areas, sexually transmitted infections or underage pregnancy.

**D) Neglect:**

The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

**Some of the following signs may be indicators of neglect:**

- Children who are living in a home that is indisputably dirty or unsafe;
- Children who are left hungry or dirty;
- Children who are left without adequate clothing, e.g. not having a winter coat;
- Children who are living in dangerous conditions, i.e. around drugs, alcohol or violence;
- Children who are often angry, aggressive or self-harm;
- Children who fail to receive basic health care; and
- Parents who fail to seek medical treatment when their children are ill or are injured.

## 7.2 Specific Safeguarding issues

Some children can find themselves in more vulnerable situations. Be mindful of the following:

- [bullying including cyberbullying](#)
- [children missing education](#) – and Annex A
- [child missing from home or care](#)
- [child sexual exploitation](#) (CSE) – and Annex A
- [child criminal exploitation](#) (page 10)
- [county lines](#)
- [domestic violence](#)
- [drugs](#)
- [fabricated or induced illness](#)
- [faith abuse](#)
- [female genital mutilation](#) (FGM) – and Annex A
- [forced marriage](#)- and Annex A
- [Honour-based violence](#)
- [gangs and youth violence](#)
- [gender-based violence/violence against women and girls](#) (VAWG)

- [hate](#)
- [mental health](#)
- [missing children and adults](#)
- [private fostering](#)
- [sexual harassment and sexual violence](#)
- [trafficking](#)
- [Upskirting](#)

It is also crucial to bear in mind and be aware of children facing issues such as:

- Child Abduction and Community Safety Incidents
- Children and the Court System
- Children with family members in prison
- Cybercrime
- Homelessness
- Children Requiring Additional Support
- Modern Slavery: this 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. Staff should still be alert to the signs as pupils may be at risk during holiday periods or have friends who are vulnerable to this type of exploitation.
- Radicalisation

**The Prevent Duty** is the duty in the **Counter-Terrorism and Security Act 2015** on specified authorities, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism.

**Channel** is an early intervention multi-agency process designed to safeguard vulnerable people from being drawn into violent extremist or terrorist behaviour. Channel works in a similar way to existing safeguarding partnerships aimed at protecting vulnerable people

Guidance and references for all of the above can be found in the prevailing KCSIE statutory guidance Annex "Further information".

### 7.3 Child Sexual Exploitation

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

**Some of the following signs may be indicators of sexual exploitation:**

- Children who appear with unexplained gifts or new possessions.
- Children who associate with other young people involved in exploitation.
- Children who have older boyfriends or girlfriends.
- Children who suffer from sexually transmitted infections or become pregnant.
- Children who suffer from changes in emotional well-being.
- Children who misuse drugs and alcohol.
- Children who go missing for periods of time or regularly come home late; and

- Children who regularly miss school or education or do not take part in education.

## 7.4 Child Criminal Exploitation

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others. Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to. It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

## 7.5 Signs of Abuse

**Definition of 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. They may be abused by an adult or adults or another child or children.

**Some of the following signs might be indicators of abuse or neglect:**

- Children whose behaviour changes – they may become aggressive, challenging, disruptive, withdrawn or clingy, or they might have difficulty sleeping or start wetting the bed.
- Children with clothes which are ill-fitting and/or dirty.
- Children with consistently poor hygiene.
- Children who make strong efforts to avoid specific family members or friends, without an obvious reason.
- Children who don't want to change clothes in front of others or participate in physical activities.
- Children who are having problems at school, for example, a sudden lack of concentration and learning or they appear to be tired and hungry.
- Children who talk about being left home alone, with inappropriate carers or with strangers.
- Children who reach developmental milestones, such as learning to speak or walk, late, with no medical reason.
- Children who are regularly missing from school or education.
- Children who are reluctant to go home after school.
- Children with poor school attendance and punctuality, or who are consistently late being picked up.
- Parents who are dismissive and non-responsive to practitioners' concerns.
- Parents who collect their children from school when drunk, or under the influence of drugs.
- Children who drink alcohol regularly from an early age.
- Children who are concerned for younger siblings without explaining why.
- Children who talk about running away.
- Children who shy away from being touched or flinch at sudden movements.

## Safeguarding and Mental Health

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health issue. However, staff are well placed to observe pupils day-to-day and identify those whose behaviour suggests they may be experiencing a mental health problem or be at risk of developing one.

If you have a mental health concern about a pupil that indicates they may be suffering, or at risk of suffering serious harm, you must contact the Designated Safeguarding Lead or one of the Deputy Designated Safeguarding Leads immediately.

The DfE advice and guidance on Preventing and Tackling Bullying can be found here: <https://www.gov.uk/government/publications/preventing-and-tackling-bullying> , and Mental Health and Behaviour in Schools, here: <https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2>.

Public Health England has also produced a range of resources to promote positive health, wellbeing and resilience among young people including its guidance Promoting children and young people's emotional health and wellbeing, which can be accessed here: <https://www.gov.uk/government/publications/promoting-children-and-young-peoples-emotional-health-and-wellbeing>

### 7.6 What to do when a child wants to tell you about something that has happened:

- a. Listen very carefully.
- b. Do not promise confidentiality.
- c. Ask 'open' questions like 'can you tell me what has happened', and avoid any leading questions like 'Did he/she do X to you?'
- d. Make written notes as soon as possible, including anything that you have said.
- e. Do not take it upon yourself to investigate what the child has told you.
- f. Do not tell the person about whom the child has complained.
- g. If you think that, a child is at risk contact the DSL, or DDSL or ADSLs.

### 7.7 How to log a concern on *MyConcern* or complete a Concern Form and write a report on what you have been told:

- a. Whenever possible, staff should log into MyConcern: <https://www.myconcern.education/>, click on "Report a concern" and complete the form as prompted.
- b. If this option is not practicable for whatever reason, Concern Forms are available as hard copy from the Front Office, or Support Staff Tea Room or any member of the safeguarding team. Copies are also available in section 23 of this policy.
- c. Complete the form, noting the date, time, the child's name and your name.
- d. Note the 'who/what/where/when' of the allegation.
- e. Note your own opinion if it is relevant, preferably with justification.
- f. Reflect on why you have logged the incident.
- g. Hand the report to the DSL, or DDSL or ADSLs.

### 7.8 Procedure for staff about reporting a concern

Any member of staff who either knows of, is told of, or strongly suspects any incident of abuse occurring in the school between pupils, or to a child of the school at home or outside the school, must report the

information the same day to the DSL or in his absence to the DDSL or ADSLs who will immediately contact Children’s Social Care Services.

### 7.9 Investigations into Child Abuse are Always Externally Managed

- a. Members of the school do not investigate reports of abuse themselves.
- b. Alleged victims, perpetrators, those reporting abuse and others involved will not be interviewed by members of staff beyond the point at which it is clear that there is an allegation of abuse.
- c. The interviewing of children and adults, if necessary, will be carried out externally by specially trained staff only, following procedures in line with government requirements and in the light of the recommendations of past inquiries into the handling of child abuse issues.
- d. The school acknowledges that its policy will inevitably lead to some investigations by external agencies being triggered, which do not substantiate the allegations made, as well as those that do.
- e. It is a basic assumption that it is better to endure some ‘false alarms’ than to fail to initiate specialist investigation of instances of real abuse by Children’s Social Care Services:
- f. If a child has been harmed, there is a risk of immediate harm or the situation is an emergency contacting children’s social care and as appropriate the police immediately is necessary.

### Contacts at the local authority (Buckinghamshire County Council):

- Education Safeguarding Advisory Service 01296 387981 [secure-esasduty@buckinghamshire.gov.uk](mailto:secure-esasduty@buckinghamshire.gov.uk)
- Education Safeguarding Advisor 01296 382732
- Local Authority Designated Officer (LADO) 01296 382070  
Nicola Johnson (Department Head)  
LADOs: Amanda Perkins, Jonathan Kempster, Larissa Webber, Rachel Dawson  
Secure email: [secure-LADO@buckinghamshire.gov.uk](mailto:secure-LADO@buckinghamshire.gov.uk)  
The LADO office is open from 9am – 5.30pm Monday to Thursday, and from 9am – 5pm on Friday.
- Social Care First Response Team 0845 4600 001
- RU Safe? (Barnardos–Child Sexual Exploitation Service) 01494 461112
- Social Care - Out of Hours 0800 999 7677
- DfE helpline for non-emergency advice 02073407264 [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk)
- Thames Valley Police 999 (in emergency)  
(Child Abuse Investigation Unit) 101 (non- emergency)

#### Buckinghamshire Safeguarding Children Partnership

For procedures, policies and practice guidelines

Bucks Family Information Service 0845 688 4944

Buckinghamshire Grid for Learning e-Safety [Bucks C C e-Safety](#)

Multi-agency safeguarding partners: <https://www.buckssafeguarding.org.uk/childrenpartnership/>

**Should you wish to contact the local authority directly, you can access their contact details by entering a postcode on this website:** <https://www.gov.uk/report-child-abuse-to-local-council>

### 7.10 When an allegation of abuse, exploitation or neglect is made

Any member of staff to whom an allegation of abuse, exploitation or neglect is made should reassure victims that they are being taken seriously and that they will be supported and kept safe. This is in order that no victim will be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. No victim should ever be made to feel ashamed for making a report.

Any staff member to whom an allegation of abuse, exploitation or neglect is made should:



- a) Not promise confidentiality.
- b) Limit any questioning to the minimum necessary to seek clarification only, strictly avoiding 'leading' the child or adult who has approached them by making suggestions or asking questions that introduce their own ideas about what may have happened.
- c) Not ask questions like "Did he do x to you?" If you do need to ask a question for clarification try to use the following tool

**T** – tell me ...

**E** –explain ...

**D** –describe...

This should support you to ask open questions.

- d) Whilst leading questions should be avoided, staff can ask children if they have been harmed and what the nature of that harm was.
- e) Stop asking any more questions as soon as the child or adult has disclosed that he or she believes that something abusive has happened to him or her, or to someone else.
- f) Tell the informing child or adult that the staff member will now make sure that the appropriate people are brought in to follow the problem up (these will include the specialist social worker and that worker may need to involve the police).
- g) Ask the informing child or adult what steps they would like to be taken to protect them now that they have made an allegation and assure them that the school will try to follow their wishes.
- h) Refer the matter immediately, preferably via *MyConcern* with all relevant details, to the DSL (the DDSL or one of the ADSLs), the Headmaster.
- i) If this cannot be done, in exceptional circumstances, the staff member should contact First Response. If the child is at immediate risk, staff will not delay and call 999.
- j) Make a written record as soon as possible, of what they have been told and make a copy of this available to the DSL (or the DDSL or the ADSLs).
- k) Remember that all matters relating to child protection are confidential.

Any staff member to whom an allegation of abuse, exploitation or neglect is made should also ensure they act professionally at all times and establish good practice to minimise their own vulnerability to allegations. See section 10 for further details.

