

SAINT RONAN'S SCHOOL



SAFEGUARDING POLICY

Applies to Prep, Pre-Prep, Boarding and EYFS

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SAFEGUARDING POLICY

The current Designated Safeguarding Lead (DSL) at the school is presently serving in an acting capacity. This arrangement ensures that all safeguarding responsibilities and protocols are maintained effectively during this interim period. The school remains committed to the safety and well-being of all pupils, with the acting DSL equipped to handle any safeguarding concerns that may arise.

1. Introduction

- 1.1 Saint Ronan's recognises its moral and statutory responsibility to safeguard and promote the safety and welfare of every child, acting in their best interest to enable all children to have the best outcomes. Every employee, supply teacher, self-employed teacher, contractor or volunteer who assists at the School is under a general legal duty:
 - To protect children from abuse
 - To be able to identify welfare concerns among pupils and to identify pupils who need additional support
 - To be aware of the School's Safeguarding procedures, to know how to access them and to follow them
 - To keep a record of any significant event, complaint or conversation
 - To report any matters of concern to the Designated Safeguarding Lead (DSL)
- 1.2 This document gives very clear instructions regarding what you should do if you hear or see anything that gives you concern that a pupil at the School may be at risk of harm.
- 1.3 Everyone at Saint Ronan's should always maintain an attitude of **'it could happen here'** where safeguarding is concerned. When dealing with the welfare of a pupil, you must always act in the best interests of the pupil. You must understand your responsibility to safeguard children and you must appropriately share any concerns that you may have about a pupil.
- 1.4 You should be prepared to identify any pupil who is a 'Child in Need' or would benefit from 'early help', providing support as soon as a problem emerges. In the first instance you should discuss your concerns with the Designated Safeguarding Lead, who may also liaise with other professionals to support early identification and an early help assessment. Such cases will be kept under constant review and consideration will be given to a referral to the Local Safeguarding Partners if the pupil's situation is not improving.
- 1.5 There is an important distinction between action required to ensure the welfare of children who need additional support and urgent action to safeguard children who have suffered or are likely to suffer significant harm. **If a child is in immediate danger or is at risk of harm, a referral to the Local Safeguarding Partners and / or the police should be made immediately.** Anyone can make a referral although the Designated Safeguarding Lead should be informed as soon as possible that a referral has been made.

2. Policy Aims

- 2.1 This policy is designed to ensure the welfare of pupils at Saint Ronan's School and on authorised activities away from School, such as School trips and expeditions. The policy is reviewed and updated annually or when required by legislative change or best practice.
- 2.2 We operate our processes with the best interests of the pupil at their heart. We are proud to operate a culture of safety, equality and protection. Where there is a safeguarding concern, we will try to ensure that the pupil's wishes and feelings are taken into account when determining what action to take and what services to provide. We manage this by encouraging pupils to be open and frank about their concerns, and providing support from the pastoral team or other responsible adults in all child protection matters.

Definition of Safeguarding

- 2.3 Safeguarding and promoting the welfare of children is defined in the Department for Education's *Keeping Children Safe in Education* (September 2024) as: providing help and support to meet the needs of children as soon as problems emerge; protecting children from maltreatment, whether that is within or outside the home, including online; preventing the 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.
- 2.4 Every pupil should feel safe and protected from any form of abuse which, in this policy, means any kind of physical abuse, emotional abuse, sexual abuse, neglect or exploitation. (see point 4.2 below). All children without exception have the right to protection from abuse regardless of gender, ethnicity, disability, sexuality, or beliefs. No child or group of children should be treated any less favourably than others in being able to access services which meet their particular needs.
- 2.5 Through PSHEE topics, tutorials, discussions in Houses, Circle Time, the Curriculum and activities inside and outside of School, pupils are encouraged to gain an understanding of what constitutes acceptable or unacceptable behaviour on the part of adults or other pupils. We support them in developing their own self-confidence and assertiveness, including awareness of the age of consent and abuse of trust. They are informed about this policy and of the various sources of help available at School – including the Pastoral Team, the Headmaster and Mrs Lewis, the School Matron, the School's Independent Listener, House Parents, Tutors and Teachers. Pupils are also made aware of external sources of support, including Childline and the NSPCC.

Legislation and Guidance underpinning this policy

- 2.6 As with all other schools in the UK, we work within a legislative framework that seeks to safeguard and promote the welfare of all children. Our Safeguarding Policy has been developed in accordance with the principles established in the following:
- The Children Acts 1989 and 2004
 - The Education Act 2002
 - Independent School Standards Regulations 2014 (ISSRs) – statutory regulations
 - The National Minimum Standards for Boarding Schools (September 2022) statutory guidance – [link to document](#)
 - The Use of Social Media for Online Radicalisation (July 2015) – non-statutory guidance – [link to document](#)
 - What to do if you're worried a child is being abused (March 2015) – [link to document](#)
 - Children Missing Education (August 2024) – statutory guidance – [link to document](#)
 - Teaching Online Safety in School (January 2023) – non-statutory guidance – [link to document](#)
 - Disqualification under the Childcare Act 2006 (September 2018) – statutory guidance – [link to document \(query whether still required in school\)](#)
 - Information Sharing – Advice for Safeguarding Practitioners (2024) – [link to document](#)
 - Counselling in Schools: a blueprint for the future – [link to document](#)
 - Mental Health and behaviour in Schools, 2018 – [link to document](#)
 - Keeping Children Safe in Education (September 2024) (KCSIE) – statutory guidance – [link to document](#)
 - Working Together to Safeguard Children (December 2023), [link to document](#)

- When to Call the Police – non statutory guidance – [link to document](#)
- Prevent Duty: Departmental Advice for Schools (June 2015, updated 2023) – non statutory guidance – [link to document](#)
- Relationships and Sex Education and Health Education (September 2019) – [link to document](#)

2.7 This policy also takes into account the policy and practice of Kent County Council, particularly the inter-agency safeguarding procedures set up by Local Safeguarding Partners (local authority, chief of police and integrated care board (ICB)).

2.8 This policy should be read in conjunction with our other policies concerning behaviour, namely our Behaviour Policy, Anti-Bullying Policy, our Acceptable Use Policies, Staff Code of Conduct, Whistleblowing, Online Safety and Mobile Phone Policy.

3. Safeguarding contact details

3.1 Our **Designated Safeguarding Lead (DSL)** is Elizabeth George. She is the first point of contact for any safeguarding matter relating to pupils. If she is not available, you should contact one of the Deputy DSLs as listed below. If, for any reason, contact fails and you are concerned that a pupil is in immediate danger please contact Children’s Services directly (details below).

Internal Safeguarding Concerns at Saint Ronan’s	Contact if	Name of contact	E mail address
Chairman of the Governors	You have concerns about the conduct of the Headmaster or the DSL	Andrew Ross	Via the Clerk to the Governors, Carlos Lloyd carloslloyd@saintronans.co.uk
Safeguarding Governor	You have concerns about safeguarding practices at SRS	Georgina MacLeay	Via the Clerk to the Governors, Carlos Lloyd carloslloyd@saintronans.co.uk
Headmaster	You have concerns about the conduct of a member of staff towards a child	Mr Joe Lewis	joelewis@saintronans.co.uk
Designated Safeguarding Lead, Designated teacher for looked after pupils, Designated teacher for anti-radicalisation,	You have any concerns about a child. You have concerns about any safeguarding-related matter at SRS	Elizabeth George	elizabethgeorge@saintronans.co.uk Safeguarding@saintronans.co.uk

Senior Mental Health Lead.			
Deputy Designated Safeguarding Lead	In the absence of the DSL you have any concerns about a child. You have concerns about any safeguarding-related matter in the Prep School at SRS	James Yeabsley	jamesyeabsley@saintronans.co.uk
Deputy Designated Safeguarding Lead Pre-Prep and EYFS	In the absence of the DSL you have any concerns about a child. You have concerns about any safeguarding-related matter in the Pre-Prep or EYFS at SRS	Andrea Bright	andreabright@saintronans.co.uk
Designated Safeguarding Lead EYFS	In the absence of the DSL you have any concerns about a child. You have concerns about any safeguarding-related matter in the Pre-Prep or EYFS at SRS	Simone Edwards	simoneedwards@saintronans.co.uk
School Attendance Champion		Joe Lewis	joelewis@saintronans.co.uk
Mental Health Matron	You have medical or mental health concerns about a child	Emily Talbot	emilytalbot@saintronans.co.uk

Matron		Angela Bouchard	angelabouchard@saintronans.co.uk
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External Safeguarding Contacts

The contact details for Kent Safeguarding Children Multi-agency Partnership for Saint Ronan's, are shown below. Any members of staff or parent may contact the Service directly.

