



Safeguarding Policy

Updated: September 2024

Author: Deputy Head (Pastoral and Safeguarding)

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Bredon School is owned and operated by Cavendish Education; the Proprietary Body also known as the Governing Body. Any reference to Governors means any Director of Cavendish Education.

This Policy document is one of a series of Bredon Policies that, taken together, are designed to form a comprehensive, formal Statement of Bredon's aspiration to provide an outstanding education for each and every one of its students and of the mechanisms and procedures in place to achieve this. Accordingly, this Policy needs to be read alongside all of these Policies in order to get the full picture; in particular it should be read in conjunction with the Equality Policy, The Health and Safety Policy, Anti-Bullying Policy and the Behaviour Management Policy.

All of these Policies have been written, not simply to meet statutory and other requirements, but to evidence the work that the whole School is undertaking to ensure the implementation of its core values:

'To be a small, family school that genuinely focuses on the individual; ensuring each student reaches his or her personal potential and destination by way of a rich and diverse journey based on breadth of opportunity, support and continuously striving towards excellence.'

In all Bredon Policies, unless the specific context requires otherwise, the word "parent" imports the meaning parent, guardian, carer or any person in whom is vested the legal duties and responsibilities of a child's primary caregiver.

Bredon employs the services of the following consulting companies to ensure compliance is met and the best practice is implemented:

**Peninsula HR Online
Peninsula Business Safe (Health and Safety)
Atlantic Data (DBS)
Educare (online CPD)
SchoolPro (Online CPD and Data Protection Service)**

The Designated Safeguarding Lead (DSL) for Bredon School is Miss Charmain Eaton, Deputy Head (Pastoral and Safeguarding) who can be contacted on 01684 293156/07920 548531.

Supporting the DSL are the following members of staff acting as Deputy Designated Safeguarding Leads (DDSL'), all of whom are trained to the same level:

Mrs Jessica Shuttleworth, Interim Head of Jarrett House, 07494419980
Mr Josh Stafford, Head of Sharp House, 07496697595
Mrs Gina Odam, Head of Thomas House, 07903477494
Mr Alisdair Cradock, Head of 6th Form, 07398623869
Mrs Vicki Miles, Sixth Form Tutor, 01684 293156
Mrs Jill Blakeney, School Nurse, 07943271713
Mrs Carey Allen, Mental Health and well-being Lead/Practitioner, 07943271713
Mr David Hughes, Director of Sport, 07496378107
Mrs Sue Dickson, Head of Junior School, 07984562041
Miss Amber Gamble, Junior School Teacher, 01684 293156
Mrs Amy Leeke, SENCo, 01684 293156

In addition to the staff above, who cover safeguarding arrangements during the school day, there is also a group of boarding staff trained as DDSL'. They are as follows:

Mr Rob Starr, Director of Boarding, 07398840423
Miss Harriet Starkey, Senior Houseparent, 07398840426
Mrs Nicola Starr, Houseparent, 01684 293156

The Headmaster is Mr Nick Oldham who can be contacted on 01684 293156.

The Governor with responsibility for Safeguarding is Mr Gary Balcombe who can be contacted on 07955 401315.

Worcestershire Safeguarding Family Front Door service can be contacted on 01905 822666 (For out of hours contact the Emergency Duty Team on 01905 768020).

Local Authority Designated Officer (LADO)*, 01905 846221.

The Children's Commissioner can be contacted on info.request@childrenscommissioner.gov.uk and 02077838330.

Independent listener, Mrs Linde Melhuish, 07967 690412, linde.melhuish@gmail.com

NSPCC whistleblowing helpline - help@nspcc.org.uk

*All references within this policy to LADO refer to the Designated Officer or Team of Officers in the Local Authority. The LADO provides advice and will undertake

investigations into any allegation or suspicion of abuse directed against anyone associated with the school. Worcestershire Children First have also produced a useful guide to LADO services which can be found at <https://www.safeguardingworcestershire.org.uk/wp-content/uploads/2020/07/LADO-A-guide-for-professionals-volunteers-who-work-with-children-1.pdf>

1 Policy statement

1.1 This policy has been authorised by the Local Governing Body ('the Governors') and proprietor of Bredon School ('the School') and is addressed to all members of staff including volunteers, the Governors and the School proprietor. This policy is available to parents on request from the Headmaster's Office and is published on the School website. This policy applies wherever staff or volunteers are working with students even when this is away from the School site on educational visits, activities or excursions.

1.2 This policy was drawn up in accordance with Department for Education guidance issues under section 157 of the [Education Act 2002](#), the [Education \(Independent School Standards\) \(England\) Regulations 2014](#), the [National Minimum Standards for Boarding Schools](#), [Keeping Children Safe in Education September 2024](#), [Children Missing Education: Statutory Guidance for Local Authorities](#), the [Prevent Duty Guidance](#) (* Appendix 1 - Indicator of Vulnerability) and the local inter-agency procedure of [Worcestershire Safeguarding Children's Partnership](#) (referred to hereon as "WSCP").

The School also contributes to interagency working in line with [Working Together to Safeguard Children 2023](#) guidance through effective implementation of the School's safeguarding arrangements and ensuring effective communication with local agencies. This policy also takes account of the School's equality obligations.

1.3 Terms Used within this Policy: In all Bredon School policies, we use the word "parent" to mean parent, guardian, carer or any person in whom is vested the legal duties and responsibilities of a child's primary caregiver.

We use the terms 'must' and 'should' throughout this policy. We use the term 'must' when the person in question is required to do something and 'should' when the advice set out should be followed unless there is good reason not to.

This policy uses the terms 'child' and 'children', which is defined for the purposes of this policy as a person aged under 18, emphasising the prominence of exploitation, adultification and teenage relationship abuse. Under this policy we adopt a wider interpretation of our safeguarding responsibilities so that they apply to all students, regardless of age.

For the purpose of this policy we, in places, use the term 'staff' which includes governors, volunteers and all who are employed by the school.

1.4 The School believes that every student in its care should feel safe and protected from any form of abuse whether through neglect, non-accidental physical injury, sexual exploitation or emotional ill-treatment. The school is also aware of its responsibilities to prevent child on child sexual violence and sexual harassment in all its forms. The School ensures students' spiritual, moral, social and cultural (SMSC) development and actively promotes the fundamental British values of democracy, the rule of law, mutual respect, individual liberty and tolerance of those with different faiths and beliefs through PSHCE/RSE assemblies and the curriculum. As a school we actively challenge behaviours and opinions which are contrary to these values.

The School also ensures that children learn and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, in a safe environment where they can also learn to challenge such ideas. Such topics are addressed in a way that is appropriate to the child's age and understanding, and takes account of any SEN and disabilities the child may have.

We also work with students through PSHCE/RSE assemblies, tutor and House times, the curriculum and other means to help them and their parents understand the importance of safeguarding, cyber safety and the risks associated with internet use and other media. We also raise awareness around topics such as radicalisation, gang affiliation and extreme cultural practices to educate, inform and keep children safe. (Further information can be found on the PSHCE/RSE scheme of work, Relationship and Sex Education (RSE) Policy and the behaviour management policies.)

1.5 The School is committed to safeguarding and promoting the welfare of children and expects all staff (including contractors) to share this commitment.

