



Cumnor House Sussex

Safeguarding & Child Protection

Policy and Procedures

A Whole-School policy including the EYFS

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| Developed by: | Paula Talman Director of Compliance, Health and Welfare & DSL |
| Approved by: | Fergus Llewellyn Headmaster & DDSL |
| Implemented: | January 2011 |
| Last reviewed: | October 2020 |
| Next review: | September 2021 |
| Any Changes made to this policy are highlighted in yellow. Previous Safeguarding Policies are saved in the archives folder. | Please read the entire policy as a number of changes have been made |
| All staff must sign a safeguarding form following each annual policy review. The form will be placed in your pigeon hole and must be returned to the DSL | DSL (Y1-Y8) Paula Talman & Matt Mockridge DSL (EYFS) Jane Sykes Deputy DSL: Fergus Llewellyn Ben Chapman Louise Hackett & Kayleigh Widdows (EYFS) |
| Reviewed by the main board of Governors and signed by the Chairman annually. Last Review: | Main Board 2019 |
| Next review | Main Board Dec: 2020 |
| Contacts Required for this working document: | |
| SPOA 01323 464222 (1st Point of Contact for all referrals East and West of County) spoa@eastsussex.gov.uk | |
| MASH/DAT WEST 01323 747373 MASH/DAT EAST 01424 724144 Emergency Duty Service (EDS) 01273 335905/335906 | |
| LADO https://www.eastsussex.gov.uk/childrenandfamilies/professional-resources/lado/ | |

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Monitoring and review:

This policy is subject to continuous monitoring, refinement and audit by The Director of Compliance, Health and Welfare and The Headmaster.

Designated Safeguarding Leads (DSL):

DSL - Paula Talman (Dir. Compliance Health & Welfare) & **Matt Mockridge** (Deputy Head & Bursar) responsible for Yr1-Yr8. **Jane Sykes** responsible for the EYFS (Nursery and Reception)
Deputy DSL- Fergus Llewellyn (Headmaster) & **Ben Chapman** (Assistant Head)
Deputy DSL EYFS- Louise Hackett (Nursery) and **Kayleigh Widdows** (Class Assistant)

In the absence of the DSL the DDSL will cover the activities of this role.

The Board of Governors will undertake a full annual review of this policy and procedures, inclusive of its implementation and the efficiency with which the related duties have been discharged, or earlier if significant changes to the systems and arrangements take place, or if legislation, regulatory requirements or best practice guidelines so require.

All staff will be informed of the update/reviewed policy and it is made available to them in either a hard copy or via the school intranet.

Introduction

This policy has been developed in accordance with the principles established by the Children Act 1989 and the Education Act 2002 and in line with government publications:

- Working Together To Safeguard Children (2018)
- Working Together To Safeguard Children ‘Information Sharing’ (2018)
- What to do if you if you are worried a child is being abused (March 2015)
- Disqualification under the Childcare Act 2006 (June 2016)
- **Keeping Children Safe In Education September (2020)**
- Prevent Duty Guidance (2015)
- The Prevent Duty: Departmental advise for schools and childminders (June 2015)
- Prevent Duty Guidance: for England & Wales (July 2015)
- The use of social media for on-line radicalisation (July 2015)
- The Independent Schools Inspectorate (ISI) Regulatory Requirements
- National Minimum Standards for boarding school 2015
- Sussex Child Protection and safeguarding Procedures (Produced by East Sussex Safeguarding Children’s Partnerships ESSCP)
- **DfE, Sexual violence and sexual harassment between children in schools and colleges (2018)**
- **DfE Mental Health and behaviour in schools (2018)**
- **When to call the police. Guidance for schools and colleges NPCC (2020)**
- **DfE Preventing youth violence and gang involvement (2013)**
- **DfE Criminal exploitation of children and vulnerable adults: county lines (2020)**

This policy operates in conjunction with locally agreed inter-agency procedures put in place by the **East Sussex Safeguarding Children Partnership (ESSCP)**, the DfE and ISI Regulatory Standards and the related safeguarding policies listed at the end of this document. All the staff at Cumnor are required to read and adhere to the school’s policies and procedures as well as the ISI Regulatory Standards and **“Keeping Children Safe In Education 2020”**. Parents can access this policy and related safeguarding policies via the school website or through the school office.

Statement of Intent

The Governing body takes seriously its responsibility under section 175 of the Education Act 2002 to safeguard and promote the welfare of pupils; and to work together with other agencies to ensure adequate arrangements within our school to identify, assess, and support those children who are suffering harm. The school follows the **East Sussex Child Protection and Safeguarding Procedures** which can be accessed via the following link:

<http://sussexchildprotection.procedures.org.uk>

We recognise that all adults, including temporary staff volunteers and governors, have a full and active part to play in protecting our pupils from harm, and that the child’s welfare is our paramount concern.

Safeguarding and promoting the welfare of children is defined for the purpose of this policy as:

- **Protecting children from maltreatment**
- **Preventing impairment of children’s mental and physical health or development;**
- **Ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and**
- **Taking action to enable all children to have the best outcomes**

Staff understand that:

- Cumnor House is a LISTENING school (Listening provisions include: pupil care committees, tutors systems, wellbeing support, school nurse and an independent listener)
- Early help (**providing support as soon as a problem arises**) is identified through the pastoral committee and pupils requiring early help are supported by the Cumnor House 'Team around the child' Framework and Pastoral Care Plans (PCP)
- **Mental health needs are a high priority and a mental health safeguarding strategy plan is in place. Mental health is recognised as a safeguarding concern.**
- **The school has a mental health and wellbeing curriculum in place which address holistic health education as well as Relationships Education (primary) and Relationships and Sex Education (secondary). Through this curriculum, its supporting toolkit and our pastoral care system we offer a whole school approach to supporting and managing children's mental, physical, social and emotional needs.**
- They must always consider the best interests of the child
- Safeguarding is everyone's responsibility
- **If they have safeguarding concerns they should act immediately**
- Concerns about a child in need is reported to the Designated Safeguarding Lead (DSL) or to the Deputy DSL who then reports to social care
- Concerns about a child at risk is reported to the DSL or to the Deputy DSL who reports immediately to social care and, if a crime has been committed, the police
- **The DSL or Deputy DSL should always be available to talk to but if they are not it should not delay appropriate action being taken**
- Anyone can make a referral to social care
- Referrals to statutory agencies do not require parental consent
- Concerns about volunteers and staff including the DSL and Deputy DSL are reported to the Head who reports to the East Sussex Single Point of Advice (SPOA) who will inform the Local Authority Designated Officer (LADO) and Police as necessary. The Head can contact the LADO regarding staff conduct issues by making an online referral.
- If the concern is regarding the Head, the Chair of Governors is informed immediately without informing the Head first. The Chair reports to the East Sussex Single Point of Advice (SPOA) who will inform the Local Authority Designated Officer (LADO) and Police as necessary. The Chair can also refer conduct issues to the LADO <https://www.eastsussex.gov.uk/childrenandfamilies/professional-resources/lado/>

All staff members believe that our school should provide a caring, positive, safe and stimulating environment that promotes the social, physical and moral development of the individual child.

Aims of this Policy

- To define child abuse and raise awareness to the signs and symptoms of abuse
- To raise awareness of safeguarding issues such as radicalisation, child sexual exploitation, Female Genital Mutilation (FGM), "upskirting", serious violence, and "Sexting" (sexual imagery)
- To support the child's development in ways that will foster security, confidence, and independence
- To provide an environment in which children can learn Fundamental British Values, feel safe, secure, valued and respected, and feel confident, and know how to, approach adults if they are in difficulties believing they will be effectively listened to

- To raise the awareness of all the teaching and non-teaching staff of the need to safeguard children and of their responsibility in identifying and reporting possible cases of abuse.
- To ensure that all staff understand that everyone has a role to play in identifying concerns, sharing information and taking prompt action
- To ensure that all staff are aware of their duty to:
 - identify children who may benefit from early help
 - report any early help requirements to the DSL or Deputy DSL
 - support other agencies and professionals in an early help assessment
- To ensure that all staff are aware of their Prevent Duty and the School's Prevent Strategy, their duty to report signs or disclosures that FGM has or may have taken place directly to the police (tel: 101) and their duty to report Children Missing in Education
- To emphasise the need for a high standard of record keeping and information sharing between all members of staff
- To develop a structured procedure within the school which will be followed by all members of staff in cases of suspected abuse and allegations of abuse against members of staff
- To develop and promote effective working relationships with other agencies, especially the **ESSCP**
- To ensure that all adults within our school who have access to children have been checked as to their suitability in accordance with statutory requirements
- To identify the safeguarding responsibilities of the staff, governors, and DSL's

What is child abuse?

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

KCSIE 2020 states that abuse is:

“A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institution or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or by another child or children”

The NSPCC defines child abuse as:

*“Child abuse is the term used when a person (**man, woman or child**) harms a child or a young person under the age of 18.....Child abuse can take four forms, all of which can cause long term damage to a child:*

- *Physical Abuse*
- *Emotional Abuse*
- *Neglect*
- *Sexual abuse*

See Appendix 1: KCSIE 2020 definitions of the different kinds of abuse. Forms of abuse and safeguarding issues include:

- Bullying including cyberbullying
- Children missing in education
- Children missing from care homes
- Relationship abuse (peer on peer abuse this includes banter)
- Domestic violence and abuse (see ESCC Domestic Violence and abuse protocol)
- Child sexual exploitation
- Drugs
- Fabricated or induced illness
- Faith abuse
- Female genital mutilation [Click Here for more information](#) [Click here for how to report](#)
- Forced marriage
- Gangs and youth violence, **Serious violence (See appendix A)**
- Gender-based violence
- Mental health
- Missing children and adults
- Private fostering
- Preventing radicalization (see Appendix 2 for information on the School’s ‘Prevent Duty and Strategy’)
- Sexting (youth produced sexual imagery, see school's policy). **Upskirting (See appendix A)**
- Trafficking
- Hate
- Honour based violence
- Child exploitation (County Lines)
- Homelessness
- **Sexual violence and sexual harassment** between children in schools and colleges
- Children as witnesses in the court system and children with a family member in prison

Broad government guidance on all the issues listed above can be accessed via the www.gov.uk and the TES, MindEd and the NSPCC websites. Staff at Cumnor are aware of these issues and their duty to report any concerns in accordance to the procedure within this policy. The school's PSHCEE program "Time to Think" addresses these issues at an age appropriate level.

'Working together to safeguard children' 2018 defines safeguarding as:

Protecting children from maltreatment and impairment of their health or development, ensuring that children grow with the provision of safe and effective care and that action is taken to enable children to have the best outcomes

Safeguarding is not just about protecting children from deliberate harm, neglect and failure to act. It relates to broader aspects of care and education, for example, health and safety, the use of reasonable force, meeting the needs of children with medical needs, first aid, and online safety. Policies related to such aspects are available on the school website.

A child may be experiencing abuse if he or she is:

- *Frequently dirty, hungry or inadequately dressed*
- *Left in unsafe situations, or without medical attention*
- *Constantly "put down," insulted, sworn at or humiliated*
- *Seems afraid of parents or carers*
- *Severely bruised or injured*
- *Displays sexual behaviour which doesn't seem appropriate for their age*
- *Growing up in a home where there is domestic violence and/or adult mental ill health*
- *Living with parents or carers involved in serious drug or alcohol abuse*

Remember, this list does not cover everything that could be considered. You may have seen other things in the child's behaviour or circumstances that worry you.