LADO Education Safeguarding Advisory Services (LESAS)	
The county LADO service deals with allegations against staff who work with children in education or the wider children's workforce.	
LADO Referral - https://kccchildrens.kent.gov.uk/	
Front Door Service - https://kccchildrens.kent.gov.uk/ or 03000 411111	
Out of Hours - 03000 419191	
Ofsted Helpline - 0300 123 1231	
LESAS Enquiries Form - https://forms.office.com/e/YSmA5MDUQb	
Prevent Officers	
North/West/Medway Sally Green	03000 413439 sally.green2@kent.gov.uk
South/East Rachel Murray	03000 413565 rachel.murray@kent.gov.uk

When dealing with allegations, concerns, suspicions and allegations, our Safeguarding team works in the Kent Safeguarding Children Multi-agency Partnership (KSCMP). All organisations involved in children's care work in line with the guidance given in Working together to Safeguard Children (December 2023). In all matters relating to Child Protection the School will follow the procedures laid down by the Kent Safeguarding Children Multi-agency Partnership (KSCMP). Information can be found here: <https://www.kscmp.org.uk/procedures>

EXTERNAL	Contact if	E mail address
LADO Team Kroner House, Eurogate Business Park, Ashford, Kent TN24. 8XU	There is one number for the whole LADO Team covering Kent Local Authority	03000 410 888 kentchildrenslado@kent.gov.uk
<p>If a call is urgent i.e. a child is in immediate danger, and the call cannot go through to the officer on Duty, the call should go through to the Integrated Front Door on: 03000 41 11 11</p> <p>Urgent child protection issue outside of office hours, Call the Central Duty Out of Hours Number: 03000 41 91 91 Social Services @kent.gov.uk</p>		
Prevent/ Extremism		020 7340 7264 33 ♣ E-mail: Counter-extremism@education.gov.uk

Independent listener Jacqueline Hewitt	For independent help	07759420263
CEOP		0870 000 3344
NSPCC helpline		0808 800 5000 Report abuse in education: The telephone helpline 0800 136 663 and email is help@nspcc.org.uk
NSPCC Whistleblowing Advice Line		Weston House 42 Curtain Road London EC2A 3NH 08000 028 0285 help@nspcc.org.uk
Teaching regulation agency		Teacher misconduct Ground Floor South Cheylesmore House 5 Quinton Road Coventry CV1 2WT 0207 593 5393 Misconduct.teacher@education.gov.uk
Independent Schools Inspectorate		0207 6000100

- 3.3 If you believe that a pupil is in immediate danger or at risk of harm, you can make an immediate referral to children's social care and/or the police. **Anyone can make a referral.** You should inform the DSL as soon as possible that a referral has been made.

4. Policy Details

4.1 A Listening School

We take a child-centred approach and try to ensure that pupils have a voice and are able to express any concerns that they may have. You are reminded that **it could happen here** and that we must always take the concerns of pupils seriously. **Safeguarding trumps everything else** – you must, without fail, make time to listen to any pupil who shows signs of distress or who wishes to confide in you. Victims of abuse will always be supported and their concerns taken seriously (regardless of how long it has taken them to come forward). They will be kept safe and never made to feel that they are causing a hindrance by reporting possible abuse. A victim must never be made to feel ashamed for making a report or have their experience minimalised. Children may not feel ready or know how to tell someone that they are being abused, exploited or neglected and /or they may not recognise their experience as harmful.

4.2 Indicators of Abuse

- 4.2.1 Abuse involves maltreatment of a child. The definition of child abuse is wide in order to cover all forms of cruelty that children may endure in their lives. Abuse, neglect, exploitation and safeguarding issues are rarely standalone events. In many cases, multiple issues overlap with

one another. Somebody may abuse, neglect or exploit a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can happen wholly online or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children. Abuse can take four main forms;

- Physical
- Emotional
- Sexual
- Neglect

4.2.2 **Physical abuse** is 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.

4.2.3 **Emotional abuse** is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on a child's emotional development. For example, it may involve telling a child that they are worthless, unloved or 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 others, which may be through domestic abuse. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children or used for coercive control. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

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

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.

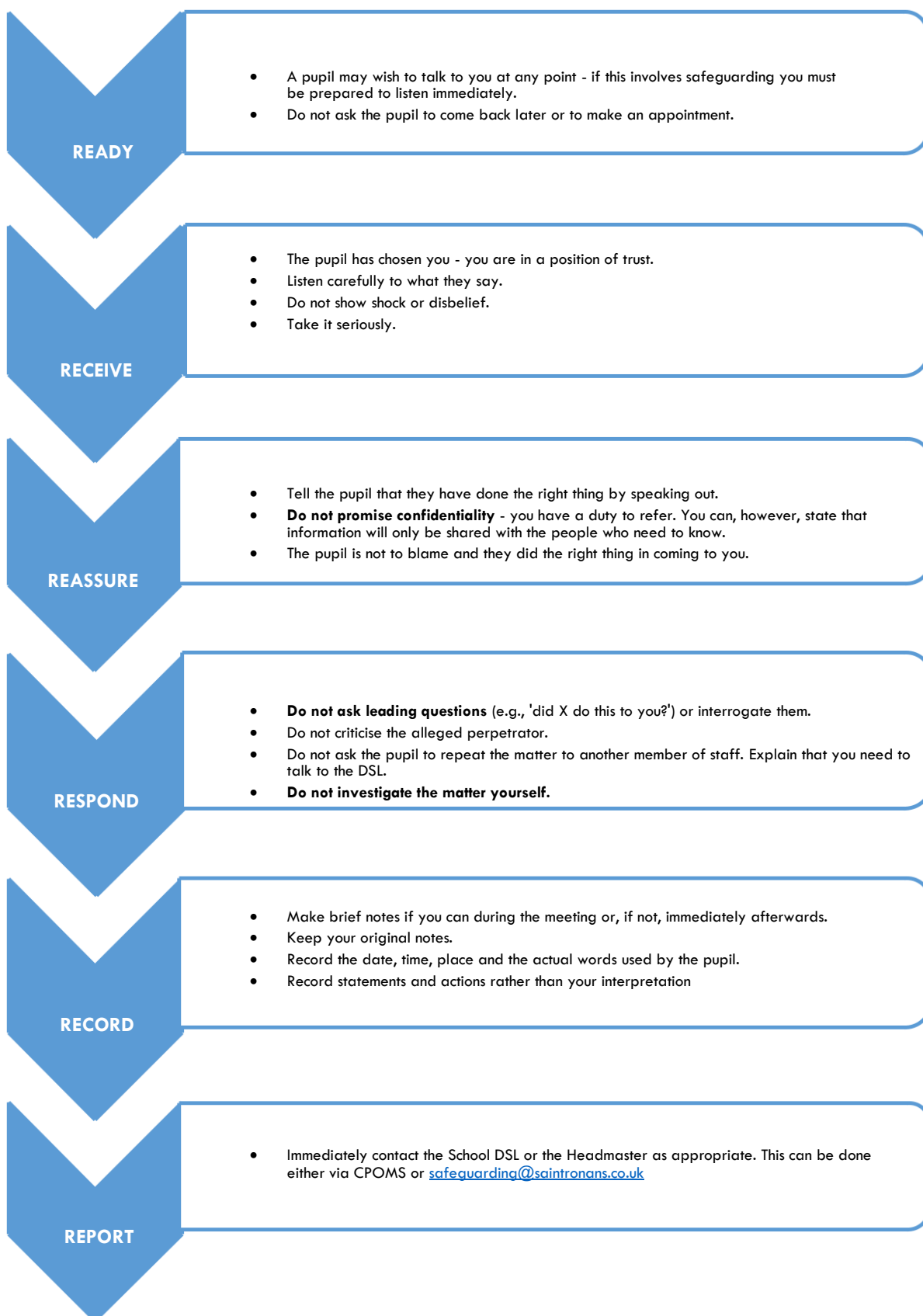
4.2.5 **Neglect** is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of health or development. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including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

- 4.2.6 Section 5 gives more information on risk factors for abuse. Appendix A of this policy also sets out further detail of possible signs of abuse and of grooming.