### 7.11 When an Allegation is passed on

On receiving an allegation of abuse, including alleged abuse by one or more pupils against another pupil, the DSL (or the DDSL or the ADSLs) should:

- a) Take steps needed to protect any child involved from risk of immediate harm. This may involve allocating an appropriate member of staff, as far as possible a person chosen by the child him/herself, to stay with him or her. Similarly, an Inspector receiving an allegation of abuse at the school may stay with the child concerned until suitable arrangements for his or her protection are made.
- b) Not interview or investigate the allegation further, but refer the matter the same day to First Response
- c) Speak personally to the Children's Social Care Services and not rely on leaving a message.
- d) Follow advice about contacting parents, other staff, police, doctor or alleged perpetrator or witnesses directly and agree any necessary next steps in relation to:
  - i. Informing a child's parents (there are circumstances where it would be inappropriate to inform parents immediately an allegation has been made).
  - ii. Medical examination or treatment for the child (again, there are circumstances where medical evidence will be needed). Immediate protection may be needed for a child who has been the victim of abuse.

- e) Take immediate and appropriate steps to protect the child who has given information about abuse and any child against whom an allegation has been made (each of these may now be at risk).
- f) Inform other people at the school who need to know (including any other member of staff) of the allegation and its investigation. Experience has shown that knowledge of an allegation or impending investigation can lead to a serious risk to the informant from the alleged perpetrator, or 'covering up' of evidence that may be sought by police such as collections of child pornographic photographs, or to pressure being applied to others to remain silent.
- g) Inform the child or adult who made the initial allegation of what the next steps are to be, having agreed these with the Children's Social Care Services Advisor.
- h) Inform the Headmaster (unless he is the subject of the allegations or suspicions) of the allegations and the action taken as above and agree necessary further action in line with these standards. It is the Headmaster who makes the decision whether to suspend from duty, pending investigation, any staff member who is alleged to have abused a child or children, taking into account the advice of the LADO or police.
- i) Take any steps for the longer-term protection and support of each child who has made allegations of abuse, or is alleged to have suffered from abuse, taking his or her wishes into account.
- j) Take any necessary steps to protect and support a child who is alleged to have abused another.
- k) Where the allegation has been made by a member of staff, remind them of the school Whistle-Blowing Policy that covers instances where an allegation has been made in good faith by any person or persons and such persons have complete immunity for their actions.

## 8. Allegations or Disclosures of Abuse

8.1 Allegations against staff (including supply teachers), volunteers, the DDSL or the ADSLs should be reported to the Headmaster. If the Headmaster is away, then it should be passed to the Chairman of Governors. If the allegation concerns the DSL, the person receiving the allegation should immediately inform the Headmaster. If he is not available, then the Chairman of Governors should be informed. If the allegation concerns the Headmaster, the person receiving the allegation should immediately inform the Chairman of Governors, without notifying the Headmaster first. In all cases via either the DSL, DDSL, ADSL, or the Headmaster, the Local Authority Designated Officer (hereafter "LADO") must be promptly informed. Should there be a conflict of interests in reporting a matter to the Headmaster, the LADO should be contacted directly. In case of serious harm, the police should be informed from the outset (more information can be found [here](#)).

8.2.1 When an allegation is made against a member of staff or volunteer and it reaches the harms threshold which indicates that a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in a school or college):

- I. If the member of staff concerned is resident, then the school will arrange for such member of boarding staff to be provided alternative accommodation off-site pending an investigation of a child protection nature.
- II. The school must report to the Disclosure and Barring Services (DBS) promptly and at least within one month of leaving the school, any person (whether employed, contracted, a volunteer or student) whose services are no longer used because he or she was involved in any allegation of child abuse. It is important that reports include as much evidence about the circumstances of the case as possible. Failure to make a report constitutes an offence and the school may be removed from the DfE register of independent schools.
- III. The school is also under a duty to consider making a referral to the Teaching Regulation Agency (TRA) where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and a prohibition order may be appropriate. The reasons such an order would be considered are: "unacceptable professional conduct", "conduct that may bring the profession into disrepute" or a "conviction, at any time, for a relevant offence". Further guidance is published on the TRA website. Where a referral has been made to the DBS, it is also necessary for a referral to be made to TRA.
- IV. The Charity Commission's guidance on serious incident reporting which was published in September 2017 ("Guidance") refers to the fact that one of the most common types of serious incidents is safeguarding issues. When deciding whether a safeguarding issue or allegation of abuse qualifies as a serious incident which needs reporting, the governors keep a record of the fact that they have considered it.
- V. Files relating to staff will be retained for 10 years or until the member of staff retires.

8.2.2 Harms Threshold is met when anyone working in the school or a college that provides education for children under 18 years of age, including supply teachers, volunteers and contractors has

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

The Head will lead any investigations unless he is the subject of allegations in which case this will be the chair of governors. The LADO(s) should be informed within one working day of all allegations that come to an employer's attention or that are made directly to the police. If an allegation is made against a governor, schools should follow their own local procedures. If a child has been harmed, there is a risk of immediate

harm or the situation is an emergency contacting children's social care and as appropriate the police immediately is necessary.

There are two aspects to consider when an allegation is made. Firstly looking after the welfare of the child. Secondly, investigating and supporting the person subject to the allegation.

Contact will be made with the LADO(s) to discuss any allegation, consider the nature, content and context of the allegation and agree a course of action including any involvement of the police. GDPR cannot be allowed to stand in the way of safeguarding children. Discussions will be recorded in writing, and any communication with both the individual and the parents of the child/children agreed. Consideration will be given on a case specific basis as to whether the circumstances of the case warrant suspension or whether alternative arrangements should be put in place. Due weight will be given to the views of the LADO, KCSIE and WT when making a decision about suspension. Records concerning allegations of abuse must be preserved for the term of the Independent Inquiry into Child Sexual Abuse and at least until the accused has reached normal pension age or for 10 years from the date of the allegation if it is longer [in any investigation] because agencies do not have direct access to children or other school staff, so they will not be able to collect the facts when an allegation is made, nor do they have all the relevant information required by the LADO as part of the referral process.

As appropriate, referrals will be made to the DBS when it is legally required and to the TRA where a teacher has been dismissed (or would have been dismissed had he/she not resigned)

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

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

Further guidance regarding managing allegations can be found guidance KCSIE 2021 (Part 4, Section 1, Allegations that may meet the harms threshold, page 81) if deemed necessary.

### **8.2.3 Supply Staff**

Whilst Caldicott is not the employer of supply teachers, we ensure allegations are dealt with properly. In no circumstances should a school or college decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the local authority designated officer (LADO) to determine a suitable outcome.

'The school will take the lead contact should be made with the LADO(s) as soon as basic enquiries have been conducted by a school in line with local procedures to establish facts to help determine whether there is any foundation to the allegation and to collate the initial information that the LADO will require. During those basic enquiries, care will be taken not to jeopardise any future potential investigation.

### **8.2.4 Disciplinary Action**

The school should consider taking, and if necessary will take, disciplinary action against any member of staff or agent of the school where it is believed that children are at risk of abuse from that member of staff, even in cases where there is to be no criminal prosecution.

## 8.2.5 Low Level Concerns

### Reporting low level concerns about adults

Concerns that do not meet the harm threshold are called low level concerns.

The harm threshold is reached when allegations are made that might indicate that a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in a school or college.

Staff may have low level concerns about adults working for on behalf of Caldicott. These may be due to behaviour being inconsistent with the staff code.

Examples of low level concerns:

- being over-friendly
- taking photos of children on a mobile phone
- engaging with children on a 1-1 basis in a secluded area
- using inappropriate sexualised, intimidating or offensive language
- showing favouritism

Low level concerns about a member of staff should still be reported to the Headmaster in order to encourage an open and transparent culture.

This enables the school to identify concerning, problematic or inappropriate behaviour early to minimise the risk of abuse. It also ensures that adults working in or on behalf of Caldicott are clear about professional boundaries and how to act within those boundaries. This is part of ensuring that the values and behaviours set out in the staff Code of Conduct are constantly lived, monitored and reinforced by staff.

Reports of low level concerns about supply staff and contractors working on site, or with our pupils off-site, will also be reported to their employers so as to enable the identification of potential patterns of inappropriate behaviour – just as they would be within our own staff body.

Where a low level concern is raised by a third party the Headmaster will speak with the person reporting, the individual involved and any witnesses to thoroughly investigate and gather evidence.

### Self-referral

Staff should also feel confident to self-refer a low level concern if they have found themselves in a situation which could be misinterpreted. All low level concern reports will be handled sensitively and proportionately as our aim is to strengthen our safeguarding system and practice and to support individuals to correct behaviour at an early stage.

### Recording of low level concerns

All low level concerns reported to the headmaster will be recorded. The record will include details of the concern, the date of the concern, the context in which the concern arose, evidence collected, the type of behaviour, the action taken, the rationale for decisions and action taken. The name of the individual sharing the concerns will also be noted (although if the reporter wishes to remain anonymous this will be respected as far as possible). All records will be kept confidential and stored securely in compliance with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

Records of low level concerns will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and responded to appropriately. Should a pattern of behaviour be identified the an appropriate course of action will be followed, which may be an internal disciplinary procedure or referral to the LADO if the harms threshold is met.

Due consideration will be given if there are any wider cultural issues in the School that enable problematic behaviours or patterns of behaviour to arise. Appropriate actions will then be taken such as revising policies and re-training and information sharing on appropriate behaviours to change practice and minimise risk of recurrence. Appropriate records must be kept of all decision making rationale on policy and practice change.

### **Onward reporting and referral**

Where the school has 'low level' concerns that do not amount to allegations or suspicions of specific abuse, but which may indicate the possibility of abuse occurring, the DSL should discuss these with Children's Social Care Services.

### **8.3 Transferable Risk**

Allegations made against staff also includes where a staff member has, 'behaved or may have behaved in a way that indicates they may not be suitable to work with children'. This is to take account of situations where a person's behaviour outside school may suggest 'transferable risk'. For example, where a member of staff or volunteer is involved in an incident outside of school which did not involve children but could have an impact on their suitability to work with children' (see paragraph 211).

## 9. Peer-on-Peer Abuse

This is a significant entity and consequently Caldicott has a standalone **Peer-on-Peer Abuse Policy** which staff should read and which can be found in **Annexe A** at the end of this document. A brief introductory overview is provided below.

At Caldicott we believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm by adults in the school and other students. We have a zero-tolerance approach to sexual violence and sexual harassment and it is never acceptable and will not be tolerated. It is especially important not to pass off any sexual violence or sexual harassment as 'banter', 'just having a laugh', 'part of growing up' or 'boys being boys' as this can lead to a culture of unacceptable behaviours and an unsafe environment for children

Staff should be aware that safeguarding issues can manifest themselves via peer-on-peer abuse. This is most likely to include, but not limited to:

- Bullying (including cyberbullying). Abuse that occurs online or outside of the school should not be downplayed and should be treated equally seriously
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm.
- Gender-based violence.
- Sexting (also known as youth produced sexual imagery).
- Initiation-type violence and rituals.
- Sexual violence and sexual harassment, including upskirting.