Our staff are aware that abuse is always wrong and it is never the young person's fault and they are advised to maintain an attitude of 'it could happen here'

Symptoms

The NSPCC lists some of the signs and behaviours which may indicate that a child is being abused:

- Repeated minor injuries
- Children who are dirty, smelly, poorly clothed or who appear underfed
- Children who have lingering illnesses which are not attended to, deterioration in school work, or significant changes in behaviour, aggressive behaviour, severe tantrums
- An air of 'detachment' or 'don't care' attitude
- Overly compliant behaviour
- A 'watchful attitude'
- Sexually explicit behaviour (e.g. playing games and showing awareness which is inappropriate for the child's age)
- A child who is reluctant to go home, or is kept away from school for no apparent reason

- Does not trust adults, particularly those who are close
- 'Tummy pains' with no medical reason
- Eating problems, including over-eating, loss of appetite
- Disturbed sleep, nightmares, bed wetting
- Running away from home
- Self-inflicted wounds
- Reverting to younger behaviour
- Depression or withdrawal
- Relationships between child and adults which are secretive and exclude others
- Spending long periods of time in isolation or on the internet

These signs are not evidence themselves; but may be a warning, particularly if a child exhibits several of them or a pattern emerges. It is important to remember that there may be other explanations for a child showing such signs. Abuse is not easy to diagnose, even for experts.

Peer on Peer Abuse (including: bullying, cyberbullying, sexual violence & sexual harassment, physical abuse, sexting, upskirting, serious violence, initiating/hazing type violence and rituals)

Staff at Cumnor House Sussex are aware that children can abuse other children and that Peer on Peer abuse is not tolerated. Peer on Peer Abuse can occur when a person under the age of 19 years experiences harm within relationships. **It is recognised that it is more likely that girls will be victims and boys perpetrators and that all peer on peer abuse is unacceptable and will be taken seriously.** It can be within a family or a boyfriend/girlfriend relationship. It also includes physical gender based violence/sexual assaults between peers under the age of 19 years. Peer on Peer abuse can manifest in the form of “sexting” and bullying which includes cyberbullying and “banter”. It is recognised at Cumnor that targeted and repetitive banter must not be tolerated and that it must never be passed off as “part of growing up” or “just having a laugh’. Disclosures about pupil-on-pupil abuse will be taken seriously and result in all children involved whether perpetrator or victim, being supported and kept safe. **Cumnor House will respond to Peer on Peer abuse on a case-by-case basis and will seek the support from children’s social care and the police as appropriate. The East Sussex Continuum of need will be used to assess the level of need** and the Perpetrator and victims will be supported using the Cumnor House Sussex “Team Around The Child” framework which is available from the school office. **Part 5 of KCSIE 2020 addresses sexual violence and sexual harassment between pupils in more detail and is to be read by all members of staff.**

Following a report of any form of Peer on Peer abuse the DSL will carry out an immediate risk and needs assessment, considering:

- The victim
- the alleged perpetrator
- all other children
- managing the school environment so that the victim and the alleged perpetrator feel supported and safe (e.g. classroom settings and space at break times or during free times)

This assessment will be kept under review and the DSL will liaise with the MASH team and the police as required.

The school will consider:

- The wishes of the victim **and parents** in terms of how to proceed
- The nature of the alleged incident
- The ages of the children involved
- The developmental stages of the children involved

- Any power imbalance between the children
- If the incident is a one-off or a sustained pattern of abuse
- If there are any on-going risks to the victim, other children, school or staff
- Any contextual safeguarding issues
- Managing the incident internally
- Seeking early help from multi-agencies
- Making a referral to the MASH
- Making a report to the police

Mental Health

All staff are 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. Staff know that only appropriately trained professionals should attempt to make a diagnosis of a mental health problem and that they as teachers 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.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour, and education. If staff have a mental health concern it should be addressed as a safeguarding concern and immediate action should be taken, following the child protection policy, and speaking to the designated safeguarding lead or a deputy.

The school is aware of the government's requirements for relationships, health and sex education and relationships education for primary and secondary schools. It has a mental health and wellbeing curriculum which addresses all these topics. The curriculum has a supporting toolkit which facilitates wellbeing conversations that are child friendly. The curriculum has a unique language that helps children to explain their mental health and wellbeing easily, it also signposts children to how and how to ask for help. Parents are encouraged to be involved in the wellbeing provisions at the school.

Procedures to be adopted in the EYFS, pre-prep and prep-school in cases of suspected child abuse

Remember:

- Always listen and consider the best interests of the child
- Safeguarding is everyone's responsibility
- Concerns about a child in need are recorded on the schools safeguarding data base 'MyConcern' and reported verbally to the Designated Safeguarding Lead (DSL), or the Deputy DSL, who reports to social care
- Anyone can make a referral to social care, you do not require parental consent
- Concerns about volunteers, supply staff and staff including the DSL are reported to the Head who reports to the East Sussex Single Point of Advice (SPOA) who will inform the Local Authority Designated Officer (LADO) and Police as necessary. The Head can refer concerns to the LADO and seek conduct advice by completing an online referral form <https://www.eastsussex.gov.uk/childrenandfamilies/professional-resources/lado/>
- If the concern is regarding the Head, the Chair of Governors is informed immediately without informing the Head first. The Chair reports to the East Sussex Single Point of Access (SPOA) who will inform the Local Authority Designated Officer (LADO) and Police as necessary. The Chair can refer concerns to the LADO and seek conduct advice by completing an online referral form.
- Fears about sharing information (including medical information) **must not** be allowed to

stand in the way of the need to promote the welfare and protect the safety of children (Appendix 9 for GDPR guidance)

If any member of staff suspects that a child may be at risk from whatever cause, i.e. outward signs of abuse, changes in behaviour or failure to develop, he or she should document the concern on the 'MyConcern' data base and verbally inform the school's Designated Safeguarding Lead (DSL) or the Deputy DSL immediately. See "What to do if you are worried about a child" Flow Chart Appendix 3. For guidelines on the "Action where there are concerns about a child" see Appendix 8.

The concern should be clearly supported by your written notes. The DSL will record the concern and refer to The Continuum of Need (CON) Assessment Tool to assess if the child is a child in need under section 17 of the Children Act 1989 and may require "Early Help" or a child at risk of immediate harm under section 47 of the Children Act 1989 and requires immediate referral (See Appendix 4 for an example. czone.eastsussex.gov.uk)

The DSL will then decide if advice or a referral is required by discussing the concern with The Single Point of Advice (SPOA). This is the first point of contact for East Sussex Children's Services and is available to anyone who has concerns about the welfare of a child.

- **If at any point there is a risk of serious harm to a child contact with the SPOA and/or police should be made immediately**
- **If a member of staff has a concern about a child they may contact the SPOA directly**
 - **Anybody can seek advice or make a referral to SPOA.**
 - **Parental consent is not required for referrals to statutory agencies**

SPOA CONTACT DETAILS

Telephone: 01323 464222

Email: 0-19.SPOA@eastsussex.gov.uk

Secure E-mail: 0-19.SPOA@eastsussex.gcsx.gov.uk

SPOA CONTACT FOR EYFS (serious injury/illness or death must be reported)

See Appendix 10

Heidi Attwood - Early Help Key Work Manager

Eastbourne, The Havens and Wealden

Mobile: 07736635303

e-mail: heidi.attwood@eastsussex.gov.uk

Tina Greenwood – Early Help Key Work Manager

Hastings, Rother and Wealden

Mobile: 07834171519

e-mail: tina.greenwood@eastsussex.gov.uk

OUT OF HOURS EMERGENCY DUTY SERVICE:

See Appendix 6 for further Safeguarding Team Contacts in East Sussex, West Sussex, Kent and Surrey

The role of the SPOA

Telephone screening, information, advice and guidance

The SPOA team is responsible for triaging concerns i.e. determining the priority of information shared about a child and their family using the CON Assessment Tool.

The Triage role identifies within one working day that the information shared is either for:

- a) Triage only – the information is logged but no further response is needed beyond checks within our own systems i.e. Children’s Index, SCIS and telephone advice given (Level 1 and 2 Continuum of Need).
- b) Triage and Early Help Allocation Hub – if the initial triage undertaken by SPOA indicates Level 3 then a referral will be made directly by SPOA to the Early Help Allocation Hub.
- c) SPOA will pass cases through to the MASH team (Multi Agency Safeguarding Hub) for further screening and response that will be required for Level 3 - 4 cusp on CON or for a Social Work response via MASH for immediate emergency safeguarding action; Social Care assessment required under Section 17 or for any potential Section 47 strategy discussion (Level 4 of CON).

East Sussex Single Point Of Advice Guidelines On

The Role Of The DSL or Deputy DSL Before Contacting The SPOA

When the DSL or Deputy DSL receives information regarding a pupil potentially at risk of harm, he/she needs to:

1. reflect on the information with the staff member reporting it
2. consider and record an overview of the information and situation
3. clarify what has been said?
4. clarify when it happened ?
5. clarify how often does this happen?
6. clarify who else knows?
7. check if the Police have been involved? (If the Police have been involved they will have made a record - a SCARF - and this will automatically be considered by the Police Detective Sergeant in the MASH. If the incident indicates concerns at Level 3 or 4 on the CON, the MASH Senior Social Worker and the Police DS will have decided whether a social care response is needed.
8. record what else do you know about the child and family? (Including rumours and suspicions if relevant)
9. check against other vulnerability factors (consider the Continuum of Need as a prompt)
10. assess how the child is presenting today – are they frightened to go home today?
11. check which other professionals are known to be working with the family?
12. check the Children Index if necessary

13. contact the Family Keyworker if there is already Early Help intervention in place and discuss the information with them and/or their manager and agree next steps.
14. contact the family Social Worker if there is one working with the family and discuss the information with them and agree next steps.
15. to consider the information against the CON if there is currently no Early Help Family Keyworker or Social Worker working with the family

The DSL or Deputy DSL does not investigate the disclosure before contacting the SPOA

Contacting the SPOA

When contacting SPOA the DSL or Deputy DSL should be:

- Prepared with the information they have discussed with the staff member
- Be ready to email this information immediately using the Statement of Referral

Form which is available at: www.sussexchildprotection.procedures.org.uk

This will enable the SPOA worker to have the written information in front of them so that the discussion can focus on clarification and reaching a shared understanding of the situation and the level of need using CON.

The purpose of the discussion with the DSL or Deputy DSL is to:

- Reach a shared understanding of what is known about the family and their current situation
- Reflect and decide on the type of case and identify where the needs appear to be on the CON
- Agree on the next course of action, including who is going to do what

When the DSL or Deputy DSL receives information confirming that a child **is at immediate risk of significant harm** he/she needs to:

- Contact the SPOA immediately making it clear when the phone is answered, what the concern is and if the risk is immediate. The SOR should then be completed and e-mailed to SPOA immediately or within 24 hours at the latest.

SPOA will make the decision as to whether the contact will be accepted as a referral and will be responsible for referring through to MASH or Early Help Services if appropriate.

If there is a concern that a crime has been committed the DSL or Deputy DSL will immediately inform the police (101@sussex.pnn.police.uk Phone 101) and The SPOA. **The school uses the NPCC guidance on 'When to call the police' pg 20 KCSIE (2020)**

Early Help - Follow up Action

If, after a referral, the child's situation does not appear to be improving, the DSL or Deputy DSL (or the person who made the referral) should press for re-consideration to ensure their concerns have been addressed and, most importantly, that the child's situation improves. If early help is appropriate, the DSL or Deputy DSL should support the staff member in liaising with other agencies and setting up an inter-agency assessment as appropriate.

If early help or other support is appropriate, the case should be kept under constant review and consideration given to a referral to children's social care if the child's situation does not appear to be improving.

Child At Risk Of Harm Referral - Follow up

If no action is taken by social care the DSL or Deputy must:

- challenge those who appear not to be taking action
- re-assess concerns
- Refer again if the concern is unchanged and/or the situation does not improve
- phone the police (101) where appropriate
- Remember the child's best interests must always come first

Ten Key Points To Follow If You Suspect, Or Are Told Of Abuse.