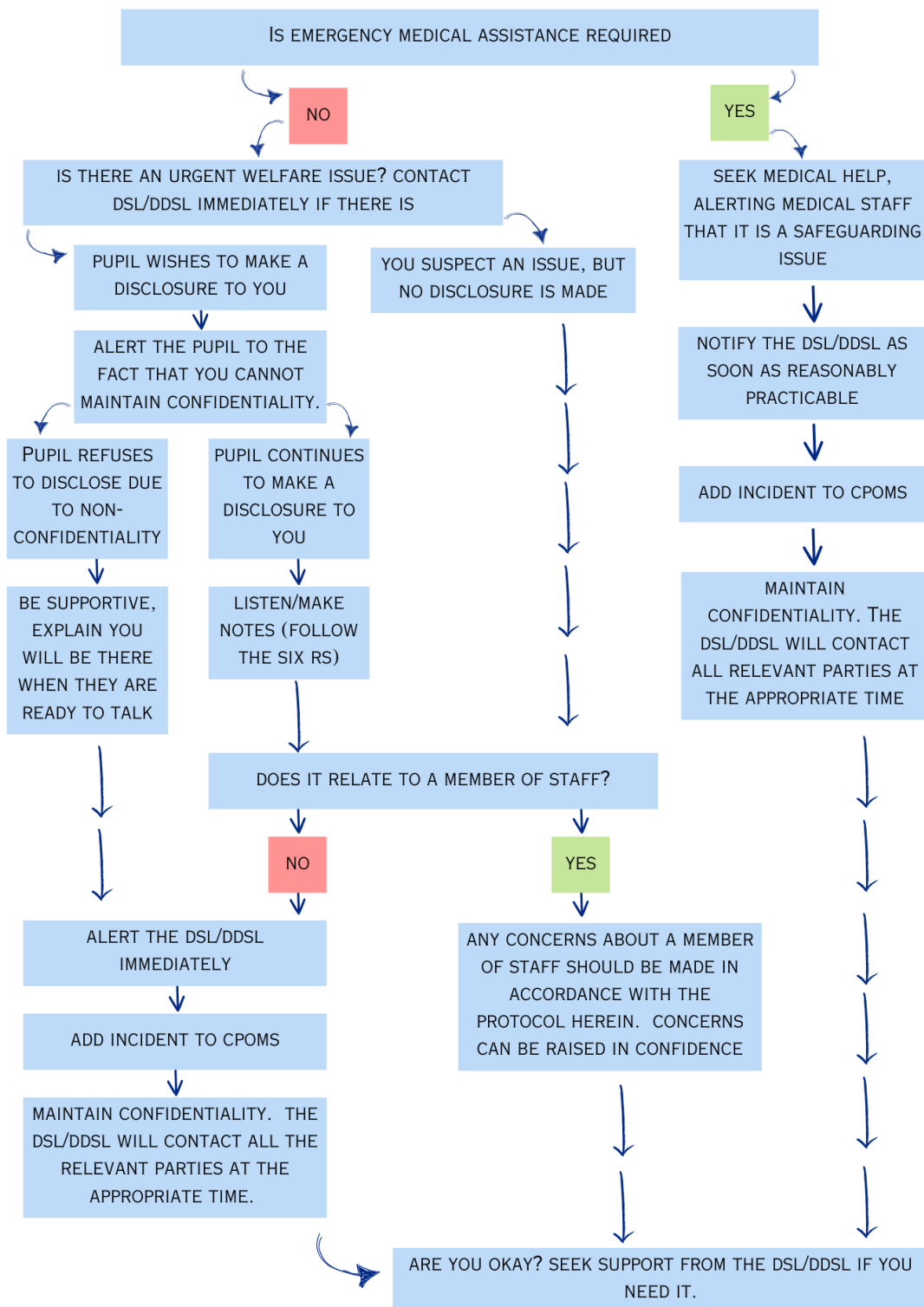
4.3 Procedure to Follow

- 4.3.1 We follow specific procedures to protect children who are suffering harm or at risk of suffering harm as a result of physical, sexual, and/or emotional abuse, neglect or exploitation in accordance with Section 157 of the Education Act 2002.
- 4.3.2 If you are told of any incident or have a strong suspicion of physical, emotional or sexual child abuse, neglect or exploitation (including attempts to radicalise or coerce individuals to hold extreme political or religious views) occurring in the School, outside the School linked to members of School staff (including volunteers, agency and supply staff and contractors) or to a pupil of the School at home or outside the School, you must report this the same day to the DSL. In the absence of the DSL, the immediate report should be made to one of the Deputy DSLs. If the allegation concerns a member of staff the matter must be reported immediately to the Headmaster (or to the DSL if the Headmaster is unavailable). If the allegation or suspicion is about the Headmaster, or the DSL, the report should be made to the Chairman of the Governors or directly to the LADO without informing the Headmaster.
- 4.3.3 You should report any abuse of a pupil that you become aware of (or suspect) including any abuse that occurs online. This may include possible abuse of a pupil by a staff member or another adult, abuse at home or perpetrated on their family members, abuse by a stranger, and abuse of a pupil/pupils by another pupil or group of pupils.
- 4.3.4 You should be aware that safeguarding incidents and/or risk associated behaviours can be associated with factors outside of the School and occur between young people outside of the School environment. All staff should consider whether children are at risk of abuse or exploitation in situations outside the School or their families. Extra familial harm can take a variety of different forms including (but not limited to) parental neglect, inadequate supervision, sexual exploitation, criminal exploitation and serious youth violence.
- 4.3.5 School staff (including the DSL, the Deputy DSLs and the Headmaster) must not investigate reports of abuse themselves. Alleged victims, perpetrators, those reporting abuse and others involved should not be interviewed by School staff beyond the point at which it is clear that there is an allegation of abuse.
- 4.3.6 If someone tells you about an allegation of physical, sexual, emotional abuse, neglect or exploitation you must follow the procedures on the next page (**the 'Six R's'**). You should record all concerns, discussions and decisions (together with reasons) made under these procedures on CPOMS, alerting the safeguarding team.
- 4.3.7 Do not assume another colleague or professional will take action. Safeguarding is everyone's responsibility. If you are worried about a pupil or have any suspicions, however small, talk to one of Saint Ronan's safeguarding team immediately. You do not have to wait for proof of your concerns. **Do not attempt to investigate the issue yourself.**
- 4.3.8 Dealing with an allegation from a child, and a child protection case, is likely to be a stressful experience. The member of staff should therefore consider seeking support for him/herself and discuss this with the DSL. As every case will be handled with confidentiality (as far as is possible), any child should be able to continue at the school, confident that any incident is not general knowledge. The same will apply for a member of staff in cases of resuming work after an accusation. Counselling may be offered and organised.

4.4 What to do if someone makes a disclosure – ‘The Six Rs’



4.5 What to do if you suspect a pupil is suffering or likely to suffer harm



5. Concerns about a Pupil - Safeguarding issues that can put children at risk of harm

5.1 Early Help, Child in Need, Child at Risk

5.1.1 Concerns about a pupil may fall into one or more of several categories, of which the most important are as follows:

5.1.2 **Early Help and Preventative Services.** Some pupils may benefit from early help, and you are expected to try to identify such pupils where possible. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years. In the first instance, if you consider that a pupil may benefit from early help you should discuss this with the DSL. The DSL will consider the appropriate action to take in accordance with the [Kent Children's Services Support Level Guidance](#) and the [Early Help Approach in Kent](#). The DSL will liaise, if necessary, with Children's Services via the [Integrated Front Door](#).

5.1.3 Any pupil may benefit from early help, but you should be particularly alert to the potential need for early help for a child who:

- is disabled and has specific additional needs;
- has special educational needs (whether or not they have a statutory education, health and care plan);
- was a young carer, or who has siblings who have taken on the primary carer role;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement or association with organised crime groups;
- is frequently missing;
- is misusing drugs or alcohol;
- is at risk of modern slavery, trafficking or exploitation;
- is from a family where circumstances are presenting challenges for the child, such as substance abuse, adult mental health problems, domestic abuse or a family member in prison;
- was previously in care;
- is showing early signs of abuse and/or neglect;
- is at risk of being radicalised or exploited;
- has been involved in consensual and non-consensual sharing of nude and semi-nude images and/ or videos;
- is a privately fostered child.
- is frequently missing/goes missing from education, home or care;
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in alternative provision or a pupil referral unit;
- has a parent or carer in custody or is affected by parental offending.

5.1.4 **A Child in Need** refers to a pupil who is unlikely to achieve or maintain a reasonable level of health or development, or whose development is likely to be significantly or further impaired without the provision of services. These pupils will be referred to Children's Services via the Integrated Front Door and will benefit from additional support which should be put in place as soon as a problem is identified.

5.1.5 **A Child at Risk** is a pupil who is at risk of significant harm (which may or may not be abuse). Such cases will be referred to Children's Services immediately in accordance with the procedures outlined in this policy. The Children's Services Support level guidance will determine the level of support the pupil requires.

5.2 Pupil at risk of immediate harm

5.2.1 If you believe that a pupil is in immediate danger or at risk of harm, you should make an immediate referral to children's social care and/or the police. **Anyone can make a referral.** Any such referral must be made immediately and in any event within 24 hours (one working day) of you becoming

aware of the risk. **Parental consent is not needed for referrals to statutory agencies such as the police and children's social care.** If anyone other than the DSL makes a referral, you should inform the DSL as soon as possible that a referral has been made. You should challenge any inaction and follow this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

- 5.2.2 Kent Safeguarding Children Multi-agency partnership work with the School and their local procedures can be found [here](#).
- 5.2.3 Specific concerns about immediate harm may arise where pupils are engaged in close one-to-one teaching, for instance in games coaching, individual music lessons, drama or in one-to-one situations with teachers.

5.3 Children missing from education

- 5.3.1 A child going missing from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues and is a potential indicator of abuse. Attendance is registered in accordance with Department for Education requirements and staff are aware of how to deal with situations where pupils go missing either from School or on a School trip. Details of these procedures are outlined in the Missing Pupil Policy.
- 5.3.2 We have a thorough attendance monitoring policy and there are clear procedures in place to deal with instances of pupils going missing from School.