It is important to note that sexual violence and sexual harassment can occur between two children of any age and sex and within intimate personal relationships between peers. A group of children may sexually assault or sexually harass a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable.

Abuse is abuse. It is no longer acceptable to tolerate peer-on-peer abuse, dismiss it as normal behaviour amongst children, or pass it off as "banter" or "part of growing up". These are safeguarding issues and must be referred to the DSL. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report or have their experience minimised. It is also crucial to respond promptly as the distress experienced by children who are victims is likely to adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attend(s) the same school and the matter is unresolved. Early intervention can also help prevent problematic, abusive and/or violent behaviour in the future. To this end, all staff working with children are advised to maintain an attitude of 'it could happen here'.

Schools should also be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school, including intimate personal relationships and it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely that it will be perpetrated by boys.

The policy in Annexe A outlines how a report should be managed and all staff need to ensure they understand and confident to manage this.

If there is reasonable cause to suspect that a child is suffering or likely to suffer significant harm, they will be referred to the local authority or the police. Members of staff must not attempt to deal with them as pastoral, classroom or disciplinary issues, and should not impose their own thresholds before consulting the DSL. It is true that there will sometimes be a grey area between, on the one hand, incidents which should be regarded as abusive, and on the other, incidents which are more properly dealt with in schools such as (for example) children fighting. However, the DSL can advise staff on the thresholds which pertain to different definitions

of peer-on-peer abuse, and in unclear cases will consult the local authority or police as necessary. Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse and sexual exploitation. Caldicott will consider the conduct of the alleged perpetrator as part of their behaviour policy on the 'balance of probabilities' and apply appropriate and proportional consequences.

**9.1 It is likely that to be considered a safeguarding allegation against a pupil, when the allegation:**

- Is made against an older pupil and refers to their behaviour towards a younger pupil or a more vulnerable pupil. Groups at particular risk include students who identify as LGBT+, or are perceived by peers to be LGBT+, and pupils with SEND.
- Is of a serious nature, possibly including a criminal offence.
- Raises risk factors for other pupils in the school.
- Indicates that other pupils may have been affected by this student.
- Indicates that young people outside the school may be affected by this student.

**9.2 Examples of safeguarding issues against a student could include:**

**Physical Abuse**

- Violence, particularly pre-planned.
- Forcing others to use drugs or alcohol.

**Emotional Abuse**

- Blackmail or extortion.
- Threats and intimidation.

**Sexual Abuse**

- Indecent exposure, indecent touching or serious sexual assaults.
- Forcing others to watch pornography or take part in sexting.

**Sexual Exploitation**

- Encouraging other children to attend inappropriate parties.
- Photographing or videoing other children performing indecent acts.
- 'Upskirting'.

This also includes 'upskirting' which is a criminal offence and typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Young people suffering from sexual exploitation themselves may be forced to recruit other young people under threat of violence.

**9.3 Minimising the risk of safeguarding concerns towards pupils from other students**

On occasion, some students will present a safeguarding risk to other students. The school should be informed that the young person raises safeguarding concerns, for example, they are coming back into school following a period in custody or they have experienced serious abuse themselves.

The guidance is clear that victims and alleged perpetrators can be kept apart in classrooms and other shared spaces. The emphasis should be on ensuring that the victim can continue their normal routines.

These students will need an individual risk management plan to ensure that other pupils are kept safe and they themselves are not laid open to malicious allegations. There is a need to balance the tension between privacy and safeguarding.



Such incidents will be recorded across the whole spectrum of sexual violence and sexual harassment, so that as a school, Caldicott can understand the scale of any problem and make appropriate plans to reduce it.

#### 9.4 **Sexting**

In cases of 'sexting' we follow guidance given to schools and colleges by the UK Council for Child Internet Safety (UKCCIS) published in 2017: 'Sexting in schools and colleges, responding to incidents, and safeguarding young people'.

#### 9.5 **Sexual Violence and Sexual Harassment between children (DfE, May 2018)**

As set out in the DfE Guidance, Sexual Violence refers to criminal acts: rape, assault by penetration and sexual assault, as defined by the Sexual Offences Act 2003. Sexual harassment is described as 'unwanted conduct of a sexual nature'.

- We recognise that sexual violence and sexual harassment can occur between two children of any sex. They can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.
- Through training, staff are aware that sexual violence refers to sexual offences under the Sexual Offences Act 2003 and include rape, assault by penetration and sexual assault.
- Through training, all staff are aware that sexual harassment is 'unwanted conduct of a sexual nature' that can occur online or offline and is likely to degrade, humiliate and /or intimidate a child.
- Children are taught about healthy, respectful relationships and cultures of sexual harassment through a planned Relationship Education and through PSHEE. Relationship Education is integrated from the First Form and Relationship and Sex Education from the Third Form.
- At Caldicott, any incidents of sexual violence and/ or sexual harassment will not be tolerated, it will be taken seriously and will not be dismissed without investigation.
- Any incidents of sexual violence or sexual harassment will be dealt with in a timely manner, following the school's usual safeguarding protocols, the DfE guidelines, as set out in Sexual violence and sexual harassment between children in schools and colleges (May 2018) and, where appropriate, Sexting in Schools and Colleges produced by the UK Council for Child Internet Safety.
- Clear records of any incidents reported will be maintained securely, along with records of discussions and decisions.
- The Designated Safeguarding Lead (DSL) will liaise with appropriate outside agencies, such as the police and/or social care and only involve staff members who are required to support the children. Staff will work collaboratively with children and their families to achieve the best possible outcome.

**When responding to reports of sexual violence and sexual harassment, refer to the Peer-on-Peer Abuse Policy guidance in Annex A.**

## 10. Staff Code of Conduct

### Code of Conduct – The Do's...

- Do put this code into practice.
- Do set an example you would wish others to follow.
- Do treat everyone with dignity and respect.
- Do treat all young people equally – show no favouritism.
- Do ensure that if you are in a one-on-one situation with a young person that the door is either open or contains a glass panel and that another adult is aware of your meeting / lesson.
- Do respect a young person's right to personal privacy.
- Do allow young people to talk about any allegations and concerns that they may have and refer immediately.
- Do encourage others to challenge attitudes / behaviours that they do not like.
- Do avoid being drawn into inappropriate attention seeking behaviour e.g. tantrums and crushes.
- Do remember this code even at sensitive moments. E.g. when responding to bullying, bereavement and abuse.
- Do keep other members of staff informed of where you are and what you are doing.
- Do remember that someone else may misinterpret your actions however well-intentioned they may be.
- Do ensure that if you need to have appropriate physical contact with a child that you ask their permission first. e.g. PE / Music / Drama / comforting a distressed child.

### Code of Conduct – The Don'ts...

- Do not let allegations, suspicions or concerns about abuse go unreported or trivialise abuse. Caldicott has a culture of safety and raising concerns and values reflective practice. The Whistleblowing policy can be accessed using this link: <https://intranet.caldicott.com/staff/home/staffdocs.php?f=hrpolicies>
- Do not enter any boarding house without the knowledge of the appropriate member of the boarding team.
- Do not allow boarders to enter staff accommodation
- Do not permit any abusive peer activities e.g. initiation ceremonies, bullying.
- Do not engage in inappropriate behaviour or contact – physical, verbal or sexual.
- Do not play physical contact games with young people.
- Do not use mobile phones when on duty.
- Do not make suggestive remarks or threats to a young person even in jest.
- Do not use inappropriate language – face to face, in writing, phoning, email or internet.
- Do not share personal phone numbers or email addresses with pupils or engage on social media.
- Do not arrange meetings out of school or visit a young person's home without permission from the Headmaster.
- Do not convey a child in a car unless parental/Headmaster's permission has been given.
- Do not develop sexual relationships with pupils. If you in a position of trust and develop a sexual relationship with a young learner under the age of 18 it may constitute a criminal offence under the Sexual Offences Act.
- Do not use physical restraint unless a child is in imminent danger of inflicting an injury on himself/herself or on another, and then only as a last resort when all efforts to diffuse the situation have failed.
- Do not rely on your good name to protect you.

### **Dress Code:**

Your appearance should always appropriately professional. Dress, which might be deemed offensive, distracting, revealing or provocative, must be avoided: clothing should be modest. Teachers should wear smart professional clothes in the classroom; PE or sports clothing should only be worn in PE or games lessons.

If you are in doubt about any form of clothing, you should seek advice from the Deputy Heads. You will be required to change your clothing if it is not considered suitable or appropriate by the Headmaster or Deputy Heads.

### **Use of Mobile Phones and Electronic Devices:**

Staff may not use their phones / personal devices for personal use whilst on duty. In particular, mobile phones should never be used whilst in a changing room, carrying out a boarding duty upstairs or supervising boys around the swimming pool.

Please refer to the school policy on “Images of Pupils for Record Keeping and Promotional Purposes: Photographs, Videos and Electronic Media”.

## **11. Establishing Good Practice: Minimising Vulnerability to Allegations**

### **Always:**

- Work in an open environment. Avoid private or out of sight locations and encourage open communication.
- Speak clearly, without whispering, so that students do not need to come close to hear.
- Avoid spending time alone with individual students away from others.
- Treat all students, regardless of race, disability, religion or belief, gender, sexual orientation, equally and with respect and dignity.
- Ensure the student’s welfare comes first and record it.
- Be aware of the impact of proxemics; maintain safe and appropriate distances; Know where and how to place your body.
- Avoid touching students, but where **educationally necessary** staff should follow these guidelines:
  - try to demonstrate without touching first
  - ask permission; say what you intend to do first and explain why
  - if a pupil seems uncomfortable: stop
  - only touch hands, arms or shoulder nearest you (don’t reach across the body)
  - Be aware of overall proximity; maintain physical space; don’t stand behind.
  - Inappropriate areas for touch include: chest, diaphragm, waist, thighs move away as soon as the contact is no longer required.
- Maintain professional boundaries, perhaps using a specific mobile number or email address for work purposes, rather than sharing personal details.
- Present as an exemplary role model by not smoking or drinking alcohol, swearing, allowing suggestive conversations or jokes or wearing less than professional clothing when in the company of a student.
- Seek to be enthusiastic and constructive when giving feedback rather than making negative or critical remarks.
- Record any injury that occurs and seek attention from a qualified First Aider or parent.
- Record any incident of concern involving student’s welfare.

### **Never:**

- Allow allegations made by a child to go unchallenged, unrecorded or not acted upon (this applies to any form of abuse or bullying).