Adults looking after children or young people in schools (or in residential establishments or youth organisations), should be aware of the risk of abuse (by adults or other young people), and take steps to reduce those risks. Adults (staff, **supply staff** or volunteers) in charge of children or young people should know what to do if they suspect or are informed that someone is being abused either physically, emotionally, sexually or through neglect. The following key points give a guide on what to do and not to do. Appendix 2 addresses safeguarding against radicalisation and extremism and how to report.

1. Always stop and listen straight away to someone who wants to tell you about incidents or suspicions of abuse.
2. If you can, write brief notes of what they are telling you while they are speaking (these may help later if you have to remember exactly what was said) - If you don't have the means to write at the time, make notes of what was said as soon as possible afterwards. You can use the SOR to help you document concerns.
3. Do not promise anything. Do not give a guarantee that you can keep what is said confidential or secret- if you are told about abuse you have the responsibility to tell the right people to get something done about it (see below). If asked, explain that if you are going to be told something very important that needs to be sorted out, you will need to tell the people who can sort it out, but that you will only tell people who absolutely have to know.
4. Don't ask leading questions that might give your own ideas of what might have happened (e.g. "did he/she do X to you") - just ask "What do you want to tell me?" or "Is there anything else you want to say?" use words like "Who", "What", "Where" or "When".
5. Immediately tell the DSL (or Deputy DSL) or if you are away from the school site the person in charge of the group at that particular time (unless they are themselves accused or suspected or abusing) – don't tell other adults or young people what you have been told.
6. If you cannot contact the DSL or Deputy DSL discuss with the person in charge whether any steps need to be taken to protect the person who has told you about the abuse (this may need to be discussed with the person who told you).
7. Never attempt to carry out an investigation of suspected or alleged abuse by interviewing people etc.- social services and police staff are the people trained to do this- you could cause more damage and spoil possible criminal proceedings.
8. As soon as possible (and certainly the same day) the DSL/Deputy DSL or the person in charge should refer the matter to the SPOA and/or police (helped by your notes). Follow their request about what to do next. They will set up any necessary investigations, and can advise you- that is their job. (If someone has made an accusation to you about the adult in charge of the group, **You** should inform the **Headmaster** who will contact SPOA or MASH Manager to advise appropriately. Where it is not possible to contact the **Headmaster** you must contact SPOA or MASH Manager

yourself, and ask them what to do next. **It is important to remember that everyone has a duty of care to report abuse.** You should inform the **Headmaster** of your actions as soon as possible.

9. Never think abuse is impossible in your school or group, or that an accusation against someone you know well and trust is bound to be wrong.

10. Children and young people often tell other young people, rather than staff or other adults, about abuse- make sure that your senior young people know how and how to ask for help.

Concerns about members of staff

If staff have safeguarding concerns, or an allegation is made about another member of staff including **supply staff**, volunteers, or the DSL's, posing a risk of harm to children then they should report this to the Headmaster. If the Headmaster is absent the **concern** or allegation should be passed on to the Chairman of Governors. **If the allegation concerns the Headmaster, the person receiving the concern or allegation should go straight to the Chairman of Governors without notifying the Headmaster.** In cases of serious harm, the East Sussex SPOA, LADO and police should be informed from the onset. The school policy and procedures for Managing Concerns & Allegations Against Staff can be found on the school website.

Children potentially at greater risk of harm

Where children need a social worker, the school will be informed by the local authority. This knowledge should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services). The DSL will share this information with others in the best interests of the child.

Corporal punishment

Corporal punishment cannot be used or threatened. Corporal punishment is prohibited for all pupils in independent schools. The prohibition includes the administration of corporal punishment to pupils during activity, whether or not within the school premises. The prohibition applies to all members of staff. These include all those acting in loco parentis, such as unpaid, volunteer supervisors. Teachers may use 'physical intervention' to avert 'an immediate danger or personal injury to, or an immediate danger to the property of, a person' (including the child). Every effort is taken to prevent such incidents arising through weekly pastoral meetings (see the school's policy on Reasonable Restraint).

Whistleblowing

Staff are required to report to the Headmaster, to the Department of Education or the social services department any concern or allegation about school practices or the behaviour of colleagues which are likely to put pupils at risk of abuse or other serious harm. The School will provide immunity from retribution or disciplinary action against such staff for 'whistleblowing' in good faith. The school's Whistleblowing Policy is available on the school website and it includes the NSPCC whistleblowing helpline.

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 – The line is available from 8:00 AM to 8:00 PM, Monday to Friday and the email is: help@nspcc.org.uk

Reporting Allegations to the Disclosure And Barring Service

Like all schools, we have a statutory legal duty to refer an individual in regulated activity, where there is the risk that he or she may harm children, or if that person has been dismissed or removed due to safeguarding concerns, or would have been had they not resigned, to the Disclosure and Barring Service (DBS) and The Teacher Regulation Agency (TRA).

This is a legal duty and failure to do so when the criteria are met is a criminal offence.

East Sussex has a specific: MANAGING ALLEGATIONS REFERRAL PATHWAY

[Click here for East Sussex LA Managing Allegations pathway](#)

East Sussex's LA and ESSCP procedures have been developed in line with the criteria set in Working Together 2018.

To ensure safeguarding is prioritised for children, East Sussex (LA) request that all social care enquiries and referrals in East Sussex go via the Single Point of Advice (SPOA) based at St Mark's House. The SPOA will inform the Multi-Agency Safeguarding Hub (MASH) if a referral is on the cusp of a level 3 and Level 4 threshold. The MASH will inform the LADO.

Enquiries and referrals to Children's Social Care via the SPOA need to be considered when a child is at risk of significant harm and an individual who is working or volunteering with children has:-

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

When considering the definitions of harm and whether the threshold is met for a LADO consultation or referral to the Multi-Agency Safeguarding Hub (MASH), the following guidance provides information about the criteria and process. The examples provided are not exhaustive as the nature of allegations can sometimes be complex, depending on the history of those who are involved.

Behaviours that Have or Are Likely to Cause Harm

These are more likely to fall in the remit of professional conduct, for example:

- Contact with children and young people through social media and private email accounts
- Bullying, threats and intimidation
- Comments of a personal, derogatory or racially abusive nature which could cause emotional harm
- Physical contact of a non-sexual nature, but which breaches a code of conduct
- Providing rewards and incentives which are not sanctioned within a code of conduct and could single out particular children or young people to the detriment of others.

These types of behaviour should be referred to the LADO in the first instance, as they have happened in isolation. Sometimes there is a fine line between harm and behaviour constituting a possible criminal offence. If they form part of a pattern or there are other concerns about the context, consideration would need to be given to whether a referral to SPOA is required.

THE FIRST RESPONSE

On receiving an allegation against a volunteer or member of staff including any of the DSL's the Headmaster will undertake to:

- Address any allegation of abuse, involving a member of staff, very seriously
- Not carry out their own investigation
- Immediately follow East Sussex Local Authority Pathway on Managing Allegations Against Members of Staff as detailed above.

-If the Headmaster is concerned of any immediate danger to a child, he must report and refer the concern immediately to the SPOA 01323 464222 who will discuss the matter with the Multi-Agency Safeguarding Hub (MASH) manager. If the person is considered to be an immediate risk to children or there is evidence of a possible criminal offence the MASH manager will inform the LADO and advise the Headmaster on what further action is required and on contacting the police (telephone contact: 101).

-If there is no immediate danger or the Headmaster wishes to seek advice he must make an online referral to the Local Authority Designated Officer (LADO) for East Sussex <https://www.eastsussex.gov.uk/childrenandfamilies/professional-resources/lado/>

The LADO should be informed within one working day of all allegations that come to the employer's attention or that are made directly to the police.

All discussions should be recorded in writing and any communication between the individual and the parents of the child/children agreed.

- The Headmaster will take advice from the LADO and, when the LADO deems necessary, the police and the MASH to agree the following:
 - The initial sharing of information and evaluation may lead to a decision that no further action is to be taken in regard to the individual facing the allegation or concern; in which case this decision and a justification for it should be recorded by both the case manager and the LADO, and agreement reached on what information should be put in writing to the individual concerned and by whom. The Headmaster should then consider with the LADO what action should follow both in respect of the individual and those who made the initial allegation.
 - Confidentiality is extremely important and the Education Act 2011 must be followed so that the identity of the member of staff is protected.

- Anonymity, who needs to know and, importantly, exactly what information can be shared.
- What action needs to be taken with regard to suspending or dismissing.
- How to manage speculation, leaks and gossip.
- What, if any information can be reasonably given to the wider community to reduce speculation; and
- How to manage press interest if and when it should arise

Under the guidance of the MASH Manager/LADO and, where appropriate the police and social care services, the Headmaster will inform the member of staff concerned honestly of the allegation that has been made. The Headmaster must provide the individual with as much information as possible at that time and explain the likely course of action, unless there is an objection by the children's social care or the police. The Headmaster will provide information on what support is available from the school to the individual and advise him or her to contact their Trade Union, Professional Association or a colleague for advice and support. They should also be given access to welfare counselling or medical advice where this is provided by the employer. A named representative will be appointed by the Headmaster to keep the person who is subject of the allegation informed of the progress of the case and to consider what other support is appropriate for the individual. Suspension or alternative arrangements will be considered and put in place until the allegation or concern is resolved.

Under the guidance of the MASH Manager/LADO, the Headmaster will inform the child's parents in confidence, inviting them to maintain confidentiality whilst the investigation takes place, unless the allegation involves the parents, in which case the Headmaster will contact the Social Services before making contact.

The MASH Manager/LADO will decide with the Headmaster who will undertake the investigation (usually a member of the SMT). However in some cases it may be necessary for an independent investigator to carry out the investigation.

Ofsted (0300 1231231) will be informed within 14 days of any allegation of serious harm or abuse by any person living, working, or looking after children at the premises (whether that allegation relates to harm or abuse committed on the premises or elsewhere), or any other abuse which is alleged to have taken place on the premises, and of the action taken in respect of these allegations.

Supply Staff

Whilst school is not the employer of supply staff, any concerns or allegations made against a supply teacher will be dealt with properly in line with our policy and procedures for Managing Concerns & Allegations against Staff. In no circumstances would the school decide to cease to use supply staff due to safeguarding concerns. The LADO would be informed of the concern or allegation to determine a suitable outcome. Agencies would be fully involved in any enquires from the LADO but the school would take the lead as the agencies would not have access to information held at the school or access to individuals at the school. In this situation supply staff would be advised to contact their trade union or a colleague for support. Agency's involved in the school should be informed by HR as to the schools safeguarding policies.

This pathway is in line with LA procedure, notwithstanding the regulatory advice

Any member of staff with a concern can contact SPOA or make a referral to the LADO for advice at any time. The Headmaster should be informed of any staff referred to SPOA or the LADO.

All safeguarding information is recorded on the safeguarding database 'MyConcern' and shared on a need to know bases.

The Headmaster also keeps a file in which staff may record any incidents of confrontation with a pupil, which may have made a teacher feel uncomfortable. A clear account of any such incident, written at the time, may afford a measure of protection should the matter be pursued by a pupil or parent.

Restrictions on mobile phones and cameras in the EYFS Setting:

- In accordance with the Local Children's Safeguarding Partnership and the DfE **KCSIE guidelines 2020**, we do not permit parents, visitors or staff to use personal devices with a camera facility to photograph or record the children (e.g. Smart phones, iPods and iPads) in the EYFS settings, Nursery, Pre-Prep department or Grace's Garden
- Staff working within the Prep, Pre-prep and EYFS must not use mobile phones whilst they are working with the children, except in the case of an emergency. Staff must leave their personal mobile devices with camera facility or video recording facility in the common room or in their office while children are onsite. Photographs taken of the children should be part of planned activities and should be taken with school cameras or school iPads only. Staff must check for parental consent on the SIMS database before placing a child's photo on display within the school, on the School website or within any other publication. School iPads are regularly checked as part of our safeguarding procedures
- Guidance for EYFS providers on what to do in the case of a serious accident, illness or death of a child is set out in Appendix 10

Reasonable Restraint

Our policy on reasonable restraint by staff is set out separately and available on the school website.