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

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care plan)
- has a mental health need
- is a young carer
- is showing signs of being drawn in to antisocial or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from education, home or care
- has experienced multiple suspensions, is at risk of being permanently excluded from school
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- is at risk of being radicalised or exploited
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and

alcohol misuse, adult mental health issues and domestic abuse

- is misusing alcohol and other drugs themselves
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child.

Additionally the School will take all reasonable measures to:

- practice safer recruitment in checking the suitability of all staff (including supply teachers, volunteers and contractors) who work with children and ensure that other organisations who provide staff to the School operate appropriate safeguarding checks and procedures, including social media checks, which candidates will be notified of at the point of application. The School's Safer Recruitment Policy can be found on the school website under [Policies](#) and a copy can be provided on written request from the Headmaster's Office.
- carry out all necessary checks on the suitability of the School proprietor and any person serving on the School's Local Governing Body;
- make a prompt and detailed report to the Disclosure and Barring Service where the School ceases to use the services of any person (whether employed, contracted, a volunteer or student) because that person was considered unsuitable to work with children;
- deal promptly and appropriately with every suspicion or complaint of abuse in an open minded, non-judgemental and careful manner;
- protect each student from any form of abuse or harassment, whether from an adult or child-on-child ensuring that students and parents know how and who to contact when needed;
- ensure that students and staff understand the safeguards in place regarding online safety and the potential threat that technology plays through inappropriate access to materials, cyber bullying and sharing of inappropriate or explicit personal content;
- ensure that particular attention is paid to the safeguarding of the female minority in the school and students who may be LGBTQ and the disproportionate vulnerability they may feel;
- be alert to signs of abuse both from within School and from outside, being aware of the wider context where safeguarding concerns can occur; with attention also focussed on those who may be at risk from radicalisation or cultural practices at odds with British values such as forced marriage, child sexual exploitation, child criminal exploitation and female genital mutilation;
- ensure staff understanding and compliance with the relevant policies including the behaviour policy, restraint policy, Staff Code of Conduct and safe working practices.
- ensure that staff at Bredon School are aware that the nature of some of our students means that we need to have a raised awareness of their potential vulnerability. Additional attention is required to ensure that some students clearly understand safeguarding issues.
- ensure that all staff and volunteers are appropriately trained (and receive hard copies of key documentation) at induction and receive updated safeguarding

training throughout their employment on a termly basis.

- ensure that all staff, new staff, volunteers and temporary staff are also made aware of the School's safeguarding and safe working practices, the schools internal Whistleblowing Policy and the NSPCC whistleblowing helpline. All staff need to understand their duty with regard to the Prevent strategy (the EduCare module of which is a mandatory part of staff training) and challenge other cultural practises which conflict with fundamental British values such as intolerance, FGM and forced marriage;
- ensure that DSL and DDSL' receive safeguarding training at least every two years.
- have procedures in place which, so far as possible, ensure that School staff and others who are innocent are not prejudiced by false allegations.
- support children who have been abused in accordance with their agreed child protection plan.
- ensure that children in need and those at risk of harm receive appropriate support.
- ensure that the school has clear arrangements in place to support looked-after students, (previously looked-after children and care leavers) and that they receive appropriate support from staff who have the skills, knowledge and understanding to help keep them safe.
- be alert to the individual needs of children with medical conditions (including those with learning needs and/or disabilities).
- operate robust and sensible health & safety procedures.
- take all practicable steps to ensure that School premises are as secure as circumstances permit.
- ensure staff understand the Supervision of students Policy and the concerns around children missing from education.
- when students attend off site activities, ensure that where staff from another organisation are working with our students, we have received assurances and verified that appropriate child protection checks and procedures apply to those staff.
- operate clear and supportive policies on drugs, smoking, vaping, alcohol and substance misuse which are clearly understood by students, parents and staff
- consider and develop procedures to deal with any other safeguarding issues which may be specific to individual children in our School or in our local area and contribute to inter-agency working as appropriate
- ensure that all visiting speakers are suitably and appropriately supervised at all times in line with Prevent duties.
- ensure where an allegation relating to an incident that happens when an individual or organisation are using the school premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities), as with any safeguarding allegation, the safeguarding policy and procedures, including informing the LADO should be applied.

2 The Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Leads (DDSL)

2.1 The School has appointed a senior member of staff in Miss Charmain Eaton, Deputy Head (Pastoral and Safeguarding) as the DSL. She is supported by a team of DDSL' who are named, with contact details on page 2 of this document. These individuals have the necessary status and authority to be responsible for matters relating to safeguarding, child protection and student welfare. [KCSIE](#) indicates (in Annex C) that these staff are the most appropriate individuals to advise on any safeguarding concerns and are trained to the same standard.

Parents are welcome to approach the DSL and/or DDSL' if they have any concerns about the welfare of any child in the School, whether these concerns relate to their own child or any other. If preferred and as appropriate, parents may discuss concerns in private with the child's Head of House (HoH) or Tutor, the boarder's Houseparent, or the Headmaster Mr Nick Oldham who will notify the DSL in accordance with these procedures.

The School also has a designated Governor for Safeguarding, Mr Stephen Aiano who meets with the appointed members of staff to review this policy and to give guidance on safeguarding and safer recruitment practices.

2.2 The main responsibilities of the DSL is to:

- provide support to staff members to carry out their safeguarding duties;
- maintain an overview of safeguarding within the School;
- be the first point of contact for parents, students, teaching and non-teaching staff and external agencies in all matters of child protection (except where an allegation of abuse involves a member of staff in which case the procedure contained in paragraph 6.7 must be followed);
- co-ordinate the child protection and safeguarding procedures in the School, and will ensure sufficient account of the nature, age range of the school and its students;
- manage referrals of all cases of suspected abuse to Worcestershire Local Authority Designated Officer (LADO) and other external agencies, such as the Disclosure and Barring Service and Police, as appropriate;
- maintain an ongoing training programme for all School employees from induction and throughout their employment;
- monitor the keeping, confidentiality and storage of records in relation to child protection;
- liaise closely with the LADO and other external agencies as appropriate;
- liaise with the Headmaster to inform him of issues such as ongoing police or safeguarding investigations (unless the allegation involves the Headmaster)
- effectively, accurately and confidentially keep a register of all Low-Level Concerns (LLCs) regarding staff. This can be found within the Confide - staff safeguarding system.
- discuss any potential safeguarding issues in line with Worcestershire procedures;
- keep parents informed of action to be taken under these procedures in relation to their child in accordance with paragraph 6.19;

- monitor records of students in the School who are subject to a child protection plan to ensure that this is maintained and updated as notification is received;
- liaise with other professionals to ensure that children who are subject to child protection plans are monitored;
- where appropriate, to take part in the child protection conferences and strategy meetings;
- inform the Children's Social Care Department in writing when a child who is subject to a child protection plan moves to another school and to inform the new school of the child protection plan as advised by the Children's Social Care department;
- monitor the effectiveness of the School's safeguarding policies and procedures in accordance with paragraph 9.2;
- for any Looked-after child (including those previously Looked-After), ensure there is a designated member of staff with responsibility for their welfare and progress;
- ensure, together with the Headmaster and Governors, that all staff receive appropriate training to help them understand the risk of radicalisation and what to do if they have any concerns that a child may be at risk of being drawn into terrorism, radicalisation and/or extremism – see contact details at the end of this policy;
- keep and maintain records of staff training on child protection and safer recruitment procedures; and
- ensure that, where a child leaves the School, the safeguarding / child protection file is copied for any new school or college within 5 days of the student starting, but transferred separately from the main student file.