- Lock doors, cover windows or use 'Do Not Disturb' signs.
- Impose humiliating or power-based punishments on a student or reduce a child to tears.
- Engage in rough, physical or sexually provocative games, including horseplay.
- Allow or engage in any form of inappropriate touching.
- Share a bedroom with a child.
- Allow children to use inappropriate language unchallenged.
- Make sexually suggestive comments to a young person, even in fun.
- Engage in any form of relationship, sexual or otherwise, with a young person you work with even if they are over the age of consent, but under 18 (older with vulnerable adults).
- Do things of a personal or intimate nature for children or disabled young people that they can do for themselves.
- Invite or allow children to stay with you at your home unsupervised.
- 'Friend' a child on their social media or yours; social media can blur boundaries.
- Take photographs or videos of children unless written/signed consent has been obtained from a parent/carer; this includes the use of phones.
- Seek physical contact. Try to gently discourage contact, rather than reject students. Model appropriate contact, e.g. shaking hands or patting the shoulder. Never allow physical contact when you are alone.
- Take a child in your car, but where this is unavoidable:
  - Prepare a risk assessment.
  - Ensure your insurance covers business passengers (NB this may provide a very good reason for not being able to take students in your car.)
  - Obtain parental permission, preferably in writing.
  - Take more than one person.
  - Sit the child in the back.
  - Travel directly to the destination.
  - Keep conversation professional.

## 12. Quick Reference – Summary

### ***If you suspect abuse, you receive a complaint or allegation.***

If you suspect abuse, a young person confides in you, or a complaint is made about any adult or yourself, it is your duty to report the concern immediately to the DSL, the DDSL or one of the ADSLs.

### **If a young person tells you about abuse by someone else or if you have a concern about a young person's safety or well-being:**

1. Allow the young person to speak without interruption, accepting what is said.
2. Offer immediate understanding and reassurance whilst passing no judgement.
3. Advise the young person that you will try to offer support but you must pass the information on.
4. Immediately tell the DSL, DDSL or one of the ADSLs.
5. Write careful notes of what was said / what you witnessed / heard or were told. Please use *MyConcern* <https://www.myconcern.education/Account/Login?returnUrl=%2F> or the Concern Form in section 23 of this document.
6. Sign, date and pass your notes onto DSL, DDSL or ADSLs.

### **If you receive a complaint or allegation about any adult or yourself:**

1. Immediately tell the DSL, DDSL or ADSLs.
2. Write careful notes of what was said / what you witnessed / heard or were told. Please use CP concern sheet (where possible).
3. Sign, date and pass your notes onto the DSL, DDSL or ADSLs.
4. Try to ensure that no one is placed in a position, which could cause further compromise.

*Note: Any adult at Caldicott school has the right to report any concerns, or suspicions about another member in confidence and free from harassment (see Whistleblowing Policy).*

### ***You must refer; you must not investigate.***

If you are in any doubt about policy or procedure, please contact:

The DSL and Deputy Head Pastoral, Sarah Bisschop, or any member of the Safeguarding Team.

### **13. Monitoring and Evaluation**

The school monitors and evaluates its safeguarding policy and procedures through the following activities:

- Pupil surveys and questionnaires
- PSHEE discussions
- Governing Body monitoring
- Child Protection Files
- Frequent scrutiny of attendance data and termly absence/behaviour audits by Heads of Year
- Regular analysis of a range of risk assessments
- Regular analysis of appropriate provision for the fulfilment of other safeguarding responsibilities relevant to the school
- Logs of bullying and/or racist behaviour incidents are reviewed regularly by the pastoral team and the governing body
- Regular review of parental concerns
- Regular review of the use of ICT rooms and after school activity programme

## 14. Children Missing from Education

Knowing where children are during school hours is an extremely important aspect of Safeguarding. Missing school can be an indicator of abuse and neglect and may also raise concerns about others safeguarding issues, including the criminal exploitation of children.

We monitor attendance carefully and address poor or irregular attendance without delay.

We will always follow up with parents/carers when pupils are not at school. This means we need to have a least two up to date contacts numbers for parents/carers. Parents should remember to update the school as soon as possible if the numbers change.

In response to the guidance in Keeping Children Safe in Education (2021) the school has:

1. Staff who understand what to do when children do not attend regularly.
2. Appropriate policies, procedures and responses for pupils who go missing from education (especially on repeat occasions).
3. Staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriage.
4. Procedures to inform the local authority when we plan to take pupils off-roll when they:
  - a. Leave school to be home educated.
  - b. Move away from the school's location.
  - c. Remain medically unfit beyond compulsory school age.
  - d. Are in custody for four months or more (and will not return to school afterwards).
  - e. Are permanently excluded.

We will ensure that pupils who are expected to attend the school but fail to take up the place will be referred to the local authority.

When a pupil leaves the school, we will record the name of the pupil's new school and their expected start date.

## 15. Supporting Staff

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

## 16. Parents

In general, we believe that parents should be informed about any safeguarding concerns regarding their children. It is important that we are honest and open in our dealings with parents. However, concerns of this nature must be referred to the DSL or the Headmaster who will decide on the appropriate response. In a very few cases, it may not be right to inform them of our concerns immediately as that action could prejudice any investigation or place the child at further risk. In such cases, advice will be sought from the LADO or Social Services.

## 17. Whistleblowing

We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so. All staff should be aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues. If it becomes necessary to consult outside the school, they should speak in the first instance, to the LADO. The School will aim to provide immunity from retribution and no disciplinary action will be taken against staff for 'whistleblowing' in the public interest. See the Whistleblowing Policy on the Staff Portal:

<https://intranet.caldicott.com/staff/home/staffdocs.php?f=hrpolicies>

## 18. Physical Restraint

Our policy on physical intervention by staff is set out separately and acknowledges that staff must only ever use physical intervention as a last resort, when a child is endangering himself or others, and that at all times it must be the minimal force necessary to prevent injury to another person. Such events should be recorded and signed by a witness. Staff who are likely to need to use physical intervention will be appropriately trained. We understand that physical intervention of a nature which causes injury or distress to a child may be considered under child protection or disciplinary procedures. We recognise that touch is appropriate in the context of working with children and all staff have been given "Safe Practice" guidance to ensure they are clear about their professional boundary.

Caldicott ensures that safeguarding and welfare concerns are taken into account when restraint is used on children with SEND. Caldicott uses individual plans in order to minimise the likelihood of challenging behaviour, and when it does occur, that there is less use of physical restraint and other restrictive methods.

## 19. Bullying

Our policy on bullying is set out in a separate document called The Anti-Bullying Policy, which can be found here: <https://intranet.caldicott.com/staff/home/staffdocs.php?f=ppolicies> and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures. This includes cyber, racist, homophobic and gender related bullying. A bullying incident may be treated as a child protection concern where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm.

## 20. Health and Safety

Our Health & Safety policy (<https://intranet.caldicott.com/staff/home/staffdocs.php?f=ppolicies>), reflects the consideration we give to the protection of our children both physically within the school environment, and for example in relation to internet use, and when away from the school when undertaking school trips and visits.



## **21. Alternative Provisions**

Caldicott is responsible for the safeguarding of their pupils when they are placed in an alternative provision. KCSIE (2020) says that schools should obtain a written statement from the provider that they have completed all the vetting and barring checks that are necessary on their staff.

## **22. Home-stays (Exchange Visits)**

If children are staying with parents from overseas as part of an exchange, KCSIE (2021) is very clear, they do need to have an enhanced DBS check. The DBS service will process these checks without payment because those parents are volunteers. If there are other people in the family aged over 16, then the school can decide whether they will do an enhanced DBS check for those 16- and 17-year-olds who live in the house.

## 23. Caldicott Welfare and Safeguarding Form

Whenever possible, staff should log into MyConcern to record a concern: <https://www.myconcern.education/>, click on "Report a concern" and complete the form as prompted. If this option is not practicable for whatever reason, then please use the form below.

Report a Concern

<b>Pupil name</b>  <b>AKA</b>		<b>Date of birth</b>	<b>Year Group</b>
<b>Name and position of person completing form (please print)</b>			
<b>Time and Date of incident /concern:</b> <b>dd/mm/yy</b>		<b>Any other documents included with concern form</b> (please list)	
<b>Incident / concern (who what where when)</b>          (Please use continuation n sheet      Y/N      No of sheets used.....)			
<b>Any other relevant information (context of info shared, witnesses, immediate action taken)</b>			
<b>Action taken by staff member</b>			
<b>Reporting Staff Signature .....</b> <b>Date.....</b>			

**Date and Time Passed to DSL.....**

**To be completed by DSL/DDSL**

**Action Taken by Designated Safeguarding Lead** (if advice sought from outside agency, complete box at bottom of form)

**Response/ outcome** (please record all steps taken and details of follow-up date)

- **Watching brief (including name of Lead Teacher)**
- **Child Protection concern – file opened (date)**
- **Discussed with parent/guardian – yes or no (if no, why not) and by whom**
- **Feedback given to reporting individual & by whom (if not, why not)**

**DSL Signature..... Date .....**

**Details of Agency Contact (if applicable);**

**Agency Contacted:**

**Person spoken to (Full Name):**

**Job Role:**

**Contact Phone Number:**

**Contact email:**

**Recommendations Given:**

**DSL Signature..... Date .....**

# Annexe A: PEER-ON-PEER ABUSE POLICY & GUIDANCE

## 1. Introduction

The Governors, Senior Leadership Team, and all staff and volunteers at Caldicott School are committed to the prevention, early identification, and appropriate management of peer-on-peer abuse (as defined below) both within and beyond the school.

In particular we believe that in order to protect children, Caldicott should:

- a. be aware of the level and nature of risk to which our students are or may be exposed and put in place a clear and comprehensive strategy which is tailored to our specific safeguarding context; and
- b. take a contextual whole-school community approach to preventing and responding to peer-on-peer abuse.
- c. regard the introduction of this policy and guidance as a preventative measure. We (a) do not feel it is acceptable merely to take a reactive approach to peer-on-peer abuse in response to alleged incidents of it and (b) believe that in order to tackle peer-on-peer abuse proactively, it is necessary to focus on all four of the following areas: (i) systems and structures; (ii) prevention; (iii) identification; and (iv) response/intervention
- d. recognize national and increasing concern about this issue and wish to implement this policy in order to mitigate harmful attitudes and peer-on-peer abuse in the school setting.
- e. encourage parents to hold us to account on this issue, so that if their child is feeling unsafe as a result of the behaviour of any of their peers, they should inform the school so that it can ensure that appropriate and prompt action is taken in response.