- **Staff make every effort to avoid incidents where reasonable restraint may become necessary**
- Staff may use reasonable restraint as a last resort
- Staff are empowered to use reasonable restraint to prevent pupils from hurting themselves or others, from damaging property, or from causing disorder
- Any incident where reasonable restraint has been used is recorded and signed by a witness

Searching personal possessions

Staff should not conduct a search of pupil's personal possessions. The DSL or Deputy DSL will decide if a search is appropriate and will direct appropriate staff when necessary. An example of

when a search may be considered appropriate would be in the case of “Sexting”(sharing of sexual imagery). In the event of such an incident the “Search” and “Sexting” policy and procedures would be abided by. These policies are available separately on the school’s website.

Children missing from education

All children, regardless of their circumstances, are entitled to a full time education which is suitable to their age, ability, aptitude and any special educational needs they may have. Local authorities have a duty to establish, as far as it is possible to do so, the identity of children of compulsory school age who are missing education in their area.

A child going missing from education is a potential indicator of abuse or neglect. Staff should follow the school’s procedures for dealing with children that go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of their going missing in future.

The School’s policy and procedures is detailed in the missing pupil policy and is available online. Staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, FGM and forced marriage.

We fulfil our legal requirement to have an admissions and attendance register for all our pupils. The school also holds at least two emergency contacts for every child attending the school in case of emergencies, and in case there are welfare concerns at the child’s home.

We are aware of our duty under Regulation 4 of the Education (Pupil Registration) (England) Regulations 2006 to inform the local authority of any pupil who is going to be deleted from the admission register where they:

- have been taken out of school by their parents and are being educated outside the school system e.g. home education;
- have ceased to attend school and no longer live within reasonable distance of the school at which they are registered;
- have been certified by the school medical officer as unlikely to be in a fit state of health to attend school before ceasing to be of compulsory school age, and neither he/she nor his/her parent has indicated the intention to continue to attend the school after ceasing to be of compulsory school age;
- are in custody for a period of more than four months due to a final court order and the proprietor does not reasonably believe they will be returning to the school at the end of that period; or,
- have been permanently excluded.

Reporting to the **West** Sussex local Authority will take place prior to the pupil’s name being deleted from the register. The school will also inform the **West** Sussex Local Authority of any new pupil who is added to the register should they join the school at any point other than the start date for the Reception intake. Reporting is completed by the registrar using the link below:

<https://www.westsussex.gov.uk/education-children-and-families/schools-and-colleges/school-places/notification-of-adding-to-the-school-register/?formcheck=checked>

Children with special educational needs and disabilities

Children with special educational needs (SEN) and disabilities can face additional safeguarding

challenges. Our Governing body and staff are aware that additional barriers can exist when recognising abuse and neglect 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;
- The potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- Communication barriers and difficulties in overcoming these barriers.

Cumnor House recognises the additional challenges that pupils with SEN and disabilities face and provides extra pastoral support to meet their needs i.e. Pastoral support plans, Tree house passes and when appropriate access to an onsite Educational psychologist.

Looked after children

The most common reason for children becoming looked after is as a result of abuse and/or neglect. The Governing body should ensure that staff have the skills, knowledge and understanding necessary to keep looked after children safe.

In particular, they should ensure that appropriate staff have the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility. They should also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. The Designated Safeguarding Lead or Deputy DSL should have details of the child's social worker and the name of the virtual school head in the authority that looks after the child.

Should 'looked after children' register at the school the Governing body would appoint a designated teacher to promote the educational achievement of those children and ensure that this person has appropriate training.

Children staying with non-relatives in the UK and abroad homestays

Schools quite often make arrangements for their children to have learning experiences where, for short periods, the children may be provided with care and accommodation by a host family to which they are not related. This might happen, for example, but not only, as part of a foreign exchange visit or sports tour. Such arrangements could amount to "private fostering" under the Children Act 1989 or the Safeguarding Vulnerable Groups Act 2006, or both.

DBS check request by a regulated activity provider

Where a private fostering or U.K based Home-Stay arrangement is made by Cumnor House Sussex and the school has the power to terminate the arrangement, then it **would** be the regulated activity provider for the purposes of the Safeguarding Vulnerable Groups Act 2006. A regulated activity provider will be committing an offence if they allow a person to carry out a regulated activity whilst barred and they know or have reason to believe that the person was barred. Where the school is the regulated activity provider, it will request a DBS enhanced check (which will include barred list information) to help determine their suitability for the arrangement. However, where the parents make the arrangements themselves, this will be a private matter between the

child's parents and the host parents and in these circumstances the school will not be the regulated activity provider.

Where the child is staying with a family outside of the UK and the arrangement is made by the school the school will complete a risk assessment which includes gathering information from the school connected with the host family and the high commission of the country in question regarding what checks may be possible prior to the stay.

Cumnor House may also request a DBS check on family members of the host family that are 16 years and above.

When pupils are placed in alternative provisions, Cumnor House requests a written statement from the Alternative Providers to confirm that they have completed relevant checks on their staff.

East Sussex Local Authority notification when private fostering is discovered

Where the school has not been involved in making the arrangement but a member of staff or volunteer at a school becomes aware that a pupil may be in a private fostering arrangement, where a child under the age of 16 (or 18 if disabled) is provided with care and accommodation by someone to whom they are not related in that person's home, they should raise this in the first instance with the DSL or Deputy DSL. The DSL or Deputy DSL should notify the local authority of the circumstances, and the local authority will check that the arrangement is suitable and safe for the child. A Home-Stay of 28 days or more with a non-relative may amount to private fostering.

Absence

We are aware of our duty to inform the local authority of any pupil who fails to attend school regularly, or has been absent without the school's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the school and the East Sussex local authority (or in default of such agreement, at intervals determined by the Secretary of State).

Contextual Safeguarding

Staff are aware that their assessment of children's safety should take into account all of the child's social sphere, not only that at the school. All staff should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence. Staff are aware of the impact of domestic violence on young people and that it must be reported to the DSL. The school is a member of a scheme called Encompass. As part of this scheme the school will be notified by the police of any incident where they have been called to a home of a pupil for report of domestic violence or abuse. Staff are aware that behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education and sexting (also known as youth produced sexual imagery) put children in danger.

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including 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, males or females, and children or adults. The abuse 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. See Appendix 1 for further information.

With regards to topics such as, gang involvement, child exploitation (County Lines) and sexual violence and sexual harassment in schools:

- Cumnor House School has a comprehensive PSHCEE and wellbeing curriculum in place to help strengthen pupil's emotional and social skills and build resilience to negative influences.
- Staff are aware of their right to discipline pupils (detention and confiscation of items), use reasonable restraint and search pupils according to related school police.
- Advise on gangs is available via the NSPCC helpline on 0808 800 5000.

Remote Learning

At school there are appropriate filters and monitoring systems to keep children safe online. However, there may be times when children may need to use digital devices to access learning online, from home. Staff are aware of the risks including unhealthy contacts, CSE, radicalisation and sexual predation (adults posing as children), bullying, sexting, pornography, and the impact that fake news can have on mental health, when children are learning online and that this risk may increase when using technology at home. Online safety forms part of our Wellbeing and PSHCEE curriculum.

The school has a separate Remote Learning Policy, which is available on the school website.

Pandemic Protocol

Please refer to our Pandemic Policy for our protocol for managing infectious disease e.g. Covid-19. The government and Public Health England's recommendations are followed closely in the event of any infectious disease outbreak and protocols are changed accordingly and in line with our risk assessments. Should changes occur parents and staff are informed by letter. All vulnerable pupils, staff and families are contacted, monitored and supported, this includes those with physical and mental health needs and SEN. Should learning be carried out remotely the DSL, the Educational Psychologist and the Learning Enhancement Team liaise closely via phone or video call with identified pupils and their families, and where necessary we will carry out home visits. Hygiene and Track and Trace protocols are carried out in accordance with government and NHS guidance. Training is provided when necessary.

The Designated Safeguarding Leads (DSL)

During term time Paula Talman (DCHW) & Matt Mockridge (Deputy Head) are the DSLs for Yr1-Yr8 and Jane Sykes is the DSL for the EYFS at Cumnor House Sussex. Fergus Llewellyn (Headmaster) and Ben Chapman (Assistant Head) are the Deputy Designated safeguarding Leads (DDSL) for this role and provide cover during term time. Louise Hackett, (Joint Nursery Head) and Kayleigh Widdows (Nursery staff) are DDSL for the EYFS and cover this role during non-term time and extended hours. They may also cover this role for the whole school during term time when required. All of the above named have been fully trained for the demands of this role in

safeguarding and inter-Agency working. They regularly attend courses with other child support agencies to ensure that they remain conversant with best practice. They undergo refresher training every two years with the local authority. The DSLs liaise regularly with ESSCP, the Governor for Safeguarding and the Governor's Safeguarding Committee. The DSLs are members of the Independent School's Safeguarding Group for East Sussex and this group also meets once a term for training and safeguarding updates from ESSCP. The responsibilities of the DSLs (the activities of the DSL are the same for the Deputies in the DSL's absence) are listed below.

- A member of the senior leadership team and the named person for safeguarding within the Prep, Pre-Prep, Boarding and Early Years departments
- Receiving reports from staff or pupils relating to any concerns regarding children's welfare and wellbeing
- Referring concerns or seeking advice from the SPOA or Channel programme
- Reviewing safeguarding policy and procedures, and the efficiency with which safeguarding duties are discharged
- Ensuring that any deficiencies or weaknesses in safeguarding arrangements are remedied without delay
- Approving amendments to safeguarding arrangements in the light of changing regulations or recommended best practice
- Advising and supporting staff on safeguarding issues
- Ensuring that staff are aware of policies and procedures related to safeguarding and that they are aware of their training requirements
- Liaising with the school's governors, ESSCP, other agencies and professionals
- Evaluating safeguarding practice with the governors safeguarding committee through annual safeguarding audits with the local authority
- Liaising with the Deputy DSLs on safeguarding concerns, child welfare and wellbeing
- Overseeing online safety and liaising with the online safety officer
- Storing safeguarding records securely and confidentially in a locked cabinet separate to the pupil's administration and academic records. Access to safeguarding files is restricted to the DSLs, and shared on a need to know basis only
- Transferring safeguarding information to a pupil's next school and liaising with the DSL at the pupil's next school when there are records to be shared

Further details of the role and responsibility of the DSL and Deputy's is outlined in their job description which is available to all staff on the school intranet. All members of staff are given a lanyard with the contact numbers for the DSLs. Visitors also receive information on safeguarding on arrival.

The Safeguarding Responsibility of Governors

The Governing Body must ensure that they comply with their duties under legislation. They must have regard to Keeping Children Safe In Education 2020 and Working Together To Safeguard Children 2018 and ensure that policies and training within the school are effective and comply with the law at all times.