2.3 The DSL or DDSL' will:

- advise and act upon all suspicion, belief and evidence of abuse reported to them;
- keep the Headmaster informed of actions unless the Headmaster is the subject of the complaint, in which case the procedures at paragraph 6.7 and 6.9 should be followed; and
- liaise with the Worcestershire Safeguarding Department and other external agencies on behalf of the School, as appropriate.

2.4 If the DSL is unavailable, all their duties will be carried out by one of the DDSL'.

2.5 The DSL and DDSL' have undertaken appropriate child protection training and training in inter-agency working and will attend refresher training at two-yearly intervals. In addition, they will attend other such necessary training to enhance the performance of their duties such as relevant updates and other training as advised by the WSCP to enhance the performance of their duties.

In addition to whole staff training at the start of the academic year, all staff are required to complete mandatory online training through EduCare on Safeguarding Young People and The Prevent Duty, amongst others, and to have done this within the period of the

first half term.

3 Safeguarding and Types of Abuse

3.1. Safeguarding: It is important that all staff understand that safeguarding is:

- Protecting children from maltreatment;
- Preventing impairment of children's health or development;
- Ensuring that children are growing up in circumstances consistent with the provision of safe and efficient care; and
- Taking action to enable all children to have the best chances.

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

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and/or alcohol misuse, unexplainable and/or persistent absences from education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk. Below are some safeguarding issues including types of abuse all staff should be aware of.

Additional information on these and other safeguarding issues can be found in Annex B.

3.2. Types of Abuse and Neglect

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

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

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

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

Sexual Abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral abuse) 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 on child.

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

Child-on-Child Abuse: Although we make reference to child-on-child abuse in this policy, Bredon School believes that the sensitive nature and specific issues involved with child-on-child abuse necessitate separate policy guidance which can be requested from the school, where necessary.

The School recognises that children are capable of abusing their peers. Staff will be aware of the harm caused by bullying (including cyber bullying) and will use the School's anti-bullying procedures where necessary, referring to the *Anti-Bullying Policy*. All child-on-child abuse is unacceptable and will be taken seriously. All staff should be able

to reassure victims that they are taken seriously and that they will be supported and kept safe. students should never be given the impression that they are inconveniencing anyone in disclosing abuse, sexual violence or sexual harassment, nor will they be made to feel ashamed for reporting as such. Child-on-child abuse can take many forms, including all the aforementioned, but also including:

Sexual harassment: this can include sexual comments, jokes or online harassment that causes the victim humiliation, discomfort or distress.

Upskirting: Illegal since 2019, this practice typically involves taking a picture under a person's clothing with the intention of viewing genitals or buttocks to obtain sexual gratification and/or cause alarm and distress.

Nudes and semi-nudes (sharing of youth produced sexual imagery (YPSI)): including the pressuring of others to send images of a similar kind.

More information on child-on-child abuse can be found in section 6.18 of this policy and in the Child-on-Child Policy.

Child Criminal Exploitation (CCE): CCE occurs when an individual, or group of individuals, exerts an imbalance of power over another person to manipulate or deceive a child into criminal activity. This imbalance of power can be age-related (most often) but also gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups of any gender, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online. The experience of girls and boys is different when being criminally exploited although both boys and girls involved in CCE are more at risk of sexual abuse and exploitation.

County Lines: A clear form of CCE, County Lines is a term used to describe gangs and organised criminal networks involved in exporting (normally) Class A drugs into one or more importing areas using dedicated mobile phone lines or other form of "deal line". Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence

and kidnap towards victims (and their families) if they attempt to leave the county lines network.

Child Sexual Exploitation (CSE): CSE involves an individual or group of adults taking advantage of the vulnerability of an individual or groups of children or young people, and victims can be of either sex. Children are often unwittingly drawn into sexual exploitation through the offer of friendship and care, gifts, drugs and alcohol, and sometimes accommodation. Sexual exploitation is a serious crime and can have a long-lasting adverse impact on a child's physical and emotional health. A common feature of sexual exploitation is that the child often does not recognise the coercive nature of the relationship and does not see themselves as a victim. The child may initially resent what they perceive as interference by staff, but staff must act on their concerns, as they would for any other type of abuse. Healthy relationships are discussed as part of the PSHCE/RSE curriculum in order to help limit the risk of our students being at risk from CSE.

Honour Based Violence / Female Genital Mutilation: Honour based violence encompasses 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. All forms of HBV are abuse.

FGM is the collective name given to a range of procedures involving the partial or total removal of external female genitalia for non-medical reasons. In England, Wales and Northern Ireland, the practice is a criminal offence under the Female Genital Mutilation Act 2003. The practice can cause intense pain and distress and long-term health consequences, including difficulties in childbirth. FGM is carried out on girls of any age, from young babies to older teenagers and adult women, so school staff are trained to be aware of risk indicators. Many such procedures are carried out abroad and staff should be particularly alert to suspicions or concerns expressed by female students about going on a long holiday during the summer holiday period. Whilst all staff should speak to the DSL (or deputy) with regard to any concerns about FGM, there is a specific legal duty on teachers.

If a teacher during the course of their work in the profession discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police and the DSL.

A forced marriage is a marriage in which a female (and sometimes a male) does not consent to the marriage but is coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse. In England and Wales, the practice is a criminal offence under the Anti-Social Behaviour, Crime and Policing Act 2014. School staff receive training and are alert to suspicions or concerns raised by a student about being taken abroad and not being allowed to return to England. Staff should immediately report a suspected forced marriage to the DSL.

Mental Health: All staff should be aware 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. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Bredon School has employed a mental health practitioner who offers a range of advice and support to help them identify children in need of extra mental health support, this includes working with external agencies.

If staff have a mental health concern about a child that is also a safeguarding concern, all concerns must be reported immediately to the DSL or DDSL and logged on to MyConcern.

Serious Violence: All staff are made aware of indicators which may signal that 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. All staff are made aware of risk factors which include 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. Further information on gangs and youth violence is available from the Home Office. All concerns should be reported immediately to the DSL.

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

4 Signs of Abuse

4.1 Indicators of abuse and neglect: The possible signs of abuse include (but are not limited to):

- the student says s/he has been abused or asks a question which gives rise to that inference;
- there is no reasonable or consistent explanation for a student's injury; the injury is unusual in kind or location; there have been a number of injuries; there is a pattern to the injuries;
- the student's behaviour stands out from the group as either being extreme model behaviour or extremely challenging behaviour; or there is a sudden change in the

- student's behaviour;
- indicators of extreme views such as radicalism and racism.
 - the student asks to avoid contact with a particular member of staff and appears reluctant to discuss the reasons;
 - the student's development is delayed;
 - the student loses or gains weight or presents with self-harm or eating disorders;
 - the student appears neglected, e.g. dirty, hungry, inadequately clothed;
 - the student is reluctant to go home, or has been openly rejected by his/her parents or carers.
 - the student is often missing from school without reasonable explanation. Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines.