5.4 Child Criminal Exploitation/Child Sexual Exploitation/Modern Slavery/Gangs and hazing

- 5.4.1 **Child Criminal Exploitation (CCE):** is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity either in exchange for something the victim needs or wants, and/or for the financial or other advantage for the perpetrator and/or through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not have to include physical contact, it can also occur through the use of technology. The most prolific form of CCE is where children are exploited and coerced to carry drugs or other contraband from urban areas to suburban and rural areas ('**county lines**'), working in cannabis factories, shoplifting or pick pocketing. They can also be forced or manipulated into committing vehicle crime and 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.

Indicators that may signal a pupil is at risk from or involved with CCE can include increased absences, a change in friendships or relationships with older individuals, a significant decline in performance, signs of self-harm or a significant change in wellbeing. Unexplained gifts or new possessions could also indicate that pupils have been approached by, or are involved with individuals associated with criminal networks or gangs and may be exposed to youth violence through initiation or hazing. If you are concerned you should contact the DSL. Additional advice can be found in Preventing Youth Violence and

Gang Involvement ([link here](#)) and Criminal Exploitation of Children and Vulnerable Adults: County Lines ([link here](#)).

5.4.2 **Child Sexual Exploitation (CSE):**

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g., through others sharing videos or images of them on social media.

CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g., they believe they are in a genuine romantic relationship. CSE can affect both male and female children and can include children who have been moved (see Modern Slavery below) for the purpose of exploitation.

5.4.3 **Modern Slavery:** encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Children can be trafficked into, out of, or around the UK. Any concerns should be reported directly to the DSL.

5.4.4 **Gangs/serious violence including initiation/hazing:**

The School recognises the risks posed to children in relation to involvement in gang-related activity which may be street gang, peer group or organised crime. Young people who are involved in gangs are more likely to suffer harm themselves, through retaliatory violence, displaced retaliation, and territorial violence with other gangs or other harm suffered whilst committing a crime. In addition, children may experience violence as part of initiation or hazing practices.

All staff should be aware of the indicators, which may signal children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

The School understands that Early Help can be crucial in the early identification of children who may need additional support due to gang-related activity and as such will provide an Early Help response when concerns are raised about indicators of gang activity. If information suggests a child may be at risk of significant harm due to gang-related activity, a referral will be made.

5.4.5 **Children are sometimes required to give evidence in criminal courts,** either for crimes committed against them or crimes they have witnessed. There are two documents which explain each step of the process, support and special measures that are available. Going to Court for 5 to 1 year olds [link to document](#) and for 12-17 year olds [link to document](#). Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online [child arrangement information tool](#) with clear and concise information on dispute resolution service. This can be useful to parents and carers.

5.4.6 **Children with family members in prison.** These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of

Offenders, [Nicco](#) provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

5.4.7 Children with particular skills and interest in computing and technology may inadvertently deliberately stray into **cyber-dependent crime**. Staff should report any concerns to the DSL who will consider referring into the Cyber Choices programme. This programme aims to intervene where young people are at risk of committing, or being drawn into, low level cyber dependent offences. The NPCC have written a useful guide for staff [When to call the Police](#)

5.4.8 Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Referrals and/ or discussion with the local authorities should not stop the School from referring to children's social care where a child has been harmed or is at risk of harm

5.5 Child Abduction

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

5.6 Domestic Abuse

5.6.1 This is defined as "any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse by those aged 16 or over who have been intimate partners of family members. This can encompass, but is not limited to:

- Psychological/emotional abuse – intimidation and threats, social isolation, verbal abuse, constant criticism, enforced trivial routines.
- Physical violence – slapping, pushing, kicking, punching, stabbing, damage to property or items of sentimental value, attempted murder or murder.
- Physical restriction of freedom – controlling who the victim or children see or where they go, what they can do, stalking, imprisonment.
- Sexual violence or financial abuse – stealing, depriving or taking control of money, etc.

5.6.2 Domestic abuse can be perpetrated by men to women and vice versa, can occur within same sex relationships and to/from a child to an adult. Children's exposure to adult conflict, even when violence is not present, can lead to serious anxiety and distress. It can also have a serious impact on a child's short and long term health, well-being, development and ability to learn. In some cases, a child may blame themselves for the abuse.

5.6.3 Consideration must also be given to young people who may themselves be in a violent relationship and be suffering or likely to suffer significant harm. Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as '**teenage relationship abuse**'

5.6.4 Children experiencing/witnessing domestic abuse may:

- Become aggressive
- Display anti-social behaviour
- Suffer from depression or anxiety

- May not achieve as well at school/may not attend school

5.6.5 Staff must escalate any concerns or information they have in this regard to the DSL immediately.

5.7 Honour Based Abuse (HBA)

5.7.1 So called 'Honour based abuse' is a general term which includes incidents or crimes which have been committed to protect or defend the 'honour' of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. If any evidence of such practices within a family comes to light you must report the matter to the DSL or DDSL immediately.

5.7.2 If you learn that an act of FGM appears to have been carried out on a girl aged under 18, you have a statutory duty to report it to the police. You should also follow the usual safeguarding procedures set out in this policy and report the matter to the DSL who will involve Children's Services where appropriate. There is a range of potential indications that a girl may be at risk or has already suffered from FGM. Further information is available within *Keeping Children Safe in Education* (September 2024). See Appendix B.

5.8 Pupil at risk of radicalisation

5.8.1 We are fully committed to safeguarding and promoting the welfare of all our pupils. Every member of staff recognises that safeguarding against radicalisation and extremism is no different to safeguarding against any other vulnerability in today's society.

5.8.2 Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. 'Extremism' is defined in the Prevent strategy as vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.

5.8.3 Signs of radicalisation: There is no single way of identifying an individual who is likely to be susceptible to extremist ideology. It can happen in many different ways and settings. Background factors may contribute to vulnerability and are often combined with influences such as family, friends or online, and with particular needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular has become a major factor in the radicalisation of young people. As with managing other safeguarding risks, you should be alert to changes in pupils' behaviour which could indicate that they may be in need of help or protection. You should use your professional judgement in identifying pupils who might be at risk of radicalisation and act proportionately. Such cases may involve a referral to the Channel programme or to children's social care depending on the level of risk. Channel is a voluntary programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism.

5.8.4 We recognise that some pupils may be in danger of being drawn into terrorism or other forms of extremism and carry out appropriate risk assessments. This may involve consultation with local partners, such as the police, about the potential risk in the local area. Such risk assessment is discussed with the Headmaster, the DSL, Deputy DSLs and the Governor responsible for safeguarding to ensure our safeguarding arrangements are sufficiently robust to help prevent and protect children from being drawn into terrorism. The Risk Assessment is regularly reviewed.

5.8.5 We take appropriate measures to ensure that visiting speakers are vetted and that they are always accompanied while on School premises. Oversight ensures that the ideas disseminated are aligned with the values of the School and fundamental British values.

5.8.6 Working in partnership: The DSL will maintain existing partnership arrangements and keep open lines of communication with the School's Local Safeguarding Partners.

5.8.7 Staff training: The DSL and the Deputy DSLs have undertaken Prevent awareness training and are able to provide advice and support to other members of staff on protecting children from the risk of radicalisation. All staff have been made aware of the Prevent duty through training.

- 5.8.8 IT: Suitable filtering is provided and periodically reviewed to keep pupils safe from terrorist and extremist material when accessing the internet in School.
- 5.8.9 Procedures: If you are concerned that a pupil may be exposed to radicalisation the normal referral processes apply i.e., you should discuss your concerns with the DSL, who will follow the safeguarding Procedures outlined in this policy and may also make a referral to the Channel programme. Borderline cases will be discussed with the Channel Panel on a no-names basis.
- 5.8.10 For further advice about extremism the DfE provide a dedicated telephone helpline and mailbox for non-emergency advice for staff and Governors: they can be contacted on 020 7340 7264 or counterextremism@education.gsi.gov.uk or contact 101 (non-emergency number for the police).
- 5.8.11 The Government has published further advice for school in the Prevent duty and the Home office have developed three e learning modules: [Prevent awareness e learning](#), [Prevent referrals E Learning](#) and [Channel Awareness E learning](#) . In addition [Educate against hate](#) is a useful Government resource to support school teachers and leaders to help safeguard their students from radicalisation and extremism.