Olivia Hatrick is the Liaison Governor for Safeguarding issues and is the Chair of the Governors' Safeguarding Committee. The Governor's responsibilities include:

- Termly Governor's safeguarding meetings (the DSLs and Deputy is in attendance) to assess and evaluate safeguarding practice within the school
- Liaise with the DSL
- To review all safeguarding policies and procedures (e.g. Safeguarding Policy and procedure, Missing Children Policy and Staff Code Of Conduct Policy) annually with the Headmaster and DSLs
- To complete an annual local authority safeguarding audit
- Plan and implement action to be taken based on the audit outcomes
- Monitor safeguarding issues termly (referrals are reported to the safeguarding governor within 48hrs) and report safeguarding issues to the governing body annually at the main governors board meeting
- Appointing the DSLs
- Supporting the DSL and Deputy DSLs and school staff and EYFS
- Monitoring how pupils are taught about safeguarding e.g. through ICT, PSHCEE and SRE
- Monitoring and ensuring safer recruitment practice
- The Chair of Governors is responsible for liaising with the local authority and/or ESSCP on safeguarding issues and with the local authority designate officer (LADO) in the event of allegations of abuse made against the Headmaster
- To be up-to-date with safeguarding training and to attend training every three years

Safer Employment Practices

Staff and volunteers are carefully selected and vetted according to statutory requirements. There is monitoring to prevent unsuitable people from being recruited and having the opportunity to harm or place children at risk. All members of the teaching and non-teaching staff at the school, including part-time staff, temporary and supply staff, and visiting staff, such as musicians and sports coaches, have an enhanced DBS Disclosure, a Barred list check and in the case of teachers a Prohibited Teachers List check before starting work. Governors and staff with management responsibilities have a prohibition from management check known as a section 128 direction check. All Governors, volunteer helpers, contractors working regularly during term-time, such as contract catering staff, and adult members of the families of members of staff who live in boarding houses are also vetted according to the DfE and KCSIE 2020 guidelines. The Bursar checks that childcare providers who hire the school for activities involving children have appropriate safeguarding Policies and Procedures in place.

Disqualification

By definition, a person who is disqualified cannot lawfully do the work from which they are disqualified. If a person is found to be disqualified, then pending resolution they must be removed

from the work from which they are or may be disqualified. There is no requirement automatically to suspend or dismiss all individuals found to be disqualified; there is scope in principle to redeploy them with in other work from which they are not disqualified, subject to assessing the risk and taking advice from the LADO when appropriate.

Schools must inform Ofsted where they are satisfied that a person working in a relevant setting falls within one of the disqualified criteria. Staff who are disqualified may apply to Ofsted for a waiver of disqualification, unless they are barred from working with children.

The school must check that relevant staff in the EYFS and early years provision have not been disqualified from childcare under the Disqualification under the Childcare Act 2006. The date of these checks must be record.

Disqualification by association now only applies to childcare in domestic settings (KCSIE 2020).

In addition to the above recruitment checks Cumnor House Sussex carries out a European Economic Area (EEA) check on all overseas candidates applying for employment which involves “teaching work”. This check will be carried out by the HR department via the TRA.

Staff involved in the recruitment process have had safer recruitment training and include the following:

- Headmaster
- Deputy Headmaster/ Bursar
- Houseparent
- Director of Compliance, Health & Welfare
- Human Resources Manager
- Governor for Safeguarding

More detail is set out in our Recruitment Policy and Policy for Adults Staying In Boarding houses.

Induction and Training

At induction every new member of staff, including governors, part-time, temporary, visiting and contract staff, receives training on their safeguarding responsibilities including:

- Staff are provided with copies of key documentation and are given access to all school policies during their induction training. They are required to sign that they have read, understood and abide to all school policy. All staff are required to sign the same agreement each January following the school’s annual policy review
- During induction training, the systems to support safeguarding are explained to staff and copies of the following policies are provided to them:

-Safeguarding and Child Protection Policy and Procedures (this includes information about the role of the DSLs)

-The Staff Code of Conduct (which covers a minimum, acceptable use of technologies, staff-pupil relationships and communication, including via social media, whistleblowing)

[-Click here](#) for Part One of KCSIE 2020 and Annex A

- Positive Behaviour Policy
- Being aware of the identity of the DSLs
- Being alert to safeguarding issues and the signs of abuse, bullying and peer abuse
- Being alert to their Prevent Duty and the schools Prevent Strategy (See Appendix 2 for reporting details and contacts), their duty to report evidence of FGM (Phone police 101 to make a report) and children missing in education (report to the SPOA).
- Being aware of the procedures and their duty of care to record and report any concerns to the DSL or Deputy DSL or where necessary directly to SPOA
- To complete online training programs provided by the school on commencing employment. These programs include child protection in education training and “Prevent” training.
- To attend Local Authority Safeguarding training in house at least every three years as required by the East Sussex Safeguarding Children’s Partnership (ESSCP).
- Keep up-to-date on safeguarding matters. DSLs liaise with the ESSCP and disseminates information to all staff so that they are up-to-date on issues such as, preventing radicalisation, FGM and child exploitation. Online training specific to these issues is provided for all staff. All Staff receive annual update training as part of their Autumn Inset.

Safeguarding training and updates are an important part of the induction process, Autumn Insets and staff meetings. The following includes some examples of what is involved:

- A DSL meets with every new member of staff on an individual basis and talks through the content of Part One of KCSIE with them at a level of depth appropriate and proportionate to the person and/or to their particular role.
- Full in-house training every three years by the East Sussex LA
- Annual inset update training each autumn by a DSL (Safeguarding Quiz)
- Updates by the DSL occur at least annually via email and weekly staff meetings. They may occur due to matters arising in the school or due to requirements introduced by the ESSCP, DfE and ISI.
- The DSLs are updated termly via the ISSG
- Staff use ‘Educare’ online training facility to keep up to date on online safety
- In addition to LA training the Governors are updated annually by a DSL

More detail is set out in our policy on Induction of New Staff, Governors and Volunteers in Child Protection.

Interaction with Pupils: Code of Conduct for Staff

New members of staff, Governors and volunteers are required **to read, understand and agree in writing** to abide by the school’s policy on Interaction with Pupils: Code of Conduct for Staff. Discussion of the procedures set out in this document forms a vital part of our induction procedures and gives clear instruction on what is acceptable and unacceptable behaviour while in a professional **position of trust**. This policy is available on the school’s website.

Record keeping & sharing information

All staff are aware that they have a professional responsibility to share information and that they cannot promise a child to keep secrets which might compromise the child's safety or well-being.

Written records are made in a timely way and held securely where adults working with children are concerned about their safety or welfare. Those records are shared appropriately, and where necessary, with consent.

Information sharing is vital to safeguarding and promoting the welfare of children and young people. The school has a duty of care to share information readily with multi-agencies such as: children's social care, the police and health care practitioners. Where possible, consent to share information will be sought from the child and/or parent. However it is important to be aware that in some cases, where it is considered to be in the best interests of the child, information may be shared without consent.

Cumnor House Sussex is legally required to inform a pupil's next school of any Child Protection issues that arise or that we are aware of.

As part of safeguarding practice, public schools request information in writing from Prep Schools in relation to any safeguarding, welfare or well-being concerns regarding any pupils making the transition to their school. Relevant nursing notes and active Pastoral Care Plans are transferred to the child's next school at the end of the child's last year at Cumnor.

When sharing information staff must:

1. Remember that General Data Protection (GDPR) and human rights laws are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.
2. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
3. Seek advice from other practitioners if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
4. Share with informed consent where appropriate and, where possible, respect the wishes of those who do not consent to share confidential information. You may still share information without consent if, in your judgment, there is good reason to do so, such as where safety may be at risk. You will need to base your judgment on the facts of the case. When you are sharing or requesting personal information from someone, be certain of the basis upon which you are doing so.
5. Consider safety and well-being: Base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
6. Necessary, proportionate, relevant, adequate, accurate, timely and secure: Ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely.
7. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

Supporting Pupils - Raising Awareness

Cumnor House Sussex prides itself on its culture of open and effective communication between staff and pupils, and on its pastoral support structures. We prepare all of our pupils to make reasoned, informed choices, judgments and decisions. Time is allocated in PSHCEE, Wellbeing, ICT, Form time, and Boarding time for developing in pupils the confidence, which they require to recognise abuse and to stay safe. Through the school's PREVENT strategy we also aim to raise their awareness to the signs and risks of radicalisation and extremism.

We recognise that a child who is abused or witnesses violence may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self-worth. We recognise that the school may be the only stability in the lives of children who have been abused or who are at risk of harm.

We support pupils by ensure they know that there are adults to whom they can turn to if they are worried, including the School Independent Listener, Tutors and Nursing Staff (These are displayed on Posters throughout the school). We also ensure that:

- All pupils have access to a telephone helpline, enabling them to call for support in private. Confidential help lines and web addresses for external specialists such as ChildLine, Commissioner of Children's Rights, Kidscape, TheMix, the Samaritans, and the Schools Independent Listener are displayed in the Boarding House, the Surgery and in the Children's phone box
- All pupils have access to a peer counselling scheme. The ABC committee offers support to our older pupils and they are encouraged to offer advice and support to younger pupils. The Cumnor Care Committees offer support to the junior pupils in the school
- We provide guidance to our Head Boy and Girl and House Captains which specifically covers the importance of offering support and assistance to younger and to vulnerable pupils
- Our policy for pupils on confidentiality is discussed with the pupils through PSHCEE and Boarding meetings
- Desktops on pupil's school iPads and computers have a CEOP report button so that they can report online concerns or abuse. Pupils are taught about online safety in ICT, and PSHCEE. There is also an annual seminar on online safety for pupils, staff and parents. The school has appropriate filters and monitoring systems in place to safeguard children from potential harm and inappropriate material on-line without unreasonable "over-blocking". The children do not have mobile phones at school and therefore do not use 3G or 4G.
- Visitors and speakers are supervised and any teaching materials are pre-viewed by hosting teaching staff.

Promotion of Welfare

The ethos of Cumnor House Sussex is to promote the spiritual, moral, social and cultural development of our pupils. We aim to:

- Enable pupils to develop their self-knowledge, self-esteem and self-confidence
- Enable pupils to distinguish right from wrong and to respect English Law
- Encourage pupils to accept responsibility for their own behaviour, to show initiative and understand how they can contribute positively to society
- Enable pupils to acquire a broad general knowledge of and respect for public

institutions and services in England

- Enable pupils to acquire an appreciation of and respect for their own and other cultures
- Encourage respect of other people
- Encourage respect for democracy and support participation in the democratic process as applied in England

Our ethos, values and PSHCEE programme teach pupils to take care for and to value themselves, and to think in terms of making a positive contribution to society as adults. All our pupils take part in a large number of charitable activities and cultural excursions. We see this as making an important contribution towards the development of the whole person, who grows up to value society and to expect to make a personal contribution towards it.

Equal Treatment

Cumnor House Sussex is committed to equal treatment for all, regardless of an individual's abilities, disability, race, culture, ethnicity, religion, sexual orientation or social background. We aim to create a friendly, caring and perceptive environment in which every individual is valued. We endeavour to contribute positively towards the growing autonomy, self-esteem and safety of each child.

Anti-Bullying

Any form of bullying, for example, online-bullying, peer on peer abuse, upskirting, serious violence, sexual violence and sexual harassment between peers, teenage relationship abuse, prejudice-based bullying, harassment, victimisation, sexual exploitation and discrimination will not be tolerated. All staff understand, the risk posed by adults or children who use technology, including the internet, to bully, groom, radicalise, or abuse. Through ICT and PSHCEE lessons, pupils are supported in developing their own understanding of these risks and learn how to keep themselves and others safe. Management and teachers oversee the safe use of technology and take immediate action if they are concerned about bullying or children's wellbeing.

Our ethos is to treat all our pupils and their parents fairly and with consideration and we expect them to reciprocate towards each other, the staff and the school. Any kind of bullying or peer abuse (including banter) is unacceptable and will be addressed immediately by the DSL and Headmaster and where necessary children's social care and the police. The school's Anti-Bullying Policy is available on the school's website.

Complaints

We hope that you and your child do not have any complaints about our school; but copies of the School's complaints procedure can be sent to you on request or you can access the complaints policy via the school website.

Policy Review

All the school policies are reviewed each September and they are then sent to all staff to read and make suggestions. The policies are then put forward to the governing body at the main board meeting in December. Once a signed approval has been obtained from the board of governors the staff are required to sign that they have read, understood and agree to the policies. A safeguarding Quiz is also completed by all staff as part of their annual safeguarding update. They are also reminded at this time that they must declare any members of their household who are disqualified from working with children.