The above are only possible indicators of abuse and not in themselves proof that abuse has occurred.

Any member of the school community may access some useful information on the [NSPCC](#) website on signs, symptoms and effect of abuse. As a school we are looking for the early signs of abuse and/or neglect.

4.2 SEN and Disability: All staff need to be alert to the specific needs of those students who have special educational needs and/or disabilities, including young carers. The school recognises that extra pastoral support may be necessary, along with ensuring any appropriate support for communication is in place. Further information regarding this can be found in Part Two of [KCSIE](#).

4.3 Children who are Lesbian, Gay, Bisexual, or Gender questioning (N.B. This section remains under review, pending the outcome of the gender questioning children guidance consultation, and final gender questioning guidance documents being published): The school recognises that a child being lesbian, gay, or bisexual is not in itself an inherent risk factor for harm, however, they can sometimes be targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who are.

However, the Cass review identified that caution is necessary for children questioning their gender as there remain many unknowns about the impact of social transition and children may well have wider vulnerabilities, including having complex mental health and psychosocial needs, and in some cases additional diagnoses of autism spectrum disorder and/or attention deficit hyperactivity disorder.

It recommended that when families/carers are making decisions about support for gender questioning children, they should be encouraged to seek clinical help and advice. When parents are supporting pre-pubertal children, clinical services should ensure that they can be seen as early as possible by a clinical professional with relevant experience.

As such, when supporting a gender questioning child, the school should take a cautious approach and consider the broad range of their individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying. Further information can be found in Part Two of [KCSIE](#).

4.4 Child in Need: the School recognises that there may be children who, whilst not suffering harm or at immediate risk, require additional support from external agencies. Where appropriate, the School may consult with the child concerned and their parents regarding a referral to external agencies (such as children's social care). This may lead to a written plan to support a child in need being drawn up or an early help assessment, such as the Common Assessment Framework, being carried out. In either case, the School will liaise and take advice from external agencies as appropriate.

4.5 Prevent Duty: Under the Counter-Terrorism and Security Act 2015, the School must have due regard to the need to prevent students from being drawn into terrorism. The School recognises that students may be at risk of being drawn into terrorism and as such, carries out appropriate risk assessments (following consultation with local partners, such as the Police) of the potential risk in the local area. Such risk assessments are discussed with the Governor responsible for Safeguarding to ensure the School's safeguarding arrangements are sufficiently robust to help prevent and protect children from being drawn into terrorism and regularly revised. Staff are trained on an annual basis by the DSL, external agencies and via EduCare modules on the risk of radicalisation and contemporary trends in this area.

5 School employees, governors, volunteers and senior students

5.1 Duty: Every employee of the school, volunteer or Governor is under a general legal and moral (as well as personal and professional) duty to:

- protect children from abuse;
- be aware of the School's child protection procedures and to follow them;
- know how to access and implement the procedures, independently if necessary;
- keep a sufficient record of any significant complaint, conversation or event;
- report any matters of concern to the DSL or one of the DDSL'.

5.2 Training: Every new member of staff will be provided with induction training that includes:

- the School's Safeguarding Policy, information on Children Missing Education and School's Behaviour Management Policy, the link for which (and all other statutory policies) is as follows: [Bredon School Policies](#)
- the identity of the DSL and DDSL's
- the Staff Code of Conduct for teaching and support staff.
- how to identify children at risk, including risk of radicalisation, FGM, forced

marriage and other extreme cultural practises.

- the schools Whistleblowing Policy and Procedures and alternative whistleblowing routes outside the school such as the NSPCC.

All staff will be required, as part of their induction or refresher training, to read a copy of Part 1 and annex A of [KCSIE](#), and sign to indicate attendance at safeguarding training as well as complete a knowledge checker quiz to ensure understanding of the content. This record will be held by the DSL who will also require governors to complete the knowledge checker as part of their duties.

All staff including contractors and the Headmaster will also receive regular safeguarding training, updates and refreshers in line with WSCP advice. In agreement with WSCP, such training is updated annually but with additional termly updates on changes to legislation and current concerns.

The School will also ensure that all staff with care of children (including new staff as part of their induction) receive appropriate training on preventing people from becoming drawn into terrorism and extremist views so as to provide staff with the knowledge and confidence to identify children at risk and to challenge ideas which can be used to legitimise terrorism. Such training will be updated as appropriate.

Members of the governing body also receive training on Safe Recruitment and The Prevent Duty, as a matter of course.

5.3 Whistleblowing: (see the School's Whistleblowing Policy which can be found in the School Handbook, and also on the website). All staff are required to report to the Headmaster, or the nominated School Safeguarding Governor in the Headmaster's absence, any concern or allegations about School safeguarding practices (including concerns about poor or unsafe practice and potential failings in the School's safeguarding regime) or the behaviour of colleagues which are likely to put students at risk of abuse or other serious harm. This latter may be dealt with in accordance with the School's Managing Allegations of Abuse against Staff procedure (see 6.7 below). There will be no disciplinary action taken against a member of staff for making such a report provided that it is done in good faith. Staff have the choice of which Designated Safeguarding Lead to contact or can choose to contact the Worcestershire Social Services or the NSPCC whistleblowing helpline.

6 Procedures

6.1 Initial disclosure/complaint: A member of staff suspecting or hearing a disclosure or complaint of abuse must:

- listen carefully to the child and keep an open mind. Staff should not take a decision as to whether or not the abuse has taken place;
- not ask leading questions, that is, a question which suggests its own answer;
- reassure the child but not give a guarantee of absolute confidentiality. (all staff

must be mindful that the overriding consideration must be the interests of the child. For this reason, absolute confidentiality cannot and should not be promised to anyone.) The member of staff should explain that they need to pass the information in order to help;

- keep a sufficient written record of the conversation. The record should include the date, time and place of the conversation and the essence of what was said and done by whom and in whose presence. The record should be signed by the person making it and should use names, not initials. The record must be kept securely and handed to the DSL or a DDSL as soon as possible and record the action taken. A record of a conversation containing a disclosure or concern is required to be submitted through MyConcern;

be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. When responding to a child, staff must take into account the age, level of understanding, language, cultural or communication difficulties the child has and determine how best to build trusted relationships with children which facilitate communication.

6.2 Preserving Evidence: All evidence (for example, scribbled notes, mobile phones containing text messages, clothing, computers), must be safeguarded and preserved.

Where a potentially illegal image(s) is/are found on a device, it/they must not be forwarded or copied, but wherever possible the device confiscated until further investigation by external agencies. If this is not possible, a written description of the image(s) must be kept.

6.3 Reporting: All suspicion or complaints of abuse must be reported immediately to the DSL, or if the complaint involves this person, to the Headmaster. Details of procedures for reporting allegations against members of staff are given in paragraph 6.7. However anyone (staff, parents, student or member of the public) may share their concerns directly with external agencies such as children's social care or the NSPCC if preferred. Where the suspicion or complaint is in relation to terrorism or extremism ideas involving a student, staff must firstly raise this with the Headmaster or Designated Safeguarding Lead without delay.

6.4 Where the level of risk is such that there is an immediate risk of harm or staff have a genuine concern that there is an immediate risk of harm, any member of staff may make a referral directly to children's social care or the Police.