5.9 Child-on-child abuse *(see Behaviour Policy and Anti-Bullying Policy)*

- 5.9.1 All staff should be aware that children can abuse other children (often referred to as child-on-child abuse). It can take many forms and can happen both inside and outside of school and online. It is important that all staff recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports. There is a policy of zero tolerance for child-on-child abuse. All staff should understand that, even if there are no reports, it does not mean it is not happening - it may be the case that it is just not being reported. As such it is important that if staff have any concerns regarding child-on-child abuse they should speak to the Designated Safeguarding Lead. It is essential that all staff understand the importance of challenging inappropriate behaviours between peers, many of which are listed below, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it. Victims of peer abuse should be supported as they would be if they were the victim of any other form of abuse, in accordance with this policy. If the threshold does not reach the level to constitute a safeguarding investigation, perpetrators will be dealt with in accordance with our Behaviour Policy.
- 5.9.2 Children may be particularly vulnerable in residential settings. In reflection of this, there are additional requirements for boarding schools that are set out in the National Minimum Standards for Boarding. All staff should understand that just because there are no reports of child-on-child abuse it does not mean it is not happening, it may simply mean that it is not being reported. Therefore, it is vital that staff report any concerns relating to child-on-child abuse to the DSL or one of the DDSLs immediately.
- 5.9.3 Pupils with SEN or disabilities could be more vulnerable to child-on-child abuse and be disproportionately impacted without showing any outward signs. Staff must bear these vulnerabilities in mind when responding the allegations and dealing with incidents.
- 5.9.4 Child-on-child abuse can take the form of harmful sexual behaviour. It is important that all victims are taken seriously and offered appropriate support, though it should be noted that current evidence has shown overwhelmingly that girls are more likely to be the victims of such abuse or harassment and boys the perpetrators. Through the PSHE and RSE programmes the School attempts to foster healthy and respectful relationships between pupils, and between pupils and pupils at other schools – both male and female.
- 5.9.5 Much child-on-child abuse takes place online. It can take place wholly online or technology may be used to facilitate offline abuse. Pupils are regularly reminded of the School’s policy on bullying and on cyberbullying, and sign an Acceptable Use Agreement which governs their behaviour on the School network.

5.9.6 Child-on-child abuse can manifest itself in many ways. Some forms of child-on-child abuse are:

Bullying: Bullying is any behaviour that **can be a single event** or be repeated over time and intentionally hurts another pupil or group of pupils physically or emotionally. It can occur directly or through cyber-technology (social websites, mobile phones, smart phones, text messages, photographs and email), prejudice based or discriminatory bullying and always involves an imbalance of power. It can cause long-lasting psychological effects. child-on-child abuse is bullying of a serious or sexual nature between persons of a similar age which results in or has the potential to cause significant harm.

Abuse in intimate personal relationships between peers

Physical abuse: this includes hitting, kicking, shaking, biting, slapping, or otherwise causing physical harm to another young person (this may include an online element which facilitates, threatens and/or encourages physical abuse).

5.10 Sexual Violence and Sexual Harassment

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

5.10.2 Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college. 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.

5.10.3 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.

5.10.4 Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with special educational needs and disabilities (SEND) and LGBTQ+ and/or gender questioning children are at greater risk.

5.10.5 Staff should be aware of the importance of:

- challenging inappropriate behaviours;
- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and,
- challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts.

Dismissing or tolerating such behaviours risks normalising them

5.10.6 **Sexual violence:**

Children can, and sometimes do, abuse their peers in this way and that it can happen both inside and outside of school. When referring to sexual violence we are referring to sexual violence offences under the Sexual Offences Act 2003, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence); causing someone to engage in sexual activity without consent i.e., forcing someone to strip, touch themselves sexually or to engage with sexual activity with a third party. It is a criminal offence for anyone to be involved in any sexual act (sexual intercourse, sexual touching, kissing, etc.) with anyone under the age of 13 whether the young person agrees or not, on the basis that anyone under 13 lacks the capacity to give valid consent to any sexual act.

5.10.7 **Sexual harassment:** refers to ‘unwanted conduct of a sexual nature’ that can occur both online and offline and both inside and outside school.

5.10.8 Sexual harassment is likely to violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and create a hostile, offensive or sexualised environment. Whilst not intended to be an exhaustive list, sexual harassment by other pupils can include:

- Sexual comments such as telling sexual stories, making lewd comments, making sexual remarks about clothing or appearance and calling someone sexualised names.
- Sexual "jokes" or taunting.
- Physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes or displaying pictures, photos or drawings of a sexual nature.
- Upskirting – where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and / or knowledge, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Anyone of any sex can be a victim.
- Online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include non-consensual sharing of sexual images and videos, sexualised online bullying, unwanted sexual comments and messages and online sexual exploitation, coercion and threats.
- Sharing nudes or semi nudes / Consensual and non-consensual **sharing**: this is when someone sends or receives a sexually explicit text, image or video either consensually or non-consensually. Pressuring someone into sending a nude or sexually explicit picture can happen in any relationship and to anyone, whatever their age, gender or sexual preference. Once the image is taken and sent, the sender has lost control of the image and these images could end up anywhere or be stored indefinitely. Possessing or distributing indecent images of a person under 18 is a crime under the Sexual Offences Act 2003. **Report any incident involving youth produced sexual imagery to the DSL immediately.** Never view, download or share the image or ask the child to delete it. Contact the DSL immediately. Please be aware that the consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk.

5.10.9 The response to a report of sexual violence or sexual harassment

The initial response to a report from a child is incredibly important. How the School responds to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward. Schools not recognising, acknowledging or understanding the scale of harassment and abuse and/or downplaying of some behaviours can lead to a culture of unacceptable behaviour. 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.

If staff have a concern about a child or a child makes a report to them, they should follow the referral process. As is always the case, if staff are in any doubt as to what to do they should speak to the DSL or DDSL.

5.10.10 Where an allegation of abuse against one or more pupils has been made or where you are concerned about child-on-child abuse, the child protection procedures set out in this policy should be followed and the DSL informed. The pupil(s) accused of abuse and the victim of abuse will both be treated as 'at risk' and a referral will be made to children's social care in respect of either pupil if that pupil is suffering or is at risk of harm.

5.10.11 If it is necessary for a pupil to be interviewed by the police in relation to allegations of abuse, we will ensure that, subject to the advice of the Local Authority Designated Officer (LADO), parents are informed as soon as possible and the pupil is supported during the interview by an appropriate adult.

5.10.12 Support for those involved in child-on-child abuse (both parties) will be offered through the pastoral team, with regular monitoring by the DSL. Counselling will be suggested to the parents if considered helpful. If Children's Services have been involved then support may be provided through the Early Help or wider safeguarding team.

5.11 Online Safety *(see Online Safety Policy)*

- 5.11.1 Many of the concerns described above (for example sexual abuse, severe bullying and extremism and radicalisation) may occur online or technology may be used to facilitate offline abuse. We ensure that the school network is appropriately filtered and monitored. All pupils and staff are guided in the acceptable use of our network and the internet in general (all advice is in line with the Department of Education guidance document, Teaching Online Safety in School 2023). Pupils are required to sign an Acceptable Use Agreement and are given advice on keeping safe online through computer technology lessons, specific lectures on e-Safety and within our PSHE and RSE courses. Our Online Safety Policy is available to read on the website. The school will regularly review the level of security protection procedures in place to safeguard systems, staff and learners and review the effectiveness of these procedures periodically to keep up with evolving cyber crime technologies.
- 5.11.2 Any evidence that a pupil may be at risk online or indeed is being harmed online should be brought to the immediate attention of the DSL or a DDSL so that it can be taken forward as a child protection issue.
- 5.11.3 Staff receive training relating to online safety as part of their regularly updated safeguarding training.
- 5.11.4 In cases of pupils sexting or sharing pornographic images online, you are reminded that it is illegal to possess, store or distribute an image containing sexual imagery of a child under 18, even if the possessor is under 18 and/or the image shared is of themselves. Therefore when taking a disclosure from a pupil concerning this issue you should avoid viewing or forwarding the image and instead alert the DSL or DDSL to the image's existence.

5.12 Mobile Phones inc. Smart Watches *(see Mobile Phone Policy)*

- 5.12.1 Personal mobile phones and smart watches belonging to EYFS staff must not be taken into the classroom. These must be stored in the locked cupboard provided.
Personal mobile phones and smart watches must not be on their person when they are in contact with children.

5.13 Safeguarding SEND pupils - Additional risks

- 5.13.1 Children with special educational needs and disabilities (SEND) can face additional safeguarding challenges. Additional barriers can exist when recognising abuse, neglect or exploitation in this group of children. These can include:
 - assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
 - children with special educational needs and disabilities can be disproportionately impacted by actions such as bullying without outwardly showing any signs; and
 - communication barriers and difficulties in overcoming these barriers
- 5.13.2 You must always be prepared to support SEND pupils in expressing any concerns they may have and be particularly vigilant to any signs or indicators of abuse, discussing this with the DSL as appropriate.

5.14 Safeguarding and Mental Health *(see Positive Mental Health Policy)*

- 5.14.1 You should consider that 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, you 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.
- 5.14.2 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 DSL or one of the DDSLs immediately.
- 5.14.3 The DfE has published advice and guidance on [Preventing and Tackling Bullying](#), and [Mental Health and Behaviour in Schools](#). In addition to this, Public Health England has produced a range of resources to promote positive health, wellbeing and resilience among young people including its guidance [here](#)

5.15 Pupils who are looked after children, or were previously looked after children

5.15.1 Pupils who are looked after by a local authority, or who were previously looked after, can face additional safeguarding issues. If you have any concerns, you should contact the DSL.