Related Child Protection Policies that are Required of Schools

Please refer to the whole school and Early Years Foundation Stage policies on

- Recruitment and Vetting Policy
- Induction of New Staff, Governors and Volunteers in Child Protection
- Interaction with Pupils: Code of Conduct for Staff
- Procedures when a Member of Staff, Volunteer, Child Protection Officer or Head Master/Mistress faces Allegations of Abuse
- Policy for staff on Pupil Confidentiality
- Policy on adults staying in Boarding Houses
- Use of ICT, Mobile Phones and Other Electronic Devices
- Taking, Storing and Using Images of Children
- Whistleblowing Policy
- Restraint Policy
- Welfare Policy
- Search Policy
- Missing Child
- Anti-Bullying
- Social media Policy
- 'Sexting' Policy
- Data Protection Policy
- Record Keeping Policy
- Remote Learning Policy

All the above policies together form the 'suite' of Safeguarding policies that the Regulations require. In accordance with those Regulations, the policies are available to parents on the school's website and can be made available in a printed version upon request at the school office. The policies are reviewed annually by the Governor responsible for Safeguarding. The governing body annually receive a copy of the school's safeguarding policies.

References

- ISI Regulatory Handbook 2017 www.isi.net
- EYFS Statutory Framework 2017 www.gov.uk
- Thrive- continuum of need 2017 czoneeastsussex.gov.uk
- Keeping children Safe in education DfE September 2020
- Working Together to Safeguard Children”, DfE 2018, www.gov.uk
- Working Together To Safeguard Children ‘Information Sharing’ 2018
- What to do if you if you are worried a child is being abused 2018
- Disqualification under the Childcare Act 2006 (June 2016)
- Prevent Duty Guidance 2015 www.gov.uk
- The Prevent Duty: Departmental advice for schools and childminders (June 2015)
- Channel Duty Guidance 2015 www.gov.uk
- The use of social media for on-line radicalisation (July 2015)
- National Minimum Standards for boarding school 2015
- Safeguarding information sharing advice for practitioners 2015 www.gov.uk
- Preventing and tackling bullying advice for Headteachers and staff and governing bodies March 2014
- Dealing with allegations of abuse against teachers and other staff. October 2012.
- Every Child Matters: Change for Children in Schools” DCSF guidance, 2005. (www.gov.uk)
- Designated Senior Person Information Pack” an IRSC Guidance Document, (www.gov.uk)
- “What is child abuse?” NSPCC Information document (www.nspcc.org.uk)
- Sussex Child Protection and safeguarding Procedures Sussex Child Protection and safeguarding Procedures (produced by the Safeguarding Children’s Partnerships for East Sussex)
- East Sussex Domestic Violence and abuse protocol for schools

APPENDIX 1:

KCSIE 2020 *Types of Abuse and Neglect*

- **Abuse:** A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institution or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or by another child or children
- **Physical abuse:** a form of abuse which may involve hitting, 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. 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 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.
- **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.

Appendix 1 Continued: Further information on Specific Safeguarding issues

Child Criminal Exploitation (CCE)

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

Some of the following can be indicators of CCE:

- Children who appear with unexplained gifts or new possessions;
- Children who associate with other young people involved in exploitation;
- Children who suffer from changes in emotional well-being;
- Children who misuse drugs and alcohol;
- Children who go missing for periods of time or regularly come home late; and
- Children who regularly miss school or education or do not take part in education

Child Sexual Exploitation (CSE)

CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child 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. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media).

The above CCE indicators can also be indicators of CSE, as can:

- Children who have older boyfriends or girlfriends; and
- Children who suffer from sexually transmitted infections or become pregnant.

County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], 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 [and store] 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, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes. 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.

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

Domestic Abuse

The cross-government definition of domestic violence and abuse is:

-Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality.

The abuse can encompass but is not limited to:

-Psychological; physical; sexual; financial; and emotional.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Operation Compass

This ensures that the school has up to date relevant information about the child's circumstances and can enable support to be given to the child according to their needs. If the police are called to a home for domestic abuse, they will inform the DSL before the child attends school to following day.

National Domestic Abuse Helpline, can be called free of charge and in confidence, 24 hours a day on 0808 2000 247.

Further information on so-called 'honour-based' abuse

So-called 'honour-based' abuse (HBA) 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 so called HBA are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt, staff should speak to the Designated Safeguarding Lead. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

Indicators

- There are a range of potential indicators that a child may be at risk of HBA. Guidance on the warning signs that FGM or forced marriage may be about to take place, or may have already taken place, can be found on pages 38-41 of the Multi agency statutory guidance on FGM

Actions

- If staff have a concern regarding a child that might be at risk of HBA, they should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. Where FGM has taken place, since 31st October 2015 there has been a mandatory reporting duty placed on teachers that requires the following:

FGM reporting duty:

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-

lasting harmful consequences.

- Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales, to report to the police (phone 101) where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, **and they should not be examining pupils**, but the same definition of what is meant by “to discover that an act of FGM appears to have been carried out” is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at Mandatory reporting of female genital mutilation procedural information.
- Teachers **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should also still consider and discuss any such case with the school’s DSL and involve children’s social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures. A summary of the FGM mandatory reporting duty is available on pg. 88 of KCSIE **2020**.

Forced marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools can play an important role in safeguarding children from forced marriage.

School staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmufco.gov.uk

Upskirting- This is a criminal offence

‘Upskirting’ is where someone takes a picture under a person’s clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim.

Serious Violence

Staff must be aware of signs such as withdrawal, absence from school, self-harm and unexplained gifts or injuries. These may indicate that children have been drawn into youth violence and gang involvement or are associated with criminal networks or gangs such as County Lines.

Further information on preventing radicalisation

Protecting children from the risk of radicalisation should be seen as part of schools' wider safeguarding duties, and is similar in nature to protecting children from other forms of harm and abuse. During the process of radicalisation it is possible to intervene to prevent vulnerable people being radicalised.

- Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific 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 other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately, which may include making a referral to the Channel programme.

Preventing radicalisation

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools' safeguarding approach.

- Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act

proportionately which may include the designated safeguarding lead (or deputy) making a Prevent referral. The school's designated safeguarding lead (and any deputies) should be aware of local procedures for making a Prevent referral.

Prevent duty

From 1 July 2015, all schools are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty.

The guidance is set out in terms of four general themes:

- Risk assessment,
- Working in partnership,
- Staff training, and IT policies
- The need to prevent people from being drawn into terrorism”

Schools are expected to assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. This means being able to demonstrate both a general understanding of the risks affecting children and young people in the area and a specific understanding of how to identify individual children who may be at risk of radicalisation and what to do to support them. Schools should have clear procedures in place for protecting children at risk of radicalisation. The Cumnor Prevent risk assessment and strategy is in the policy appendices.

- The Prevent guidance refers to the importance of Prevent awareness training to equip staff to identify children at risk of being drawn into terrorism and to challenge extremist ideas. Individual schools are best placed to assess the training needs of staff in the light of their assessment of the risk to pupils at the school of being drawn into terrorism. As a minimum, however, schools should ensure that the DSL undertakes Prevent awareness training and is able to provide advice and support to staff on protecting children from the risk of radicalisation.
- Schools should ensure that children are safe from terrorist and extremist material when accessing the internet in schools.

The Government has launched educate against hate, a website designed to equip school and college leaders, teachers and parents with the information, tools and resources they need to recognise and address extremism and radicalisation in young people.

Channel

School staff should understand when it is appropriate to make a referral to the Channel programme. Channel guidance. An e-learning channel awareness programme for staff is available at: Channel General Awareness. Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual’s engagement with the programme is entirely voluntary at all stages. In addition to information sharing, if a staff member makes a referral to Channel, they may be asked to attend a Channel panel to discuss the individual referred to determine whether support is required. Channel guidance is available at on pg. 90 of KCSIE.

Sexual violence and sexual harassment between children in schools

Context;

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. 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. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.

Staff should be aware of the importance of:

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

Sexual violence

It is important that school staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual violence offences under the Sexual Offences Act 2003 as described below:

Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

What is consent? Consent is about having the freedom and capacity to choose.

Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom.

Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

Sexual harassment

When referring to sexual harassment we mean ‘unwanted conduct of a sexual nature’ that can occur online and offline. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child’s dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Whilst not intended to be an exhaustive list, sexual harassment can include:

- Sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- Sexual “jokes” or taunting;
- Physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes (schools should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- 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, including, on social media;**
 - **Sexual exploitation; coercion and threats; and ‘upskirting’**

Appendix 2 Prevent strategy

Every school under The Counter Terrorism and Security Act 2015 has a duty to reduce the threat to people being drawn into terrorism this is known as the “PREVENT DUTY”

Cumnor House Sussex is committed to safeguarding against radicalisation and extremism and is implementing the following Prevent Strategy.

P-Promotion of equality, diversity and positive relationships between pupils, staff and the Cumnor Community. Ensure that the school’s policies have procedures in place to reduce risk

R- Risk assessment. A risk assessment will assess general level of risk and to identify individuals who may be at risk. Concerns will be Reported via the DSL. Referrals will be made to the Channel Police Practitioner via the SPOA or the out of hours Duty and Assessment Team East. Advice can be gained via the Police non-emergency line (101) or the DfE helpline and mailbox for staff and governors: 020 7340 7264 and counter-extremism@education.gsi.gov.uk.

E-Education for students in PSHCEE Time To Think sessions, ICT lessons, assemblies and tutorial

V-Vetting, removal and monitoring of any material of an extremist nature. Specific attention to be given to iPads, computers, posters, newspapers and reading books

E-Environment: ensure sufficient IT security procedures and online filtering are in place

N-News monitoring for any concerns in the locality

T-Training of staff to raise awareness of the signs and risks of radicalisation

It is important to remember that people who are vulnerable can be any age, from any group, faith, ethnicity or background. There is no single way to identify who is likely to be vulnerable to being drawn into terrorism.

Risk factors may include:

- Peer pressure, bullying
- Influences from other people and via the internet
- Involvement in crime
- Family tensions
- Race/hate crime
- Lack of self-esteem or identity and personal or political grievances

Signs of engagement may include:

- | | |
|---|---|
| -Feelings of grievance and injustice | -Feeling under threat |
| -A need for identity and belonging adventure | -A desire for status, excitement, and |
| -A need to dominate or control others | -A desire for political or moral change |
| -Family or friends influence | -Mental Health issues |

Appendix 3

School Reporting flow chart

Appendix 3: **Flow Chart**

What to do if you are worried about a child

Remember that if you have a concern about a child you can contact social services for advice or to make a referral

If you are worried about a child



Document and report

immediately to the

DSLs Paula Talman/Matt Mockridge/Jane Sykes

Or The Deputy DSL

Fergus Llewellyn (Headmaster)

Or The Deputy DSL EYFS

Louise Hackett/Matt Mockridge (during non-term time and extended hours)

Other contact numbers for the DSL's are available from the school office / Nursery office or iSAMS program.