6.5 Parent Concerns: Parents who have concerns about suspected abuse or neglect may also approach one of the Designated Safeguarding Leads, a student's Personal Tutor,

House Master / House Mistress, member of the boarding staff or the Headmaster who will ensure such concerns are dealt with in accordance with this policy. Parents should also make a referral directly to children's social care or the police where they have concerns that there is a risk of immediate serious harm.

6.6 Action by the DSL: The action to be taken will take into account:

- the local inter-agency procedures of WSCP;
- the wishes of the student concerned (taking into account the student's maturity and understanding) provided they have been properly informed and consulted. Circumstances may arise where the student's wishes need to be overridden;
- the parent's wishes, provided informing the parents do not put the student at risk and they have no interest which would conflict with the student's best interests;
- the nature and seriousness of the suspicion or complaint. A complaint involving a serious criminal offence will always be referred to the Children's Social Care Department and reported to the Police;
- confidentiality for those involved or reporting, so far as applicable.

If there is room for doubt as to whether a referral should be made, the DSL should consult with the WSCP (Family Front Door service) on a no names basis without identifying the family. However, as soon as sufficient concern exists that a child may have suffered significant harm or is at risk of significant harm, a referral will be made promptly (and in any event within 24 hours). If the initial referral is made by telephone, the Designated Person will confirm the referral in writing to Children's Social Care Department within 24 hours and ensure the referral is followed up if no response or acknowledgment is received within two working days using the WSCP Referral Form.

Any member of staff who has concerns that a child's situation does not appear to be improving should press for reconsideration of the matter. The School's Whistleblowing Policy should be used in the instance a member of staff is not satisfied with the actions taken by the DSL.

The School will not do anything that may jeopardise any external investigation. Once the matter has been referred, all further responsibility for gathering information and deciding what happens next will rest with social services and the Police.

With regard to the Prevent Duty, the School will cooperate with Channel panels and the Police while assessments are being undertaken.

6.65 External agencies: Whether or not the School decides to refer a particular complaint to the Children's Social Care Department or the Police, the parents and student will be informed of their right to make their own complaint or referral to the Children's Social Care Department or the police and will be provided with contact names, addresses and telephone numbers, as appropriate, subject to 6.20. Boarders and their parents have access to a complaints procedure in relation to issues affecting their welfare which provides contact details for ISI, the Children's Rights Commissioner and the WSCP.

6.7 Allegations against staff (including the Headmaster and Safeguarding Leads) and volunteers: Every staff member has a responsibility to ensure safe working practices and that their behaviour and actions do not place students or staff at risk of harm or of allegations of harm to a student (see the Staff Code of Conduct for further information). The School's procedures for dealing with allegations against any staff member (and volunteers who work with children) aims to strike a balance between the need to protect children from abuse and the need to protect staff and volunteers from vexatious allegations. The School will make every reasonable effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered. The School will liaise with the LADO, police and social services as to the appropriate way to manage confidentiality. The School's procedures for managing allegations against any staff member or volunteer follows WSCP arrangements and apply when staff, including volunteers, have (or are alleged to have):

- Behaved in a way that has harmed a student, or may have harmed a student;
- Possibly committed a criminal offence against or related to a student; or
- Behaved towards a student in a way that indicated that they would pose a risk of harm if they were to work regularly or closely with children
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children (includes behaviour that may have happened outside of school, known as transferable risk)

Where an allegation or complaint is made against any member of staff (including, cover, supply or volunteer staff), other than the Headmaster, the matter should be reported immediately to the Headmaster, or in his absence, the Governor responsible for safeguarding whilst keeping the Headmaster informed. All concerns or allegations about a member of the local advisory board should be directed to the Cavendish Governor responsible for safeguarding.

The Headmaster (or Governor with responsibility for safeguarding) will then immediately, and in any event within one working day, inform the LADO of all allegations which appear to meet the above criteria or that are made directly to the police. If, at any point, there is a risk of immediate serious harm, immediate intervention by social services and/or the police will be required and sought. The Headmaster will discuss the matter with the LADO and where necessary, the LADO will obtain further details of the allegations and the circumstances in which the allegation was made. The School will act in accordance with advice given by the LADO and will not investigate allegations or inform any individuals without the LADO's consent. The Headmaster (or Governor with responsibility for safeguarding) will keep a written record of discussions with the LADO.

Allegations against a member of staff who is no longer at the School (including historical allegations) should be referred to the Police.

- The School recognises it has a duty of care to staff but may take action in the event of allegations against staff in accordance with its disciplinary procedures. The School will ensure support is in place for individuals facing an allegation and a representative will be appointed to keep the individual informed of progress of the case and to consider what other support is available and appropriate for the individual.

6.75 Low-Level Concerns (LLC's): In accordance with KCSIE, if staff have a safeguarding concern or an allegation about another member of staff (including supply staff, volunteers or contractors) that does not meet the harm threshold - ie, a 'low-level concern' - then this should be shared in accordance with the school's Low-Level Concern Policy.

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

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

Where a low-level concern arises about anyone working in the school, including supply teachers, volunteers, contractors and employees working across more than one school, it must be shared confidentially with the school's Headmaster by making an entry in the Confide facility on the Safeguarding Company platform, verbally or via email (for external personnel). This should be done within 24 hours of the low-level concern arising.

The sharing of a low-level concern must always be understood as a neutral act.

The record of low-level concerns on Confide are formally reviewed by the DSL and the Headmaster at least weekly. The Headmaster is the ultimate decision maker in respect of all low-level concerns, although it is recognised that the Headmaster may wish to consult with the DSL and take a more or less collaborative decision making approach, depending on the nature of some low-level concerns and / or the role of the DSL.

Low-level concerns about supply staff and contractors are notified to their employers by the DSL.

Exceptions to the above:

- Where a low-level concern arises about the DSL, a DDSL or a member of SLT (including the Headmaster), it must not be entered on Confide - rather it must be reported to the Cavendish Education Compliance Director using the form at Annex A (Can be found in the Low-level Concerns Policy). All such reports are considered and acted upon immediately by the Compliance Director with the Group Managing Director.
- Where a low-level concern arises about a group-level employee of Cavendish Education, including Directors, it must not be entered on Confide - rather it must be reported to the Cavendish Education Chairman using the form at Annex A (Can be found in the Low-level Concerns Policy). All such reports are considered and acted upon by the Chairman supported by appropriate external professionals.

If the Headmaster, the Compliance Director or the Chairman is in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, they consult with the relevant LADO.

As appropriate, the Headmaster, the Compliance Director or the Chairman review low-level concerns to identify potential patterns of inappropriate, problematic or concerning behaviour. Where a pattern of such behaviour is identified, the Headmaster, the Compliance Director or the Chairman decides on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a low-level concern to meeting the harm threshold, in which case it is referred to the relevant LADO. They also consider whether there are wider cultural issues within the school that enabled the behaviour to occur and whether appropriate policies should be revised, or extra training delivered to minimise the risk of recurrence.

The reporting of LLCs is important to create a culture where all concerns are shared appropriately with the correct member of staff, and are recorded with a sensitive and proportionate response. Self-referral can also avoid misinterpretation, and allows staff to reflect on their practice.

Clarity around professional boundaries (clearly stated in the Staff Code of Conduct) and the obvious benefit to our students in minimising the risk of abuse are also at the forefront of our LLC approach.