6. Concerns about a member of staff (see *Managing Allegations/ Concerns raised Against Staff Policy, Low-Level Concerns Policy and the Staff Code of Conduct*)

6.1 Child protection concerns

6.1.1 If you are concerned about the behaviour of a member of staff towards a pupil or pupils you may worry that you have misunderstood the situation]. However, any concern about a member of staff must be raised immediately (see section 6.2) **regardless of how unlikely it seems that there would be any substance to the concern.** No further action may be necessary but it is important that such information is brought to the School's attention as soon as possible. You must remember that in all situations **the welfare of the child is paramount.**

6.1.2 Our reporting procedures for managing concerns/allegations against staff are in line with Part Four of Keeping Children Safe in Education and Local Safeguarding Partner arrangements. They apply when staff have, or are alleged to have:

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

The last bullet point above includes behaviour that may have happened outside of School, that might make an individual unsuitable to work with children, this is known as transferable risk. The school may receive an allegation relating to an incident that happened when an individual or organisation was using their school premises for the purposes of running activities for children. As with any safeguarding allegation, the schools will follow its safeguarding policies and procedures, including informing the LADO.

6.1.3 When you report a concern of this nature you can expect:

- the concern to be taken seriously;
- your identity to remain confidential (if this is your wish), unless you are later required to act as a witness in court proceedings;
- to be protected as far as possible from victimisation or harassment;
- for an initial inquiry to take place to identify any action necessary;
- Children's Services and the police to be involved if the concern relates to abuse, neglect or exploitation or the potential commission of a crime;
- written confirmation that your concern has been received and is being dealt with; and
- to be informed of the final outcome where possible, subject to the constraints of confidentiality and legal advice (please note, if restrictions are in place, or if we have received specific direction from the LADO or the police, communication with the reporting party might not be permissible).

6.1.4 If you feel the School is not dealing with a matter in accordance with our procedures, you should follow the Whistleblowing Procedure.

6.2 How to raise a concern about an adult

- 6.2.1 If you have child protection concerns about the behaviour of a member of staff, or about a School practice, which is likely to put pupils at risk of abuse or other serious harm, you **must** report it immediately, using one of the steps outlined below:

Allegations/ Concerns raised in relation to staff, volunteers, supply staff, peripatetic staff or contractors: If you are making an allegation or complaint against any such member of staff you should report it immediately to the Headmaster (or to the DSL if the Headmaster is unavailable).

Allegations / Concerns raised in relation to the Headmaster or DSL: If you are making an allegation against the Headmaster or DSL, you should report it to the Chairman of the Governors or directly to the LADO if the Chairman is not available, without notifying the Headmaster or DSL.

Allegations/ Concerns raised in relation to a Governor: If you are making an allegation against a Governor you should report it to the Chairman. If the Chairman is not available, you should report it to the LADO.

Allegations/ Concerns raised in relation to the Chairman: If you are making an allegation against the Chairman you should report it to the LADO.

- 6.2.2 Allegations against a staff member who is no longer working at the School or no longer teaching will be referred to the police and any relevant authorities. Historical (non-recent) allegations of abuse will be referred to the police and to the LADO.

6.3 What happens when an allegation has been made?

- 6.3.1 We will deal with any allegation of inappropriate behaviour that harms, or may cause harm to a pupil or pupils, as an immediate priority.

- 6.3.2 If an allegation is made against anyone working or volunteering at the School, we will not undertake our own investigation into the allegation without prior consultation with the Local Authority Designated Officer (LADO) or, in the most serious cases, the police, so as not to jeopardise statutory investigations. It is important that staff do not carry out their own investigations.

- 6.3.3 Once an allegation has been made, which appears to meet the reporting criteria (section 6.1.2) the Headmaster (or Chairman, depending on who the allegation has been made against), will immediately contact the LADO to discuss the nature, content and context of the allegation and agree a course of action. The LADO must be informed within one working day of any allegation reported to the School that appears to meet the criteria or of any allegations that are made directly to the police. All discussions with the LADO will be recorded in writing. We will follow advice from the LADO about how to approach the matter in question, whether the police are to be involved and whether there is to be a strategy meeting. We will also take direction from the LADO as to what we may communicate to:

- a) the person about whom allegations have been made,
- b) the person who has raised the allegation, and
- c) (if it concerns a pupil) their parents.

- 6.3.4 The Headmaster or Chairman will ensure that the individual against whom the allegation has been made is notified as soon as possible and given an explanation of the likely course of action (unless there is an objection from the police). A named representative will be appointed to keep the individual informed of the progress of the case and to arrange appropriate support.

- 6.3.5 Careful consideration will be given to whether the circumstances of the case warrant suspension whilst the allegation is investigated or whether alternative arrangements can be put in place. Alternative accommodation will be arranged (away from pupils) in cases where a member of boarding staff is suspended pending an investigation of a child protection nature.

- 6.3.6 The Headmaster or Chairman (depending on who the issue was reported to) will, after consultation with the LADO and/or the police, inform the parents and provide regular updates as soon as permissible.
- 6.3.7 Where an allegation is made against a staff member not directly employed by us such as supply staff or agency staff, the Headmaster will immediately contact both the company concerned and the LADO to discuss the nature, content and context of the allegation, in order that all parties can work together to agree a course of action. We will continue to support any investigation that is required.

6.4 How an individual will be treated if an allegation is raised against them

- 6.4.1 The School's Disciplinary Procedure may apply in the event of an allegation being made.
- 6.4.2 The School will make every effort to maintain confidentiality and guard against unwanted publicity. These restrictions will apply up to the point where the accused person is charged with an offence or the Teaching Regulation Agency (TRA) publishes information about an investigation or decision in a disciplinary case.
- 6.4.3 Allegations found to be malicious will be removed from the personnel record of the individual concerned. In all other cases a written record of the decision will be placed on their file in accordance with KCSIE and a copy provided to the individual concerned. Allegations which are false, malicious, unfounded or unsubstantiated will not be included within the individual's future references.

6.5 Reporting low-level concerns about adults working for or on behalf of Saint Ronan's *(see Low-Level Concerns Policy)*

- 6.5.1 Concerns that do not meet the harm threshold are called low-level concerns. Examples of these could be using inappropriate language with pupils, being overly friendly, showing favouritism, etc. Low-level concerns should still be reported in the same way as described in 6.2.1 in order to encourage an open and transparent culture, enabling the School to identify concerning problematic or inappropriate behaviour early, to minimise the risk of abuse, and to ensure that adults working in or on behalf of the School are clear about professional boundaries and how to act within these boundaries.
- 6.5.2 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 with the primary aim to strengthen systems within the School's safeguarding system and to support individuals to correct behaviour at an early stage.
- 6.5.3 All low-level concerns will be recorded. The record will include details of the concern, the date of the concern, the context in which the concern arose and the action taken. The name of the individual sharing the concerns will also be noted, although names may be protected where concerns are shared confidentially. All records will be kept confidential and stored securely.
- 6.5.4 Please note that low-level concerns are likely to be behaviours that would amount to disciplinary action as a breach of School policies, not least of which would be the Staff Code of Conduct. Staff can approach the LADO if unsure whether low level concerns shared about a member of staff reaches the harm threshold.
- 6.5.5 All low-level concerns should be reported to the Head.

6.6 Whistleblowing Procedure *(see Whistleblowing Procedures)*

- 6.6.1 You should always feel able to raise concerns about poor or unsafe practices and potential failures in our safeguarding regime. If you have concerns that we are not dealing with a child protection matter in accordance with our stated procedures, you should raise it under the School's Whistleblowing Policy.

- 6.6.2 Alternatively, if you feel that your genuine concerns are not being addressed, you may contact the NSPCC whistleblowing advice line (0800 028 0285 or help@nspcc.org.uk) or contact the Local Authority Designated Officer (LADO) when appropriate to do so in accordance with Keeping Children Safe in Education.
- 6.6.3 There will be no retribution or disciplinary action taken against you for making such a report provided that it is done in good faith. Malicious allegations may be considered a disciplinary offence.