If you are unable to contact the DSL/DDSL

You should contact the SPOA

Then

Document and report to the Headmaster/DSL as soon as possible

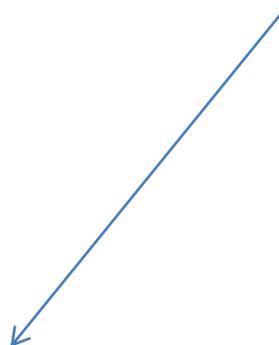
The DSL will record & assess the situation (guided by the continuum of need indicators)

DSL will where appropriate refer to:

- The SPOA **01323 464222** or
- The Out of hours Duty & Assessment **01273 335905**
- **The Headmaster and Governor for safeguarding**
- Reporting must be carried out as soon as possible on the same day

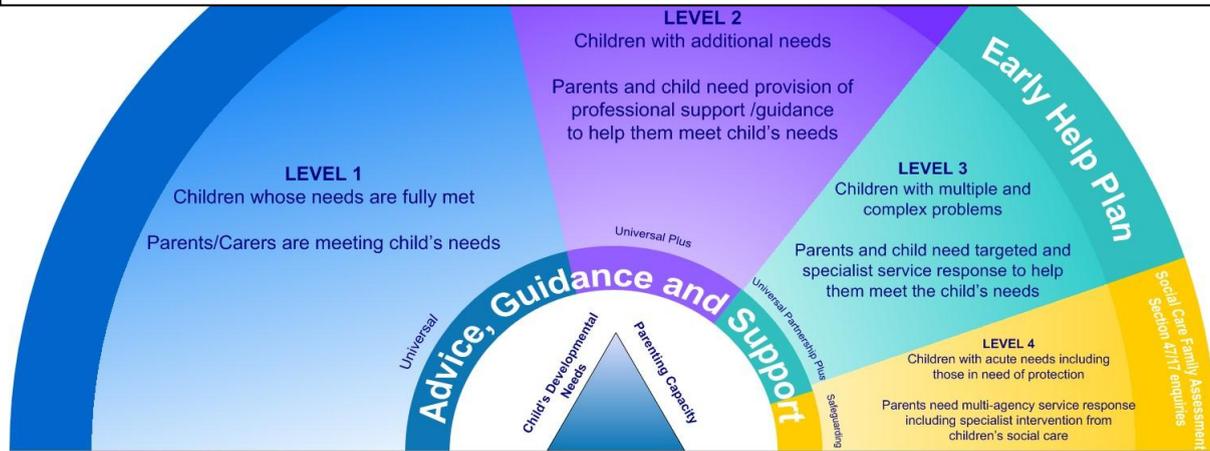


Any report to social services will be followed up in writing within 24hours by the person who made the report. Ofsted (0300 1231231) must be informed within 14 days of any child protection concern/allegation involving any person living or working at the school.



If you have a concern about a volunteer or member of staff (including the DSL). Report to the Headmaster who will refer to the SPOA or seek advice by referring to the LADO as appropriate. If you are concerned about the Headmaster report to the Chair of Governors without informing the Headmaster first. The Chair will refer to the SPOA or by referring to the LADO as appropriate.

<https://www.eastsussex.gov.uk/childrenandfamilies/professional-resources/lado/>



Family and Environmental Factors

| | Level 1 - Achieving Expected Outcomes (Universal) | Level 2 - Children with additional needs (Universal Plus) | Level 3 - Children with Multiple and complex needs (Universal Partnership Plus) | Level 4 - children with acute needs, including protection (Safeguarding) |
|-------------------------------------|--|--|---|---|
| Early years level descriptors | | | | |
| Health | Physically well | Susceptible to minor health problems | Severe/chronic health problems | Severe/chronic health problems & appropriate services not being accessed. Life threatening health problems |
| | Balanced healthy diet/good hygiene/clothing | Adequate diet | Problematic diet e.g. obesity, faltering growth | Severe health effects from problematic diet |
| | Developmental checks/immunisations up to date, health appointments kept, incl. antenatal | Slow in reaching developmental milestones. Starting to default on appointments | Slow in reaching developmental milestones. Non attendance for appointments | Developmental milestones unlikely to be met. Non organic faltering growth |
| | All physical health needs met | Minor concerns regarding diet/hygiene/clothing | Escalating concerns regarding diet/hygiene/clothing | Regularly unwell. Very unclean/dirty, clothing smell |
| | Speech & language development appropriate | Emerging speech & language difficulties | Failure to access / engage with some speech & language services. | Significant impact of not accessing or engaging with speech and language support |
| | Dental and optical care as required | Defaulting on dental and optical appointments | Dental and optical concerns not being met | Severe impact from dental and optical concerns not being met |
| | Sexual activity and awareness appropriate for age | Emerging concerns around sexual activity and awareness | Increasing risk of vulnerability from sexual activity and awareness (In teenage pregnancy) | Sexual exploitation/abuse |
| | Good state of mental health & emotional well-being | Emerging concerns around mental health & emotional well-being | Significant concerns not being met. Failure to access support and services | Serious mental health issues. Serious risk to self or others. Sustained bouts of depression/self-harm. Threats of suicide |
| No use or exposure to substances | Exposure to substances which impact on health and development | Exposure to problematic use. Experimental use by adolescent | Problematic and chaotic use of substances which impact significantly on the health and well-being of the child. Class A drug use or daily use of any substance by an adolescent | |
| Learning & Education | Success/achievement: reaching educational potential | Not thought to be reaching educational potential. Some identified learning needs that require school-based support | Identified learning needs that are not being met. Evidence of non-engagement with appropriate support. | |
| | Regular school attendance and good punctuality | Pattern of regular school attendances | Some fixed term exclusions. Permanent exclusion. High percentage of non-attendance. | Repeated permanent school exclusion. Permanent school exclusion with other risk factors |
| | Age appropriate cognitive development. Positive and stimulating environment | Reduced access to books/toys. Not always engaged in learning, e.g. poor concentration, low motivation & interest | No access to leisure activities/stimulation. No interests/skills displayed | Denied access to stimulation |
| Emotional & Behavioural Development | Feelings & actions demonstrate appropriate responses | Some difficulties with peer group relationships & adults. Evidence of inappropriate responses & actions | Difficulty coping with anger, frustration & upset | Regularly involved in anti-social/criminal activities |
| | Good quality attachment with caregivers | Disrupted attachment due to parental or child factors. Can be overfriendly or withdrawn with strangers | Disruptive/challenging behaviour by parent or child linked to poor attachment | Dysfunctional attachment between parent and child leading to significant harm |
| | Behavioural difficulties well managed | Emerging difficulties around managing challenging/disruptive behaviour | Challenging / disruptive behaviour impacting on daily life, achievement & relationships etc | Challenging / disruptive behaviour putting others or self in danger |

Appendix 5

Managing Allegations/Concerns About Individuals Who Work with Children

See separate document [\(here\)](#)

Appendix 6

List of Contacts

Education Safeguarding Team Contacts – September 2020

| East Sussex (includes: Danehill, Brighton, Hove, Lewes, Eastbourne, Bexhill) | |
|---|---|
| <p>(LADO) Area Children's Officer (Safeguarding)</p> <p>Police liaison officer Louise.bridger@sussex.pnn.police.uk</p> <p>School Safeguarding officer</p> | <p>Office: 01323 466620 Mobile: 07825782793 https://www.eastsussex.gov.uk/childrenandfamilies/professional-resources/lado/</p> <p>07826892420 - Police emergency number 101</p> <p>07834148479/01323 464949</p> |
| <p>Duty and Assessment Team West (Eastbourne & Hailsham district)</p> <p>If the child is 11 years old and under, contact the Duty and Assessment Team West.</p> <p>3rd Floor, St Mary's House, 52 St Leonards Road, Eastbourne, East Sussex BN21 3UU</p> <p>Phone: 01323 747373 (MASH)</p> <p>Fax: 01323 747343</p> | <p>Duty and Assessment Team East (Hastings and Rother district)</p> <p>If the child is 11 years old and under, contact the Duty & Assessment Team East.</p> <p>Ground floor, Ocean House, 87-89 London Road, St Leonards-on-Sea, East Sussex TN37 6DH</p> <p>Phone: 01424 724144 (MASH)</p> <p>Fax: 01424 724122</p> |
| <p>Emergency Duty and Assessment Team.</p> <p>Available out of hours – Mon-Fri 5pm-8am, all weekends and bank holidays.</p> <p>Phone: 01273 335905</p> | <p>Emergency Duty and Assessment Team.</p> <p>Available out of hours – Mon-Fri 5pm-8am, all weekends and bank holidays.</p> <p>Phone: 01273 335905</p> |

List of Contacts

**Education Safeguarding Team Contacts –
September 2020**

| | |
|--|--|
| West Sussex (includes: Danehill, East Grinstead, Haywards Heath) | |
| LADO Area Children's Officer (Safeguarding) | Office: 01243 642962 |
| <p><i>For Safeguarding/Child Protection issues in West Sussex</i></p> <p>Anyone with concerns about a child's welfare can now contact a single countywide phone number:</p> <ul style="list-style-type: none"> • Phone: 01403 229900 <p>This single point of contact is called the Children's Access Point (CAP).</p> <p>Referrals can be made via secure email or by post:</p> <ul style="list-style-type: none"> • Email: cap@westsussex.gcsx.gov.uk • Address: Children's Access Point, 4th Floor, County Hall North, Chart Way, Horsham, West Sussex, RH12 1XH | <p><i>West Sussex Emergency out of hours line</i></p> <p>We provide a helpline on 01903 694422 for social care emergency situations that are out of hours and cannot wait until the local offices are open.</p> <p>The helpline is available weekdays between 5.00pm - 8.00am. Weekends and bank holidays are covered 24 hours a day until 8.00am the next working day.</p> <p>Referral forms available at www.westsussexscb.org.uk</p> |

Appendix 7

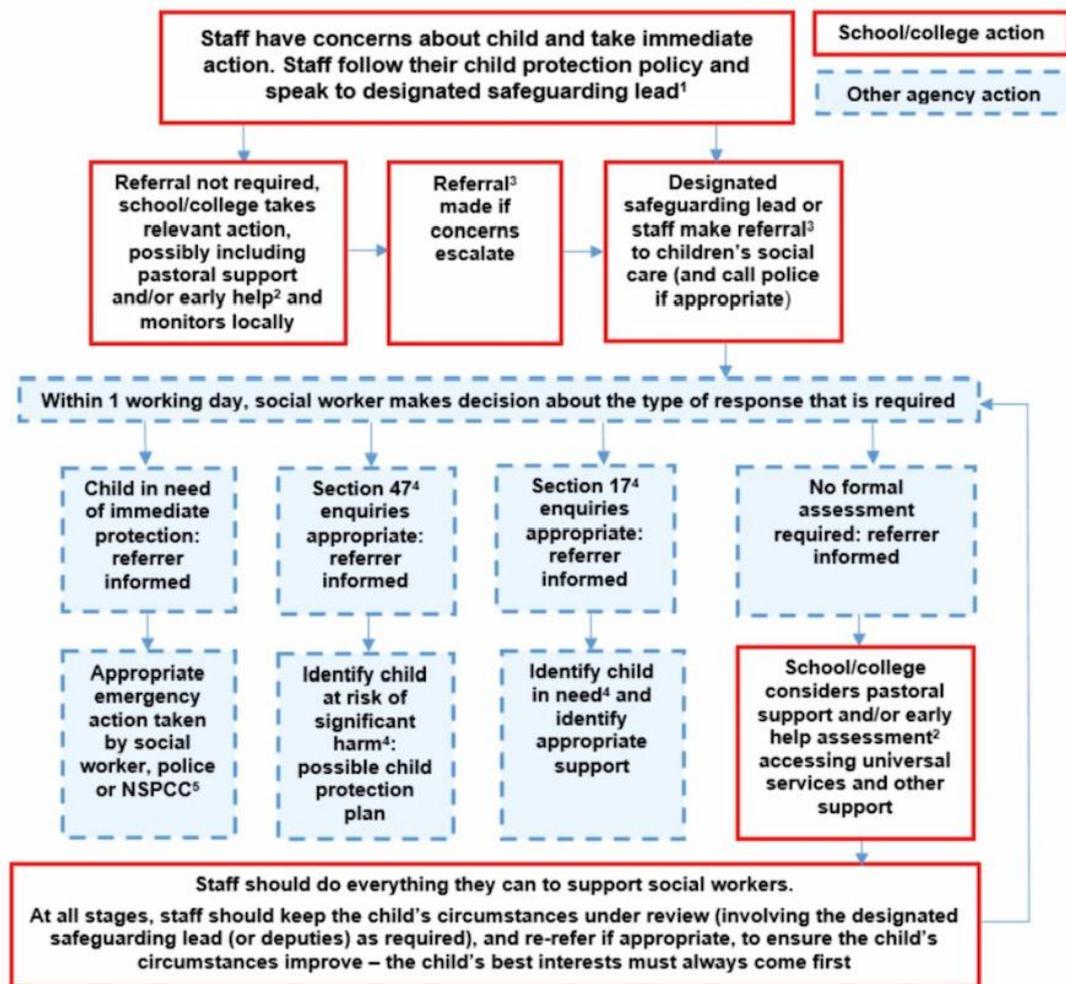
Prevent Risk Assessment Tool

| <u>Prevent Vulnerability/Risk Area</u> | Risk Y/N | <u>Action taken/already in place to mitigate/address risk</u> |
|--|---------------------|--|
| <u>Leadership</u> Do the following have an understanding of their Prevent Duties -Governors -SMT -DSL -Teachers | | |
| <u>Partnership</u> Is there active engagement from Senior management, Governors and teachers? Does the school have an identified person for PREVENT? Does the school have contact with outside Agency's for PREVENT such as the Local Safeguarding Partnership (PAN Sussex) or children's social care? | | |
| <u>Staff Training</u> Do all staff have sufficient knowledge and confidence to: 1) exemplify British Values in their management, teaching and through general behaviours in the school 2) understand the factors that make people vulnerable to being drawn into terrorism and to challenge extremist ideas which are used by terrorist groups and can purport to legitimise terrorism 3) have sufficient training to be able to recognise this vulnerability and be aware of what action to take in response | | |
| | | |