Instances which may be defined a Low Level Concern could be, but are not limited to, the following:

- being over friendly with students
- having favourites
- contacting (even inadvertently) students on a personal device
- taking photographs of children on their mobile phone, contrary to school policy
- one-to-one contact with a student in a secluded area or behind a closed door
- inappropriate use of language (e.g. humiliating students, swearing)

Accountability and good practice are at the forefront of Bredon School's approach which can also be observed in our LLC Policy and other relevant staff policies and procedures.

6.8 Records and References: Details of allegations that are found to have been malicious will be removed from personnel records. However, for all other allegations the School will keep clear, comprehensive and confidential records of any allegation made against staff including the action taken and decisions reached. A copy will only be provided to the individual concerned following consultation with appropriate agencies and when agreement has been reached as to what information can be disclosed. Allegations proven to be false, unsubstantiated or malicious will not be included in employer references. As a general rule, LLC's will ordinarily not be included in a reference.

6.9 Allegations against the Headmaster: Where an allegation or complaint is made against the Headmaster or the DSL, the person receiving the allegation should immediately inform the Governor with responsibility for safeguarding without first notifying the Headmaster or DSL. Any such allegation will be discussed with the LADO before further action is taken.

6.10 Allegations against the Chairman and Governors: Where an allegation or concern is made against a Governor (including the Chair of Governors), the person receiving the allegation should immediately inform the Headmaster without first notifying the person subject of the allegation or concern. Any such allegation will be discussed with the LADO before action is taken.

6.11 Suspension: Suspension will not be an automatic response to an allegation but will be considered where the circumstances warrant it. Where suspension is being considered, the LADO should be consulted so that full consideration can be given to all the options, subject to the need to ensure:

- the safety and welfare of the students or student concerned;
and
- the need for a full and fair investigation.

If suspension is deemed appropriate, the reasons and justifications will be recorded by the school and the individual will be notified of the reasons usually within one working day. If a member of residential staff is suspended pending a child protection investigation, the School will make arrangements for alternative accommodation outside the school, away from children until the allegation or concern is resolved.

6.12 Unfounded or malicious allegations:

- Where an allegation by a student is shown to have been deliberately invented or malicious, the Headmaster will consider whether to take disciplinary action in accordance with the School's behaviour and disciplinary policy.

- Where a parent has made a deliberately invented or malicious allegation, the Headmaster will consider (in accordance with the School's terms and conditions) whether to require that parent to withdraw their child or children from the school on the basis that they have treated the school or a member of staff unreasonably.
- Whether or not the person making the allegation is a student or a parent (or other member of the public), the School reserves the right to contact the Police to determine whether any further action might be appropriate.

6.13 Ceasing to use staff: If the School ceases to use the services of a member of staff, a Governor or volunteer (whether employed, contracted, a volunteer or student), a Governor or volunteer for regulated activity and the DBS referral criteria is met (that is, they have caused harm or posed a risk of harm to children) because they are unsuitable to work with children, a prompt and detailed report will be made to the DBS. A settlement agreement will not be appropriate where a referral is made to the DBS.

All reports to the DBS will be followed by an internal review of the School's safeguarding procedures with a report being presented to the Governing body. Where a dismissal does not reach the threshold for a DBS disclosure, the School will consider whether to make a referral to the Teaching Regulation Agency (TRA) as well as referral to DBS where a teacher has been dismissed (or would have been had they not resigned) and a prohibition order may be appropriate because of unacceptable professional conduct, conduct that may bring the profession into disrepute, or a conviction at any time for a relevant offence. It is important to note here that a referral to the TRA regarding a teacher's professional conduct with regards to matters other than safeguarding, for example dereliction of their academic duties, may not result in DBS involvement.

6.14 Resignation: If a member of staff (or a Governor or volunteer) tenders his or her resignation, or ceases to provide his or her services, any child protection allegations will still be followed up by the School. Resignation will not prevent a prompt and detailed report being made to the DBS in appropriate circumstances. The School will never enter into settlement agreements with a member of staff when an allegation has been made, regardless of whether a member of staff cooperates or refuses to cooperate with an investigation.

The name, address and telephone number of ISI are displayed in prominent places around the school.

ISI address: CAP House, 9-12 Long Lane, London, EC1A 9HA. info@isi.net 02076000100

6.16 Staff Guidance: (see also the Staff Code of Conduct) Detailed guidance is given to staff to ensure that their behaviour and actions do not place students or themselves at risk of harm or of allegations of harm to a student. This guidance is contained in the Staff Handbooks. The School's policy on physical restraint is also included in the Behaviour Management Policy, which is available on the School website. A copy of this can also be made available to parents on request to the Headmaster's office.

6.17 Allegations against students: Children may be harmed by other children, child-on-child abuse, an area highlighted in [KCSIE](#) in paragraphs 32-35, inclusive. A bullying incident will be treated as a child protection concern where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. There may also be occasions when a student's behaviour warrants a response under these procedures rather than the School's Behaviour Management Policy and Exclusions Policy. Where abuse may be child-on-child and a student against whom an allegation of abuse has been made, may be excluded from school during the investigation (for further information see the schools Child-on-Child Abuse Policy and Exclusions Policy, respectively).

The school will take advice from the WSCP on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all students involved including the victim and alleged perpetrator / perpetrator. If it is necessary for a student to be interviewed by the police in relation to allegations of abuse, the school will ensure that, subject to the advice of the WSCP or the Police, parents are informed as soon as possible and that the students involved are supported during the interview by an appropriate adult and until the investigation is completed.

In the case of students whose parents are abroad, guardian will be requested to provide support to the student and to accommodate the student if an exclusion is necessary during the investigation. Confidentiality will be an important consideration for the School and advice will be sought as necessary from the WSCP or Police as appropriate.

6.18 Child-on-Child Abuse: All staff should be aware that children are capable of abusing their peers and the many forms it may take, both in and out of school and in person or online. All staff should be clear about the procedures to follow if they suspect this is happening. Even if not overt (or not reported), this does not mean that it is not happening. Any staff who suspect that child-on-child abuse is occurring should speak to the DSL or one of their DDSL'.

The information in this section closely links to that in Section 3.2 (Types of abuse and neglect):

- allegations of child-on-child abuse will be recorded, investigated and dealt with as with any other form of abuse.
- victims, alleged perpetrators or perpetrators and any other child affected by child-on-child abuse will be supported with consideration with the safety of each child considered as the paramount concern.
- we believe that abuse is abuse and should never be tolerated or passed off as "banter", "just having a laugh", "boys being boys" or "part of growing up". This creates an unacceptable and unsafe culture, normalising these behaviours and making it unlikely such abuse is not reported.
- we recognise the gendered nature of child-on-child abuse (i.e. that it is more likely that girls will be victims and boys perpetrators), but that all child-on-child

abuse is unacceptable and will be taken seriously. We also recognise that LGBT students may also be vulnerable to abuse due to their individualised circumstances.