7. Management of Safeguarding

We follow rigorous procedures to ensure that the welfare of pupils is paramount. These include the following:

7.1 Safer Recruitment *(see Safer Recruitment Policy)*

7.2 Staff training

- 7.2.1 All members of the teaching and support staff receive safeguarding training as part of their induction. We ensure understanding by asking all staff to complete online training or sign a declaration to the effect that KCSIE has been read and understood.
- 7.2.2 During their induction: Staff will be introduced to the Designated Safeguarding Lead and the Deputy Designated Safeguarding Leads (DDSLs).
- Staff will also be trained on the School's Safeguarding (Child Protection) Policy and procedures; including reading KCSIE Part One and Annex B.
 - Staff will learn how to receive a disclosure from a pupil and what to do if they are concerned about the behaviour of a colleague.
 - Staff will also learn about Prevent awareness procedures, online safety for pupils, and the School's safeguarding response to children who go missing from education.
 - Staff will be informed about the School's Whistleblowing Policy, Staff Code of Conduct (which includes acceptable use of IT and staff/pupil relationships) and additional policies relating to safeguarding, including the Pupil Behaviour Policy and the Prevention of Bullying Policy to ensure that they are aware and confident in the use of all procedures relating to safeguarding. Access to all relevant documents will be provided during induction.
 - Training will include an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring.
- 7.2.3 Volunteers are provided with safeguarding induction training that includes:
- The School's Safeguarding (Child Protection) Policy
 - Part 1 and Annex B of Keeping children safe in education (September 2024)
 - The identity and contact details of the DSL and DDSLs
 - Brief guidance notes on the School's expectations of their behaviour around pupils
- 7.2.4 Contractors or visitors to the School receive, as a minimum, the identity and contact details of the DSL and guidance on what to do if they are concerned about a child or a safeguarding practice at the School.
- 7.2.5 The DSL will provide an annual update to all teaching staff at the beginning of each Autumn Term; any other necessary updates for all staff will take place during the course of the year as required, including in relation to online safety.
- 7.2.6 Compulsory safeguarding refresher training for all staff will take place on a three-yearly basis or more frequently if required by the School's Local Safeguarding Partners. The DSL and Deputy DSLs will attend suitable training in child protection and multi-agency working every two years. All training records are held by the DSL, and **staff will be notified when their training is due to expire and the date of their next training session.**

- 7.2.7 The Governor with specific responsibility for safeguarding will also undergo additional child protection training and updates; this will involve refresher training every two years. They will also ensure that children are taught about safeguarding, including in relation to online safety.
- 7.2.8 Staff are required to pay attention to safeguarding issues in all areas of School life, for instance but by no means exclusively, risk assessments for trips, the checks required for the recruitment of staff and volunteers (even if they are to be supervised), organisation of external events and so on. They will receive full training if they are involved in any of the above.
- 7.2.9 Staff will regularly be given guidance to ensure that their behaviour and actions do not place pupils, or indeed themselves, at risk of harm or of allegations of harm to a pupil particularly in situations where they are alone with pupils providing one-to-one tuition or assistance. This guidance may come in the form of Safeguarding Bulletins, email updates or department meetings. In particular, the Staff Code of Conduct provides in depth advice for staff relating to appropriate levels of behaviour. This will be discussed during the induction training and periodically thereafter.
- 7.2.10 Any concerns about a member of staff's behaviour towards a pupil or pupils will be dealt with under the School's Staff Disciplinary Procedure, having particular regard to expert advice on child protection issues involving staff and to our legal obligation to report any possible offences.
- 7.2.11 Staff will receive regular training and briefings to ensure that they have the skills, knowledge and understanding necessary to keep safe any pupil looked after, or previously looked after, by a local authority.
- 7.2.12 All staff are trained on how to manage and report a disclosure along with specific guidance relating to managing a report of child-on-child sexual violence or sexual harassment.
- 7.2.13 All staff are aware of their role in the local early help process

7.3 The Management of Safeguarding

- 7.3.1 The Staff Code of Conduct can be found in the Staff Handbook. The aim of the Staff Code of Conduct is to provide clear guidance concerning your actions and conduct in order to ensure pupils or staff are not at risk of harm, or of allegation of harm to a pupil. It sets out the behaviour we expect from all members of staff, and offers specific guidance for staff in boarding houses, delivering tutorials or in one-to-one situations where they may be vulnerable to malicious accusations or for misunderstandings to occur. It also explains the major policies that you must comply with and where to find them.

7.4 Responsibilities of staff members

You must maintain an attitude of '**it could happen here**' where safeguarding is concerned. When concerned about the welfare of a pupil, you should always act in the best interests of the pupil. We all have responsibility for ensuring the welfare of the pupils, and you must always appropriately share any concerns that you may have about a pupil.

7.5 Responsibilities of the Designated Safeguarding Lead (DSL)

7.5.1 The Role of the Designated Safeguarding Lead

The DSL is a member of the Senior Management Team and is given authority, resources and time in order to fulfil the role. The DSL carries ultimate responsibility for safeguarding and Child Protection, as well as online safety.

Raise awareness across the School:

- Ensure that all staff and the Headmaster (teaching and non-teaching, part time, temporary, volunteer), parents and Governors know who the DSL is and what their responsibilities are.

- Brief all School staff (teaching and non-teaching, part time, temporary, volunteer) the Headmaster and Governors on the relevant contents of the guidance and procedures they must follow as specified in this document – including the briefing of new staff and Governors as part of their induction at the School.
- Ensure that all staff (teaching and non-teaching, part time, temporary, volunteer), the Headmaster and Governors understand their responsibilities in being alert to and acting appropriately in cases of or suspected cases of abuse.
- Ensure that the Headmaster is kept informed of any concerns.
- Act as a source of support and expertise to the School community.
- Review and update the policy annually and when new legislation is issued.
- Make this policy available to staff, volunteers and parents and ensure it is posted on the School website.

Coordinate, deliver, record and assess training:

- Keep a record of all staff training: safeguarding INSET, annual updates, training in response to changes to local and national guidance, or changes in policy.
- Ensure that all staff have read and understood KCSIE (Part 1 and Annex B) September 2024 either directly from the DSL or through external training providers.
- Deliver support staff and Governors' Induction and statutory training.
- Provide statutory training for all staff and the Headmaster (teaching and nonteaching, part time, temporary, volunteer) and Governors every three years.
- Receive appropriate training in line with advice from the local three safeguarding partners every two years, or when new legislation is introduced, and ensuring that this training is disseminated to all others in the School in line with statutory requirements.
- Ensure the Deputy DSLs have Working Together and Child Protection training every two years.
- Assess staff training needs regularly through testing staff understanding of policy in practice.
- Liaise with staff (especially pastoral support staff, matron, IT and other technicians and SENDCOs) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies.

Online Safety:

- Safeguarding includes online safety and the DSL and Deputies must ensure that they are trained adequately to be able to advise and guide School staff and policy in this area.

SEND:

- Safeguarding includes SEND and the DSL and Deputies must ensure that they are trained adequately to be able to advise and guide School staff and policy in this area.

LGBTQ+ and Gender Questioning

- Understanding that these children have additional risk factors and ensuring that they can identify an appropriate adult to talk to.

Keeping up to date on new local and national guidance and regulations:

- Hold relevant documentation and guidance including the School's copy of "Working Together: a guide to arrangements for multi-agency co-operation for the protection of children from abuse" and KCSIE, September 2024.
- Develop and maintain effective links with external agencies.

Work with Governors:

- Attend a termly meeting with Safeguarding Governor preceding the Governors' meeting to provide information for Governor review.
- Attend the three annual Safeguarding subcommittee meetings.

- Ensure that the Governing Body undertakes an annual review of the School's child protection policies and procedures and of the efficiency with which the related duties have been discharged.
- Provide an annual safeguarding report to the Governors which is sent to the Kent safeguarding team within the required timeframe.

Management of Safeguarding and Child Protection concerns:

- Develop effective working relationships with other agencies and services and cooperate as required with enquiries of a child protection or safeguarding nature.
- Keep written records of all concerns when noted and reported by staff or when disclosed by a child, ensuring that such records are stored securely and reported onward in accordance with this policy guidance, but kept separately from the child's general file.
- All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child. Records should include:
 - a clear and comprehensive summary of the concern;
 - details of how the concern was followed up and resolved;
 - a note of any action taken, decisions reached and the outcome.
- Decide whether to take further action about specific safeguarding (not child protection) concerns e.g., discuss with Educational Safeguarding Team, Early Help, LADO, talk to parent, find suitable support, use Early Help Assessment (EHA), refer to Child Services.
- Make referrals as appropriate, following guidance on further action.
- Submit reports to and attend child protection conferences
- Coordinate the School's contribution to child protection plans.
- Inform Early Years and Family Support if a child, who is in receipt of a child protection plan, has unexplained absence of more than 2 days.
- Ensure that when a child with a child protection plan leaves the School, their information is passed to their new school and the child's social worker is informed.
- To ensure that when a child moves to a new school, in addition to the secure transference of the child protection file within 5 days of the child arriving at the new school, the DSL should share information proactively with the new school to enable the new school to have support in place when a child arrives and to ensure that key staff, such as the SENCO, are aware of their needs.
- Ensure the School effectively monitors children who have been identified as 'at risk'
- Provide guidance to parents, children and staff about obtaining suitable help.
- Attend multi-agency briefings.
- Follow guidance on reporting and tracking lost/missing children and removing children from the admission register.
- Ensure safe recruitment practices are always followed and staff/volunteers are selected and recruited following appropriate safe recruitment processes detailed in the Safer Recruitment Policy (appended)
- Review child protection procedures and remedy any weaknesses immediately.
- The DSL should consider the context within which any incidents or behaviours occur. This is known as contextual safeguarding where assessment of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety or welfare. This is especially likely to be the case with regards to online safety concerns. Children may be harmed outside of the home.
- Help promote 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. The role includes ensuring that the School, and its staff, know who these children are, 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.
- The DSL should ensure the sharing of information which is vital in identifying and tackling all forms of abuse, neglect and exploitation.