| | | |
|--|--|--|
| <p><u>Welfare, pastoral</u></p> <p>1) Are there adequate arrangements and resources in place to provide pastoral care and support as required by the school?</p> | | |
| <p>2) Are their adequate monitoring arrangements to ensure that pastoral support is effective and supports the school's welfare and equality policies?</p> <p>3) Does the pastoral support reflect the pupil demographic and need?</p> | | |
| <p><u>Speakers and Events</u></p> <p>1) Is there an effective framework for managing speaker/visitor requests?</p> <p>2) Is it well communicated to staff and complied with?</p> <p>3) Is there a framework for managing on site events?</p> <p>4) Is the content of speakers seminars monitored</p> | | |
| <p><u>Safety Online</u></p> <p>1) Does the school have a policy relating to the use of IT and does it contain a specific reference and inclusion of the Prevent Duty?</p> <p>2) Does the school employ filtering/firewall systems to prevent staff/students/visitors from accessing extremist websites and material?</p> <p>3) Does this also include the use of using their own devices via Wi-Fi?</p> <p>Does the system alert to serious and/or repeated breaches or attempted breaches of the policy?</p> | | |
| <p><u>Prayer and Faith Facilities</u></p> <p>1) Does the school have prayer facilities?</p> <p>Are there good governance and management procedures in place in respect of activities and space in these facilities?</p> | | |
| <p><u>School Security</u></p> <p>1) Are there effective arrangements in place to manage access to the school by visitors and non-students/staff?</p> <p>2) Is there a policy regarding the wearing of visitors badges on site? Is it enforced?</p> <p>3) Are dangerous substances kept and stored on site?</p> <p>4) Is there a policy in place to manage the storage of such substances?</p> <p>5) Is there a policy covering the distribution (including electronic) of leaflets or other publicising material?</p> | | |

| | | |
|--|--|--|
| <p><u>Safeguarding</u></p> <ol style="list-style-type: none"> 1) Is protection against the risk of radicalisation and extremism included within Safeguarding and other relevant policies? 2) Do Safeguarding and welfare staff receive additional and ongoing training to enable the effective understanding and handling of referrals relating to radicalisation and extremism? 3) Does the school utilise Channel as a support mechanism in cases of radicalisation and extremism? <p>Does the school have a policy regarding referral to Channel identifying a recognised pathway and threshold for referral?</p> | | |
| <p><u>Communications</u></p> <ol style="list-style-type: none"> 1) Are staff and pupils made aware of the Prevent Duty, current risks and who to report to within the school | | |
| <p><u>Incident Management</u></p> <ol style="list-style-type: none"> 1) Does the school have a critical incident management plan which is capable of dealing terrorist related issues? 2) Is a suitably trained and informed person identified to lead on the response to such an incident? 3) Does the school have effective arrangements in place to identify and respond to tensions on or off site which might impact upon staff, pupils and/or public safety? <p>Are effective arrangements in place to ensure that staff and students are appraised of tensions and provide advice where appropriate?</p> | | |
| <p>Notes:</p> | | |
| | | |
| | | |
| | | |
| | | |

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 9

Governing bodies and proprietors should ensure relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal as provided for in the Data Protection Act 2018 and the GDPR. This includes:

- being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information which is sensitive and personal, and should be treated as 'special category personal data'
- understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data. This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner but it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.
- for schools, not providing pupils' personal data where the serious harm test under the legislation is met. For example, in a situation where a child is in a refuge or another form of emergency accommodation, and the serious harms test is met, they must withhold providing the data in compliance with schools' obligations under the Data Protection Act 2018 and the GDPR. Where in doubt schools should seek independent legal advice. The Data Protection Act 2018 and GDPR do 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.

DfE Data protection: a toolkit for schools (2018)

APPENDIX 10

Guidance for Early Years Providers on what do in the case of serious accidents, illness or death of a child.

Why do you need to report?

The need to report serious accidents, illness or injury to, or death of, any child while in your care is a statutory requirement. The rationale for this is, to explore whether the behaviour of an adult may have contributed to the incident either knowingly, or through neglect of their responsibilities. For example, through the lack of supervision of children, failure to follow a procedure or by deliberate harm. To comply with Ofsted regulations there are specific occasions when a setting has a duty to inform Ofsted of certain incidents.

Serious accidents, illness or injury or death are amongst those that must be reported. To comply with EYFS statutory requirements a setting has a duty to also inform the local child protection agencies, in East Sussex this is through the Single Point of Advice (SPOA) having regard to the Pan Sussex Child Protection and Safeguarding Manual. Best practice would be to inform Ofsted and SPOA at the same time. The duty to inform local child protection agencies of any serious accident or injury to, or the death of a child should be linked to the guidance on the management of allegations procedures. (See the East Sussex 'Managing allegations/concerns about individuals who work or volunteer with children flowchart guidance' and flowchart). You must use your professional judgement, alongside this guidance, on which accidents or injuries you inform your local child protection agency about. East Sussex Early Years providers should be aware of patterns of minor injuries that might indicate parental neglect or inappropriate staff behaviours.

Accident records should be regularly examined to check for patterns. If there are any concerns a setting should contact the SPOA for advice and guidance. Settings need to consider whether the behaviour of an adult may have contributed to the incident either knowingly, or through neglect of their responsibilities. For example, through the lack of supervision of children, failure to follow a procedure or by deliberate harm.

Please note this not a comprehensive list. East Sussex County Council's advice is to notify Ofsted and the SPOA if there is any doubt.

How do you report? (more detailed guidance is within the document 'SPOA guidance for early years settings')

Report serious accidents, illness or death, as listed in Ofsted Early Years Compliance handbook (paragraph 56 - see extract below), through the SPOA.

SPOA Phone: 01323 464222

Opening hours: Monday to Thursday 8.30am to 5pm, Friday 8.30am to 4.30pm

Email: 0-19.SPOA@eastsussex.gov.uk

Information to include in your report:

- The name and age of the child/children involved.
- Where and when the incident happened.
- Details of the incident.

ESCC Guidance for Early Years Providers on what do in the case of serious accidents, illness or death of a child v4 Sept 16

Please remember that this information may be shared with other agencies as appropriate.

Advice Safeguarding and child protection advice in relation to serious accidents, illness and death can also be gained from the Local Area Designated Officer (LADO) if there are any concerns involving the behaviour of staff members//volunteers where:

- their personal behaviour or failure to follow procedure warrants an internal investigation into conduct or
- there was direct harm caused by the adult which appears to have been caused deliberately or through carelessness.

LADO Contact: 07825 782 793 or complete referral form:

<https://www.eastsussex.gov.uk/childrenandfamilies/professional-resources/lado/>

The statutory requirement to report is found within the following documents:

Working together to safeguard children 2018

Early years providers have a duty under section 40 of the Childcare Act 2006 to comply with the welfare requirements of the Early Years Foundation Stage.

Statutory Framework for the Early Years Foundation Stage

Registered providers must notify Ofsted or the childminder agency with which they are registered of any serious accident, illness or injury to, or death of, any child while in their care, and of the action taken. Notification must be made as soon as is reasonably practicable, but in any event within 14 days of the incident occurring. A registered provider, who, without reasonable excuse, fails to comply with this requirement, commits an offence. Providers must notify local child protection agencies of any serious accident or injury to, or the death of, any child while in their care, and must act on any advice from those agencies. (Pan Sussex Child Protection and Safeguarding Manual)

Local Safeguarding Children Partnership

Pan Sussex Child Protection and Safeguarding Manual Brighton and Hove, East Sussex and West Sussex Safeguarding Children Partnerships (previously known as the LSCBs) have commissioned the policies and procedures in this manual, which reflects a significant consensus about best practice across the **Partnership**, and all those agencies in Sussex that contribute to the prevention, detection and investigation of abuse or neglect, risk management of offenders and the support and treatment of those affected. Section 8.35 Unexpected child death Sussex Joint Agency Protocol for Unexpected Child Deaths provides guidance to professionals confronted with the unexpected death of a child. It is acknowledged that each death has unique circumstances.

Section 8.36 Unexplained injuries to young children

Any injury and its explanation must be assessed in relation to the infant's developmental abilities and the likelihood of the occurrence. The designation of the term "unexplained" should not influence staff into making assumptions that the injury is either accidental or non-accidental. All efforts must be made to establish an explanation for the injury which in turn may assist in determining whether or not the injury is accidental or non-accidental.

- See more at: <https://sussexchildprotection.procedures.org.uk>

The Ofsted Early Years Compliance Handbook, March 2019 states:

Notifications from providers

(paragraph 57 pg 20) Childminders and childcare providers must inform us (Ofsted) of the following events no later than 14 days after the event occurred. *Failing to notify Ofsted of a significant or notifiable event.* We (Ofsted) can prosecute a provider who fails to notify us of a significant or notifiable event as set out in regulations. This does not apply to providers registered only on the Childcare Register. We (Ofsted) define **serious injuries** as:

- any injury that requires resuscitation or admittance to hospital for more than 24 hours
- broken bones, a fracture or dislocation of any major joint
- any loss of consciousness, severe breathing difficulties or asphyxia
- loss of sight (temporary or permanent), any penetrating injury to the eye, any chemical or hot metal burn to the eye
- any injury leading to hypothermia or heat-induced illness
- any injury or medical treatment arising from absorption of any substance by inhalation, ingestion or through the skin
- any injury or medical treatment resulting from an electric shock or electrical burn
- any injury or medical treatment where there is reason to believe that this resulted from exposure to harmful substance, a biological agent, or its toxins, or infected material. Some examples of serious injuries that must be notified to us are set out below.
- A child trips and falls in a nursery and loses consciousness due to a bang on the head.
- A child is accidentally hit hard in the chest by a football during outdoor play at an out of school club, and has persistent, severe breathing difficulties.
- A baby breaks a leg during a fall at the nursery.
- A child takes a heavy fall while running around and is taken to hospital; the child is kept in hospital for over 24 hours.

Minor injuries do not need reporting to Ofsted. We define minor injuries as:

- sprains, strains and bruising
- cuts and grazes
- wound infections
- minor burns and scalds
- minor head injuries
- insect and animal bites
- minor eye injuries
- minor injuries to the back, shoulder and chest.

Cumnor House Sussex

01825 790 347 | office@cumnor.co.uk