- we recognise that physical abuse may take many forms such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm.
- we recognise that sexual abuse may take many forms including coercive behaviour through to harassment and sexual activity without consent (forcing someone to strip, touch themselves sexually or engage in sexual activity with a third party, and that these can happen in existing intimate relationships (and that this can also happen in an online setting).
- initiation/hazing type violence and rituals are unacceptable, open to abuse and not allowed at Bredon school.
- sharing of nude and semi-nude imagery is a complex problem and the school will look at each case individually to support students, looking for coercion, level of vulnerability and the fallout from this activity. The use of technology is a concern and the school recognises the evolving nature of the threat it presents to our students. Parents and carers are kept updated with contemporary trends and supported through a half-termly newsletter from the DSL. This guidance is taken from the UKCIS guidance on [Sharing Nudes and Semi-Nudes](#).

Where any concern(s) or allegation(s) indicate(s) that indecent images of a child or children may have been shared online, the DSL will consider what urgent action can be taken in addition to the actions and referral duties set out in this policy, and other relevant policies, and seek specialist help in preventing the images spreading further and removing the images from the internet. Under no circumstances should any member of staff ask to view the images / video's / digital media etc. In addition and as stated in the government's [Sharing nudes and semi-nudes: how to respond to an incident \(Overview\)](#), all staff must:

- Never view, copy, print, share, store or save the imagery yourself, or ask a child to share or download – this is illegal.
- If the imagery has been viewed by accident (e.g. if a child/young person has shown it to them before they could ask them not to), this must be reported to the DSL (or equivalent) and seek support.
- Not delete the imagery or ask the child/young person to delete it.
- Not ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL (or equivalent).
- Not share information about the incident with other members of staff, the child/young person(s) it involves or their, or other, parents and/or carers.
- Not say or do anything to blame or shame any child/young people involved.
- Explain to the child/young person that the incident will need to be reported and reassure them that they will receive support and help from the DSL (or equivalent).

[The Internet Watch Foundation \(IWF\)](#), for example, has a trained team that can evaluate

and remove illegal images from the internet when the images are reported to them quickly. They will also share the image with the National Crime Agency's Child Exploitation and Online Protection (CEOP) Command to facilitate an investigation. Any report to IWF will be made in consultation with the police.

6.18.1 Early Help: In line with managing internally, the school may decide that the children involved in child-on child abuse do not require referral to statutory services but may benefit from early help. Early help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. Providing early help is more effective in promoting the welfare of children than reacting later. Early help can be particularly useful to address non-violent harmful sexualised behaviour and may prevent escalation of sexual violence. It is particularly important that the DSL and DDSL's know what the local early help process is and how and where to access support.

6.19 Suspected harm from outside the School: A member of staff who suspects that a student is suffering harm from outside the School should seek information from the child with tact and sympathy using 'open' and not leading questions. A sufficient record should be made of the conversation which should be referred to the DSL or a DDSL as soon as possible. Staff should be aware of any children at potential risk of FGM or forced marriage or other extreme cultural practices. It is important that all staff are aware of the potential wider context of any safeguarding concerns and are able to look beyond the school environment.

6.20 Reporting kinship allegations involving the Headmaster, DSL / DDSL: Bredon School acknowledges the presence of students who are related to either the Headmaster or the DSL and DDSL. In order to ensure a secure environment where all staff members can confidently report safeguarding concerns without bias, the following procedure has been established:

- **Headmaster's Child / children Safeguarding Concerns:** If a safeguarding concern arises in relation to the child of the Headmaster, staff members should promptly and verbally report the concern to the DSL in the initial stage.
- **DSL / DDSL's Child/Children Safeguarding Concerns:** If a safeguarding concern arises regarding the child or children of the DSL / DDSL, staff members should immediately and verbally communicate the concern to the Headmaster as the first step.

6.20 Missing child procedures: Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines.

All staff are informed of the separate procedure to be used for searching for, and if necessary, reporting, any boarder or day student missing in school. Refer to the *Internal Missing Child Procedure for Registration and Lessons* for more information. The procedure

includes the requirement to record any incident using the MyConcern safeguarding reporting system, and must include the time stated actions to be taken (including any reports made to social services and/or the Police) and the reasons given by the student for being missing.

6.21 Informing parents: Parents will normally be kept informed as appropriate of any action to be taken under these procedures. However, there may be circumstances when the DSL or a DDSL will need to consult the WSCP before discussing details with parents.

7 Secure school premises

7.1 School premises: The School will take all practicable steps to ensure that School premises are as secure as circumstances permit.

7.2 Visitors: All visitors to the school are required to sign in at Reception in Pull Court. Their picture and personal details are taken (car reg etc) and they are issued with a visitor's lanyard (blue) and badge stating their name and containing their picture. They will be escorted whilst on School premises by a member of staff (wearing a maroon lanyard) and required to wear the blue lanyard at all times. DBS checked contractors will have a green lanyard and go through the same procedure.

7.3 Boarding Houses: All visitors to the houses during Reception's working hours are required to sign in at Reception in Pull Court. All visitors outside of these times (parents dropping off out of hours/after Exeat weekends etc) to houses must report to the house staff on duty immediately on arrival, and must expect to be kept under sufficient staff supervision during their visit.

7.4 Photography and mobile phones: Whilst the School asks permission from all parents whether to allow their child to be photographed, no visitor or member of staff should photograph or film any student at the School without permission from the Headmaster. Staff will not use personal mobile phones to contact parents or students and will ensure their personal mobile phones are kept safely away from children. Staff will ensure that only school equipment is used and images or recordings are downloaded within 24 hours. For residential trips the School would expect the same time scales to be observed upon return to school. When outdoors or away from school staff may use their personal phones to contact medical staff in an emergency. Junior School parents will be requested not to use mobile phones when dropping off and collecting their children.

7.5 Internet security/online safety: The School operates a robust policy with regards to devices that are connected to the network, and a BYOD login is required from the IT manager. In addition to this, an effective "Smoothwall" content filter is permanently in place 24 hours a day, with the DSL and DDSL's receiving instant alerts if an attempt is made to breach the filter. There is also a monitoring system from the same provider which is effective in combating non-disclosures. Student Chromebooks do not allow connection to any other Wifi sources other than the School's in line with the group Google policy. For more information on student mobile device use, see the *Behaviour*

Management Policy and the *Welcome to Bredon* document available to all students.

All staff are informed about the Smoothwall filtering and monitoring system. Additionally, designated personnel, including the DSL and DDSLs, and the IT manager, will receive training on the utilisation and functionalities of the system.

The DSL takes lead responsibility for understanding the filtering and monitoring systems and processes in place.

All staff are made aware of the Smoothwall filtering and monitoring system. The DSL, DDSL's and the IT manager receive training on how to use the system and its functionality.

The School has an effective approach to online safety which protects and educates students and staff in their use of technology taking into consideration the four categories of risk:

Content: being exposed to illegal, inappropriate or harmful material such as pornography, fake news, racist or radical and extremist views;

Contact: being subjected to harmful online interaction with other users such as commercial advertising as well as adults posing as children or young adults;

Conduct: personal online behaviour that increases the likelihood of, or causes, harm such as making, sending and receiving explicit messages (eg consensual and non-consensual sharing of nudes and seminudes and/or pornography) or online bullying.

Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams.

students are educated through the PSHCE programme, regular tutorials and assemblies and parents are updated by the DSL on a half-termly basis as to contemporary issues regarding online safety.