## 2. Scope of Policy

This policy:

- a. Is the School's overarching policy for any issues that could constitute peer-on-peer abuse. It relates to, and should be read alongside, Caldicott's Safeguarding and Child Protection Policy and any other relevant policies including Online safety, Children Missing in Education, Student Behaviour and Discipline, Exclusions, Data Protection.
- b. Sets out our strategy for preventing, identifying, and appropriately managing peer-on-peer abuse. It is the product of a comprehensive consultation with students and staff. In producing this policy, we have discussed the issue in the Pastoral and Safeguarding committees.
- c. Applies to all Governors, Senior Leadership Team, staff, volunteers, contractors etc. It is reviewed annually, and updated in the interim, as may be required, to ensure that it continually addresses the risks to which students are or may be exposed. A number of staff and students will be involved in each annual review, which involves and is informed by an assessment of the impact and effectiveness of this policy over the previous year.
- d. Recognise that abuse is abuse, and should never be passed off as 'banter', 'just having a laugh', or 'part of growing up' and that such behaviours may lead to unacceptable behaviours and an unsafe environment if unchallenged.
- e. Recognise that even if there are no reported cases of peer-on-peer abuse, such abuse may still be taking place and is simply not being reported. Staff vigilance and awareness is key.
- f. Is compliant with the statutory guidance on peer- on-peer abuse as set out in Keeping Children Safe in Education (September 2021).
- g. Does not use the term 'victim' and/or 'perpetrator'. This is because Caldicott takes a safeguarding approach to all individuals involved in allegations of or concerns about peer-on-peer abuse, including those who are alleged to have been abused and those who are alleged to have abused their peers, in addition to any sanctioning work that may also be required for the latter. Research has shown that many children who present with harmful behaviour towards others, in the context of peer-on-peer abuse, are themselves vulnerable and may have been victimized by peers, parents or adults in the community prior to their abuse of peers.
- h. Uses the terms 'child' and 'children', which is defined for the purposes of this policy as a person aged under 18. We have nonetheless chosen not to restrict our approach to peer-on-peer abuse under this policy to children but instead to adopt a wider interpretation of our safeguarding responsibilities so that they apply to all students, regardless of age. Although the starting point is that the school's response to peer-on-peer abuse should be the same for all students, regardless of age, there may be some additional considerations in relation to the school's response to incidents, for example, incidents involving the exchange of youth involved sexual

imagery will need to differ depending on the age of the students involved.

### 3. Understanding Peer-on-Peer abuse

#### Definition of peer-on-peer abuse:

For these purposes, peer-on-peer abuse is any form of physical, sexual, emotional and financial abuse, and coercive control, exercised between children and within children's relationships (both intimate and non-intimate), friendships and wider peer associations.

Peer-on-peer abuse can take various forms, including:

- bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or other physical harm
- abuse in intimate personal relationships between peers
- sexual exploitation, violence and sexual harassment
- consensual and non-consensual sharing of nude and semi-nude images and /or videos (also known as sexting or youth-produced sexual imagery)
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- upskirting
- initiation/hazing type violence and rituals
- domestic violence and abuse
- youth and serious youth violence
- prejudice-based violence including, but not limited to, gender-based violence.

**Examples** of online peer-on-peer abuse would include sexting, online abuse, peer-on-peer grooming, the distribution of youth involved sexualized content, and harassment.

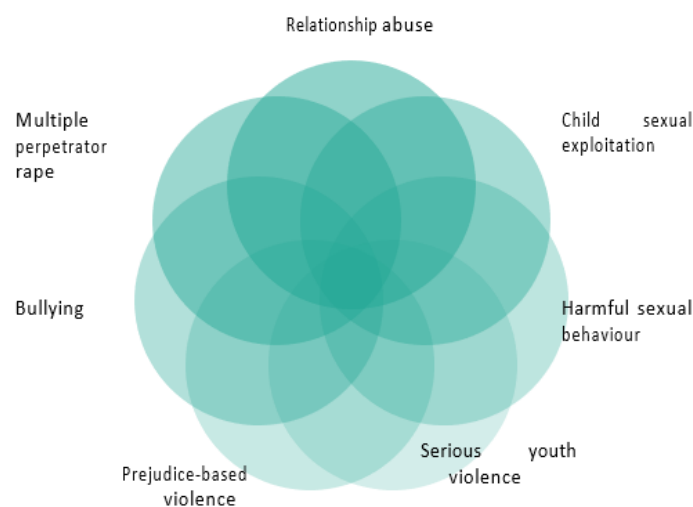
These types of abuse rarely take place in isolation and often indicate wider safeguarding concerns. Children's experiences of abuse and violence are rarely isolated events, and they can often be linked to other things that are happening in their lives and spaces in which they spend their time. Any response to peer-on-peer abuse therefore needs to consider the range of possible types of peer-on-peer abuse set out above and capture the full context of children's experiences. This can be done by adopting a Contextual Safeguarding approach and by ensuring that our response to incidents of peer-on-peer abuse takes into account any potential complexity.

## Contextual Safeguarding

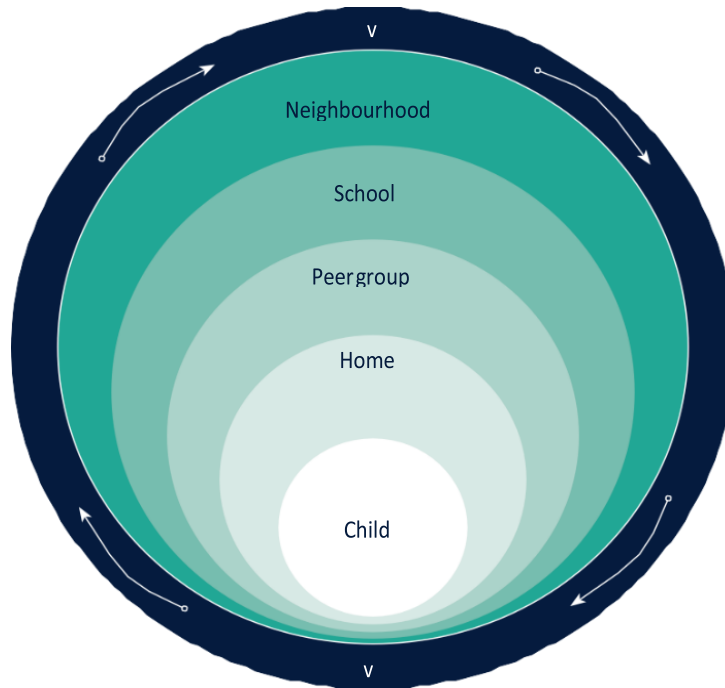
This policy encapsulates a Contextual Safeguarding approach, which:

- a. Is about changing the way that professionals approach child protection when risks occur outside of the family, thereby requiring all those within a Local Safeguarding Partnership to consider how they work alongside, rather than just refer into, children's social care, to create safe spaces in which children will not encounter peer-on-peer abuse. Considers interventions to change the systems or social conditions of the environments in which abuse has occurred. For example, rather than move a child from a school, professionals could work with the school leadership and student body to challenge harmful, gendered school cultures, thus improving the pre-existing school environment.
- b. Adopts a whole-school community Contextual Safeguarding approach. This means it is an approach to safeguarding children that recognizes their experiences of significant harm in extra-familial contexts, and seeks to include these contexts within prevention, identification, assessment and intervention safeguarding activities.
- c. Being aware of and seeking to understand the impact that these wider social contexts may be having on Caldicott's students.
- d. Creating a safe culture in the school by, for example:
  - implementing policies and procedures that address peer-on-peer abuse and harmful attitudes;
  - promoting healthy relationships and attitudes to gender/ sexuality;
  - hot spot mapping to identify risky areas in the school;
  - training on potential bias and stereotyped assumptions.
- e. Being alert to and monitoring changes in students' behaviour and/or attendance.
- f. Contributing to local child protection agendas by, for example, challenging poor threshold decisions and referring concerns about contexts to relevant local agencies.
- g. Recognises that as children enter adolescence, they spend increasing amounts of time outside of the home in public environments (including on the internet) within which they may experience abuse; and raise awareness in this respect.

## Holistic account of peer-on-peer abuse



## Contextual circles of adolescent vulnerability



## Prevalence of peer-on-peer abuse

Research suggests that peer-on-peer abuse is one of the most common forms of abuse affecting children in the UK.

## When does behaviour become problematic or abusive?

All behaviour takes place on a spectrum. Understanding where a child's behaviour falls on a spectrum is essential to being able to respond appropriately to it.

## Sexual behaviours

As the NSPCC explains "children's sexual behaviours exist on a wide continuum, from normal and developmentally expected to highly abnormal and abusive. Staff should recognise the importance of distinguishing between problematic and abusive sexual behaviour... As both problematic and abusive sexual behaviours are developmentally inappropriate and may cause developmental damage, a useful umbrella term is harmful sexual behaviours or HSB. This term has been adopted widely in the field and is used throughout the NSPCC's and Research in Practice's Harmful Sexual Behaviour Framework, as well as this policy.

For the purpose of the NSPCC's and Research in Practice's Harmful Sexual Behaviour Framework, and as adopted in this policy, harmful sexual behaviours are defined as "Sexual behaviours expressed by children...that are developmentally inappropriate, may be harmful towards self or others, or be abusive towards another child...or adult."

Simon Hackett has proposed the following continuum model to demonstrate the range of sexual behaviours presented by children, which may be helpful when seeking to understand a student's sexual behaviour and deciding how to respond.

Normal	Inappropriate	Problematic	Abusive	Violent
<ul style="list-style-type: none"> <li>• Developmentally expected</li> <li>• Socially acceptable</li> <li>• Consensual, mutual, reciprocal</li> <li>• Shared decision making</li> </ul>	<ul style="list-style-type: none"> <li>• Single instances of inappropriate sexual behaviour</li> <li>• Socially acceptable behaviour within peer group</li> <li>• Context for behaviour may be inappropriate</li> <li>• Generally consensual and reciprocal</li> </ul>	<ul style="list-style-type: none"> <li>• Problematic and concerning behaviour</li> <li>• Developmentally unusual and socially unexpected</li> <li>• No overt elements of victimization</li> <li>• Consent issues may be unclear</li> <li>• May lack reciprocity or equal power</li> <li>• May include levels of compulsivity</li> </ul>	<ul style="list-style-type: none"> <li>• Victimizing intent or outcome</li> <li>• Includes misuse of power</li> <li>• Coercion and force to ensure compliance</li> <li>• Intrusive</li> <li>• Informed consent lacking or not able to be freely given</li> <li>• May include elements of expressive violence</li> </ul>	<ul style="list-style-type: none"> <li>• Physically violent sexual abuse</li> <li>• Highly intrusive</li> <li>• Instrumental violence which is psychologically and/or sexually arousing to the child responsible for the behaviour</li> <li>• Sadism</li> </ul>

Hackett's continuum relates exclusively to sexual behaviour and is not exhaustive. The Brook Sexual Behaviours Traffic Light Tool can help professionals working with children to distinguish between three levels of sexual behaviour – green, amber, and red, and to respond according to the level of concern (this can be found under the school's internal policy tab on the Staff Portal). Staff should always use their professional judgment and discuss any concerns with the DSL. Where an (alleged) incident involves a report of sexually harmful behaviour, staff should consult the DfE's Advice.

## Other behaviour

When dealing with other alleged behaviour which involves reports of, for example, emotional and/or physical abuse, staff can draw on aspects of Hackett's continuum to assess where the alleged behaviour falls on a spectrum and to decide how to respond.

This could include, for example, whether it:

- is socially acceptable.
- involves a single incident or has occurred over a period of time.
- is socially acceptable within the peer group.
- is problematic and concerning.
- involves any overt elements of victimization or discrimination e.g. related to race, gender, sexual orientation, physical, emotional, or intellectual vulnerability.
- involves an element of coercion or pre-planning.
- involves a power imbalance between the child/children allegedly responsible for the behaviour and the child/children allegedly the subject of that power.
- involves a misuse of power.