7.5.2 Role of the Deputy DSL

- Deputise in the absence of the Designated Safeguarding Lead and to be trained in all areas to the same level as the DSL.
- Support and liaise with the Designated Safeguarding Lead in all matters regarding safeguarding and child protection.
- Receive specialist training in line with advice from the local three safeguarding partners every 2 years.

7.5.3 Role of the EYFS DSL

- Liaise with the Designated Safeguarding Lead on all matters regarding safeguarding and child protection.
- Receive specialist training in line with advice from the local three safeguarding partners every 2 years.

7.5.4 Role of the Headmaster

- To ensure that the Safeguarding Policy and procedures are implemented and followed by all staff.
- To allocate sufficient time and resources to enable the DSL and deputies to carry out their roles effectively, including the assessment of children and attendance at strategy discussions and other necessary meetings.
- To ensure that staff feel 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.
- Ensure that the children's safety and welfare is addressed through the curriculum.

7.6 Data Protection and UK GDPR

- 7.6.1 The Data Protection Act (2018) and UK GDPR does not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

8. Governance Arrangements for Safeguarding

- 8.1 Governing bodies have a strategic leadership responsibility for safeguarding arrangements and must ensure that they comply with their duties under legislation. They must have regard to this guidance, ensuring policies, procedures and training in their schools or colleges are effective and comply with the law at all times.

Where a school or college has charitable status, Charity Commission guidance on charity and trustee duties to safeguard children is available at GOV.UK.

- 8.2 Governing bodies and proprietors should ensure they facilitate a **whole school approach** to safeguarding. This means ensuring safeguarding and child protection, including online safety, are at the forefront and underpin all relevant aspects of process and policy development. Ultimately, all systems, processes and policies should operate with the best interests of the child at their heart. Where there is a safeguarding concern, the Governing body should ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems should be in place, and they should be well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.
- 8.3 Governing bodies should satisfy themselves that children are taught how to keep themselves and others safe.

- 8.4 Governing bodies must ensure that all Governors and trustees receive appropriate safeguarding and child protection training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures are effective. This training should be regularly updated.
- 8.5 Governors should be aware of their obligations under the Human Rights Act 1988 and the Equality Act 2010 and their local multi agency safeguarding arrangements.
- 8.6 Governors must ensure that the DSL has the appropriate status and authority within the school to carry out the duties of the post.

8.7 The Role of the Safeguarding Governor:

- To oversee the Schools' Safeguarding Policy and practice and ensure that the Policy is reviewed annually and signed by the Chairman of the Governors.
- To ensure that an annual report, compiled by the DSL, is made to the Governing Body and then sent to the Kent Education Safeguarding Team.
- To chair the Safeguarding and Pastoral Care Committee, which will review safeguarding and child protection every term and on request in between times.
- To assess the efficiency with which the related duties have been discharged.
- To ensure that any deficiencies or weakness in safeguarding are remedied without delay.
- To monitor systems of online security, including specifically ensuring that the School has appropriate filters and monitoring systems in place, which are regularly reviewed They should also ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and know how to escalate concerns where identified.
- To determine whether there are any improvements to be made to the School's procedures or practice following a substantiated allegation against a member of staff.
- To ensure that the DSL should have regular reviews of her own practice and provide opportunities to discuss any concerns about welfare and safeguarding matters.

Appendix A: Signs of Abuse

Possible signs of abuse

The following lists are neither definitive nor exhaustive. The information is to be used in context with a range of other information related to a child's circumstances. Any concern, even if there is no clear indicator, must be reported to the DSL.

Physical Abuse

- Unexplained injuries or burns, particularly if they are recurrent
- Improbable excuses given to explain injuries
- Refusal to discuss injuries
- Untreated injuries or delay in reporting them
- Excessive physical punishment
- Arms and legs kept covered in hot weather
- Fear of returning home
- Aggression towards others
- Running away

When considering the possibility of non-accidental injuries, remember that injuries may have occurred for other reasons e.g., genuine accidents or medical disorders.

Physical Neglect

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Poor state of clothing
- Frequent lateness, or unexplained non-attendance at school
- Untreated medical problems
- Low self-esteem
- Poor peer relationships
- Stealing

Emotional Abuse

- Low self-esteem
- Continual self-deprecation
- Sudden speech disorder
- Significant decline in concentration
- Socio-emotional immaturity
- "Neurotic" behaviour (e.g., rocking, head banging)
- Self-mutilation
- Compulsive stealing
- Extremes of passivity or aggression
- Running away
- Indiscriminate friendliness

Sexual Abuse

Not all children are able to tell, or are believed by, parents. Changes in behaviour may be a signal that something has happened. It is important to remember that there may well be no physical or behavioural signs. The following indicators may show that a child is troubled, but not through sexual abuse. The child may have some of these signs or none at all. It is a combination, frequency and duration of signs that can alert you to a problem.

Behavioural:

- Lack of trust in adults, or overfamiliarity with adults
- Fear of a particular individual
- Social isolation – withdrawal or introversion
- Sleep disturbance (nightmares, irrational fears, bed wetting, fear of sleeping alone, needing a nightlight)
- Running away
- Reluctance or refusal to participate in physical activity or to change clothes for activities
- Low self-esteem
- Drug, alcohol or solvent abuse
- Display of sexual knowledge beyond their years [SEE NSPCC TRAFFIC LIGHT SYSTEM](#)
- Unusual interest in the genitals of adults, children or animals
- Expressing affection in an inappropriate way
- Fear of bathrooms, showers, closed doors
- Abnormal, sexualised drawing
- Fear of medical examinations
- Developmental regression
- Poor peer relations
- Over-sexualised behaviour/sexual promiscuity
- Stealing
- Psychosomatic factors e.g., recurrent abdominal pains or headache

Physical:

- Sleeplessness, fear of the dark, nightmares
- Bruises, scratches, bite marks to the thighs or genital area
- Itch, soreness, discharge, unexplained bleeding from the rectum, vagina or penis
- Pain on passing urine or recurrent urinary infection
- Stained underwear
- Unusual genital odour
- Anxiety, depression
- Eating disorder e.g., anorexia or bulimia
- Discomfort/difficulty in walking/sitting
- Venereal disease
- Soiling or wetting in children who have been trained
- Self-mutilation/suicide attempts

Sexual Exploitation:

- Unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Older boyfriends or girlfriends
- Change in emotional well-being
- Misuse of drugs or alcohol
- Self-harm
- Missing for periods of time or regularly home late
- Sexually transmitted diseases or pregnancy
- The consensual and non-consensual sharing of nude and semi-nude images

Signs of grooming:

The signs of grooming are not always obvious. Groomers will go to great lengths not to be identified. Some actions associated with those grooming children in schools may include.

- Meeting pupils secretly
- Collusive behaviours designed to cultivate dependency such as:
 - Unprofessional conversations about other members of staff
 - 'Friending' pupils on social media platforms, contrary to school policy

Pupils who are being groomed at school or elsewhere may:

- Be very secretive, including about what they are doing online
- Have unexplained absences
- Have older friends or partners
- Go to unusual places to meet friends
- Have new belongings such as clothes or mobile phones that they can't or won't explain
- Have access to drugs or alcohol.

In older children, grooming can be easily mistaken for "normal" teenage behaviour, but unexplained change in behaviour or personality, or inappropriate sexual behaviour for their age may be observed.

You may find it useful to refer to the Department for Education's guidance [What to do if you're worried a child is being abused \(March 2015\)](#).

Appendix B: Keeping Children Safe in Education

It is a condition of employment that everyone employed by St Ronan's School or volunteering at the School read and understand Part 1 and Annex B of the government document *Keeping children safe in education (September 2024)* The document may be accessed [here](#).

Other Related Policies

Staff Code of Conduct see section 2 of the Staff Handbook. Hard copy supplied at Induction.

Whistleblowing Policy see Policy 2.29 of the Staff Handbook. Hard copy supplied at Induction.

Managing Allegations or Concerns Against Staff Policy & the Low-Level Concern Policy. See Section 2 of the Staff Handbook

Policy on the use of Force to control of restrain pupils see section 3 of the Staff Handbook. Hard copy supplied at Induction.

Mobile Phone Policy see section 2 of the Staff Handbook. Hard copy supplied at Induction.

Safer Recruitment Policy see section 3 of the Staff Handbook.

Behaviour Policy see section 3 of the Staff Handbook.

Anti bullying Policy see section 3 of the Staff Handbook.

Positive Mental Health Policy see section 3 of the Staff Handbook.

Social Media Policy