7.6 CCTV: In order to help keep our community safe, CCTV is installed at various locations on the school site. The feed and all data for the CCTV is stored securely within the Bursar's office, and can only be accessed by members of SMT, in certain circumstances. The school recognises that CCTV not only acts as a deterrent to undesirable behaviour, but also as an effective tool in combating non-disclosures after incidents have occurred.

8 Confidentiality and information sharing

8.1 Confidentiality and information sharing: The School will keep all child protection records confidential, allowing disclosure only when required by law and/or anywhere

information needs to be shared in order to safeguard and promote the welfare of children and taking into account the School's obligations under the Data Protection Act 2018. It is clear that the GDPR compliance cannot stand in the way of safeguarding children. The School will co-operate with the Police and Children's Social Care departments to ensure that all relevant information is shared for the purposes of child protection investigations under section 47 of the Children Act 1989 and in accordance with the requirements of [Working Together to Safeguard Children 2023](#).

8.2 It is important that governing bodies and proprietors are aware that among other obligations, the Data Protection Act 2018, and the UK General Data Protection Regulation (UK GDPR) place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure. See ICO guidance 'For Organisations' which includes information about obligations and how to comply, including protecting personal information, and providing access to official information.

In addition, see the DfE Data Protection guidance for schools Data protection in schools - Guidance - GOV.UK (www.gov.uk) which will help school staff and governors to understand how to comply with data protection law, develop data policies and processes, know what staff and student data to keep and follow good practices for preventing personal data breaches.

8.3 Allegations against staff: Where allegations have been made against staff, the School will consult with the LADO and, where appropriate, the police and social services to agree the information that should be disclosed and to whom. Residential staff would be supported to move off site during the period of an investigation.

9 Monitoring

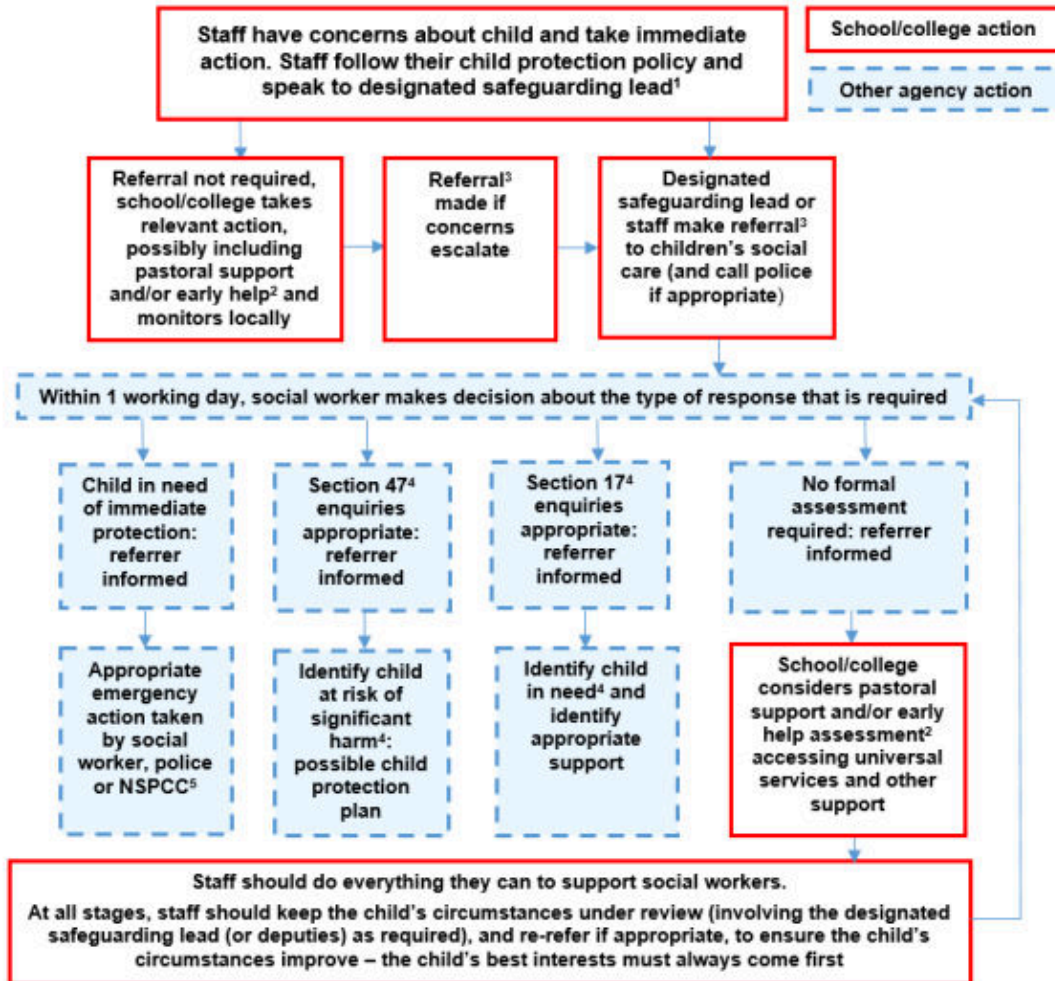
9.1 Incidents: Any child protection incidents at the School will be followed by a review of the safeguarding procedures within the School and a report to the Governors of Bredon School. Where an incident involves a member of staff, the LADO will assist in this review to determine whether any improvements can be made to the School's procedures or practices to help prevent similar events in the future.

9.2 Review: In addition, the DSL and Deputies will monitor and keep under review this policy and other relevant procedures to ensure they meet statutory obligations and relevant guidance and will make an annual report to the Governors and proprietor of Bredon School.

9.3 Governing Body: The Governors will undertake an annual review of this policy and also review how their duties under it have been discharged. The Governors will ensure that any deficiencies or weaknesses in regard to child protection arrangements at any time are remedied without delay and if needed, the policy reviewed.

Appendix 1 - Flowchart used in the case of an external referral (KCSIE 2024)

Actions where there are concerns about a child



¹ In cases which also involve a concern or an allegation of abuse against a staff member, see Part four of this guidance.

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

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

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

⁵ This could include applying for an Emergency Protection Order (EPO).

Appendix 2 – Stop Abuse Together (gov.uk resource)

[Stop Abuse Together](#)

If you're concerned about a child in your care, you should follow your organisation's safeguarding procedures. You can find more advice in our [keeping children safe in education guidance](#).

If you are a professional working with children, you can sign up to the [Thinkuknow professional network](#) to get the latest resources and support on tackling child sexual abuse and child sexual exploitation.

The [Centre of expertise on child sexual abuse](#) offers evidence-based practice resources for professionals and can provide training and development courses online and in-person. Their [Signs and Indicators](#) template* can help you identify and respond to concerns of child sexual abuse with confidence. You can also visit the [NWG Network](#) for training and advice.

You can also read The Children's Society [Guidance for professionals](#) on how to respond when children share experience of sexual harassment and abuse.

You can find more information about teaching students the knowledge they need to recognise and report abuse in the [relationships, sex and health education statutory guidance](#).

*Please note with caution that the CoEoCSA site says that “the [Signs and Indicators](#) template is designed to inform practice, rather than determine decision-making. The [Signs and Indicators](#) template is not a risk assessment tool, substitute for further observation or for directly communicating with children and their families”.

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Approved



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