It should be borne in mind that there are some aspects of Hackett's continuum which may not of course be relevant or appropriate to consider in response to other alleged behaviour involving reports of other types of abuse. For example, the issue of consent and the nuances around it, is unlikely to apply in the same way in cases where the alleged behaviour is reported to involve emotional and/or physical abuse, as it could in cases of alleged sexual behaviour which is reported to involve harmful sexual behaviour.

In addition, the school could be required to deal with cases involving a range of alleged behaviour including sexual behaviour, emotional, physical behaviour, and digital behaviour.

It should also be recognised that the same behaviour presented by different children may be understood at different points on a spectrum, depending on the particular context. For example, an incident involving youth produced sexual imagery may be inappropriate in one context, for example, when exchanged between two children in a consenting relationship, and abusive in another, for example, when it is (a) shared without the consent of the child in the image; (b) produced as a result of coercion; or (c) used to pressure the child into engaging in other sexual behaviours.

Behaviour which is not abusive at first may potentially become abusive quickly or over time. Intervening early and



addressing any inappropriate behaviour which may be displayed by a child is vital and could potentially prevent their behaviour from progressing on a continuum to become problematic, abusive and/or violent - and ultimately requiring (greater/more formal) engagement with specialist external and/or statutory agencies. For example, a physical fight between two children may not constitute peer-on-peer abuse where the fight is a one-off incident but may be abusive where the child's/children's behaviour subsequently deteriorates into a pattern of bullying behaviour and requires a safeguarding response from a multi-agency partnership – including a statutory assessment of whether this has led, for example, to a risk of significant harm to a child.

The importance of intervening early and addressing any inappropriate behaviour does not just apply on an individual student basis but could also apply across the student body.

Behaviour generally considered inappropriate may in fact indicate emerging concerning behaviour to which schools need to take a whole-school approach in order to prevent escalation. For example, where multiple boys are making inappropriate comments about girls, one-off sanctions are unlikely to be effective and wider actions should be considered, such as arranging for an external person to deliver a year group intervention exercise; and/or a discussion around whether anything is happening within the wider community that might be affecting the students' behaviour.

It will also be important to consider the wider context in which the alleged behaviour is reported to have occurred, and which may trigger the need for a referral. For example, some behaviour that is considered inappropriate may be capable of being dealt with internally. However, if there are wider safeguarding concerns relating to the child/children in question, a referral to statutory agencies may be necessary. Where the behaviour which is the subject of the concern/allegation is considered or suspected by the DSL to constitute peer-on-peer abuse, the school will follow the procedures set out further in this policy.

### **How can a child who is being abused by their peers be identified?**

All staff should be alert to the well-being of students and to signs of abuse, and should engage with these signs, as appropriate, to determine whether they are caused by peer-on-peer abuse. However, staff should be mindful of the fact that the way(s) in which children will disclose or present with behaviour(s) as a result of their experiences will differ.

The School's Pastoral Committee regularly review behaviour incident logs to identify any changes in behaviour and/or concerning patterns or trends at an early stage.

Signs that a child may be suffering from peer-on-peer abuse can also overlap with those indicating other types of abuse (please see the Recognizing Abuse section of the Caldicott Safeguarding Policy for indicators of abuse) and can include:

- Failing to attend school, disengaging from classes, or struggling to carry out school related tasks to the standard ordinarily expected.
- Physical injuries.
- Experiencing difficulties with mental health and/or emotional wellbeing.
- Becoming withdrawn and/or shy; experiencing headaches, stomach aches, anxiety and/or panic attacks; suffering from nightmares or lack of sleep or sleeping too much.
- Broader changes in behaviour including alcohol or substance misuse.
- Changes in appearance and/or starting to act in a way that is not appropriate for the child's age.
- Abusive behaviour towards others.

Abuse affects children very differently. The above list is by no means exhaustive and the presence of one or more of these signs does not necessarily indicate abuse. The behaviour that children present with will depend on their particular circumstances. Rather than checking behaviour against a list, staff are trained to be alert to behaviour that might cause concerns, to think about what the behaviour might signify, to encourage children to share with them any underlying reasons for their behaviour, and, where appropriate, to engage with their parents/carers so that the cause(s) of their behavior can be investigated. Where a child exhibits any behaviour that is out of character or abnormal for his/her age, staff should always consider whether an underlying concern is contributing to their behaviour (for example, whether the child is being harmed or abused by their peers) and, if so, what the concern is and how the child can be supported going forwards.

The power dynamic that can exist between children is also very important when identifying and responding to their behaviour: in all cases of peer-on-peer abuse, a power imbalance will exist within the relationship. This inequality will

not necessarily be the result of an age gap between the child responsible for the abuse and the child being abused. It may, for example, be the result of their relative social or economic status. Equally, while children who abuse may have power over those who they are abusing, they may be simultaneously powerless to others.

### Looking behind students' behaviour

A 15-year-old girl starts to exhibit challenging behaviour in class which is out of character. She starts to have disagreements with the girls in her class and a number of "friendship issues" are reported to the teachers. The school moves the girl to another class, changes her timetable so that she does not have to interact with the girls in question, and provides her with a mentor.

A few months later the girl throws a chair across the classroom. The girl is sent to the head teacher who calls the parents and temporarily excludes the girl from school.

The pastoral lead discusses the incident with the head teacher, explaining that the behaviour is completely out of character for the girl and that the school should explore the matter further. The pastoral lead sits down with the girl and asks her how she is. The girl discloses that her boyfriend is being physically violent

### Are some children particularly vulnerable to abusing or being abused by their peers?

Any child can be vulnerable to peer-on-peer abuse due to the strength of peer influence during adolescence (and before), and staff should be alert to signs of such abuse amongst all children. Individual and situational factors can increase a child's vulnerability to abuse by their peers. For example, an image of a child could be shared, following which they could become more vulnerable to peer-on-peer abuse due to how others now perceive them, regardless of any characteristics which may be inherent in them and/or their family.

Peer group dynamics can also play an important role in determining a child's vulnerability to such abuse. For example, children who are more likely to follow others and/or who are socially isolated from their peers may be more vulnerable to peer-on-peer abuse. Children who are questioning or exploring their sexuality may also be particularly vulnerable to abuse by their peers.

Research suggests that:

- Peer-on-peer abuse may affect boys differently from girls, and that this difference may result from societal norms (particularly around power, control and the way in which femininity and masculinity are constructed) rather than biological make-up. Barriers to disclosure will also be different. As a result, schools need to explore the gender dynamics of peer-on-peer abuse within their settings and recognize that these will play out differently in single sex, mixed or gender- imbalanced environments.
- Research shows that it is more likely that girls will be victims and boys perpetrators.
- Children with Special Educational Needs and/or Disabilities (SEND) are three times more likely to be abused than their peers without SEND, and additional barriers can sometimes exist when recognizing abuse in children with SEND.

These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to a child's disability without further exploration.
- The potential for children with SEND to be disproportionately impacted by behaviours such as bullying and harassment, without outwardly showing any signs.
- Communication barriers and difficulties.
- Overcoming these communication barriers and difficulties.
- Some children may be more likely to experience peer-on-peer abuse than others as a result of certain characteristics such as sexual orientation, ethnicity, race or religious beliefs

## 4. How can the School raise awareness of and prevent peer-on-peer abuse?

### School environment

The school actively seeks to raise awareness of and prevent all forms of peer-on-peer abuse by:

- Educating all Governors, Senior Leadership Team, staff and volunteers, students, and parents about this issue. This includes:
  - Training all Governors, Senior Leadership Team, staff and volunteers on the nature, prevalence and effect of peer-on-peer abuse, and how to prevent, identify and respond to it. This includes: (a) Contextual Safeguarding; (b) the identification and classification of specific behaviours including digital behaviours; (c) the importance of taking seriously all forms of peer-on-peer abuse (no matter how low level they may appear) and ensuring that no form of peer-on-peer abuse is ever dismissed as horseplay or teasing.
  - Social media and online safety, including how to encourage children to use social media in a positive, responsible and safe way, and how to enable them to identify and manage abusive behaviour online.
- Educating children about the nature and prevalence of peer-on-peer abuse positive, responsible, and safe use of social media, and the unequivocal facts about consent, via PSHE and the wider curriculum. For example, by addressing gender inequality in a statistics class, or by reviewing literature in an English class which addresses bullying and its effect on mental health. Students are frequently told what to do if they witness or experience such abuse, the effect that it can have on those who experience it and the possible reasons for it, including vulnerability of those who inflict such abuse. They are regularly informed about the school's approach to such issues, including its zero tolerance policy towards all forms of peer-on-peer abuse.
- Educating students about consent includes teaching them basic facts such as (i) a child under the age of 13 can never consent to any sexual activity; (ii) the age of consent is 16; and (iii) sexual intercourse without consent is rape, and engaging parents on this issue by:
  - Talking about it with parents, both in groups and one to one.
  - Asking parents what they perceive to be the risks facing their child and how they would like to see the school address those risks.
  - Involving parents in the review of school policies and lesson plans.
  - Encouraging parents to hold the school to account on this issue.
- Supporting the on-going welfare of the student body by drawing on multiple resources that prioritise student mental health, and by providing in-school counselling and therapy to address underlying mental health needs. These interventions can be de-clinicalised' and brokered through a positive relationship with the school and its staff. All staff are trained to meet low-level mental health difficulties within the students.
- Working with Governors, Senior Leadership Team, all staff and volunteers, students and parents to address equality issues, to promote positive values, and to encourage a culture of tolerance and respect amongst all members of the school community.
- Creating conditions in which
  - our students can aspire to, and realise safe and healthy relationships fostering a whole-school culture which is founded on the idea that every member of our School community is responsible for building and maintaining safe and positive relationships, and helping to create a safe School environment in which violence and abuse are never acceptable,
  - students are able to develop trusting relationships with staff, and in which staff understand, through regular discussion and training, the importance of these relationships in providing students with a sense of belonging, which could otherwise be sought in problematic contexts,
  - students feel able to share their concerns openly, in a non-judgmental environment, and have them listened to, which (i) proactively identifies positive qualities in students; (ii) nurtures these qualities; (iii) teaches and encourages students to think about positive hopes for the future; and (vi) supports students in developing small-scale goals that enable realistic ambitions, and
  - which provides supervised activities to students that give them the experience of having their needs

met that might otherwise apparently be met in abusive circumstances. These can include experiencing (i) status; (ii) excitement; and (iii) a degree of risk.

- Providing service initiatives wherein tolerance, empathy, consideration and respect are cultivated.
- Challenging the attitudes and behaviours that underlie such abuse (both inside and outside the classroom).
- Responding to cases of peer-on-peer abuse promptly and appropriately.
- Ensuring that all peer-on-peer abuse issues are fed back to the school's safeguarding (team/DDSL) so that they can spot and address any concerning trends and identify students who may be in need of additional support. This is done by way of a weekly staff meeting at which all concerns about students (including peer-on-peer abuse issues) are discussed.

## Multi-agency working

Caldicott actively engages with its local partners in relation to peer-on-peer abuse, and works closely with, for example, Bucks LSCP, MASH team, children's social care, and/or other relevant agencies in accordance with the Local Safeguarding Partnership's procedures, and other schools.

The relationships the school has built with these partners are essential to ensuring that the Caldicott is able to prevent, identify early and appropriately handle cases of peer-on-peer abuse. They help the school to:

- develop a good awareness and understanding of the different referral pathways that operate in its local area, as well as the preventative and support services which exist.
- ensure that our students are able to access the range of services and support they need as quickly as possible.
- support and help inform our local community's response to peer-on-peer abuse.
- increase our awareness and understanding of any concerning trends and emerging risks in our local area to enable us to take preventative action to minimize the risk of these being experienced by our students.

The school actively refers concerns/allegations of peer-on-peer abuse where necessary to Bucks MASH, children's social care, the police, and/or other relevant agencies in accordance with the Local Safeguarding Partnership's procedures. This is particularly important because peer-on-peer abuse can be a complex issue, and even more so where wider safeguarding concerns exist. It is often not appropriate for one single agency (where the incident cannot be managed internally) to try to address the issue alone – it requires effective partnership working.

### **What should you do if you suspect either that a child may be at risk of or experiencing abuse by their peer(s), or that a child may be at risk of abusing or may be abusing their peer(s)?**

If a member of staff thinks for whatever reason that a child may be at risk of or experiencing abuse by their peer(s), or that a child may be at risk of abusing or may be abusing their peer(s), they should discuss their concern with the DSL without delay so that a course of action can be agreed.

***If a child is suffering, or likely to suffer from harm it is important that a referral to children's social care (and if appropriate, the police) is made immediately.***

***Anyone can make a referral. Where referrals are not made by the DSL, the DSL should be informed as soon as possible that a referral has been made.***

If a child speaks to a member of staff about peer-on-peer abuse that they have witnessed or are a part of, the member of staff should listen to the child and use open language that demonstrates understanding rather than judgement. For further details please see the procedure set out in Allegations or Disclosures of Abuse section of the child protection policy.

## 5. Responding to concerns or allegations of peer-on-peer abuse

It is essential that all concerns/allegations of peer-on-peer abuse are handled sensitively, appropriately, and promptly. If staff have any concerns about a child's welfare, they should act on them immediately. The way in which they are responded to can have a significant impact on our school environment.

- Any response should be acted upon immediately
- Include a thorough investigation of the concerns/allegations and the wider context in which they may have occurred (as appropriate); (as appropriate) – depending on the nature and seriousness of the alleged incident(s), it may be appropriate for the police and/or children's social care to carry out this investigation.
- Treat all children involved as being at potential risk - while the child allegedly responsible for the abuse may pose a significant risk of harm to other children, they may also have considerable unmet needs and be at risk of harm themselves. Schools should 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, and additional sanctioning work may be required for the latter.
- Take into account:
  - that the abuse may indicate wider safeguarding concerns for any of the children involved and consider and address the effect of wider socio-cultural contexts - such as the child's/children's peer group (both within and outside the school); family; the school environment; their experience(s) of crime and victimization in the local community; and the child/children's online presence. Consider what changes may need to be made to these contexts to address the child's/children's needs and to mitigate risk.
  - the potential complexity of peer-on-peer abuse and of children's experiences and consider the interplay between power, choice, and consent. While children may appear to be making choices, if those choices are limited, they are not consenting.
  - 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. It is particularly important to take into account the wishes of any child who has allegedly been abused, and to give that child as much control as is reasonably possible over decisions regarding how any investigation will be progressed and how they will be supported.
- The DSL will discuss the concerns or allegations with the member of staff who has reported them and will, where necessary, take any immediate steps to ensure the safety of the child/all children affected.
- Where any concern(s) or allegation(s) indicate(s) that indecent images/and or videos of a child or children may have been shared online, whether consensual or non-consensual (also known as sexting or youth-produced sexual imagery, the DSL should consider what urgent action can be taken in addition to the actions and referral duties set out in this policy, to seek specialist help in preventing the images spreading further and removing the images from the internet. Staff must not view or forward illegal images of a child.
- The Internet Watch Foundation (IWF), for example, has a trained team that can evaluate and remove illegal images from the internet when the images are reported to them quickly. They will also share the image with the National Crime Agency's CEOP Command to facilitate an investigation. Any report to IWF will be made in consultation with the police.
- Government advice on searching screening and confiscating can be obtained here: [Searching, screening and confiscation at school - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/guidance/searching-screening-and-confiscating-at-school)

DSLs should always use their professional judgement to:

- assess the nature and seriousness of the alleged behaviour.
- determine whether it is appropriate for alleged behaviour to be to be dealt with internally and, if so, whether any



external specialist support is required. In borderline cases the DSL may wish to consult with children's social care and/or any other external agencies in accordance with the Local Safeguarding Partnership's procedures, on a no-names basis to determine the most appropriate response. Where the DSL considers or suspects that the behaviour in question might be abusive or violent on a spectrum (as opposed to inappropriate or problematic), the DSL should contact Bucks MASH immediately, and in any event within 24 hours of the DSL becoming aware of the alleged behaviour. The DSL will discuss the allegations/concerns with MASH and agree on a course of action, which may include:

- **A. Manage internally with help from external specialists where appropriate and possible.** Where the alleged behaviour between peers is abusive or violent (as opposed to inappropriate or problematic), scenarios B, C or D should ordinarily apply. However, where support from local agencies is not available, the school may need to handle allegations/concerns internally. In these cases, the school will engage and seek advice from external specialists (either in the private and/or voluntary sector).

- **B. Undertake/contribute to an inter-agency early help assessment, with targeted early help services provided to address the assessed needs of a child/children and their family.**

These services may, for example, include family and parenting programmes, responses to emerging thematic concerns in extra familial contexts, CAMHS, a specialist harmful sexual behaviour team, and/or youth offending services.

- **C. Refer child/children to children's social care for a section 17 and/ or 47 statutory assessment.**

Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and, if appropriate, a report to the police) is made immediately. This referral will be made to children's social care in the area where the/each child lives. Depending on the safeguarding procedures issued by the Local Safeguarding Partnership in that area, there will normally be an initial review and assessment of the referral, in accordance with that area's assessment framework.

As a matter of best practice, if an incident of peer-on-peer abuse requires referral to and action by children's social care and a strategy meeting is convened, then the school will hold every professional involved in the case accountable for their safeguarding response, including themselves, to both the child who has experienced the abuse, and the child who was responsible for it, and the contexts to which the abuse was associated.

- **D. Report alleged criminal behaviour to the Police.**

Alleged criminal behaviour will ordinarily be reported to the Police. However, there are some circumstances where it may not be appropriate to report such behaviour to the Police. For example, where the exchange of youth produced sexual imagery does not involve any aggravating factors. All concerns/allegations will be assessed on a case-by-case basis, and in light of the wider context.

## 6. Responding to reports of sexual violence and sexual harassment

If staff have concerns about a child's welfare, they should act on them immediately. Sexual abuse can happen anywhere, and Caldicott staff embrace an attitude of 'it could happen here'. Staff should remain aware that just because there are no reported cases, it does not mean it is not/may not be occurring. All reports and concerns made about sexual violence and/or sexual harassment both online and offline, including those that have happened outside of the school/college will be addressed. How the school responds to a report is crucial because of the impact it will have on the confidence of future victim to report or come forward.

There are four 'likely scenarios' to consider when managing reports of sexual violence and/or sexual harassment: internal management; early help; referrals to children's social care; and reporting to the police.

In responding it is important to:

- Ensure that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward and that they will be supported and kept safe. Abuse that occurs online or outside of the school or college should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report or their experience minimised.
- If possible, managing reports with two members of staff present, (one of them being the Designated Safeguarding Lead or a deputy).
- Where the report includes an online element, being aware of searching screening and confiscation advice (for schools) and UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people. The key consideration is for staff not to view or forward illegal images of a child. In some cases, it may be more appropriate to confiscate any devices to preserve any evidence and hand them to the police for inspection.
- Do not promise confidentiality at this initial stage as it is very likely a concern will have to be shared further (for example, with social care) to discuss next steps. Information should only be shared with those people who are necessary in order to progress the report. It is important that the victim understands what the next steps will be and who the report will be passed to.
- Recognise that a child is likely to disclose to someone they trust: this could be anyone on the school or college staff. It is important that the person to whom the child discloses recognises that the child has placed them in a position of trust. They should be supportive and respectful of the child.
- Recognise that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory and so children may not be able to recall all details or timeline of abuse.
- Keep in mind that certain children may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity and/or sexual orientation.
- Listen carefully to the child, reflecting back, using the child's language, being non-judgmental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions – where, when, what, etc. It is important to note that whilst leading questions should be avoided, staff can ask children if they have been harmed and what the nature of that harm was.
- Consider the best way to make a record of the report. Best practice is to wait until the end of the report and immediately write up a thorough summary. This allows the staff member to devote their full attention to the child and to listen to what they are saying. It may be appropriate to make notes during the report (especially if a second member of staff is present). However, if making notes, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking. Either way, it is essential a written record is made
- Only record the facts as the child presents them. The notes should not reflect the personal opinion of the note taker. Schools and colleges should be aware that notes of such reports could become part of a statutory assessment by children's social care and/or part of a criminal investigation.
- Informing the Designated Safeguarding Lead (or deputy), as soon as practically possible.

## **Safety Plans - Individual risk and needs assessment**

Where there is an incident of peer-on-peer abuse, the Caldicott will always carry out a robust risk and needs assessment (Safety Plan) in respect of each child affected by the abuse. These risk assessments will be in respect of:

- Any child who is alleged to have behaved in a way that is considered to be abusive or violent.
- Any child who has reportedly been abused or affected by the alleged abusive or violent behaviour by another child.
- Any child who may be at risk due to the alleged abusive or violent behaviour by another child as deemed appropriate by the DSL.

The aim will be to:

- Assess and address the nature and level of risks that are posed and/or faced by the child/each child.
- Engage the child's parents and draw upon local services and agencies to ensure that the child's needs are met in the long-term. Consider whether any targeted interventions are needed to address the underlying attitudes or behaviour of any child.
- Review at regular intervals in light of the child's on-going needs to ensure that real progress is being made which benefits the child.
- Any risk and needs assessment should consider whether there may have been other victims

If at any stage the child's needs escalate, the DSL should contact Bucks MASH to determine the appropriate course of action.

Where it is alleged that a child has behaved in a way that is considered to be inappropriate or problematic (as opposed to abusive or violent), the DSL will use their professional judgment – based on the particular concern(s) and/or allegation(s) raised, and the needs and circumstances of the individual child/children in question – to determine whether it would be appropriate to contact children's social care, and to carry out a safety plan.

Careful judgment and consideration are required as to whether alleged behaviour which might be judged to be inappropriate by an adult might actually be harmful to another child. Consultation is recommended with children's social care if there is any doubt about this. Careful consideration should also be given to a range of factors including the context, severity of the alleged behaviour, impact of the alleged behaviour on others, risk to others, and whether there are any patterns of behaviour occurring. Where other children have been identified as witnesses to alleged abuse or violence, consideration should also be given by the DSL to whether there might be any risks to those children, and whether a safety plan would be appropriate in relation to any risks presenting to them.

## **Risk Assessment when there has been a report of sexual violence**

The Designated Safeguarding Lead (or a deputy) should make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis and consider:

- the victim, especially their protection and support
- whether there may have been other victims,
- the alleged perpetrator(s)
- all the other children, (and, if appropriate, adult students and staff) at the school or college, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms

Risk assessments should be recorded (written or electronic) and should be kept under review. At all times, the school should be actively considering the risks posed to all their pupils and students and put adequate measures in place to protect them and keep them safe.

The Designated Safeguarding Lead (or a deputy) should ensure they are engaging with children's social care and specialist services as required. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required. The above school or college risk assessment is not intended to replace the detailed assessments of expert professionals. Any such professional



assessments should be used to inform the school's or college's approach to support

### **Action following a report of sexual violence and/or sexual harassment**

As set out above, sexual violence and sexual abuse can happen anywhere, and Caldicott staff embrace an attitude of 'it could happen here'. All reports and concerns about sexual violence and/or sexual harassment both online and offline, including those that have happened outside of the school/college will be addressed. Important considerations will include:

- the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however need to be balanced with the school's duty and responsibilities to protect other children
- the nature of the alleged incident(s), including whether a crime may have been committed
- the ages of the children involved
- the developmental stages of the children involved
- any power imbalance between the children. For example, is the alleged perpetrator(s) significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?
- if the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature)
- that sexual violence and sexual harassment can take place within intimate personal relationships between peers
- are there ongoing risks to the victim, other children, adult students or school or college staff?
- other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

Immediate consideration will be given as to how best to support and protect the victim and the alleged perpetrator(s) and any other children involved/impacted according to the specific details of said incident.

### **Information sharing, data protection and record keeping**

When responding to concern(s) or allegation(s) of peer-on-peer abuse, the school will:

- Always consider carefully, in consultation with children's social care, the police and other relevant agencies (where they are involved), how to share information about the concern(s) or allegation(s) with the student(s) affected, their parents, staff, and other students and individuals.
- Record the information that is necessary for the school and other relevant agencies (where they are involved) to respond to the concern(s) or allegation(s) and safeguard everyone involved. The school uses MyConcern as a central, secure recording hub.
- Keep a record of the legal purpose for sharing the information with any third party, including relevant authorities, and ensure that the third party has agreed to handle the information securely and to only use it for the agreed legal purpose.
- Be mindful of and act in accordance with its safeguarding and data protection duties, including those set out in Working Together to Safeguard Children (July 2018) and the HM Government advice on Information Sharing (updated in July 2018).

### **Disciplinary action**

If there are police proceedings underway, or there could be, the school will work in partnership with the police and/or children's social care.

Where a matter is not of interest to the police and/or children's social care, the school may still consider what is the most appropriate action to take to ensure positive behaviour management. Disciplinary action may sometimes be appropriate; any such action should address the abuse, the causes of it, and attitudes underlying it. Disciplinary action may sometimes be appropriate, including:

- (a) to ensure that the child/children take(s) responsibility for and realise(s) the seriousness of their behaviour.
- (b) to demonstrate to the child/children and others that peer-on-peer abuse can never be tolerated.

- (c) to ensure the safety and wellbeing of other children.

However, these considerations must be balanced against any police investigations, the child's/children's own potential unmet needs and any safeguarding concerns. Before deciding on appropriate action, the school will always consider 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 peer-on-peer abuse and the causes of it.

The school will, where appropriate, consider the potential benefit, as well as challenge, of using managed moves or exclusion as a response, and not as an intervention, recognizing that even if this is ultimately deemed to be necessary, some of the measures referred to in this policy may still be required.

Exclusion will only be considered as a last resort and only where necessary to ensure the safety and wellbeing of the other children in the school.

Engaging in processes to assist with decision-making associated to managed moves and exclusions can also be beneficial on occasion and would be considered if deemed necessary.

Disciplinary interventions alone are rarely able to solve issues of peer-on-peer abuse, and the school will always consider the wider actions that may need to be taken, and any lessons that may need to be learnt going forwards, as set out above and below.

### **On-going proactive work to a contextual whole-school approach**

The school's response to concerns/allegations of peer-on-peer abuse should be part of on-going proactive work by the school to embed best practice and take a contextual whole-school community approach to such abuse. As such the school's response can become part of its wider prevention work. This response may include the school asking itself a series of questions about the context in which an incident of peer-on-peer abuse occurred in the school, the local community in which the school is based, and the wider physical and online environment. Where a pattern is identified, the school or college should not only decide on a course of action, but also consider whether there are wider cultural issues within the school that enabled the inappropriate behaviour to occur and what could be done to minimise the risk of it happening again. Questions could include:

- (a) What protective factors and influences exist within the school (such as positive peer influences, examples where peer-on-peer abuse has been challenged etc.) and how can the school bolster these?
- (b) How (if at all) did the school's physical environment contribute to the abuse, and how can the school address this going forwards, for example by improving the school's safety, security and supervision?
- (c) How (if at all) did the online environment contribute to the abuse, and how can the school address this going forwards, for example by strengthening the way in which the school encourages positive and safe use of the internet by students?
- (d) Did wider gender norms, equality issues and/or societal attitudes contribute to the abuse?
- (e) What was the relationship between the abuse and the cultural norms between staff and students, and how can these be addressed going forwards?
- (f) Does the abuse indicate a need for staff training on, for example, underlying attitudes, a particular issue or the handling of particular types of abuse or to address any victim-blaming narratives from staff?
- (g) How have similar cases been managed in the past and what effect has this had?
- (h) Does the case or any identified trends highlight areas for development in the way in which the Caldicott works with children to raise their awareness of and/or prevent peer-on-peer abuse, including by way of Caldicott's PSHEE curriculum and lessons that address underlying attitudes or behaviour such as gender and equalities work, respect, boundaries, consent, children's rights and critical thinking and/or avoiding victim-blaming narratives?
- (i) Are there any lessons to be learnt about the way in which the school engages with parents to address peer-on-peer

abuse issues?

- (j) Are there underlying issues that affect other schools in the area and is there a need for a multi-agency response?
- (k) Does this case highlight a need to work with certain children to build their confidence and teach them how to identify and manage abusive behaviour?
- (l) Were there opportunities to intervene earlier or differently and/or to address common themes amongst the behaviour of other children in the school?
- (m) If needed it is important that the school or college do everything they reasonably can to protect the victim from bullying and harassment as a result of any report they have made.
- (n) Safeguarding and supporting the alleged perpetrators is also a potential consideration. The school will have a difficult balancing act to consider aspects relating to both alleged perpetrator and victim.
- (o) Consider the age and the developmental stage of the alleged perpetrator(s).
- (p) In considering the nature and frequency of the allegations we must consider the proportionality of the response. The alleged perpetrator(s) may potentially have unmet needs (in some cases these may be considerable) as well as potentially posing a risk of harm to other children. Their behaviour may be a symptom of either their own abuse or exposure to abusive practices and or materials.
- (q) What measures of ongoing support need to be put in place, could be accessed. Victims may not talk about the whole picture immediately. A victim of sexual violence is likely to be traumatised and, in some cases, may struggle in a normal classroom environment. It may be necessary for schools and colleges to maintain arrangements to protect and support the victim for a long time.

Example:

- Rape Crisis <https://rapecrisis.org.uk/>
- The Survivors Trust. <https://www.thesurvivorstrust.org/>
- CAMHS <https://www.nhs.uk/NHSEngland/AboutNHSservices/mental-health-services-explained/Pages/about-childrens-mental-health-services.aspx>
- HSBToolkit [https://www.stopitnow.org.uk/concerned-about-a-child-or-young-persons-sexual-behaviour/preventingharmfulsexualbehaviour/?utm\\_campaign=1540968\\_HSB%20Toolkit%20email\\_SOCIAL%20MEDIA&utm\\_medium=email&utm\\_source=Lucy%20Faithfull%20Foundation&dm\\_i=48W7,X10O,38NO7C,43A9L,1](https://www.stopitnow.org.uk/concerned-about-a-child-or-young-persons-sexual-behaviour/preventingharmfulsexualbehaviour/?utm_campaign=1540968_HSB%20Toolkit%20email_SOCIAL%20MEDIA&utm_medium=email&utm_source=Lucy%20Faithfull%20Foundation&dm_i=48W7,X10O,38NO7C,43A9L,1)
- NSPCC <https://learning.nspcc.org.uk/child-abuse-and-neglect/harmful-sexual-behaviour>

Caldicott will, where appropriate and possible, work with the local authority and wider partners to deliver on this plan, possibly as part of a wider Contextual Safeguarding school assessment led by or with input from the local authority.

## Further Resources

### Peer-on-peer abuse

- The Centre for Social Justice: <http://www.centreforsocialjustice.org.uk/core/wp-content/uploads/2016/11/Bullying-RT-Report-1.pdf> This 2016 roundtable report looks at how the education sector can best support children who self-exclude due to bullying. It sets out a number of important statistics.
- Parliament publication: <https://publications.parliament.uk/pa/cm201617/cmselect/cmwomeq/91/9105.htm> This 2016 publication examines the scale and impact of sexual harassment and sexual violence in schools.

### Identifying, assessing and responding to behavior

The following links are designed to help professionals working with children to identify, categories and respond appropriately to sexual behaviours by children:

- NSPCC's and Research in Practice's Harmful Sexual Behaviour Framework: <https://www.nspcc.org.uk/services-and-resources/research-and-resources/2016/harmful-sexual-behaviour-framework/>, which contains the continuum model proposed by Simon Hackett (2010), and provides schools with information about what to expect from local partnerships.
- NSPCC guidance on the stages of normal sexual behaviour: <https://www.nspcc.org.uk/preventing-abuse/keeping-children-safe/healthy-sexual-behaviour-children-young-people/>
- Brook Sexual Behaviours Traffic Light Tool: <https://www.brook.org.uk/our-work/the-sexual-behaviours-traffic-light-tool>

### Educating staff and children

- New youth produced imagery guidance: [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/609874/6\\_2939\\_SP\\_NCA\\_Sexting\\_In\\_Schools\\_FINAL\\_Update\\_Jan17.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/609874/6_2939_SP_NCA_Sexting_In_Schools_FINAL_Update_Jan17.pdf)
- Anti-bullying guidance: [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/623895/Preventing\\_and\\_tackling\\_bullying\\_advice.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/623895/Preventing_and_tackling_bullying_advice.pdf)
- Cyber bullying: <http://www.childnet.com/ufiles/Cyberbullying-guidance2.pdf>
- Tender works with schools providing educational programmes for children and staff training aimed at preventing domestic abuse and sexual violence and promoting healthy relationships based on equality and respect: <http://tender.org.uk/>
- Childnet: <http://www.childnet.com/resources/pshetoolkit>

### General

Contextual Safeguarding Practitioners' Network: [www.contextualsafeguarding.org.uk](http://www.contextualsafeguarding.org.uk)